LAX SPECIFIC PLAN AMENDMENT STUDY

Final EIR

January 2013

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1. INTRODUCTION

In accordance with the California Environmental Quality Act (CEQA), the City of Los Angeles, as Lead Agency, completed a Draft Environmental Impact Report (Draft EIR) to address and disclose the potential environmental impacts associated with the proposed project, the Specific Plan Amendment Study (SPAS). The SPAS is required under Section 7.H of the LAX Specific Plan and Section V of the Stipulated Settlement, as discussed in more detail in Section 1.1.2 of the SPAS Draft EIR. Through the SPAS process, nine alternatives were formulated to provide a broad range of options for improvements to the north airfield, terminals, and the ground transportation system at LAX, all of which are addressed in the SPAS Draft EIR. As further described below in Chapter 2, a detailed description of the proposed project, including the proposed alternatives, is provided in Section 1.2 and Chapter 2 of the SPAS Draft EIR. The LAWA Staff-Recommended Alternative, which was derived from the range of alternatives discussed in Section 1.2 and Chapter 2 of the SPAS Draft EIR, is discussed below in Chapter 2.

The City of Los Angeles, Los Angeles World Airports (LAWA) has identified a range of potential improvements at Los Angeles International Airport (LAX) in conjunction with completion of the LAX SPAS. The SPAS process includes the identification and evaluation of potential alternative designs, technologies, and configurations for the LAX Master Plan Program that would provide solutions to the problems that certain improvements within the Master Plan, referred to as "the Yellow Light Projects," were designed to address. The SPAS process also includes identification of potential amendments to the LAX Specific Plan that plan for the modernization and improvement of LAX in a manner that is designed for a practical capacity of 78.9 MAP while enhancing safety and security, minimizing environmental impacts on the surrounding communities, and creating conditions that encourage airlines to go to other airports in the region, particularly those owned and operated by LAWA. Presented herein is the Final Environmental Impact Report for the SPAS project, as further described below.

On July 27, 2012, LAWA published the SPAS Draft EIR, which was circulated for public review for 75 days, providing an expanded opportunity for public review and input beyond the 45-day review period required by Section 15105 of the State CEQA Guidelines, with the SPAS Draft EIR review period closing on October 10, 2012. Additional means for public involvement during the SPAS Draft EIR review and comment period were provided through three public meetings, held during the comment period on August 25, 2012, August 28, 2012, and August 29, 2012, as well as through a "virtual meeting" available online between September 10, 2012 and October 10, 2012, and through a project website (laxspas.org). A total of 251 unique commentors submitted comments in conjunction with the SPAS Draft EIR public review period, through written correspondence and e-mails to LAWA, oral testimony and video-taped comments at the aforementioned public meetings, and comments on the virtual meeting and project website. A total of 2,063 individual comments were received by LAWA. For purposes of this Final EIR, written comments, video-taped comments, emailed comments, comments submitted via the virtual meeting and website, and oral testimony received during the public hearings are all referred to as "comment letters."

Pursuant to Section 15088 of the State CEQA Guidelines, LAWA evaluated comments received from persons who reviewed the SPAS Draft EIR and prepared written response to those comments. Those comments and written responses, along with other information, are included as part of the SPAS Final EIR. As required by Section 15088(c) of the State CEQA Guidelines, the focus of the responses to comments is on "the disposition of significant environmental issues raised."

Specifically, in accordance with Section 15132 of the State CEQA Guidelines, the SPAS Final EIR, consists of:

(a) The Draft EIR;

(b) Comments and recommendations received on the Draft EIR;

(c) A list of persons, organizations, and public agencies commenting on the Draft EIR;

(d) The responses of LAWA to significant environmental points raised in the review and consultation process; and,

(e) Other information added by LAWA.

The SPAS Final EIR is presented in two parts, as follows:

Part I: Draft EIR and Technical Appendices

Part 1 consists of the nine-volume SPAS Draft EIR, which was distributed for public review and comment from July 27, 2012 through October 10, 2012. The SPAS Draft EIR includes the Main Document (Chapters 1 through 10) in Volumes 1 through 4, and Appendices A through K2 in Volumes 5 through 9.

Part II: Responses to Comments and Other Final EIR Materials

The second part of the Final EIR includes a description of the LAWA Staff-Recommended Alternative (Chapter 2 of this document), which is a combination of two of the alternatives presented in the SPAS Draft EIR, and a discussion of the environmental impacts associated with this alternative; a description of potential amendments to the LAX Specific Plan and LAX Plan (Chapter 3 of this document); a compilation of the comments received on the SPAS Draft EIR and the written responses prepared by LAWA to those comments (Chapter 4 of this document); and corrections and additions to information presented in the SPAS Draft EIR (Chapter 5 of this document). Indices (i.e., lists) of agencies, organizations, and individuals that commented on the SPAS Draft EIR are provided in Chapter 4 to help locate specific comment letters, and copies of the comment letters in their original form (i.e., photocopies of comment letters) are included as Attachment 5 of this part of the Final EIR. (Videotaped comments were transcribed; this transcription is also provided in Attachment 5.) Supporting technical information is provided in Attachments 1 through 4.

All of the documents described above, comprising the Final EIR for the Specific Plan Amendment Study, are available for public review at:

Los Angeles World Airports
Capital Programming and Planning Division
One World Way
Los Angeles, CA 90045
Contact: Diego Alvarez
(424) 646-5179

The Final EIR is also available at www.lawa.org/laxspas/.

In addition to, and in conjunction with, completion of the SPAS process and the SPAS EIR, LAWA prepared a Preliminary LAX SPAS Report describing the history and development of the SPAS, including a description of the problems that the Yellow Light Projects were designed to address and the SPAS planning goals, the SPAS Community/Advisory Committee Input, the SPAS alternatives, potential LAX Specific Plan amendments, and a financial analysis of the SPAS alternatives. The six-volume Preliminary LAX SPAS Report was published in July 2012 concurrent with the SPAS Draft EIR and is also available at www.lawa.org/laxspas/. LAWA has also prepared the Final LAX SPAS Report, which describes the LAWA Staff-Recommended Alternative, identifies the proposed amendments to the LAX Specific Plan and LAX Plan, and provides minor corrections and additions to the July 2012 Preliminary LAX SPAS Report. The Final LAX SPAS Report is available for public review at:

Los Angeles World Airports
Capital Programming and Planning Division
One World Way
Los Angeles, CA 90045
Contact: Diego Alvarez
(424) 646-5179

The Final LAX SPAS Report is also available at www.lawa.org/laxspas/.

The Final EIR will be presented to the decision-makers for their use in considering the project. Any interested persons may comment on the Final EIR, including the responses to comments on the SPAS Draft EIR, in the course of the decision-making process related to SPAS. However, LAWA is not required to provide responses to such comments.

2. LAWA STAFF-RECOMMENDED ALTERNATIVE

2.1 Introduction

2.1.1 Identification of the LAWA Staff-Recommended Alternative

Nine alternatives offering various options to the Yellow Light Projects, including one alternative that provides for implementation of the Yellow Light Projects, were addressed in the SPAS Draft EIR. As described in Section 1.2.2 of the SPAS Draft EIR, the types of improvements used to define the key characteristics of each SPAS alternative can be grouped into the following three categories: airfield improvements, terminal improvements, and ground access improvements. Alternatives 1 through 4 are "fully-integrated" alternatives that include specific improvements in all three categories: airfield improvements, terminal improvements, and ground access improvements. Alternatives 5 through 7 focus on variations to the airfield improvements, which, in turn, affect the terminal improvements. Alternatives 8 and 9 focus on variations to the ground access improvements. Detailed descriptions of each of these alternatives are provided in Section 2.3 of the SPAS Draft EIR. The objectives associated with completion of the SPAS process are described in Section 2.2 of the SPAS Draft EIR. Table 1-2 of the SPAS Draft EIR provides an evaluation of how each alternative responds to these objectives.

As noted in Section 1.2.2 of the SPAS Draft EIR, there is a certain amount of interchangeability between the SPAS alternatives. Specifically, the airfield and terminal improvements in Alternatives 5 through 7 are equally compatible with the ground access improvements in Alternatives 1, 2, 8, and 9. Likewise, the ground access improvements in Alternatives 8 and 9 are equally compatible with the airfield and terminal improvements in Alternatives 1, 2, 5, 6, and 7. In other words, the proposed ground transportation system incorporated into Alternatives 1 and 2 could function in the same manner with Alternatives 5, 6, or 7. That would also be the case for the ground transportation systems under Alternatives 8 and 9, which could be developed under Alternatives 5, 6, or 7, and could also replace the ground transportation system associated with Alternatives 1 and 2.

Following completion of the SPAS Draft EIR, and receipt and review of public comments on the SPAS Draft EIR, LAWA staff identified a recommended alternative. LAWA staff recommends an alternative that combines the airfield and terminal components associated with Alternative 1 with the ground access components associated with Alternative 9. The key features of the LAWA Staff-Recommended Alternative include:

- Relocation of Runway 6L/24R 260 feet north
- Construction of a centerline taxiway
- Easterly extension of Runway 6R/24L
- Improvements to north airfield taxiways
- Development/redevelopment/extension of Terminal 0, Terminal 3, Tom Bradley International Terminal, and the future Midfield Satellite Concourse
- 153 passenger gates
- Development of an Intermodal Transportation Facility (ITF), Consolidated Rent-A-Car Facility (CONRAC), and parking outside the Central Terminal Area (CTA)
- Construction of an Automated People Mover (APM) to link new facilities to the CTA and provide connectivity with planned Metro facilities

The LAWA Staff-Recommended Alternative is illustrated in **Figure SRA-2.1-1**. A complete description of the alternative is provided in Section 2.2. All components of the LAWA Staff-Recommended Alternative were also described and analyzed in the SPAS Draft EIR. The approach to the analysis of alternatives in the SPAS Draft EIR (i.e., grouping components of the alternatives together into “fully-integrated”

alternatives or alternatives that focus on one particular category of improvements), and the subsequent identification of an alternative that combines the airfield and terminal improvements of Alternative 1 with the ground access improvements of Alternative 9 is consistent with CEQA.[1]

2.1.2 Rationale for the LAWA Staff-Recommended Alternative

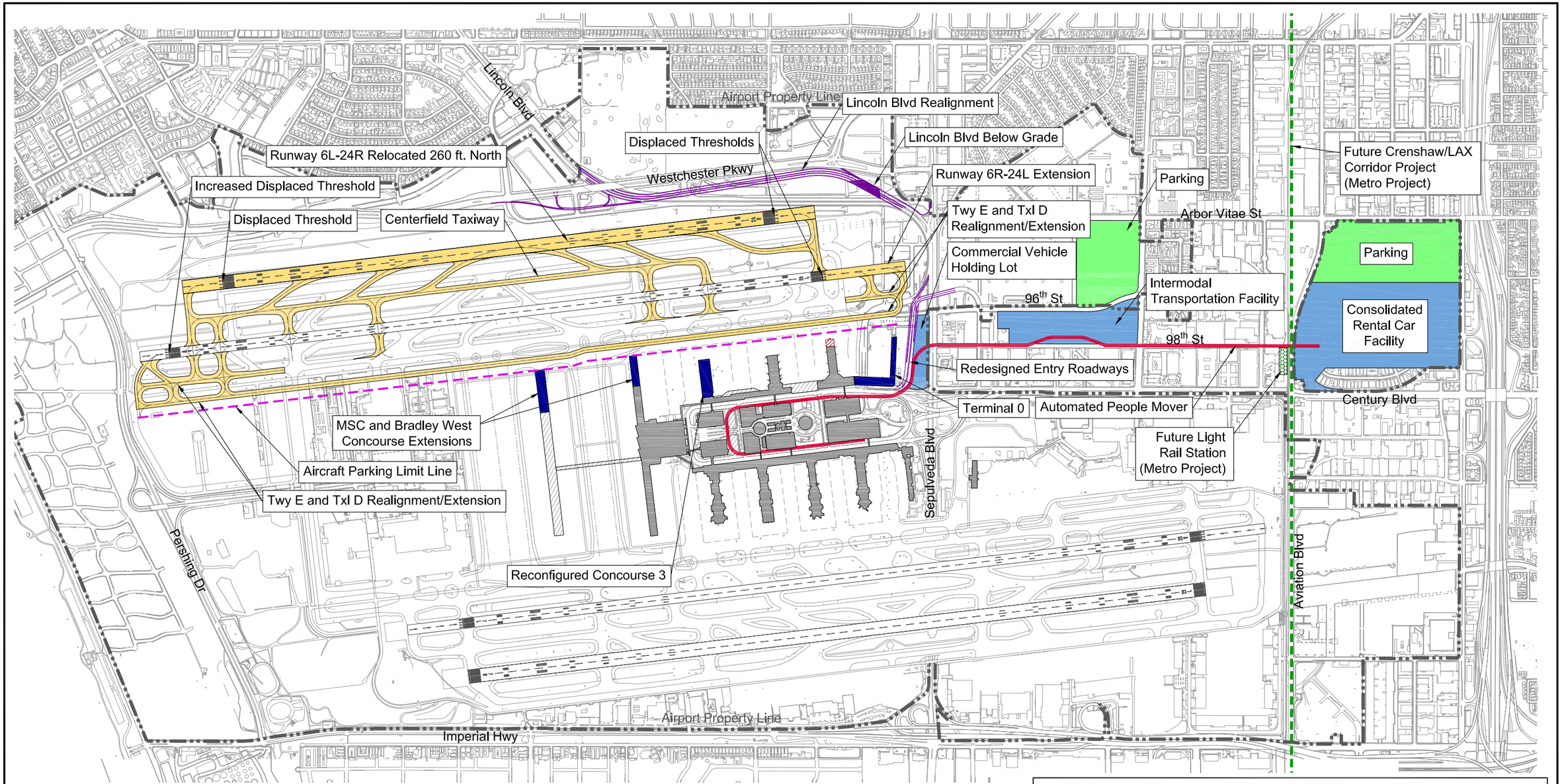
The LAWA Staff-Recommended Alternative seeks to achieve a balance between SPAS airfield-related objectives and the SPAS objective of minimizing impacts on surrounding communities. The airfield improvements associated with the LAWA Staff-Recommended Alternative, which are those associated with Alternative 1 in the SPAS Draft EIR, support standard operations on the north airfield, with the exception of Aircraft Design Group (ADG) VI aircraft when visibility is less than ½ mile, a condition that occurs infrequently at LAX. This alternative provides pilot line-of-sight to the end of Runway 6R/24L (the departures runway) for ADG V operations and includes needed taxiway/taxilane improvements. The LAWA Staff-Recommended Alternative addresses existing Runway Safety Area (RSA) deficiencies, and relocates the Runway 6L/24R Runway Protection Zone (RPZ) such that residences would no longer be located within the RPZ. Addition of a centerline taxiway would enhance the safe and efficient movement of aircraft at LAX and, by providing an airfield that can accommodate Group VI aircraft in most weather conditions, the LAWA Staff-Recommended Alternative would support LAX's role as an international gateway.

The ground access improvements associated with the LAWA Staff-Recommended Alternative, which are those associated with Alternative 9 in the SPAS Draft EIR, would better accommodate airport traffic, reduce congestion in the CTA, enhance security, and provide connectivity with existing and planned Metro bus and transit systems.

Following is a summary of the relationship between the project objectives identified in the SPAS Draft EIR and the LAWA Staff-Recommended Alternative.

1. **Provide North Airfield Improvements that Support Safe and Efficient Movement of Aircraft at LAX:** The LAWA Staff-Recommended Alternative would provide for standardization of nearly all airfield operations, substantially improve pilot situational awareness, address all airfield hazards, and include efficiency features. Specifically, the configuration of the airfield would meet FAA design standards for ADG V aircraft (i.e., Boeing 747) and would accommodate ADG VI aircraft (i.e., Airbus A380) in good visibility conditions, although it would not permit standardized operation of ADG VI aircraft on the centerfield taxiway in all visibility conditions (i.e., poor visibility). Improvements to Taxilane D and Taxiway E would improve the ability of large aircraft to taxi to/from runways and implementation of a centerfield taxiway would provide substantial safety benefits. The extension of Runway 6R/24L would enhance departure capability on the north airfield complex and the westward shift in the landing threshold on Runway 6L/24R would remove residential areas from RPZ.
2. **Improve the Ground Access System at LAX to Better Accommodate Airport-Related Traffic, Especially as Related to the Central Terminal Area:** The LAWA Staff-Recommended Alternative would redesign the CTA roadway segments/curbsides prone to traffic bottlenecks; reduce traffic volumes within the CTA by providing transportation facilities outside of CTA; provide grade-separated/dedicated access route into the CTA; and integrate CTA with regional transit facilities. Development of an Intermodal Transportation Facility (ITF) on 98th Street, provision of surface parking at Manchester Square, and the connection of those facilities, as well as the future Metro transit station nearby, to the CTA via an APM would reduce traffic in and around the CTA.

[1] A "component approach" to project description and a "mix and match" approach to alternatives was specifically upheld in *California Oak Foundation v. Regents of the University of California (*2010) 188 Cal.App.4th 227, 275-277.



Note: Improvements depicted are conceptual only and do not represent engineered design.

0 1,500 ft
Scale

north

Prepared by: Ricondo & Associates, Inc., 2012.

Legend

- Airfield Improvements
- Terminal Improvements
- Terminal Demolition
- Non-SPAS Terminal Improvements
- Aircraft Parking Limit Line
- Ground Access Facilities
- Parking
- Automated People Mover (APM)
- Future Metro Light Rail Project
- Roadway Improvements

LAX Specific Plan Amendment Study Final EIR

LAWA Staff - Recommended Alternative

Figure
SRA - 2.1-1

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3. **Maintain LAX's Position as the Premier International Gateway in Supporting and Advancing the Economic Growth and Vitality of the Los Angeles Region:** The LAWA Staff-Recommended Alternative would fulfill this objective by substantially meeting objectives 1 and 2 above, while at the same time providing opportunity to modernize terminals and concourses for international passengers. Airfield improvements at LAX that support the safe and efficient operation of large aircraft, which are the predominant aircraft type used for international travel, would help maintain LAX's position as the international gateway to Southern California. Ground access improvements are also considered to be supportive of this objective.
4. **Plan Improvements That Do Not Result in More Than 153 Passenger Gates at 78.9 MAP:** The LAWA Staff-Recommended Alternative would provide for no more than 153 passenger gates.
5. **Enhance Safety and Security at LAX:** The LAWA Staff-Recommended Alternative would enhance safety at LAX by substantially fulfilling Objective 1 above. With appropriate security operations and protocols, the LAWA Staff-Recommended Alternative would meet existing and anticipated future federal security standards.
6. **Minimize Environmental Impacts on Surrounding Communities:** Implementation of applicable LAX Master Plan commitments, LAX Master Plan mitigation measures, and SPAS-specific mitigation measures would minimize impacts on surrounding communities.
7. **Produce an Improvement Program that is Efficient, Sustainable, Feasible, and Fiscally Responsible:** The LAWA Staff-Recommended Alternative would have a low to moderate impact to LAWA finances upon implementation, relative to other alternatives.

2.1.3 Relationship of the LAWA Staff-Recommended Alternative to the SPAS Draft EIR

As noted above, the LAWA Staff-Recommended Alternative represents the combination of the airfield and terminal improvements associated with Alternative 1 with the ground access components associated with Alternative 9. The environmental impacts of both the Alternative 1 airfield and terminal improvements and the Alternative 9 ground access components were comprehensively identified and analyzed in the SPAS Draft EIR. The environmental impacts specific to the LAWA staff-recommended combination of Alternatives 1 and 9 are presented in Section 2.3 of Part II of this Final EIR. This summary of impacts is a restatement of information previously included in the SPAS Draft EIR and does not provide any significant new information. The features and components of the LAWA Staff-Recommended Alternative are components of either Alternative 1 or Alternative 9, and there have been no changes to any of these individual project components or features. All of the data presented in Section 2.3 are a recombination or restatement of previously-existing data. For the air quality analysis in Section 2.3, construction and operations emissions associated with Alternatives 1 and 9 were combined to present the emissions associated with the LAWA Staff-Recommended Alternative. These combined emissions were then modeled to present construction and operations concentrations. Toxic air contaminant emissions were similarly combined to model human health risks. Greenhouse gas (GHG) emissions were also combined to present GHG emissions associated with the LAWA Staff-Recommended Alternative. Although the criteria pollutant concentrations, GHG emissions, and human health risks are unique to the LAWA Staff-Recommended Alternative, the results fall within the low and high ends of the ranges of impacts presented in the SPAS Draft EIR. Therefore, the results do not constitute significant new data or information.

Given that the SPAS Draft EIR clearly explains the potential for interchangeability between the SPAS alternatives, and explains that the ground access improvements in Alternative 9 are compatible with the airfield and terminal improvements in Alternative 1, the LAWA Staff-Recommended Alternative is within the range of alternatives that the public could reasonably have anticipated LAWA's decision-makers to consider. As stated above, the environmental effects of the LAWA Staff-Recommended Alternative are the same as Alternative 1, Alternative 9, or a combination of the impacts of these alternatives, or the impact of the LAWA Staff-Recommended Alternative falls within the low and high ends of the ranges of

impacts presented in the Draft EIR. Similarly, all LAX Master Plan commitments, LAX Master Plan mitigation measures, and SPAS-specific mitigation measures that pertain to the LAWA Staff-Recommended Alternative were previously identified in the SPAS Draft EIR, except for those that were modified as a result of responses to comments, and added to the SPAS Draft EIR through corrections and additions to that document, as identified in Chapter 5 of Part II of this Final EIR. The LAWA Staff-Recommended Alternative would not result in a new significant environmental impact beyond those described in the SPAS Draft EIR or a substantial increase in the severity of an environmental impact described in the SPAS Draft EIR, and does not represent an alternative or mitigation measure that is different from others analyzed in the SPAS Draft EIR, as amended by corrections and additions as noted above. Therefore, the following description of the LAWA Staff-Recommended Alternative and the summary of its impacts is not significant new information. In light of this, and after consideration of the comments received on the SPAS Draft EIR, all of the comments received on the SPAS Draft EIR, and the responses to those comments provided in Chapter 4 of Part II of this Final EIR, apply to the LAWA Staff-Recommended Alternative.

2.2 LAWA Staff-Recommended Alternative Description

2.2.1 Features of the LAWA Staff-Recommended Alternative

Overview

The LAWA Staff-Recommended Alternative is a fully-integrated alternative, consisting of airfield, terminal, and ground access components. The distinguishing airfield improvement feature of this alternative is the movement of Runway 6L/24R 260 feet north, along with the addition of a centerfield taxiway, the extension of Runway 6R/24L, improvements to Taxilane D and Taxiway E, and relocation of the service road. Terminal Improvements include addition of new Terminal 0, loss or modifications to concourse areas and/or gates at Terminals 1, 2, and 3, and the modification and potential northward extension of concourse area and gates at TBIT and the future MSC. Ground access improvements include modification of Sky Way; development of an Intermodal Transportation Facility (ITF) at 98th Street west of Airport Boulevard; development of a CONRAC and parking at Manchester Square; development of an Automated People Mover (APM) along 98th Street; and the relocation of Lincoln Boulevard, a portion of which would be below grade and/or tunneled. The APM would be located within an elevated/dedicated corridor along 98th Street, with a bridge over Sepulveda Boulevard and stops at Manchester Square, the future Metro LAX/Crenshaw Light Rail Transit Station at/near Century and Aviation Boulevards, the ITF, and the CTA. Within the CTA, the APM would be located on a new elevated guideway. This alternative is illustrated in **Figure SRA-2.1-1**.

2.2.1.1 Airfield Facilities

The LAWA Staff-Recommended Alternative meets FAA airport (runway) design standards for ADG V with a Category II/III outboard runway (Runway 6L/24R) and Category I inboard runway (Runway 6R/24L), and provides sufficient space between Runway 6R/24L and the centerfield taxiway for ADG V aircraft to hold prior to crossing the runway with a pilot line-of-sight of the end of Runway 24L. This alternative provides the FAA standard ADG VI runway-to-taxiway separation between Runway 6L/24R and the centerfield taxiway for approach visibility at or above one-half mile (Category I approaches). Taxiway E and Taxilane D dimensions would meet ADG V standards.

Runway Modifications

Runway 6L/24R

- Relocate 260 feet north of current location to accommodate a new centerfield parallel taxiway (see below) and to provide for ADG V separation distances
- Extend 604 feet west so that the RPZ no longer extends over residential areas

- Establish dual displaced thresholds to remove existing residences from the RPZ (east end displaced threshold) and maintain existing westerly aircraft landing heights (west end displaced threshold)
- Widen to 200 feet to meet FAA standards

Runway 6R/24L

- Remains in its current location
- Extend 1,250 feet east to meet RSA requirements and maximize aircraft takeoff length
- Shift 6R landing threshold 104 feet east to meet RSA requirements
- Reconstruct east 2,000 feet for grade compliance

Taxiway Modifications

Centerfield Taxiway

- Construct an 82-foot-wide centerfield taxiway between Runways 6L/24R and 6R/24L, with a centerline separation distance of 500 feet to Runway 6L/24R and 460 feet to Runway 6R/24L, to enhance safety and reduce incursions and other airfield hazards, while providing for ADG V separation distances; also provide exit taxiways from Runway 6L/24R to the centerfield taxiway, taxiways from the centerfield taxiway to and across Runway 6R/24L, and other related airfield taxiway improvements

Taxiway E

- Rebuild western 2,190 feet to straighten alignment (0 to 64 feet southerly relocation)
- Extend 950 feet east to support easterly extension of Runway 6R/24L and to provide additional hold area for departing aircraft

Taxilane D

- Relocate varying distances (ranging from 15 to 19 feet) north to provide ADG V separation distances between the taxiway and APLL
- Extend 745 feet east to support easterly extension of Runway 6R/24L and 5,145 feet west to provide for dual full-length taxiways in the north airfield

Other Airfield-Related Features

- Cover the entire length of the Argo Drainage Channel (9,857 linear feet) such that the weight of an aircraft could be supported within the RSA by converting the existing open unlined channel to a concrete box culvert
- Relocate Lincoln Boulevard northward between Sepulveda Boulevard and Westchester Parkway, and depress the eastern portion of the road segment to be compatible with the object free area requirements for the east end of Runway 6L/24R, which would require approximately 540 linear feet of the road segment to be tunneled
- Relocate the service road that currently lies between Taxiway E and Taxilane D to a location 142 feet south of Taxilane D centerline to increase the separation between the two taxiways to allow for simultaneous operations with larger aircraft than currently accommodated, improve safety and efficiency, and meet FAA standards
- Taxiway E and Taxilane D dimensions, based on proposed improvements, would meet ADG V standards

- In the eastern portion of the airfield, the APLL would move south to a location 852 feet south of the existing Runway 6R/24L centerline. Beginning just west of Taxiway S, the APLL would move south an additional 50 feet (902 feet south of the Runway 6R/24L centerline).
- Relocate and/or remove existing facilities as specifically described in Section 2.2.2 and as listed in **Table SRA-2.2-2** below and as shown in Figure 2-10 of the SPAS Draft EIR

2.2.1.2 Terminal Facilities

Proposed modifications to terminal facilities, including aircraft gates, under the LAWA Staff-Recommended Alternative would include the following:

- Construct a new Terminal 0 with seven gates in the western portion of the area now occupied by Park One to replace gates lost or downsized at Terminals 1 through 3
- Demolish approximately 177 feet of the Terminal 1 concourse to accommodate the southerly movement of the APLL
- Demolish and reconstruct the Terminal 3 concourse and associated gates, with the building centerline shifted 40 feet to the west to increase the width of the alleyway between Terminals 2 and 3 to allow for dual-directional aircraft movement and comply with FAA standards
- Demolish and replace the northerly end of the TBIT concourse and associated gates (with new concourse and gates in line with the new Bradley West concourse) to the LAWA Staff-Recommended Alternative APLL
- Provide the opportunity to extend the northerly end of the future MSC to the LAWA Staff-Recommended Alternative APLL
- As a result of moving the APLL south to meet ADG V standards, several gates would be eliminated or downsized (i.e., would accommodate smaller aircraft types)
- The commuter facility currently in use east of Sepulveda Boulevard would be maintained
- Use of west remote gates would be eliminated upon completion of the airfield and terminals improvements
- The total number of gates used at LAX for scheduled passenger service would be 153

2.2.1.3 Ground Access Facilities

Ground Access

Under the LAWA Staff-Recommended Alterative, the characteristics of the airport ground access system would be as follows:

- Maintain private vehicle access to the CTA
- Relocate Sky Way (upper and lower level roadways) eastward between the future Terminal 0 and Sepulveda Boulevard to provide additional roadway and curbfront in the CTA, while allowing the development of Terminal 0
- Add new curbside space at Terminal 0
- Relocate the commercial vehicle holding lot south of 96th Street, between Sepulveda Boulevard and the relocated Sky Way to meet RSA and RPZ requirements
- Construct a new ITF on 14 acres between 96th and 98th streets and between Vicksburg Avenue and Airport Boulevard. Key features of the ITF include public parking and remote passenger pick up/drop off. In addition, arriving passengers could travel to the ITF to board door-to-door shuttles or scheduled buses
- Construct a CONRAC in a portion of Manchester Square, including a customer service area and a structured parking facility to accommodate approximately 1,000 stalls for quick turn-around and 5,800 stalls for ready return. Additional surface parking would be constructed to accommodate a portion of the total demand for staging and storage of rental vehicles by the various operators.

- Construct an elevated APM between Manchester Square and the CTA, primarily using the 98th Street corridor, including a bridge over Sepulveda Boulevard and stops at the future Metro LAX/Crenshaw Light Rail Transit Station at/near Century and Aviation Boulevards and the new ITF. Within the CTA, the APM would be located on an elevated guideway. The number of stations in the CTA has yet to be determined but could range from 3 to 5.
- Provide connectivity to public transit via the APM, with a stop/connection at the new Metro transit station at Aviation/Century. LAX shuttle bus from the Metro Green Line Aviation Station would be discontinued.
- An APM maintenance facility would be constructed, likely in Manchester Square
- Relocate Lincoln Boulevard to the north, outside of the Runway 6L/24R RSA, with a portion below grade and/or tunneled

Parking

Under the LAWA Staff-Recommended Alternative, the characteristics of airport parking within the control of LAWA would be as follows:

- Generally, no changes to existing CTA parking conditions would occur as a result of SPAS, although future pricing structures may change long-term/short-term composition
- Parking Lot E, would no longer be used for employee parking, although this property could be used for other airport purposes in the future. Changes to the use of this parking area would occur independently from SPAS.
- No changes are proposed to Public Parking Lot C
- Parking Lot D would provide approximately 1,944 employee parking spaces. The Jenny Lot east of Parking Lot D would provide approximately 2,000 employee parking spaces. These parking areas were not in use in the 2010 baseline year; however, their use for parking is occurring independently from SPAS.
- Development of the ITF would include approximately 4,900 short-term public parking spaces to facilitate passenger drop off and pick up outside of CTA
- Construct approximately 2,750 employee parking spaces in the existing Avis rental car lot
- Construct approximately 4,200 public parking spaces in a portion of Manchester Square
- No public or employee parking is proposed for the area referred to as Continental City
- The existing Park One parking would be eliminated to allow development of Terminal 0 and the relocated entry roadway
- The West Employee Parking facility would not be constructed

2.2.1.4 Elimination of LAX Master Plan Components

Under the LAWA Staff-Recommended Alternative, the following non-Yellow Light projects approved as part of the LAX Master Plan would be fully or partially eliminated:

- Demolition of all CTA parking structures and replacement with passenger terminals (partially eliminated)
- West Employee Parking facility
- CONRAC in Parking Lot C (would be developed in Manchester Square instead)
- Reconfiguration and expansion of Parking Lot E north of 111th Street
- ITC in the area referred to as Continental City
- APM between ITC, CONRAC, and CTA (APM 1)

A summary of the key characteristics of the LAWA Staff-Recommended Alternative is presented in **Table SRA-2.2-1**.

Table SRA-2.2-1

Summary of the LAWA Staff-Recommended Alternative

	Baseline Conditions	SRA
Airfield Elements - Key Components		
Runways		
Relocate Runway 6L/24R to north		260'
Extend Runway 6L/24R to west		604'
Extend Runway 6R/24L to east		1,250'
Taxiways		
Centerfield Taxiway	N	Y
Extend Taxiway E to east		950'
Relocate Taxilane D to north		
Between D7 and Q (TBIT and Terminals 1, 2, and 3)		15'
Between Q and E13 (MSC)		19'
Extend Taxilane D to east		745'
Extend Taxilane D to west		5,145'
Service Road		
Construct New Service Road (South of Taxilane D)		Y
Terminal Elements - Key Components		
Central Terminal Area (CTA)		
Terminal 0 Concourse and Passenger Processing		
Proposed New		330,000
Terminal 1 Concourse	138,000	
Demolition		(24,000)
Proposed Remaining		114,000
Terminal 2 Concourse	306,000	
Demolition		(0)
Proposed Remaining		306,000
Terminal 3 Concourse	279,000	
Demolition		(242,000)
Proposed Reconfigured		223,000
Bradley West - North Concourse Extension		
North Extension		113,800
Midfield Satellite Concourse (MSC) - North Concourse Extension		
North Extension		249,400
Ground Access Elements - Key Components		
Transportation Facilities		
Intermodal Transportation Facility (ITF)		X
CONRAC - Manchester Square		X
Circulation System Improvements		
Sky Way Realignment		X
APM - Between Manchester Square and CTA		X
Parking		
CTA[1,2]		
Public	8,577	7,041
Employee	420	420
Subtotal	8,997	7,461
Parking Lot C[3]		
Public	7,300	7,300
Employee	0	0
Subtotal	7,300	7,300
Parking Lot D[4] and Jenny Lot		
Public	0	0

Table SRA-2.2-1

Summary of the LAWA Staff-Recommended Alternative

	Baseline Conditions	SRA
Employee	0	4,344
Subtotal	0	4,344
Park One		
Public	2,728	0
Employee	0	0
Subtotal	2,728	0
Manchester Square		
Public	0	4,200
Employee	0	0
Subtotal	0	4,200
Avis Rental Car Lot		
Public	0	0
Employee	0	2,750
Subtotal	0	2,750
Proposed Parking Structure at ITF		
Public	0	4,900
Employee	0	0
Subtotal	0	4,900
Parking Lot F (Parking Structure at the SE corner of Avion Dr. & Century Blvd.)[5]		
Public	0	0
Employee	1,200	1,200
Subtotal	1,200	1,200
Total	**25,695**	**32,155**

[1] Some of the public parking in the CTA is currently used by government employees.
[2] Assumes that the MSC Passenger Processor building (not a SPAS-related project) would require the removal of parking structures 2B and 5 (1,536 total spaces). Any parking spaces that may be included as a component of the Passenger Processor project is not included in these parking totals.
[3] An area of Parking Lot C comprising approximately 850 spaces is currently being used as a limousine and charter bus holding lot. The 7,300 spaces represents the number of potential spaces if this commercial holding lot were relocated.
[4] Parking Lot D opened to employee parking in November 2011 with 1,944 parking spaces. However, there was no parking in this lot in 2010 (baseline year).
[5] This parking structure is currently used primarily by airport tenants; however, LAWA does sell some monthly parking passes to the public who likely work in nearby offices. For purposes of this summary, this structure is considered as employee parking.

Source: LAWA, CDM Smith, Ricondo & Associates, AECOM, 2011.

2.2.2 Existing Facilities Affected by SPAS Improvements

Implementation of the LAWA Staff-Recommended Alternative would require the relocation and/or removal of several existing facilities both within LAX property, and outside of LAX property. **Table SRA-2.2-2** below provides an overview of the existing facilities that would be affected by the LAWA Staff-Recommended Alternative, including the name, size, current use, and disposition of each facility. Additional discussion of the facilities is provided in Section 2.3.1.10 of the SPAS Draft EIR. Figure 2-10 of the SPAS Draft EIR delineates the existing and proposed locations of the affected facilities. Because the planning and analysis for the LAWA Staff-Recommended Alternative are at a programmatic level, specific improvements to these facilities have yet to be designed and would not be implemented for several years. The disposition of each facility described below is based on 4th quarter 2011 conditions and currently available information, and is subject to change as local conditions change and more detailed plans are formulated.

Table SRA-2.2-2

Summary of Existing Facilities Affected by the LAWA Staff-Recommended Alternative

Facility	Approximate Size	Current Use	Disposition of Facility/Use
Navigational Aids		Navigational aids	The navigational aids located at the ends of the north airfield runways would be relocated. FAA's existing Airport Surveillance Radar (ASR) would be relocated north of Westchester Parkway.
North Maintenance Road	Various lengths	Road	The eastern portion of the road would be relocated independent of the LAX Master Plan or SPAS. The LAWA Staff-Recommended Alternative would require relocation of the entire road to the north with operational restrictions on the eastern end.
Argo Drainage Channel	9,857 feet long	Drainage channel	Independent of SPAS, the easternmost portion of the channel is required to be structurally covered to comply with requirements governing RSAs. Under the LAWA Staff-Recommended Alternative, the entire length of the channel would be structurally covered (i.e., converted to a concrete box culvert).
North Airfield (Abandoned) Tunnel Segment	720 feet long	Unused	The tunnel would be filled.
Airport Operations Area (AOA) Access Guard Post #3	155 square feet	Guard post	Building and appurtenant structures would be demolished. There are no plans to replace the guard post in this area.
Lincoln Boulevard and Adjoining Streets		Road	Lincoln Boulevard and adjoining streets would be realigned. Approximately 540 linear feet of Lincoln Boulevard would require the tunneling.
96th Street Bridge/Sky Way		Bridge	The bridge and roadway would be reconfigured, allowing the eastern extension of Runway 6R/24L and Taxiway E, additional CTA curbside, and the accommodation of Terminal 0.
Taxi Holding Lot	100 vehicles (2.5 acres)	Vehicle parking/staging area	Independent of the LAX Master Plan or SPAS, the taxi holding lot must be relocated. Under the LAWA Staff-Recommended Alternative, the lot would move to the eastern portion of the Park One facility.
Urgent (Medical) Care Facility	Approx. 21,500 square feet	Medical office building	The building would be demolished due to the realignment of 96th Street Bridge/Sky Way. This building could potentially be relocated elsewhere in the vicinity.
LAWA Police Station/Facilities	33,300 square feet	Police station and related facilities	Facilities would be removed and relocated. The facilities could be relocated to the future LAX Public Safety Building and Supporting Facilities currently being planned by LAWA, separate from SPAS.

Table SRA-2.2-2

Summary of Existing Facilities Affected by the LAWA Staff-Recommended Alternative

Facility	Approximate Size	Current Use	Disposition of Facility/Use
Park One Parking Facility and Billboards	2,728 spaces and 8 billboards	Privately-operated airport parking lot and outdoor advertising	Parking lot use would be eliminated, along with eight billboards. No relocation of the parking is anticipated.
West Remote Aircraft Gates/Parking Positions	18 gates to facilitate scheduled passenger service	Aircraft gates and parking spaces	With the extension of Taxilane D, various west remote gate structures and parking positions would be removed. These gates and parking positions would be replaced in the buildout gating plan. (It should be noted that all West Remote gates/parking positions are to be removed under LAX Master Plan buildout.)
LAWA Construction and Maintenance (C&M) Division Facilities	135,000 square feet	C&M facilities	With the extension and/or relocation of Taxilane D, the C&M recycling yard and equipment yard (northern portion of the facility), as well as separately located structures used for storage, would be removed and consolidated/reconfigured at the current site or moved elsewhere on the AOA or to the area referred to as Continental City.
FedEx Aircraft Maintenance Facility	164,000 square feet	Maintenance facilities	The extension and/or relocation of Taxilane D would require the removal of the FedEx Maintenance employee parking area, an apron and run-up area, and miscellaneous storage areas within the northern portion of the facility. The facilities on the leasehold would be reconfigured and consolidated on the existing site or relocated elsewhere on the AOA.
On-Airfield Fuel Truck Filling Station		Fueling facility	With the extension of Taxilane D, the fueling station would need to be reconfigured or relocated within the AOA.
Southwest Airlines Ground Support Equipment(GSE) Facility	7,972 square feet	GSE and vehicle maintenance facility	With the extension and/or relocation of Taxilane D, the Southwest Airlines GSE facility would be removed and relocated elsewhere on, or adjacent to, the AOA.
Airfield Bus Parking Area and Operations Building	44 parking spaces, 3,876-square-foot-building	Bus parking	With the extension of Taxilane D, 44 bus parking spaces and an airfield bus operations building would be removed. These uses would be relocated within the AOA or the area referred to as Continental City.
Avis Rental Car Facility	24 acres	Rental car operation	This facility would be replaced with parking. The primary rental car function would be relocated to the CONRAC in Manchester Square. Heavy maintenance and supporting functions would require relocation elsewhere, but could potentially occur on LAWA property on 111th Street west of La Cienega Boulevard.

Table SRA-2.2-2

Summary of Existing Facilities Affected by the LAWA Staff-Recommended Alternative

Facility	Approximate Size	Current Use	Disposition of Facility/Use
Burger King Restaurant	3,551 square feet	Restaurant	An existing Burger King restaurant located on the northwest corner of Airport Boulevard and 96th Place would be eliminated. Relocation would be a business decision. This business could potentially relocate to elsewhere in the vicinity.
Travelodge Hotel and Denny's Restaurant	154 rooms (Travelodge) 7,347 square feet (Denny's)	Hotel and restaurant	An existing Travelodge hotel and Denny's restaurant located in the southwestern portion of Manchester Square would be eliminated. Relocation would be a business decision. These businesses could potentially relocate to elsewhere in the vicinity.

Source: LAWA and CDM Smith, 2011.

2.2.3 Acquisition

The LAWA Staff-Recommended Alternative would require the acquisition of properties located east of the airport. Table 2-4 of the SPAS Draft EIR lists the properties that may be affected and provides information pertaining to each parcel. A composite map of all of the acquisition properties is provided in Figure 2-11 of the SPAS Draft EIR. The parcels that would be acquired under the LAWA Staff-Recommended Alternative are identified in Table 2-5 of the SPAS Draft EIR (under the heading "Alts. 1, 2, 8, and 9") and illustrated in Figure 2-12 of the SPAS Draft EIR. Following acquisition, the uses would be demolished and replaced with SPAS-related improvements.[2]

2.2.4 Construction Staging Areas

Figure 2-15 of the SPAS Draft EIR depicts the locations of potential construction staging areas that could be utilized in some combination during development of the LAWA Staff-Recommended Alternative. As indicated in Section 2.2.1, the LAWA Staff-Recommended Alternative was formulated at a conceptual level only and there are no specific planning, design, or engineering studies or construction plans for this alternative.

Construction Staging Areas A though D are located within the LAX Northside planning area, which is planned for future development independent from SPAS. Depending on the nature and timing of such future development, use of Construction Staging Areas A through D for SPAS-related construction staging may be limited.

In addition to the potential construction staging areas described above, there are numerous existing surface parking lots in the vicinity of Arbor Vitae Street, and Airport and Aviation Boulevards that could serve as potential short-term and temporary construction staging areas.

[2] The LAWA Staff-Recommended Alternative would require the same acquisition as Alternatives 1, 2, 8, and 9.

2.3 Environmental Impact Analysis of the LAWA Staff-Recommended Alternative

Introduction

This section presents the environmental impacts of the LAWA Staff-Recommended Alternative described in Section 2.2, *LAWA Staff-Recommended Alternative Description*, as derived from the analysis presented in the SPAS Draft EIR as amended by corrections and additions to that document identified in Chapter 5 of Part II of this Final EIR. A description of the physical environment at and within the vicinity of LAX that may be affected by the LAWA Staff-Recommended Alternative is provided in Chapters 3 and 4 of the SPAS Draft EIR.

Based on information in the SPAS Draft EIR, this section provides a discussion of the potential impacts to that physical environment that are specifically associated with the LAWA Staff-Recommended Alternative and the measures proposed to mitigate those impacts, as required.

As described in Section 2.1 of this chapter, the LAWA Staff-Recommended Alternative couples the airfield and terminal improvements associated with Alternative 1 with the ground access components associated with Alternative 9. Thus, the impacts analysis in this section for the LAWA Staff-Recommended Alternative is representative of the impacts analysis of Alternatives 1 and 9 in Chapter 4 of the SPAS Draft EIR. For some topics, such as aircraft noise, impacts from the LAWA Staff-Recommended Alternative would only result from airfield improvements; the impacts for these topics are equivalent to the impacts associated with Alternative 1 as presented in the SPAS Draft EIR. For other sections, such as on- and off-airport transportation, impacts from the LAWA Staff-Recommended Alternative would only result from the ground access improvements; the impacts for these sections are identical to the impacts associated with Alternative 9 in the SPAS Draft EIR. For some topics, such as aesthetics, impacts from the LAWA Staff-Recommended Alternative would result from both the airfield/terminal and the ground access improvements; in these cases, the impacts associated with the LAWA Staff-Recommended Alternative represent a combination of the impacts associated with Alternative 1 and Alternative 9 of the SPAS Draft EIR.

The following provides a list of topics addressed in this section, along with an indication of the analogous impacts assessment in the SPAS Draft EIR:

- Aesthetics (Alternatives 1 and 9)
- Air Quality (Alternatives 1 and 9, with the combined emissions modeled to identify air pollutant concentrations)
- Biological Resources (Alternatives 1 and 9)
- Coastal Resources (Alternative 1)
- Cultural Resources (Alternatives 1 and 9)
- Greenhouse Gases (Alternatives 1 and 9)
- Hazards/Hazardous Materials
  - Human Health Risk Assessment (Alternatives 1 and 9, with new risk calculations for the combined toxic air contaminant emissions)
  - Safety (Alternative 1)
  - Hazardous Materials (Alternatives 1 and 9)
- Hydrology/Water Quality (Alternatives 1 and 9)
- Land Use and Planning (Alternatives 1 and 9)
- Noise
  - Aircraft Noise (Alternative 1)

  - Road Traffic Noise (Alternative 9)
  - Construction Traffic and Equipment Noise (Alternatives 1 and 9)
  - Transit Noise and Vibration (Alternative 9)
- Public Services
  - Fire Protection (Alternatives 1 and 9)
  - Law Enforcement (Alternatives 1 and 9)
- Transportation
  - On-Airport Transportation (Alternative 9)
  - Off-Airport Transportation (Alternative 9)
- Utilities
  - Energy (Alternatives 1 and 9)
  - Solid Waste (Alternatives 1 and 9)
  - Wastewater Generation (Alternatives 1 and 9)
  - Water Supply (Alternatives 1 and 9)

As discussed in Section 2.1.3 of this chapter, the analysis of impacts associated with the LAWA Staff-Recommended Alternative is not new information. Rather, the analysis presented herein is a restatement of the analyses provided in the SPAS Draft EIR under the headings of "Alternative 1" and "Alternative 9." As noted above, additional modeling was performed to provide an estimate of the air pollutant concentrations associated with the combination of emissions from the Alternative 1 airfield and terminal improvements and the Alternative 9 ground access components. Such calculations are provided in Attachment 1 of Part II of this Final EIR. Similarly, new risk calculations were performed on the combined toxic air contaminant emissions. These calculations are also provided in Attachment 1 of Part II of this Final EIR. The results of the calculations fall within the range of air pollutant concentration impacts and human health risk impacts identified in Sections 4.2, *Air Quality*, and 4.7.1, *Human Health Risk Assessment*, of the SPAS Draft EIR and do not constitute new significant environmental impacts.

Each of the 13 main environmental disciplines addressed in this section is discussed in a separate section using a common organization. Sections are numbered 2.3.1 through 2.3.13. Several sections are divided into subsections to simplify and clarify the discussion. The impacts analyses in this section is based upon the same methodology and thresholds of significance described in Chapter 4 of the SPAS Draft EIR. Unless otherwise noted, the impacts analysis for the LAWA Staff-Recommended Alternative also assumes that the applicable LAX Master Plan commitments and mitigation measures identified in Section 2.5, *Summary of Impacts and Mitigation Measures Related to the LAWA Staff-Recommended Alternative*, of this chapter and described in detail in Chapter 4 of the SPAS Draft EIR would be implemented concurrently with and as part of the LAWA Staff-Recommended Alternative.

Within each environmental topic section, discussion of the following is provided:

- The **Impacts Analysis** section presents the analysis of impacts for the LAWA Staff-Recommended Alternative for the buildout horizon year 2025. Impacts were compared to the thresholds of significance identified in Chapter 4 of the SPAS Draft EIR to determine whether they would be, under CEQA, significant or less than significant. For purposes of determining significance, potential impacts were compared to the environmental baseline conditions, as further described in the *Analytical Framework* in the Introduction to Chapter 4 of the SPAS Draft EIR.
- **Mitigation Measures** are specified procedures, plans, policies, or activities proposed for adoption by the lead agency to reduce or avoid the significant impacts identified in the analysis of environmental impacts. This section identifies SPAS-specific mitigation measures proposed to address significant impacts that would occur with implementation of the LAWA Staff-Recommended Alternative. In accordance with the requirements of CEQA, a Mitigation Monitoring and Reporting Program would be

adopted as part of the SPAS project approvals, to ensure that implementation of mitigation measures is properly monitored and documented.

- **Level of Significance After Mitigation** is a CEQA determination of the significance of a particular impact after implementation of the proposed mitigation measures. This section identifies any significant impacts that cannot be mitigated to a level that is less than significant. These "significant unavoidable impacts" are also listed in Section 2.5, *Summary of Impacts and Mitigation Measures Related to the LAWA Staff-Recommended Alternative*, of this chapter. The level of significance after mitigation is not included for those environmental topics where no significant impacts would occur and, as a result, where no mitigation measures specific to SPAS are required.

2.3.1 Aesthetics

2.3.1.1 Impacts Analysis

As noted in Section 2.3, impacts of the LAWA Staff-Recommended Alternative related to aesthetics are associated with the airfield/terminal components of Alternative 1 and the ground access components of Alternative 9, as evaluated in Section 4.1.6 of the SPAS Draft EIR.

In addition to the LAX Master Plan commitments and mitigation measure, and as previously discussed under Section 4.1.3.1 of the SPAS Draft EIR, new development at LAX is subject to compliance with a number of design- and lighting-related regulations and guidelines. Compliance with applicable regulations and guidelines is supported through LAWA's design review process where plans are reviewed by the Facilities Planning Division, other airport divisions, and by the City of Los Angeles Building and Safety Department as part of the permitting process. The Building and Safety Department distributes the plans as appropriate to other City departments including Planning, Public Works, and Cultural Affairs with final design approval required by the Cultural Affairs Commission. As architectural plans are not available for the improvements proposed under the LAWA Staff-Recommended Alternative, the following analysis assumes that new development at LAX would be carried out in compliance with relevant LAX Master Plan commitments and mitigation measure, and with relevant LAX and City of Los Angeles design and lighting regulations and guidelines.

The LAWA Staff-Recommended Alternative (described in Section 2.2, *LAWA Staff-Recommended Alternative Description*, of this chapter) includes various features that are particularly relevant to the analysis of impacts to aesthetics, views, and light and glare. These features include airfield facility and terminal improvements; ground access improvements, such as the Intermodal Transportation Facility (ITF), new parking and a CONRAC in the Manchester Square area, and the relocation of Lincoln Boulevard; and the relocation of navigational aids.

2.3.1.1.1 Aesthetics

Century Corridor/Eastern Boundary

The LAWA Staff-Recommended Alternative would involve construction of a new ITF on 14 acres between 96th and 98th Streets and between Vicksburg Avenue and Airport Boulevard. Key features of the ITF include public parking and remote passenger pick up/drop off areas. In addition, arriving passengers would travel to the ITF to board door-to-door shuttles or scheduled buses. As part of the LAWA Staff-Recommended Alternative, the Manchester Square area would be developed with a parking facility and a CONRAC. An APM between Manchester Square and the CTA would be constructed within an elevated/dedicated structure primarily using the 98th Street corridor, including a bridge over Sepulveda Boulevard and stops at the future Metro LAX/Crenshaw Light Rail Transit Station at/near Century and Aviation Boulevards and the new ITF.

The construction of a new ITF would involve the acquisition and demolition of existing parking structures, and commercial and industrial properties, some of which are currently vacant and fenced off from the street. The structures that would be removed do not contribute to a valued aesthetic character or image of the area. As described in Section 4.1 of the SPAS Draft EIR, the existing visual quality of this area is

poor and limited landscaping is located within this area. Construction of the ITF would create a new use that would be compatible with surrounding commercial, industrial, and parking uses. Design plans for the ITF have not been developed. However, the LAX Street Frontage and Landscape Development Plan Update requires passenger facilities, such as the ITF, as a highly utilized public facility, to include intensive landscaping amenities and visual treatments. Such visual treatments would include edge treatments, pedestrian amenities, and other decorative elements. In addition, the LAX Specific Plan requires the development of conceptual design guidelines for new projects, including new central terminals and passenger facilities such as the ITC.

LAX Master Plan Commitments DA-1, Provide and Maintain Airport Buffer Areas, LU-4, Neighborhood Compatibility Program, and LU-2, Establishment of a Landscape Maintenance Program for Parcels Acquired Due to Airport Expansion, would further reduce the potential for the ITF to have adverse effects on aesthetic and visual resources. In particular, LU-4, Neighborhood Compatibility Program, outlines interface treatments along the airport perimeter for the purpose of "ensuring that the airport complements surrounding properties and neighborhoods." As stated in LAX Master Plan Commitment LU-4, the purpose of the NCP is to encourage ongoing coordination and planning by LAWA to ensure that the airport complements surrounding properties and neighborhoods. Efforts to promote the visual compatibility of the ITF with surrounding uses would be undertaken during LAWA's architectural design and development process and would support the LAX Specific Plan, LAX Street Frontage and Landscape Development Plan Update, and future conceptual design guideline objectives. In light of these applicable design guidelines, plan provisions, and LAX Master Plan commitments, and given that the site and surrounding areas are not of high aesthetic quality, and the ITF would not remove features that would change the aesthetic character of the area, impacts to aesthetic and visual resources from the ITF would be less than significant.

The ITF would be developed in an area with poor visual quality that does not include notable views. The ITF would not be located within the viewshed of a designated scenic highway, corridor, or parkway. As development of the ITF would not affect views from a designated scenic highway, corridor, or parkway or obstruct/diminish other valued focal or panoramic views, impacts on views would be less than significant.

Since the Manchester Square area has been largely cleared and consists of vacant grass lots surrounded by fencing, the existing visual quality of the area is low, and areas surrounding the site do not provide valued scenic views or include sensitive visual receptors. Development of the proposed parking facility and CONRAC would involve removal of the limited remaining structures in Manchester Square and existing LAWA- maintained landscaping. The new parking facility and CONRAC would be in character with surrounding surface parking facilities, commercial, and industrial development. Furthermore, edge and landscape treatments would be incorporated into the design of the parking facility and CONRAC in compliance with the LAX Street Frontage and Landscape Development Plan Update and efforts to promote the visual compatibility of the new parking facility and CONRAC would be undertaken as part of LAX Master Plan Commitments DA-1, Provide and Maintain Airport Buffer Areas, and LU-4, Neighborhood Compatibility Program. As discussed above, the Manchester Square area does not provide valued focal or panoramic views, nor is the area within the viewshed of a designated scenic highway, corridor, or parkway. In light of applicable design guidelines and LAX Master Plan commitments for screening, buffers, setbacks, and maintenance of neighborhood compatibility, and given that the site and surrounding areas are not of high aesthetic quality, impacts to aesthetic and visual resources due to the proposed parking facility and CONRAC would be less than significant. As development of the new parking facility and CONRAC would not affect views from a designated scenic highway, corridor, or parkway or obstruct/diminish other valued focal or panoramic views, impacts on views would also be less than significant.

Development of the APM and support pilings ranging in height from ground level up to 20 feet above grade would be developed between Manchester Square and the CTA primarily along the 98th Street corridor, including a bridge over Sepulveda Boulevard and stops at the future Metro LAX/Crenshaw Light Rail Transit Station near Century and Aviation Boulevards and the new ITF. Views in this area are limited and consist of parking facilities, hotel, commercial, and industrial uses which do not contribute to a valued aesthetic image. Furthermore, efforts to promote the visual compatibility of the elevated APM with

surrounding uses would also be undertaken during LAWA's architectural design and development process and through conformance with LAX Master Plan Commitment LU-4, Neighborhood Compatibility Program. Therefore, in light of applicable design guidance and LAX Master Plan commitments, and because the elevated APM would not degrade an area valued for its aesthetic character or involve the removal of features that contribute to the aesthetic image of the area, impacts to aesthetic and visual resources would be less than significant.

The elevated APM would be most visible from lower floors of hotels and office buildings along 98th Street and adjacent roadways. The elevated APM would also be visible from adjacent roadways and properties along 96th Street, Sepulveda Boulevard south of 96th Street, and portions of Aviation Boulevard adjacent to the cross-over at 98th Street. While development of the elevated APM would introduce a new and unique feature in the project area, due to the height of the structure and support pilings, views most likely to be affected would be from the lower levels of hotel and office uses along 98th Street and Sepulveda Boulevard, which are not scenic. As such, development of the elevated APM would not impact valued focal or panoramic views from upper stories of hotel and office uses. Furthermore, the elevated APM is not within the viewshed of a designated scenic highway, corridor, or parkway. Accordingly, the elevated APM would have a less than significant impact in regard to obstruction or diminishment of views.

Central Terminal Area

Terminal improvements under the LAWA Staff-Recommended Alternative include the addition of new Terminal 0, loss or modifications to concourse areas and/or gates at Terminals 1, 2, and 3, and the modification and northern extension of concourse area and gates at TBIT and the future Midfield Satellite Concourse (MSC). Ground access improvements within the CTA include modification of Sky Way (the primary access road connecting CTA to southbound Sepulveda Boulevard and 96th Street Bridge). No modifications to the Theme Building or Airport Traffic Control Tower would occur. An APM would be located within the CTA under this alternative. The APM would be situated on an guideway located between the parking garages and the terminal buildings. The existing parking garages and terminal buildings are aging, functional in nature, and generally lack architectural interest or extensive landscaping, and do not contribute meaningfully to the aesthetic quality of the CTA. As such, the addition of the APM adjacent to these structures, while it would be visually noticeable, would introduce a new, modern feature within the CTA that would be consistent with the airport's image as a Gateway to the City of Los Angeles.

The APM would be developed within the CTA, but its precise alignment has yet to be designed. Depending on the height of the APM tracks and various support structures, the APM could potentially diminish valued focal views of the Theme Building from a variety of vantage points in the CTA, particularly views from terminal front areas and sidewalks to the north and south. Views of the Theme Building are valued focal views within the CTA. Although plans for the APM within the CTA are conceptual, impacts to valued focal views of the Theme Building from different vantage points within the CTA under the LAWA Staff-Recommended Alternative would be significant. With incorporation of Mitigation Measure MM-HA Mitigation Measure MM-HA (SPAS)-2, Preservation of Historic Resources: Theme Building and Setting, described in Section 2.3.1.2 below, views of the north and south elevations of the Theme Building would not be impaired by the APM, reducing this impact to a level that is less than significant.

The new Terminal 0, and reconstruction and modifications of the Terminal 3 concourse and gates would, pursuant to the LAX Plan and LAX Street Frontage and Landscape Development Plan Update, incorporate external and more modern design elements and greater architectural articulation than current conditions. In addition, the LAX Specific Plan requires the development of conceptual design guidelines for new central terminals. Thus, the new Terminal 0 and modified facilities are expected to represent an aesthetic improvement within the CTA that would promote the airport's image as a Gateway to the City of Los Angeles. Therefore, impacts to aesthetic and visual resources would be less than significant.

Terminal and airfield improvements within/near the CTA under the LAWA Staff-Recommended Alternative would take place on the airfield and north of Sky Way. These improvements would not obstruct or degrade views of the Theme Building within the CTA.

Additional CTA improvements proposed as part of the LAWA Staff-Recommended Alternative include the relocation of Sky Way eastward between the future Terminal 0 and Sepulveda Boulevard. These modifications involve the relocation of an existing roadway, which would not detract from or constitute the loss of a valued visual resource. Existing views of Sky Way are not notable, and notable views within the CTA would not be altered with the relocation of Sky Way.

Since development of terminal improvements under the LAWA Staff-Recommended Alternative would not degrade features that contribute to the valued aesthetic character of the area, impacts to aesthetic and visual resources would be less than significant. As development of the terminal improvements under the LAWA Staff-Recommended Alternative would not affect views from a designated scenic highway, corridor, or parkway or obstruct valued focal or panoramic views, impacts to views would also be less than significant.

Southern Boundary

Limited improvements would occur near the southern portion of the airport under the LAWA Staff-Recommended Alternative, representing little change from existing conditions. Airfield and terminal modifications would be visible in the distance from upper stories of hotels and office buildings located along the south side of Imperial Highway to Sepulveda Boulevard and motorists along Imperial Highway. Farther west along Imperial Avenue from California Street to Pershing Drive, there are views of the airfield and the CTA and more distant views of the Santa Monica Mountains from viewers on the bluff-top greenbelt and a limited number of taller commercial buildings and elevated residential properties.

Various terminal and airfield modifications under the LAWA Staff-Recommended Alternative would not introduce a new land use that would materially alter the overall visual character of the airfield, CTA, or aircraft operations. Since improvements under the LAWA Staff-Recommended Alternative within the southern boundary would not degrade or remove features that contribute to the valued aesthetic character of the area, impacts on aesthetic and visual resources would be less than significant.

Views of the existing airfield, while of public interest, and more distant views to the CTA, are not scenic. Changes to the north airfield and terminal improvements in the northern portion of the CTA would not alter existing long-range views of the Santa Monica Mountains due to the distance of the proposed improvements and the substantially higher vantage points to the south. Modifications would not affect views from a designated scenic highway, corridor, or parkway. Improvements under the LAWA Staff-Recommended Alternative would not alter valued views in El Segundo of airfield operations, such as arriving and departing aircraft. Accordingly, improvements that would occur near the southern boundary of the airport under the LAWA Staff-Recommended Alternative would not affect views from a designated scenic highway, corridor, or parkway or obstruct/diminish other valued focal or panoramic views; therefore, impacts on views would be less than significant.

Western Boundary

Development in the western boundary area would also be limited under the LAWA Staff-Recommended Alternative. Runway 6L/24R would be extended to the west, and taxiways would be improved and extended near the western end of the site. In order to accommodate the relocation of Runway 6L/24R, and the adjustment to the Runway 6R landing threshold, existing navigational aids within the Dunes and Habitat Restoration Area would be removed and new facilities would be installed and modified to align with proposed runway configurations.

Improvements to the airfield, CTA, and navigational aids would represent a continuation of existing uses and would not introduce a new land use that would materially alter the overall visual character of the airfield, CTA, or aircraft operations. Similar to existing conditions, new and modified navigational aids would be low in profile or would be narrow thin poles that would not materially change the aesthetic character of the Dunes or Habitat Restoration Area. Since improvements under the LAWA Staff-Recommended Alternative within the western boundary would not degrade or remove features that contribute to the valued aesthetic character of the area, impacts on aesthetic and visual resources would be less than significant.

Existing views of the airfield and more distant views to the CTA from public vantage points along Pershing Drive and residential areas north and south of the airport, while of public interest, are not scenic. As stated in Section 4.1 of the SPAS Draft EIR, scenic views of the ocean to the west are obscured by the Dunes. West of Pershing Drive, large areas of the Dunes are undeveloped and somewhat natural in appearance and, accordingly, provide a scenic appearance to pedestrians and motorists along Pershing Drive and to residential areas and public streets north and south of the Dunes. Other areas of the Dunes include remnant residential streets, radar, navigational aids, related safety facilities, and other ancillary facilities, which are not visually prominent from public vantage points along Pershing Drive. Vista del Mar, a City of Los Angeles-designated Scenic Highway, bounds the far westerly edge of the airport property, adjacent to the Dunes. Views of airport facilities are not possible from Vista del Mar due to the intervening Dunes.

The runway improvements under the LAWA Staff-Recommended Alternative would generally occur at grade level and would not block any valued focal or panoramic view of the Dunes. Additionally, with the exception of changes to existing navigational aids, no development would take place in the Habitat Restoration Area, and views of the Dunes and views along Vista del Mar, a City of Los Angeles-designated Scenic Highway, would not materially change.

As discussed previously, in order to accommodate the relocation of Runway 6L/24R, and the adjustment to the Runway 6R landing threshold, existing navigational aids would be removed and new facilities would be installed and modified to align with proposed runway configurations. However, similar to existing conditions, new and modified navigational aids would be low in profile or would be narrow thin poles that would not comprise a noticeable portion of the overall viewshed. Furthermore, the intervening topography of the Dunes makes the navigational aids difficult to see from adjacent roadways. Existing vegetation is low in profile and minimal vegetation would be removed to accommodate new and modified navigational aids.

Since airfield and terminal improvements and the relocation and modification of navigational aids under the LAWA Staff-Recommended Alternative within the western boundary would not affect views from a designated scenic highway, corridor, or parkway or obstruct/diminish other valued focal or panoramic views, impacts on views would be less than significant.

Northern Boundary

Implementation of the LAWA Staff-Recommended Alternative would involve changes to the north airfield, which would include movement of Runway 6L/24R to the north and extension of Runway 6R/24L to the east. Modifications to the north airfield and CTA would be visible from the Westchester Golf Course, residential areas to the north of Lincoln Boulevard, homes located along West 91st Street north of Saint Bernard High School and west of Falmouth Avenue, and homes west of Pershing Drive due to the higher elevation of these areas. However, views of the north airfield and CTA from residential areas north of Lincoln Boulevard and east of the Westchester Golf Course are limited. As described in Section 4.1 of the SPAS Draft EIR, the northern boundary of the LAX Northside project site, along West 88th Place between Sepulveda West Way and the Westchester Golf Course, and then north to Manchester Avenue, is largely screened with 20-foot-high buffers.

Improvements to the north airfield and CTA under the LAWA Staff-Recommended Alternative would represent a continuation of existing airfield uses and would not meaningfully change the aesthetic and visual characteristics of the airfield or CTA. Under the LAWA Staff-Recommended Alternative, Lincoln Boulevard would be realigned to the north, with approximately 540 linear feet below grade and/or covered. The realignment and depression of Lincoln Boulevard would not introduce a new land use that differs substantially from existing conditions.

As discussed in Section 4.1 of the SPAS Draft EIR, future development within LAX Northside would be subject to height restrictions, setback requirements, and landscape guidelines set forth in Appendix A of the LAX Specific Plan, as well as the 1989 LAX Northside Design Plan and Guidelines. Implementation of these conditions would promote a visually open landscaped northern boundary, and setbacks and height limits would reduce aesthetic impacts associated with the airfield modifications.

In addition, LAX Master Plan Commitments DA-1, Provide and Maintain Airport Buffer Areas, and LU-4, Neighborhood Compatibility Program, would further reduce impacts to aesthetic and visual resources along the northern boundary. In particular, LAX Master Plan Commitment DA-1, Provide and Maintain Airport Buffer Areas, requires the provision and maintenance of landscaped buffer areas that will include setbacks, landscaping, screening, or other appropriate view-sensitive improvements with the goals of avoiding land use conflicts, shielding lighting, enhancing privacy, and screening view of airport facilities from adjacent residential areas. LAX Master Plan Commitment LU-4, Neighborhood Compatibility Program, addresses all issues relating to compatible land use, including landscape buffer issues as well as noise, light spill-over, odor, and vibration.

In light of these applicable LAX Master Plan commitments and plan provisions, and given that improvements to the north airfield under the LAWA Staff-Recommended Alternative would not degrade or remove features that contribute to the valued aesthetic character of the area, impacts on aesthetic and visual resources would be less than significant.

Views of the north airfield operations are not scenic although more distant views of the historic Theme Building are visible. Airfield improvements would generally occur at grade level and improvements to the CTA would be comparable in scale, proportion, and massing to existing uses and would not block distant views of valued visual resources, such as the iconic Theme Building. Modifications under the LAWA Staff-Recommended Alternative would not affect views from a designated scenic highway, corridor, or parkway. Furthermore, as discussed previously, future development within LAX Northside would be subject to height restrictions, setback requirements, and landscape guidelines set forth in Appendix A of the LAX Specific Plan, as well as the 1989 LAX Northside Design Plan and Guidelines. Implementation of these conditions would promote a visually open landscaped northern boundary, and setbacks and height limits would reduce visual intrusion or obscuring of distant views.

As improvements occurring under the LAWA Staff-Recommended Alternative within the northern boundary would not affect views from a designated scenic highway, corridor, or parkway or obstruct/diminish other valued focal or panoramic views, impacts on views would be less than significant.

Construction

Construction of airfield, terminal, ground access, and parking improvements under the LAWA Staff-Recommended Alternative would occur during different time periods, and construction of many improvements, such as runway improvements and navigational aids, would not be visually intrusive from surrounding vantage points. However, construction activities would cause some areas of the airport environs to have an incomplete, disrupted, and unattractive quality.

Areas where the construction activities would be most visible include commercial and hotel uses along 98th and 96th Streets; commercial areas north and south of Manchester Square; residential areas and viewers near the relocated portion of Lincoln Boulevard; residential areas northwest of Pershing Drive; and viewers along Imperial Highway, Sepulveda Boulevard south of 96th Street, Pershing Drive, I-405 north of Century Boulevard, I-105, Imperial Highway, and Aviation, Lincoln, Airport, and Century Boulevards.

Under the LAWA Staff-Recommended Alternative, Construction Staging Areas A, B, C, and D would be located along the northern boundary of the airport (see Figure 2-15 in Chapter 2, *Project Description*, of the SPAS Draft EIR). These construction staging areas would be visible from residential areas north of Westchester Parkway, and from the Westchester Golf Course and elevated residential areas northwest and northeast of Pershing Drive. A number of sound walls of varying heights separate some of the residential uses from these construction areas, particularly along West 88th Street. However, the noise walls may not be of sufficient height to block all views of the construction activities, and not all residential areas have such walls. Although Construction Staging Areas A, B, C, and D would be visible to some degree from off-site vantage points, the areas are largely vacant and do not include valued aesthetic resources or notable views. Construction staging equipment and activities would not contrast or be out of character with airfield runways and axillary structures located to the south.

Construction Staging Areas E and F in the mostly vacated Belford and Manchester Square areas would be visible from surrounding commercial, industrial, and surface parking uses. Views of the Manchester Square area would also be visible from the limited number of multi-family homes to the north, some which would have elevated views of the site from upper stories. Construction Staging Areas E and F would also be visible from surrounding roadways. While Construction Staging Areas E and F would be visible to surrounding uses and vantage points, these areas are largely vacant, the existing visual quality in these areas is low, and the areas do not support notable views.

The vacant Continental City site would potentially serve as Construction Staging Area G which would be visible along on Aviation Boulevard, 111th Street, and I-105. Residential areas south of I-105 have limited views of the Continental City site due to the presence of I-105 support pilings, a sound wall, and right-of-way fronting Imperial Highway. Currently, the Continental City site is vacant and does not contain valued aesthetic resources or notable views.

Since these construction staging areas do not contain notable views or valued aesthetic resources, temporary aesthetic and visual impacts related to construction staging areas would be less than significant. Furthermore, impacts related to temporary construction activities would be reduced by LAX Master Plan Mitigation Measure MM-DA-1, Construction Fencing. Specifically, MM-DA-1 would ensure construction fencing and pedestrian canopies would be installed by LAWA to the degree feasible to ensure maximum screening of areas under construction along major public approach and perimeter roadways. Along Century Boulevard, Sepulveda Boulevard, and in other areas where the quality of public views are a high priority, treatment of the fencing would further reduce temporary visual impacts.

Therefore, short-term impacts related to temporary construction activities would not affect views from a designated scenic highway, corridor, or parkway or obstruct/diminish other valued focal or panoramic views; therefore, impacts on views would be less than significant. Similarly, short-term aesthetic and visual impacts related to temporary construction activities would be less than significant.

2.3.1.1.2 Light and Glare

Century Corridor/Eastern Boundary

Under the LAWA Staff-Recommended Alternative, the Manchester Square area would be developed with a lighted parking facility and CONRAC. Development of the parking facility and CONRAC would replace an isolated, predominantly vacant area containing a few remaining residences with some street lights with more and higher intensity light sources. This increase in lighting would be consistent in character with surrounding commercial and industrial development, but would also occur in proximity to two light-sensitive uses including a multi-story apartment complex approximately one-half block to the north, and the Westin Los Angeles Airport Hotel across Century Boulevard to the south.[3]

Although development in the Manchester Square area would result in a change in lighting or lighting intensity, light spill would be minimized. Similar to other development on LAX property, parking facility lighting would be shielded and directed downward to minimize light spillover consistent with LAMC Section 93.0117. Furthermore, the parking facility would be screened and buffered from surrounding land uses by decorative walls, berms, trees, and landscaping, and/or other appropriate mechanisms in accordance with the LAX Street Frontage and Landscape Development Plan Update and LAX Master Plan Commitment DA-1, Provide and Maintain Airport Buffer Areas. Also, the future parking facility

[3] The parking facility would also be constructed adjacent to the Animo Leadership Charter High School. At the publication time of the Notice of Preparation for the SPAS Draft EIR, October 2010 (i.e., the baseline year for the EIR impacts analysis), the Animo Leadership Charter High School was located at the northeast corner of Aviation Boulevard and Arbor Vitae Street, across from Manchester Square. This school, however, has subsequently moved to a new location in Lennox, approximately 2.5 miles from the current site (see http://www.dailybreeze.com/news/ci_21358340/animo-leadership-has-new-lennox-campus-and-new, accessed on December 10, 2012). In order to provide a consistent basis of comparison, the impacts discussion for the LAWA Staff-Recommended Alternative contained herein assumes the location of the Animo Leadership Charter High School to be at its former location at the northeast corner of Aviation Boulevard and Arbor Vitae Street, across from Manchester Square. However, even at its former location, because schools are not in normal use during nighttime hours, schools are not considered light-sensitive uses for purposes of this analysis.

lighting would first undergo LAWA review to ensure that it is placed in such a manner that it does not adversely affect adjacent sensitive receptors consistent with the NCP and LAX Master Plan Commitment LI-3, Lighting Controls. Also, while there would be several new light sources visible from the aforementioned light-sensitive uses under this alternative, the general character of the existing ambient light environment at these receptors would not change appreciably. Compliance with the applicable LAX Master Plan commitments and plans described above would ensure that light spillover onto these uses from LAX parking lot lighting would be minimized such that sensitive uses would not be affected. Impacts related to light spill would thus be less than significant.

As discussed above, the LAWA Staff-Recommended Alternative could result in a new source of glare in the Manchester Square area. However, the parking facility would be subject to the anti-glare requirements of LAX Master Plan Commitment LI-2, Use of Non-Glare Generating Building Materials, which would avoid the generation of substantial glare. Glare from unshielded bright lighting would be avoided through conformance with LAX Master Plan Commitment LI-3, Lighting Controls, which requires that lighting be shielded and focused to avoid glare. Therefore, glare impacts in this area would not adversely affect nighttime views in adjacent areas sensitive to glare, and impacts would be less than significant.

Under the LAWA Staff-Recommended Alternative, between 96th and 98th Streets, the ITF would include public parking, remote passenger and pick up/drop off areas, and indoor waiting areas for passengers and meter/greeters within a multi-story parking structure. This would replace approximately 14 acres of existing commercial, industrial, and surface parking lot uses at the site. Lighting from the ITF would be typical of parking structures and terminal-like facilities, with light emanating from the interior and the rooftop deck equipped with parking lot lighting on light standards. While there are several existing light-sensitive uses (e.g., hotels) along 98th Street that would have views of the ITF, lighting from the ITF would not spillover onto these hotels for the same reasons discussed above with respect to the proposed Manchester Square parking facility. Thus, the impacts of the ITF on light-sensitive uses within this area would be less than significant.

As discussed above, the LAWA Staff-Recommended Alternative could result in new sources of glare in the vicinity of the ITF. However, the ITF would not generate substantial glare as it would be subject to the glare controls of LAX Master Plan Commitment LI-2, Use of Non-Glare Generating Building Materials, LAX Master Plan Commitment LI-3, Lighting Controls, which requires that lighting be shielded and focused downward, the buffering requirements of the LAX Street Frontage and Landscape Development Plan Update, and LAX Master Plan Commitment DA-1, Provide and Maintain Airport Buffer Areas. In addition, the ITF would replace existing uses at the site which already generate glare and, while the ITF would operate during nighttime hours, the parking lot already operates during nighttime hours and security lighting already exists around the commercial and industrial uses and generates glare. Therefore, the glare impacts in this area would not adversely affect nighttime views in areas sensitive to glare, and the impacts would be less than significant.

Throughout the Century Corridor and eastern boundary area, a proposed APM on pilings up to 20 feet above grade would be visible. The route of the APM would extend along 98th and 96th Streets from the proposed Manchester Square parking facility westward to the ITF and CTA. Light sources associated with the APM would include street lighting and lighting from the headlights and interiors of the APM trains. Such light sources would not be expected to generate unusually bright emissions, and, although some APM track lighting could spill off the elevated APM track and onto the uses below, this APM track lighting would be shielded and focused downward consistent with LAMC Section 93.0117 to minimize such spillover. Buffering and landscape treatments would be provided, where possible, in accordance with the LAX Street Frontage and Landscape Development Plan Update; LAX Master Plan Commitment DA-1, Provide and Maintain Airport Buffer Areas; and the NCP. Also, most of the land uses along the proposed APM route are commercial and industrial uses, which are not light-sensitive. The only exceptions are the hotels along the north side of Century Boulevard, including those with rooms oriented towards 98th Street. However, the area around the hotels is presently developed and brightly lit; thus lighting associated with the APM would not be expected to meaningfully increase ambient lighting levels. Furthermore, the 98th Street right-of-way, which includes existing street lights on both sides of 98th

Street, would separate potentially affected hotel uses from the APM alignment, and lighting from APM trains would be focused on 98th Street rather than the hotel uses. Also, while there would be several new light sources visible from the hotels under this alternative, the general character and intensity of the existing ambient light environment at these hotels would not change appreciably and window shades would continue to be employed by guests for privacy and to control outdoor lighting. Therefore, the proposed elevated APM would not result in a change in lighting or lighting intensity such that light would spill off and affect light-sensitive areas, and impacts would be less than significant.

The elevated APM could introduce new sources of glare. However, light from the headlights of APM trains would be similar to or less than existing automotive lighting on the City streets and would occur within a well-lit urban environment. Furthermore, the APM would also not be oriented toward hotel buildings. Also, the APM would not include large expanses of glass or other reflective surfaces, and thus would not generate substantial reflective glare. Therefore, the glare impacts in this area would not adversely affect nighttime views in adjacent areas sensitive to glare, and impacts would be less than significant.

Southern Boundary

The airport improvements proposed under the LAWA Staff-Recommended Alternative closest to the existing light-sensitive uses to the south would include the relocated/new navigational aids proposed in the Habitat Restoration Area west of Pershing Drive, CTA improvements proposed to the northern ends of the TBIT and MSC terminal concourses, and the north airfield runway and taxiway improvements. New sources of light associated with these improvements would include navigational aids, entrance lighting, light emanating from structure interiors, roof perimeter and parapet lights, and security lighting.

As discussed in Section 4.1.3.2.2, of the SPAS Draft EIR, there are a number of intervening features between the light-sensitive uses to the south and the airport property, including Imperial Highway, Imperial Avenue, I-105, the Imperial Strip, and partially opaque airport perimeter fencing or earthen berm. Some of the residences south of Imperial Highway could see the proposed relocated/new navigational aids through the trees of the Imperial Strip, and the navigational aids could be visible from the upper stories of the apartments and hotels south of Imperial Highway. However, navigational aids already exist in both the Habitat Restoration Area and the north airfield, and there would be no net increase in navigational aids. The navigational aids only operate periodically (e.g., when Santa Ana winds require eastward takeoffs and landings) and they are too far from the light-sensitive uses in the southern boundary area to result in light spillover onto these uses. Similarly, some of the residences south of Imperial Highway could see lighting associated with the balance of the proposed improvements through the trees of the Imperial Strip, while the upper floors of the multi-story apartment buildings and hotels could have views of these improvements. However, the closest of these improvements would be the TBIT and MSC concourse extensions, which would be located several thousand feet from these light-sensitive uses. The substantial distance would attenuate the light intensity from these improvements and the balance of the proposed improvements, and light from these improvements would not spill over onto the light-sensitive uses and affect light-sensitive areas. Furthermore, LAX Plan Policy P7 requires the provision of landscaped buffer areas along the southern boundary of Airport Airside to include screening or other mechanisms to shield airport lighting from adjacent residential areas. Therefore, light spillover impacts in this area would be less than significant.

Furthermore, any glare from these proposed improvements would be subject to the anti-glare requirements of LAX Master Plan Commitments LI-2, Use of Non-Glare Generating Building Materials, and LI-3, Light Controls, as well as the buffering requirements of LAX Master Plan Commitment DA-1, Provide and Maintain Airport Buffer Areas, and light shielding and directional requirements of LAMC Section 93.0117. Therefore, the glare impacts in this area would not adversely affect nighttime views in adjacent areas sensitive to glare, and impacts would be less than significant.

Western Boundary

Development within the western boundary area would be limited under the LAWA Staff-Recommended Alternative to the relocation of Runway 6L/24R to the north and extension to the west, construction of a

centerfield taxiway, extension of Taxiway D to the west, and relocated navigational aids within the Dunes and Habitat Restoration Area. Development in this area would not be appreciably intensified, nor would the improvements represent a substantial change or contrast with existing facilities. Nighttime lighting associated with the runway, taxiway and navigational aids modifications would include aviation lighting which is highly visible to aircraft but not to ground-level views.

Light from the aforementioned new and relocated runways and taxiways on the airport property would not result in light spillover into the Dunes or Habitat Restoration Area because of the distance (135 or more feet) between the airport property and the Dunes and Habitat Restoration Area, and the fact that runway and taxiway lights would be at ground level rather than on light standards. Similarly, the runway and taxiways and associated light fixtures would not be constructed of large expanses of reflective materials that could generate substantial reflective glare that would adversely affect nighttime views within this area. Therefore, light and glare impacts within the Dunes and Habitat Restoration Area from proposed runway and taxiway improvements under the LAWA Staff-Recommended Alternative would be less than significant.

Similarly, the relocated navigational aids in the Dunes and Habitat Restoration Area under this alternative would not result in an increase in light spillover into, or generate substantial glare which would adversely affect nighttime views within, these areas. This is because: (1) there would be no net increase in navigational aids; (2) while upgrades would occur to the relocated navigational aids, there would be no increase in light intensity of individual bulbs, no change in the frequency of blinking, and no change in the color spectra; (3) the navigational aids would be directed upward rather than downward; (4) the navigational aids would only operate occasionally, when Santa Ana winds require eastward takeoffs and landings; (5) the navigational aids would not be reconstructed with large expanses of reflective materials; and (6) light and glare from the existing navigational aids and street lights along both Pershing Drive and Vista del Mar already generate light and glare within the Dunes and Habitat Restoration Area such that ambient light and glare conditions in the Dunes and Habitat Restoration Area would not change appreciably under this alternative. Based on relevant data contained in a quantitative lighting study conducted for the LAX Master Plan, it is anticipated that increases in lighting in the vicinity of the Dunes and Habitat Restoration Area under the LAWA Staff-Recommended Alternative would be less than 0.34 footcandles and far below the LAMC 2.0 footcandle threshold.[4,5] Therefore, light and glare impacts in the Dunes and Habitat Restoration Area under the LAWA Staff-Recommended Alternative would be less than significant.

Northern Boundary

Under the LAWA Staff-Recommended Alternative, airport improvements in the northern portion of the airport property would include relocation of Runway 6L/24R 260 feet to the north, and extension of the runway westward; extension of Runway 6R/24L eastward; development of the centerfield taxiway; modifications to Taxiway E and Taxilane D, including the westerly extension of Taxilane D; extension of the TBIT and MSC concourses north; replacement of the Terminal of 3 concourse; development of Terminal 0; and realignment of Lincoln Boulevard to the north, with approximately 540 linear feet below grade and/or covered.

The residential uses north of the airport that have both southern exposures and are elevated on the bluffs would likely have views of some of these improvements. However, the light and glare effects of these improvements would be attenuated by several factors. The distance between the proposed facilities and the closest receptors would range from several hundred to several thousand feet, distances that would

4 City of Los Angeles, Final Environmental Impact Report for Los Angeles International Airport (LAX) Proposed Master Plan Improvements, Section 4.18, April 2004.

5 The LAX Master Plan EIR evaluated four development alternatives, including LAX Master Plan Alternative D, Because the runway, taxiway, and navigational aid improvements within the western boundary area under the LAWA Staff-Recommended Alternative would be less than those under LAX Master Plan Alternative D (e.g., no West Employee Parking Structure and no net increase in navigational aids in the Dunes), it is anticipated that light levels in the Dunes under the LAWA Staff-Recommended Alternative would increase by even less than the 0.34 footcandles projected for under Alternative D. Light impacts in the Dunes under Alternative D were determined to be less than significant in the LAX Master Plan EIR.

substantially attenuate light intensities and any glare from the project. Moreover, an earthen berm and opaque perimeter fence intervene between most of the LAX Northside area and the airport property, thus blocking direct views of the proposed improvements from Manchester Parkway. Farther east, the Westchester Golf Course and a 12-foot-high noise wall atop an 8-foot-high berm buffer the airport from view by residential uses north and immediately east of the golf course. Many of the north airfield improvements would involve the replacement of existing uses, rather than the development of new uses, and thus would not represent new light and glare sources. Lighting from the runways and taxiways, including from the new centerfield taxiway, would be at ground level and directed at oncoming aircraft, and would not result in light and glare impacts off-site. Lighting associated with Terminal 0 would be sufficiently distant as to not result in light impacts off-site. The potential for light and glare impacts would be further reduced by existing requirements to assure that airport development does not result in light spillover onto adjacent properties or the generation of substantial glare, including: the NCP; LAX Master Plan Commitment DA-1, Provide and Maintain Airport Buffer Areas, which requires screening and buffering of airport uses; LAX Master Plan Commitments LI-3, Light Controls, which put controls on lighting to avoid substantial light and glare impacts; and LAMC Section 93.0117 which prohibits light spillover and requires that light sources be shielded and directed downward.[6] Furthermore, with respect to the Lincoln Boulevard realignment under this alternative, associated lighting would also be subject to the light and glare standards of the LAX Northside Plan and Development Guidelines, and to the light standards and objectives of the Los Angeles Transportation Element. Finally, while the concourse improvements under this alternative would be up to several stories in height, the lengthy distance between the concourses and the residences north of the airport, combined with LAX Master Plan Commitment LI-2, Use of Non-Glare Generating Building Materials, would ensure that concourse building facades would not generate substantial glare which could adversely affect nighttime views in adjacent areas sensitive to glare.

Given all of the above factors, while there would be several new light sources visible from the aforementioned light-sensitive uses under this alternative, the general character of the existing ambient light and glare environment at these receptors would not change appreciably. As a result, the LAWA Staff-Recommended Alternative would not result in light spillover onto, and would not generate substantial new sources of glare which would adversely affect nighttime views in, adjacent areas sensitive to glare along the northern boundary area. Therefore light and glare impacts in this area would be less than significant.

Construction

Construction activities associated with improvements under the LAWA Staff-Recommended Alternative would involve nighttime activities that would require lighting of work areas at the construction sites themselves and within the proposed construction staging areas. A number of sound walls of varying heights separate some of the residential uses from these construction areas, particularly along West 88th Street. However, the noise walls may not be of sufficient height to block all light and glare associated with construction activities, and not all residential areas have such walls. Whether or not such noise walls are already present, construction fencing would be installed in accordance with LAX Master Plan Mitigation Measure MM-DA-1, Construction Fencing, to block and/or buffers views of the construction sites and construction staging areas. Also, some of the construction staging areas are already the sites of construction staging activities and, thus, are already a source of construction light and glare. Finally the construction sites and proposed construction staging areas are already located in a well-lit, urban environment. Therefore, although there would be greater levels of ambient lighting during construction in these areas, this light and any associated glare would not result in a change in lighting or lighting intensity such that light would spill off and affect light-sensitive areas, and would not result in substantial new

[6] The LAX Northside Design Plan and Development Guidelines are not included because, while they include substantial controls on future development within the LAX Northside area, they are not applicable to uses in other parts of the airport. Similarly, the LAX Street Frontage and Landscape Development Plan Update is not included because none of the proposed northerly facilities occur along public street frontages and, thus, this plan is not applicable.

sources of glare which would adversely affect nighttime views of adjacent areas sensitive to glare. Therefore, construction light and glare impacts would be less than significant.

2.3.1.2 Mitigation Measures

2.3.1.2.1 Aesthetics

Implementation of LAX Master Plan Commitments DA-1, DA-2, LU-2, and LU-4, and Mitigation Measure MM-DA-1 would ensure that impacts to aesthetic and visual resources and views would remain less than significant for the LAWA Staff-Recommended Alternative in most instances described above. However, even with implementation of these LAX Master Plan commitments and mitigation measures, there would be significant impacts to views of the Theme Building as a result of the implementation of the APM under the LAWA Staff-Recommended Alternative. The following mitigation measure specific to SPAS was developed as part of the historical resources analysis (see Section 2.3.5, *Cultural Resources*, of this chapter) to address impacts to the Theme Building and Setting, and would reduce impacts to views of the Theme Building associated with the LAWA Staff-Recommended Alternative:

- **MM-HA (SPAS)-2. Preservation of Historic Resources: Theme Building and Setting.**

  Consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties, this measure will ensure that the historic character of the Theme Building and Setting will be retained and preserved. The Theme Building's integrity will be preserved and removal of distinctive materials or alteration of features, spaces, and spatial relationships that characterize the Theme Building and contribute to its eligibility will be avoided (Standards for Preservation 1-7). The contributing Setting of the Theme Building shall be protected and maintained (Standards for Rehabilitation and Guidelines for Rehabilitation) and changes to the features and spatial relationships of the CTA shall be undertaken in a manner consistent with the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitation, and shall be compatible with the historic materials, features, size, scale and proportion, and massing of the Theme Building to protect the integrity of the historic resource and its environment (Standards for Rehabilitation 9 and 10).

  The historic features of the Theme Building include the extant original exterior and interior features of the structure such as the base, elevator core, original features of the restaurant space, public viewing platform, structural arches and footings and associated original hardscape/landscape features and circulation elements immediately surrounding the structure (concrete wall/grille around base, pedestrian entrance, patios, planters/planting beds, and pedestrian and vehicular circulation). The removal of distinctive materials or alteration of features, spaces, and spatial relationships that characterize the Theme Building and contribute to its eligibility shall be avoided (Standards for Preservation 1-7). Necessary alterations to the Theme Building shall conform to the Secretary of the Interior's Standards for the Treatment of Historic Properties (Standards for Rehabilitation 9 and 10).

  Changes to the features and spatial relationships of the CTA that may remove or alter features, spaces, and spatial relationships that characterize the Setting of the Theme Building and contribute to the Theme Building's eligibility shall also be avoided (Standards for Rehabilitation 1-7). Necessary alterations to the Theme Building Setting shall conform to the Secretary of the Interior's Standards for Rehabilitation 9 and 10. Contributing features and views of the Theme Building's Setting include:

  - the two Central Service Facility Buildings and a segment of original axial road alignment and associated concrete sidewalks and hardscape;
  - the architectural form of the 1961 Airport Traffic Control Tower and its distinctive control booth;
  - the general character of the airport setting, including the centrally located and visually predominant Theme Building within the U-shaped concourse area, and the horizontal forms, rectangular massing and generally consistent scale and height of the concourse buildings and their Modern architectural character and materials (Jet Age/International Style, rectangular volumes, horizontality, metal and concrete, smooth surfaces, large expanses of glass, and ribbon windows);

- the Primary Axial View between the Theme Building and the 1961 Airport Traffic Control Tower, including the axial road alignment and unobstructed view corridor between the 1961 Airport Traffic Control Tower and the Theme Building, the view to the 1961 Airport Traffic Control Tower from the Theme Building restaurant and public roof-top viewing platform, the view from the 1961 Airport Traffic Control Tower to the Theme Building, and the view from vehicular and pedestrian circulation paths within the immediate vicinity of the Primary Axial view corridor;
- the mid- and long-range outward looking views from the Theme Building's 80-foot level restaurant and the 360-degree views from the roof-top viewing platform, including mid-range views of the concourses and terminals, long-range views of the airfields, and distant views to the surrounding neighborhoods, mountains, and Pacific Ocean;
- direct views of the Theme Building from the U-shaped vehicular and pedestrian circulation paths within the concourse complex where, at a minimum, the upper portions of the Theme Building would be visible; and
- direct views of the Theme Building from the edges of the horizontal concourse levels, including views through the continuous horizontal strip windows directly facing the Theme Building from the south terminals where, at a minimum, the upper portions of the Theme Building would be visible.

Changes to non-contributing features and spatial relationships of the CTA that may indirectly impact the Theme Building and Setting shall be undertaken in a manner consistent with the Secretary of the Interior's Standards for Rehabilitation 9 and 10, and shall be compatible with the historic materials, features, size, scale and proportion, and massing of the Theme Building to protect the integrity of the historic resource and its environment. The design of the APM shall ensure that important contributing views of the north and south elevations of the Theme Building are not materially impaired.

Prior to the final design of the APM, a qualified historic preservation consultant shall be engaged by LAWA to review the compatibility of new design and construction components adjacent to the Theme Building for conformance with Secretary of the Interior's Standards that provide guidelines for sensitively and respectfully managing changes to the defining characteristics of a historic property's site and environment. With regard to adjacent new construction, Standard for Rehabilitation 9 recommends that destruction of historic materials that characterize the property be avoided where feasible, and that adjacent new work shall be compatible with the massing, size, scale, and architectural features of the historical resource to protect the historic integrity of the property and its environment. Standard for Rehabilitation 10 requires that new construction be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired. This mitigation measure and the required Standards conformance review by a qualified historic preservation consultant shall achieve and document compliance with the applicable Standards through the requisite plan reviews and sign-off of plans. In addition, a letter report will be provided to the City of Los Angeles Office of Historic Resources documenting the results.

2.3.1.2.2 Light and Glare

Implementation of LAX Master Plan Commitments LI-2 and LI-3 would ensure that impacts with respect to light and glare associated with the LAWA Staff-Recommended Alternative would be less than significant. Therefore, no mitigation measures specific to SPAS are required.

2.3.1.3 Level of Significance After Mitigation

Implementation of SPAS Mitigation Measure MM-HA (SPAS)-2, Preservation of Historic Resources: Theme Building and Setting, would reduce impacts to views associated with the LAWA Staff-Recommended Alternative within the CTA to a level that is less than significant.

2.3.2 Air Quality

2.3.2.1 Impacts Analysis

As noted in Section 2.3, air quality emissions (of both criteria pollutants and toxic air contaminants) associated with the airfield/terminal components of Alternative 1 were combined with the emissions associated with the ground access components of Alternative 9 to present air quality emissions associated with the LAWA Staff-Recommended Alternative. These combined emissions were then modeled to identify air pollutant concentrations.

2.3.2.1.1 Construction Emissions

Peak daily construction emissions for the LAWA Staff-Recommended Alternative are presented in **Table SRA-2.3.2-1**. As indicated in **Table SRA-2.3.2-1**, the vast majority (80 percent or more) of the construction emissions for the LAWA Staff-Recommended Alternative would be associated with the airfield and terminal improvements. Such improvements include moving Runway 6L/24R 260 feet north and completing related improvements such as covering the Argo Drainage Channel and realigning Lincoln Boulevard, lengthening Runways 6L/24R and 6R/24L, various taxiway and taxilane improvements, and terminal improvements.

Table SRA-2.3.2-1

Peak Daily Construction Emissions

Pollutant/ Source[1]	LAWA Staff-Recommended Alternative lbs/day
CO	
Airfield/Terminal Construction	1,233
Ground Access Construction	281
Grand Total	1,514
Threshold	550
Significant?	**Yes**
VOC	
Airfield/Terminal Construction	259
Ground Access Construction	54
Grand Total	313
Threshold	75
Significant?	**Yes**
NO_x	
Airfield/Terminal Construction	2,926
Ground Access Construction	757
Grand Total	3,683
Threshold	100
Significant?	**Yes**
SO_2	
Airfield/Terminal Construction	3.4
Ground Access Construction	0.8
Grand Total	4.2
Threshold	150
Significant?	**No**
PM10	
Airfield/Terminal Construction	1,441
Ground Access Construction	270
Grand Total	1,711

Table SRA-2.3.2-1

Peak Daily Construction Emissions

Pollutant/ Source[1]	LAWA Staff-Recommended Alternative lbs/day
Threshold	150
Significant?	**Yes**
PM2.5	
Airfield/Terminal Construction	219
Ground Access Construction	44
Grand Total	263
Threshold	55
Significant?	**Yes**

[1] Totals may not add exactly due to rounding.

Sources: Environmental Compliance Solutions, 2012; CDM Smith, 2012.

Under the LAWA Staff-Recommended Alternative, peak daily emissions of SO_2 would not exceed the SCAQMD construction emission thresholds; however, peak daily emissions of CO, VOC, NO_x, PM10, and PM2.5 would exceed the SCAQMD construction emissions thresholds. Therefore, the LAWA Staff-Recommended Alternative construction emissions of CO, VOC, NO_x, PM10, and PM2.5 would be significant.

2.3.2.1.2 Construction Concentrations

Calculations supporting the results presented in the following sections are provided in Attachment 1 of Part II of this Final EIR.

Ambient concentrations resulting from construction-related activities for the LAWA Staff-Recommended Alternative are presented in **Tables SRA-2.3.2-2** and **SRA-2.3.2-3**. **Table SRA-2.3.2-2** addresses CO, NO_2, and SO_2, for which the applicable thresholds of significance require the inclusion of background concentrations (see Table 4.2-6 of the SPAS Draft EIR), and **Table SRA-2.3.2-3** addresses PM10 and PM2.5, which include only the project-related concentrations, without background concentrations, pursuant to the applicable thresholds of significance (see Table 4.2-6 of the SPAS Draft EIR).

As shown in **Table SRA-2.3.2-2**, construction concentrations for the LAWA Staff-Recommended Alternative would exceed the 1-hour NO_2 CAAQS and NAAQS. In addition, PM10 concentrations would exceed the 24-hour and annual CEQA thresholds set by SCAQMD, as shown in **Table SRA-2.3.2-3**. Therefore, the LAWA Staff-Recommended Alternative construction concentrations would be significant for NO_2 and PM10. The LAWA Staff-Recommended Alternative construction concentrations would be less than significant for CO, SO_2, and PM2.5.

Table SRA-2.3.2-2

Peak Construction Concentrations for CO, NO_2, and SO_2

Pollutant/ Source[1]	Averaging Period	LAWA Staff-Recommended Alternative ($\mu g/m^3$)
CO	CAAQS	
Alternative	1-Hour	654
Background	1-Hour	4,581
Total	1-Hour	5,235

Table SRA-2.3.2-2

Peak Construction Concentrations for CO, NO_2, and SO_2

Pollutant/ Source[1]	Averaging Period	LAWA Staff-Recommended Alternative (µg/m³)
Threshold[2]	1-Hour	23,000
Significant?	1-Hour	**No**
	CAAQS/NAAQS	
Alternative	8-Hour	458
Background	8-Hour	2,897
Total	8-Hour	3,355
Threshold[3]	8-Hour	9,000
Significant?	8-Hour	**No**
NO_2	CAAQS	
Alternative	1-Hour	1,016
Background	1-Hour	177
Total	1-Hour	1,193
Threshold[4]	1-Hour	339
Significant?	1-Hour	**Yes**
	NAAQS	
Alternative	1-Hour	837
Background	1-Hour	125
Total	1-Hour	962
Threshold[5]	1-Hour	188
Significant?	1-Hour	**Yes**
	CAAQS	
Alternative	Annual	9
Background	Annual	26
Total	Annual	35
Threshold[6]	Annual	57
Significant?	Annual	**No**
SO_2	CAAQS	
Alternative	1-Hour	2
Background	1-Hour	65
Total	1-Hour	67
Threshold[7]	1-Hour	655
Significant?	1-Hour	**No**
	NAAQS	
Alternative	1-Hour	2
Background	1-Hour	37
Total	1-Hour	39
Threshold[8]	1-Hour	196
Significant?	1-Hour	**No**
	CAAQS	
Alternative	24-Hour	0.1
Background	24-Hour	16
Total	24-Hour	16
Threshold[9]	24-Hour	105
Significant?	24-Hour	**No**

[1] The significance thresholds for CO, NO_2, and SO_2 are based on California and/or National Ambient Air Quality Standards (CAAQS and/or NAAQS) which are absolute thresholds. Therefore, future construction concentrations are determined by adding existing background concentrations to the calculated future airport-related concentrations under a given alternative for comparison to the thresholds.

[2] The 1-Hour CO threshold is the 1-Hour CO CAAQS since this standard is more stringent than the 1-Hour CO NAAQS.

[3] The 8-Hour CO threshold is equivalent to both the 8-Hour CO CAAQS and 8-Hour CO NAAQS.

[4] The 1-Hour NO_2 CAAQS is not to be exceeded.

Table SRA-2.3.2-2

Peak Construction Concentrations for CO, NO_2, and SO_2

Pollutant/ Source[1]	Averaging Period	LAWA Staff-Recommended Alternative ($\mu g/m^3$)

[5] The 1-Hour NO_2 NAAQS is based on the 3-year average of the 98th percentile of daily maximum 1-hour concentrations.
[6] The annual NO_2 threshold is the annual NO_2 CAAQS since this standard is more stringent than the annual NO_2 NAAQS.
[7] The 1-Hour SO_2 CAAQS is not to be exceeded.
[8] The 1-Hour SO_2 NAAQS is based on the 3-year average of the 99th percentile of daily maximum 1-hour concentrations.
[9] The 24-Hour SO_2 CAAQS is not to be exceeded.

Source: CDM Smith, 2012.

Table SRA-2.3.2-3

Peak Construction Concentrations for PM10 and PM2.5

Pollutant/ Source[1]	Averaging Period	LAWA Staff-Recommended Alternative ($\mu g/m^3$)
PM10		
Alternative	24-Hour	41
Threshold	24-Hour	10.4
Significant?	24-Hour	**Yes**
Alternative	Annual	4
Threshold	Annual	1.0
Significant?	Annual	**Yes**
PM2.5		
Alternative	24-Hour	6
Threshold	24-Hour	10.4
Significant?	24-Hour	**No**

[1] The significance thresholds for PM10 and PM2.5 are based on project incremental thresholds developed by SCAQMD. Therefore, future construction concentrations are the values under a given alternative to be compared to the thresholds.

Source: CDM Smith, 2012.

Off-airport peak NO_2 construction-related concentrations are estimated to occur at the western property line of the airport north of the Hyperion Treatment Plant, based on the assumption that much of the construction support equipment/operations would occur in the western portion of the airport south of World Way West, as has been the case for several major construction projects at LAX, such as the South Airfield Improvement Project, the Crossfield Taxiway Project, and the Bradley West Project. Key construction support equipment/operations are assumed to include a concrete/asphalt batch plant(s) and rock crusher, and associated equipment such as loaders and concrete/materials transfer trucks, and construction delivery/haul staging. These facilities and activities would contribute the majority of the NO_2 emissions that drive the peak emissions, while the NO_2 emissions associated with overall construction activities in the north airfield (i.e., runway and taxiway improvements) would be a secondary contributor to the peak NO_2 concentrations.

The peak 24-hour and annual PM10 concentrations are estimated to occur just east of the CTA, near the intersection of Century Boulevard and Sepulveda Boulevard. The sources contributing to this peak concentration would include the construction of the proposed APM, north airfield improvements and north concourse improvements along with the bridge and roadway modifications at the entrance to the CTA.

2.3.2.1.3 Operational Emissions

Operational emissions for the LAWA Staff-Recommended Alternatives are presented in **Tables SRA-2.3.2-4** and **SRA-2.3.2-5**. **Table SRA-2.3.2-4** indicates the change from baseline (2009) conditions relative to each emissions source (i.e., aircraft, APU, GSE, on- and off-airport roadways, parking facilities, and on-airport stationary sources) that would occur. For **Table SRA-2.3.2-4**, the incremental project operational emissions were determined by calculating total airport emissions in 2025 after implementation of the alternative, then subtracting the baseline (2009) emissions. The incremental project emissions for the LAWA Staff-Recommended Alternative were then compared to the significance thresholds for operations that are presented in Table 4.2-5 of the SPAS Draft EIR.

Table SRA-2.3.2-4

Incremental Project Operational Emissions Compared to Baseline (2009) Conditions

Pollutant/Source[1]	LAWA Staff-Recommended Alternative lbs/day
CO	
Aircraft[2]	7,649 to 10,222
APU[2]	157 to 166
GSE[3]	1,222
On-Airport Parking	-2,031
On-Airport Roadways	-1,375
On-Airport Stationary[4]	<1
Total On-Airport	5,631 to 8,194
Off-Airport Roadways	-35,133
Off-Airport Stationary[5]	8
Total Off-Airport	-35,125
Grand Total	-29,494 to -26,931
Threshold	550
Significant?	**No**
VOC	
Aircraft[2]	1,358 to 1,695
APU[2]	15 to 16
GSE[3]	-187
On-Airport Parking	-375
On-Airport Roadways	-136
On-Airport Stationary[4]	<1
Total On-Airport	677 to 1,013
Off-Airport Roadways	-2,363
Off-Airport Stationary[5]	<1
Total Off-Airport	-2,363
Grand Total	-1,686 to -1,350
Threshold	55
Significant?	**No**
NO_x	
Aircraft[2]	9,585 to 10,034
APU[2]	275 to 280
GSE[3]	-1,150
On-Airport Parking	-1,356
On-Airport Roadways	-577
On-Airport Stationary[4]	<1
Total On-Airport	6,783 to 7,227

Table SRA-2.3.2-4

Incremental Project Operational Emissions Compared to Baseline (2009) Conditions

Pollutant/Source[1]	LAWA Staff-Recommended Alternative lbs/day
Off-Airport Roadways	-14,982
Off-Airport Stationary[5]	1
Total Off-Airport	-14,981
Grand Total	-8,199 to -7,754
Threshold	55
Significant?	**No**
SO_2	
Aircraft[2]	859 to 1,003
APU[2]	33 to 34
GSE[3]	0
On-Airport Parking	< 1
On-Airport Roadways	< 1
On-Airport Stationary[4]	< 1
Total On-Airport	893 to 1,036
Off-Airport Roadways	< 1
Off-Airport Stationary[5]	< 1
Total Off-Airport	0
Grand Total	893 to 1,036
Threshold	150
Significant?	**Yes**
PM10	
Aircraft[2]	97 to 107
APU[2]	27 to 28
GSE[3]	-37
On-Airport Parking	-28
On-Airport Roadways	<1
On-Airport Stationary[4]	<1
Total On-Airport	60 to 69
Off-Airport Roadways	2,450
Off-Airport Stationary[5]	1
Total Off-Airport	2,450
Grand Total	2,510 to 2,519
Threshold	150
Significant?	**Yes**
PM2.5	
Aircraft[2]	97 to 107
APU[2]	27 to 28
GSE[3]	-36
On-Airport Parking	-41
On-Airport Roadways	-19
On-Airport Stationary[4]	<1
Total On-Airport	29 to 38
Off-Airport Roadways	118
Off-Airport Stationary[5]	1
Total Off-Airport	119
Grand Total	149 to 157
Threshold	55
Significant?	**Yes**

[1] Project operational emissions are determined by subtracting existing airport emissions (see Table 4.2-4 of the SPAS Draft EIR) from future airport emissions for each alternative. Totals may not add exactly due to rounding.

Table SRA-2.3.2-4

Incremental Project Operational Emissions Compared to Baseline (2009) Conditions

Pollutant/Source[1]	LAWA Staff-Recommended Alternative lbs/day

[2] Ranges in aircraft and APU emissions were developed from various weather conditions that impact airfield activity. The low end of the range typically represents good visibility with less spacing required between aircraft, and the high end of the emission range typically represents poor weather conditions with greater spacing between aircraft and more ground delay time.

[3] GSE operations and activity levels are assumed to be directly related to aircraft activity levels; therefore, GSE emissions are the same for all future alternatives since aircraft activity is the same for all alternatives in 2025.

[4] On-airport stationary sources are natural gas combustion units for space heating and water heating.

[5] Off-airport stationary sources are natural gas combustion electric power generators supplying electricity to project facilities. It is estimated that 22 percent of LADWP power is produced in the South Coast Air Basin (Los Angeles Department of Water and Power, 2011 Power Integrated Resource Plan, December 22, 2011).

Source: CDM Smith, 2012.

Table SRA-2.3.2-5

Peak Daily Project Operational Emissions Compared to Alternative 4 (2025)

Pollutant/Source[1]	LAWA Staff-Recommended Alternative lbs/day
CO	
Aircraft[2]	-4,039 to -499
APU[2]	-3 to 0
GSE[3]	-1
On-Airport Parking	-58
On-Airport Roadways	-19
On-Airport Stationary[4]	<1
Total On-Airport	-4,119 to -577
Off-Airport Roadways	-181
Off-Airport Stationary[5]	7
Total Off-Airport	-173
Grand Total	-4,293 to -750
Threshold	550
Significant?	**No**
VOC	
Aircraft[2]	-532 to -86
APU[2]	0
GSE[3]	-1 to 0
On-Airport Parking	-38
On-Airport Roadways	-2
On-Airport Stationary[4]	<1
Total On-Airport	-572 to -127
Off-Airport Roadways	-37
Off-Airport Stationary[5]	<1
Total Off-Airport	-36
Grand Total	-608 to -163
Threshold	55
Significant?	**No**
NO_x	
Aircraft[2]	-809 to -119
APU[2]	-2 to -1
GSE[3]	-17 to -1

Table SRA-2.3.2-5

Peak Daily Project Operational Emissions Compared to Alternative 4 (2025)

Pollutant/Source[1]	LAWA Staff-Recommended Alternative lbs/day
On-Airport Parking	-118
On-Airport Roadways	-5
On-Airport Stationary[4]	<1
Total On-Airport	-933 to -259
Off-Airport Roadways	-167
Off-Airport Stationary[5]	1
Total Off-Airport	-166
Grand Total	-1,100 to -425
Threshold	55
Significant?	**No**
SO_2	
Aircraft[2]	-236 to -28
APU[2]	0
GSE[3]	0
On-Airport Parking	0
On-Airport Roadways	0
On-Airport Stationary[4]	0
Total On-Airport	-236 to -28
Off-Airport Roadways	0
Off-Airport Stationary[5]	0
Total Off-Airport	0
Grand Total	-236 to -28
Threshold	150
Significant?	**No**
PM10	
Aircraft[2]	-17 to -2
APU[2]	0
GSE[3]	0
On-Airport Parking	-22
On-Airport Roadways	-7
On-Airport Stationary[4]	<1
Total On-Airport	-46 to -31
Off-Airport Roadways	-69
Off-Airport Stationary[5]	1
Total Off-Airport	-69
Grand Total	-114 to -100
Threshold	150
Significant?	**No**
PM2.5	
Aircraft[2]	-17 to -2
APU[2]	0
GSE[3]	0
On-Airport Parking	-4
On-Airport Roadways	-1
On-Airport Stationary[4]	<1
Total On-Airport	-23 to -8
Off-Airport Roadways	-17
Off-Airport Stationary[5]	1
Total Off-Airport	-16
Grand Total	-39 to -24
Threshold	55
Significant?	**No**

Table SRA-2.3.2-5

Peak Daily Project Operational Emissions Compared to Alternative 4 (2025)

Pollutant/Source[1]	LAWA Staff-Recommended Alternative lbs/day

[1] The operational emissions presented in this table represent the incremental differences of the LAWA Staff-Recommended Alternative's emissions compared to those of Alternative 4. Emissions are based on 2025 activity levels, with Alternative 4 representing the future scenario with the fewest airport improvements compared to the LAWA Staff-Recommended Alternative. Totals may not add exactly due to rounding.

[2] Ranges in aircraft and APU emissions were developed from various weather conditions that impact airfield activity. The low end of the range typically represents good visibility with less spacing required between aircraft, and the high end of the emission range typically represents poor weather conditions with greater spacing between aircraft and more ground delay time.

[3] GSE operations and activity levels are assumed to be directly related to aircraft activity levels; therefore, GSE emissions are the same for all future alternatives since aircraft activity is the same for all alternatives in 2025.

[4] On-airport stationary sources are natural gas combustion units for space heating and water heating.

[5] Off-airport stationary sources are natural gas combustion electric power generators supplying electricity to project facilities. It is estimated that 22 percent of LADWP power is produced in the South Coast Air Basin (Los Angeles Department of Water and Power, 2011 Power Integrated Resource Plan, December 22, 2011).

Source: CDM Smith, 2012.

For **Table SRA-4.1.2-5**, the incremental project operational emissions were determined by calculating total airport emissions in 2025 after implementation of the alternative, then subtracting the Alternative 4 (2025) emissions. The incremental project emissions were then compared to the significance thresholds for operations that are presented in Table 4.2-5 of the SPAS Draft EIR. The results of that comparison, relative to Alternative 4 conditions, are delineated in **Table SRA-2.3.2-5**. Alternative 4 represents the future scenario with the least amount of airfield improvements, and thus provides a basis for comparing alternatives with the same level of aircraft activity.

In each of these emissions tables, a range of aircraft emissions is presented which represents the range of daily emissions that might occur due to different weather conditions. The high end of the emission ranges for aircraft typically represents poor weather conditions that result in greater engine-on ground delays. The grand total maximum values for the LAWA Staff-Recommended Alternative are compared to the significance thresholds.

As shown in **Table SRA-2.3.2-4**, many of the pollutant emissions associated with the LAWA Staff-Recommended Alternative are shown as negative values, indicating that the emissions associated with each alternative in 2025 would be lower than the existing emissions in the baseline (2009) conditions. In most cases, these negative values are due primarily to reductions in emissions from on-road motor vehicles (cars and trucks carrying passengers and cargo to and from the airport). As emission standards for motor vehicles continue to become more stringent over time, and the motor vehicle fleet is replaced with newer, less-polluting cars and trucks, the daily emissions from these sources decrease substantially when compared to baseline (2009) conditions. The reduction in motor vehicle emissions occurs even though the total VMT for airport-related trips increases between the baseline (2009) period and 2025. As reflected in **Table SRA-2.3.2-4**, this emissions reduction more than compensates for the growth in emissions from aircraft and APUs for all gaseous pollutants except SO_2. Fuel sulfur content for motor vehicle fuels, as well as for aircraft fuel, does not change between the baseline (2009) condition and 2025; therefore, SO_2 emissions would increase relative to the baseline (2009) condition as noted above. In addition, fugitive road dust emission factors are assumed to remain constant between 2009 and 2025; thus, PM10 and PM2.5 emissions would increase relative to the growth in vehicle trips between 2009 and 2025.

Table SRA-2.3.2-5 was developed to provide a more direct comparison between alternatives, delineating changes in emissions that are primarily attributable to the specific characteristics of each alternative, while controlling for effects of emissions standards common to all alternatives. Of the fully developed alternatives analyzed in the SPAS Draft EIR, Alternative 4 has the least amount of improvements and most closely represents a future (2025) "no Yellow Light Projects" scenario, from which to measure the differences in emissions that would occur with implementation of the improvements associated with each other alternative. It should be noted that Alternative 4 does not represent a future scenario with no airport improvements related to air quality impacts, as inclusion of a CONRAC (and associated consolidation/reduction of rental car company shuttle travel) in Alternative 4 provides some air quality benefits not achieved in the other alternatives, as further described below. The modeling assumptions associated with Alternative 4 do, however, account for the continued implementation of more stringent motor vehicle emissions standards and cleaner vehicle fleets in the future that would also occur with all the other alternatives, including the LAWA Staff-Recommended Alternative. In so doing, the differences between vehicular source emissions shown in **Table SRA-2.3.2-5** are more illustrative of the differences in ground access improvements between the alternatives.

Using Alternative 4 as a basis of comparison also better represents the differences in aircraft emissions that are directly attributable to the different airfield configurations currently being considered. Under Alternative 4, the only airfield improvement would be the eastward extension of Runway 6R/24L, which would be solely to provide for additional runway safety area in accordance with FAA requirements and would not alter existing airfield operations. Within **Table SRA-2.3.2-4**, the incremental aircraft emissions associated with the LAWA Staff-Recommended Alternative in 2025 (i.e., buildout year) are measured against the existing aircraft emissions in the baseline (2009) condition. As such, the incremental aircraft emissions of the LAWA Staff-Recommended Alternative include both the growth in aircraft activity anticipated to occur between 2009 and 2025, which is common to all alternatives, and the changes in aircraft operations that are attributable to the proposed airfield configuration specific to the LAWA Staff-Recommended Alternative. The vast majority of the aircraft emissions increases shown in **Table SRA-2.3.2-4** are due to the anticipated growth in aircraft activity. **Table SRA-2.3.2-5** presents the incremental aircraft emissions associated with the LAWA Staff-Recommended Alternative in 2025 as measured against the 2025 emissions of Alternative 4. The same aircraft activity level and fleet mix are assumed for all alternatives, including the LAWA Staff-Recommended Alternative, in 2025. As such, the incremental aircraft emissions shown in **Table SRA-2.3.2-5** are only influenced by the differences in the airfield configuration specific to the LAWA Staff-Recommended Alternative. It should be noted that conclusions regarding whether the incremental emissions would result in a significant impact are based on the comparisons in **Table SRA-2.3.2-4**. The comparisons in **Table SRA-2.3.2-5**, which include a delineation of the SCAQMD threshold for each criteria pollutant, are provided for informational purposes only.

Comparison to Baseline (2009) Conditions

Project operational emissions of SO_2, PM10, and PM2.5 would exceed the daily operational thresholds. Therefore, the LAWA Staff-Recommended Alternative operational emissions of SO_2, PM10, and PM2.5 would be significant relative to baseline (2009) conditions. Aircraft and APUs are the sources of increased SO_2 emissions. Fugitive road dust is the primary source of increased PM10 and PM2.5 emissions.

Daily operational thresholds would not be exceeded for total emissions of CO, VOC, and NO_x. These pollutant emissions would not exceed their respective thresholds mainly because of ongoing implementation of more stringent motor vehicle emissions standards and cleaner future fleet mixes in the future, as described above in the introduction to the operational emissions impacts analysis. These anticipated reductions in future motor vehicle emissions would more than offset the estimated increases in other types of emissions, such as from aircraft, APU, and GSE.

The majority of emissions that would increase in the future under the LAWA Staff-Recommended Alternative would be from aircraft. If one were to consider airfield emissions (aircraft, APU, and GSE) alone under the LAWA Staff-Recommended Alternative, the thresholds of significance would be

exceeded for all criteria pollutants, except PM10; however, based on total emissions compared to baseline (2009) conditions, only the emissions of SO_2, PM10, and PM2.5 would be a significant impact.

Comparison to 2025 Conditions Using Alternative 4 as Basis of Comparison

As shown in **Table SRA-2.3.2-5**, the airside-related (aircraft, APU, and GSE) criteria pollutant peak daily emissions associated with the LAWA Staff-Recommended Alternative would range from approximately 2 to 4,040 lbs/day less than would otherwise occur under Alternative 4, depending upon the pollutant and weather condition. This comparative decrease in airside-related emissions is due primarily to reduced aircraft taxi/idle time associated with aircraft moving more efficiently on the ground with the proposed airfield improvements. Roadway- and parking-related emissions associated with the LAWA Staff-Recommended Alternative would also be less than those of Alternative 4, with the primary distinguishing factor being that the LAWA Staff-Recommended Alternative has an APM (reducing the number of shuttle bus trips to and from the airport).

2.3.2.1.4 Operational Concentrations

Ambient concentrations resulting from operations, including background concentrations, for CO, NO_2, and SO_2 under the LAWA Staff-Recommended Alternative are presented in **Table SRA-2.3.2-6** and compared to the appropriate NAAQS and CAAQS. Since the project is located in a nonattainment area for PM10 and PM2.5, the project concentrations are compared against the SCAQMD significance thresholds for short term and annual PM10 and PM2.5, instead of the NAAQS or CAAQS. The PM10 and PM2.5 project concentrations are shown in **Table SRA-2.3.2-7**.

Table SRA-2.3.2-6

Peak Operational Concentrations including Background

Pollutant/Source[1]	Averaging Period	LAWA Staff-Recommended Alternative (µg/m^3)
CO	CAAQS	
Alternative	1-Hour	1,222 to 1,856
Background	1-Hour	4,581
Total	1-Hour	5,803 to 6,437
Threshold[2]	1-Hour	23,000
Significant?	1-Hour	**No**
	CAAQS/NAAQS	
Alternative	8-Hour	302 to 487
Background[3]	8-Hour	2,897
Total	8-Hour	3,199 to 3,384
Threshold[4]	8-Hour	10,000
Significant?	8-Hour	**No**
NO_2	CAAQS	
Alternative	1-Hour	356 to 686
Background	1-Hour	177
Total	1-Hour	533 to 863
Threshold[5]	1-Hour	339
Significant?	1-Hour	**Yes**
	NAAQS	
Alternative	1-Hour	155 to 189
Background	1-Hour	125
Total	1-Hour	279 to 313
Threshold[6]	1-Hour	188
Significant?	1-Hour	**Yes**
	CAAQS/NAAQS	
Alternative	Annual	17
Background	Annual	26
Total	Annual	43
Threshold[7]	Annual	57
Significant?	Annual	**No**

Table SRA-2.3.2-6

Peak Operational Concentrations including Background

Pollutant/Source[1]	Averaging Period	LAWA Staff-Recommended Alternative (µg/m^3)
SO_2	CAAQS	
Alternative	1-Hour	158 to 273
Background	1-Hour	65
Total	1-Hour	224 to 339
Threshold[8]	1-Hour	655
Significant?	1-Hour	**No**
	NAAQS	
Alternative	1-Hour	82 to 104
Background	1-Hour	37
Total	1-Hour	119 to 140
Threshold[9]	1-Hour	196
Significant?	1-Hour	**No**
	NAAQS	
Alternative	3-Hour	81 to 92
Background	3-Hour	10
Total	3-Hour	91 to 103
Threshold[10]	3-Hour	1,300
Significant?	3-Hour	**No**
	CAAQS/NAAQS	
Alternative	24-Hour	14 to 19
Background	24-Hour	16
Total	24-Hour	30 to 35
Threshold[11]	24-Hour	105
Significant?	24-Hour	**No**
	NAAQS	
Alternative	Annual	6
Background	Annual	3
Total	Annual	9
Threshold[11]	Annual	80
Significant?	Annual	**No**

1 The significance thresholds for CO, NO_2, and SO_2 are based on California and/or National Ambient Air Quality Standards (CAAQS and/or NAAQS) which are absolute thresholds. Therefore, future operational concentrations are determined by adding existing background concentrations to the calculated future airport-related concentrations under a given alternative for comparison to the thresholds. Totals may not add exactly due to rounding.

2 The 1-Hour CO threshold is the 1-Hour CO CAAQS since this standard is more stringent than the 1-Hour CO NAAQS.

3 Although the CAAQS and NAAQS background design value are different, because the standards are the same and CAAQS background is higher, this represents a more conservative value.

4 The 8-Hour CO threshold is equivalent to both the 8-Hour CO CAAQS and 8-Hour CO NAAQS. Although the CAAQS and NAAQS background design value are different, because the standards are the same and CAAQS background is higher, this represents a more conservative value.

5 The 1-Hour NO_2 CAAQS is not to be exceeded.

6 The 1-Hour NO_2 NAAQS is based on the 3-year average of the 98th percentile of daily maximum 1-hour concentrations.

7 The annual NO_2 threshold is the annual NO_2 CAAQS since this standard is more stringent than the annual NO_2 NAAQS.

8 The 1-Hour SO_2 CAAQS is not to be exceeded.

9 The 1-Hour SO_2 NAAQS is based on the 3-year average of the 99th percentile of daily maximum 1-hour concentrations.

10 The 3-Hour SO_2 NAAQS is not to be exceeded more than once per year.

11 The 24-Hour SO_2 NAAQS and CAAQS, and annual SO_2 NAAQS, are not to be exceeded.

Source: CDM Smith, 2012.

Table SRA-2.3.2-7

Peak Incremental Operational Concentrations for PM10 and PM2.5

Pollutant/Source[1]	Averaging Period	LAWA Staff-Recommended Alternative (µg/m^3)
PM10		
Alternative	24-Hour	2.3 to 2.4
Threshold	24-Hour	2.5
Significant?	24-Hour	**Yes**[2]
Alternative	Annual	1.2
Threshold	Annual	1.0
Significant?	Annual	**Yes**
PM2.5		
Alternative	24-Hour	0.8 to 2.1
Threshold	24-Hour	2.5
Significant?	24-Hour	**No**

1 The significance thresholds for PM10 and PM2.5 are based on project incremental thresholds developed by SCAQMD. Therefore, future operational concentrations are the values under a given alternative to be compared to the thresholds.

2 The project increment for the LAWA Staff-Recommended Alternative is just under the significance threshold. Given that the peak daily concentrations for all other alternatives are higher than the threshold, and that there is a very small margin between the peak daily concentration for the LAWA Staff-Recommended Alternative and the threshold, the lead agency is identifying the PM2.5 project concentration as significant.

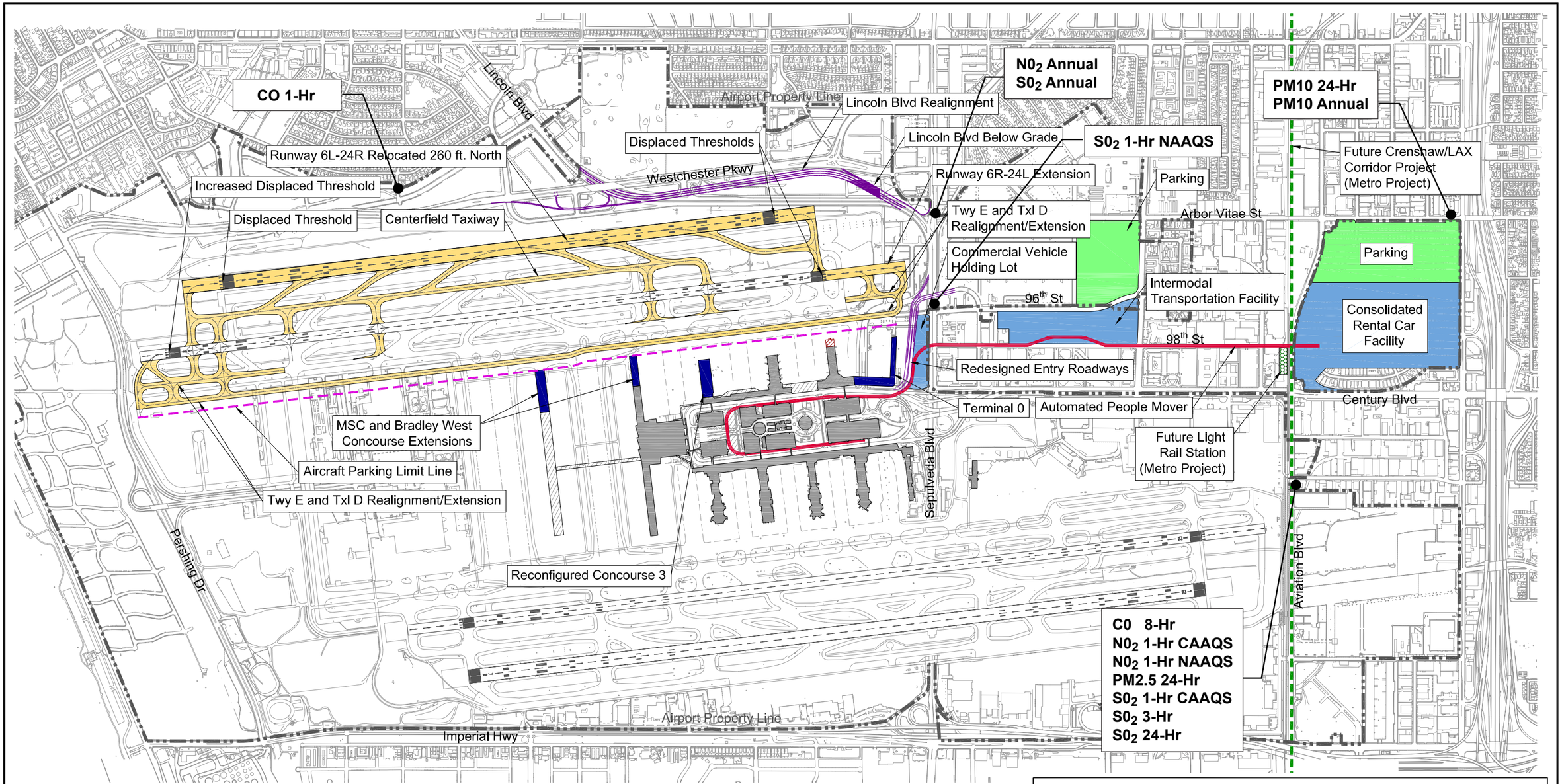
Source: CDM Smith, 2012.

Operational impacts of the LAWA Staff-Recommended Alternative in 2025 were analyzed using the methods described in Section 4.2.2.2 of the SPAS Draft EIR. The estimated operational concentrations shown in **Table SRA-2.3.2-6** indicate that, with the exception of the 1-hour NO_2 CAAQS and NAAQS, all other NAAQS or CAAQS for CO, NO_2, and SO_2 would not be exceeded. As shown in **Table SRA-2.3.2-7**, the project incremental concentrations of PM10 would exceed the SCAQMD significance thresholds, and incremental concentrations of PM2.5 would not exceed the thresholds.

Implementation of the LAWA Staff-Recommended Alternative would exceed the 1-hour NAAQS for NO_2, the 1-hour CAAQS for NO_2, and the SCAQMD significance thresholds for PM10; therefore, the LAWA Staff-Recommended Alternative operational concentrations would be significant for NO_2 and PM10. Aircraft in the takeoff mode would contribute over 95 percent to the peak 1-hour NO_2 concentrations, and the peak 1-hour NO_2 impact locations would be on the LAX property line east of Runway 25R. Emissions from the parking lot and CONRAC located at Manchester Square contribute to the peak daily and annual PM10 concentrations. The peak impact location for PM10 is the northeast corner of Manchester Square. Peak impact locations for each pollutant and averaging period for the LAWA Staff-Recommended Alternative are shown in **Figure SRA-2.3.2-1**. The extent to which these standards would be exceeded under the LAWA Staff-Recommended Alternative would be less than the exceedance that would otherwise occur under Alternative 4 (i.e., future NO_2 NAAQS and PM10 concentrations would be higher if the LAWA Staff-Recommended Alternative improvements were not made to the airfield).

2.3.2.2 Mitigation Measures

With respect to all construction-related impacts from air emissions associated with the SPAS project, including the LAWA Staff-Recommended Alternative, LAWA is committed to mitigating temporary construction-related emissions to the maximum extent feasible and has established some of the most aggressive construction emissions reduction measures in Southern California, particularly with regard to requiring construction equipment to be equipped with emissions control devices. The framework



Note: Improvements depicted are conceptual only and do not represent engineered design.

0 1,500 ft
Scale north

Prepared by: Ricondo & Associates, Inc., 2012.

Legend

- Airfield Improvements
- Terminal Improvements
- Terminal Demolition
- Non-SPAS Terminal Improvements
- Aircraft Parking Limit Line
- Ground Access Facilities
- Parking
- Automated People Mover (APM)
- Future Metro Light Rail Project
- Roadway Improvements

LAX Specific Plan Amendment Study Final EIR

Peak Operational Concentrations Locations
LAWA Staff - Recommended Alternative

Figure
SRA - 2.3.2-1

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identified in the MPAQ for reducing air emissions associated with construction of the Master Plan and the specific means for implementing the mitigation measures described in Section 4.2.5 of the SPAS Draft EIR, as well as all of the measures identified in Table 4.2-8 of the SPAS Draft EIR, would be used to reduce air emissions associated with implementation of the SPAS project. In addition, LAWA has identified a SPAS-specific mitigation measure, MM-AQ (SPAS)-1, that would further address construction-related emissions associated with the SPAS alternatives, including the LAWA Staff-Recommended Alternative. These mitigation measures establish a commitment and process for incorporating all technically feasible air quality mitigation measures into each component of the SPAS project as each element of that project is constructed. At a programmatic level, this provides the most comprehensive means of ensuring air emissions will be reduced to the maximum extent feasible. In addition, the *LAWA Sustainable Airport Planning, Design and Construction Guidelines* encourage contractors to implement a number of voluntary measures that would reduce criteria pollutant and greenhouse gas emissions. Through the sustainability program, contractors are encouraged to implement such measures as: further reduce vehicle and equipment idling times; comply with Tier 4 emission standards for non-road diesel equipment; retrofit existing diesel equipment with particulate filters and oxidation catalysts; replace aging equipment with new low-emission models; and consider the use of alternative fuels for construction equipment. There are no additional feasible measures that could be adopted at this time to reduce air emissions further.

It is estimated that the LAWA Staff-Recommended Alternative would have significant impacts relative to operational emissions of SO_2, operational concentrations of NO_2, and operational concentrations of SO_2. As indicated in the impacts discussion above, the vast majority (over 95 percent) of the emissions contributing to those significant impacts (i.e., causing exceedances of the applicable 1-hour CAAQS and NAAQS) would occur from aircraft during takeoff. Other than potential future improvements in aircraft engine technology and associated reductions in air pollutant emissions, there are no feasible means to mitigate emissions during aircraft takeoff because the only measures are related to aircraft operational options, such as reduced thrust take-off, which are at the sole discretion of the pilot. However, as noted above, LAWA is committed to mitigating operational air quality impacts to the maximum extent feasible. The specific measures (i.e., MM-AQ-3, Transportation-Related Mitigation Measures, and MM-AQ-4, Operations-Related Mitigation Measures) described in Section 4.2.5 of the SPAS Draft EIR would also be applied to the SPAS project. In addition, LAWA has identified two SPAS-specific mitigation measures, MM-AQ (SPAS)-1 and MM-AQ (SPAS)-2, that would further address transportation- and operations-related impacts associated with the SPAS alternatives, including the LAWA Staff-Recommended Alternative. Although these measures would not mitigate operational impacts to a level that is less than significant, they would reduce impacts associated with the LAWA Staff-Recommended Alternative to the maximum extent feasible. When the specific elements of the SPAS project are implemented, additional project-specific mitigation measures may be identified to further reduce air quality impacts.

2.3.2.3 Level of Significance After Mitigation

Even with implementation of feasible construction-related mitigation measures, the maximum daily construction-related emissions associated with the LAWA Staff-Recommended Alternative would be significant for CO, VOC, NO_x, PM10, and PM2.5. Construction-related concentrations of NO_2 and PM10 would also be significant for the LAWA Staff-Recommended Alternative.

Even with implementation of feasible operations-related mitigation measures, the maximum daily operational emissions associated with the LAWA Staff-Recommended Alternative would be significant for SO_2, PM10, and PM2.5. Operational concentrations of NO_2 and PM10 would be significant for the LAWA Staff-Recommended Alternative.

2.3.3 Biological Resources

2.3.3.1 Impacts Analysis

As noted in Section 2.3, impacts of the LAWA Staff-Recommended Alternative on biological resources are associated with the airfield/terminal components of Alternative 1 and the ground access components of Alternative 9, as evaluated in Section 4.3.6 of the SPAS Draft EIR, Habitats/Vegetation Associations.

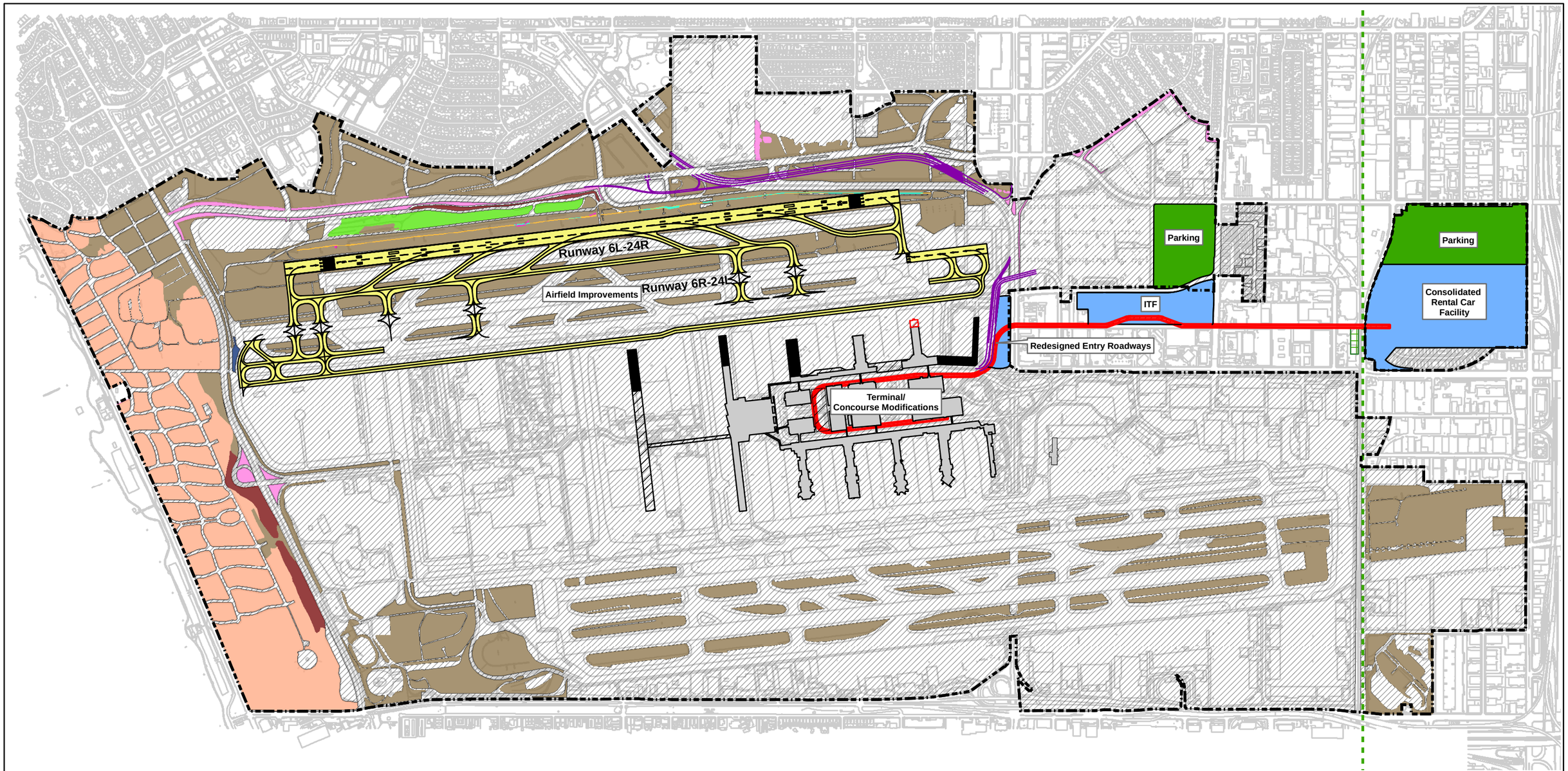
The analysis of impacts to habitats and vegetation associations is presented in two parts. The first part addresses impacts associated with development of the north airfield--including the relocation of Runway 6L/24R and associated high-speed taxiway exits, the construction of a centerfield taxiway, the reconstruction of the western portion of Taxiway E and the westerly extension of Taxilane D, and the structural covering of the Argo Drainage Channel--as well as the use of construction staging areas around the perimeter of the airport. Also considered in the analysis are the roadway modifications, terminal/concourse modifications, Intermodal Transportation Facility (ITF), Consolidated Rental Car Facility (CONRAC), Automated People Mover (APM), and parking area on the eastern side of the airport; however, as these facilities would occur in areas that are currently either developed or highly disturbed on the east side of the airport and well-removed from sensitive biological resources, these improvements are not discussed further in this section, with the exception of vegetation in developed areas that may support nesting birds. The second part addresses impacts specifically associated with the relocation of navigational aids. The analysis of navigational aids considers impacts associated with new light standards and foundations. At this level of planning, the location of construction staging areas and temporary access roads associated with the relocation of the navigational aids, and potential permanent service roads for navigational aids, have not yet been determined. However, as discussed in Section 4.3.2 of the SPAS Draft EIR, the extent of the new permanent service roads has been estimated based on plans generated for the LAX Master Plan EIR (Alternative D), and impacts based on these estimates are considered herein.

North Airfield and Construction Staging Areas

Figure SRA-2.3.3-1 depicts impacts to vegetation associations under the LAWA Staff-Recommended Alternative associated with development of the north airfield and use of construction staging areas. (For ease of viewing the vegetation associations, not all proposed project improvements are labeled in **Figure SRA-2.3.3-1**. Refer to Figure SRA-2.1-1 of this chapter for a complete depiction of all improvements associated with the LAWA Staff-Recommended Alternative, and Figure 2-15 of the SPAS Draft EIR for proposed construction staging areas.) The acreage of each vegetation association affected by the LAWA Staff-Recommended Alternative, and the acreage that would remain following implementation of this alternative, are included in **Table SRA-2.3.3-1**.

There are approximately 637.47 acres of undeveloped area located east of Pershing Drive, including areas within the airfield and Construction Staging Areas A, B, C, D, and G. Vegetation associations within the undeveloped portions of this area include: Disturbed Southern Dune Scrub; Encelia Scrub; California Bulrush Marsh; Sandbar Willow Thicket; ruderal (Argo Drainage Channel); and ruderal vegetation. Implementation of the improvements under the LAWA Staff-Recommended Alternative would reduce the total undeveloped area from the baseline conditions of 637.47 acres within this area by 128.37 acres to 509.10 acres (refer to **Table SRA-2.3.3-1**). Impacts to 128.37 acres of undeveloped area includes 121.71 acres of ruderal vegetation associated with the north airfield and with proposed Construction Staging Areas A, B, C, D, and G, and 2.69 acres of Disturbed Southern Dune Scrub within Construction Staging Area A. Additional impacts associated with structurally covering the Argo Drainage Channel include 1.31 acres of California Bulrush Marsh, 0.21 acre of Sandbar Willow Thicket, and 2.45 acres of ruderal (Argo Drainage Channel).

With respect to ruderal vegetation, areas classified as ruderal are not locally- or state-designated sensitive habitat; ruderal vegetation areas are also subject to regular operations and maintenance, including mowing. For these reasons, impacts to ruderal vegetation are not significant.



Source: Glenn Lukos Associates; Ricondo & Associates 2012.
Prepared by: Glenn Lukos Associates, December 2012.

LAX Specific Plan Amendment Study Final EIR	**Vegetation/Land Uses: LAWA Staff - Recommended Alternative**	Figure **SRA - 2.3.3-1**

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Construction of the north airfield improvements under the LAWA Staff-Recommended Alternative would result in the permanent loss of 2.69 acres of Disturbed Southern Dune Scrub (refer to **Table SRA-2.3.3-1**). Southern Dune Scrub is a state-designated sensitive habitat with a global ranking of G1 and a state ranking of S1.1, indicating that there are less than 2,000 acres throughout both its global and state range, and that it is very threatened. However, the Disturbed Southern Dune Scrub associated with the north airfield occurs in a long, narrow strip covering approximately 2.69 acres along Westchester Parkway, is surrounded by developed and ruderal areas, and is highly disturbed, having been previously developed for residential use. Because this area is highly disturbed, isolated, colonized by invasive, non-native species, and provides greatly diminished habitat value relative to the Disturbed Southern Dune Scrub in the Dunes, it is not consistent with the definition of the state-designated sensitive habitat (i.e., Southern Dune Scrub), despite the presence of indicator species. Nevertheless, this impact is considered significant. To address this impact, Mitigation Measure MM-BIO (SPAS)-14, Replacement of Habitat Units, described in Section 2.3.3.2 below, is proposed. This measure would provide compensatory mitigation for this loss of habitat. With implementation of Mitigation Measure MM-BIO (SPAS)-14, impacts to Disturbed Southern Dune Scrub habitat in this area would be less than significant. See Other Impacts, below, for additional discussion of this mitigation.

Construction of the north airfield improvements under the LAWA Staff-Recommended Alternative would result in the permanent loss of all vegetation associated with the Argo Drainage Channel, including 0.21 acre of Sandbar Willow Thicket, 1.31 acres of California Bulrush Marsh, and 2.45 acres of ruderal vegetation within the channel (refer to **Table SRA-2.3.3-1**). None of these vegetation associations are state-designated sensitive habitats or otherwise considered sensitive, and impacts would be less than significant. Impacts to Sandbar Willow Thicket, California Bulrush Marsh, and ruderal (Argo Drainage Channel) within potential USACOE and CDFG jurisdiction are further addressed under the heading Jurisdictional Aquatic Features.

Under the LAWA Staff-Recommended Alternative, operation of the proposed improvements would not have an impact on sensitive habitats and vegetation associations, as operation would not result in any additional disturbance leading to a substantial reduction in any federally-designated critical habitat, locally-designated natural communities including state-designated sensitive habitats, ESHAs, and habitat preservation areas designated pursuant to local ordinances. Operation of the proposed improvements would also not conflict with any local policies or ordinances protecting biological resources. Under both construction and operation of the improvements associated with the LAWA Staff-Recommended Alternative, there would be no conflict with the provisions of an adopted HCP, Natural Communities Conservation Plan (NCCP), or other approved local, regional, or state habitat conservation plans, as there are no adopted HCP or NCCP plans covering any portion of the biological resources study area. Under both construction and operation of the improvements associated with the LAWA Staff-Recommended Alternative, there would be no substantial reduction in a locally-designated natural habitat or plant community, as no such habitats or plant communities are associated with the biological resources study area.

Navigational Aids

Under the LAWA Staff-Recommended Alternative, relocation of navigational aids would result in permanent impacts to 0.31 acre of undeveloped area within the north airfield east of Pershing Drive, including impacts to 0.03 acre of Encelia Scrub and 0.28 acre of ruderal vegetation (refer to **Table SRA-2.3.3-2** and **Figure SRA-2.3.3-2**). Additional temporary impacts to ruderal vegetation and Encelia Scrub may occur during construction associated with temporary access roads. Since ruderal is not a sensitive vegetation association for the reasons discussed above, impacts to ruderal habitat would be less than significant.

Under the LAWA Staff-Recommended Alternative, 0.03 acre of Encelia Scrub would be impacted for construction on the western end of the north airfield. The Encelia Scrub vegetation association has a Global/State Ranking G4 S3, meaning that it is apparently secure in its global range, but there are approximately 10,000 to 50,000 acres of this association in its state range. However, the Encelia Scrub occurrence associated with the north airfield consists of a long, narrow habitat fragment covering

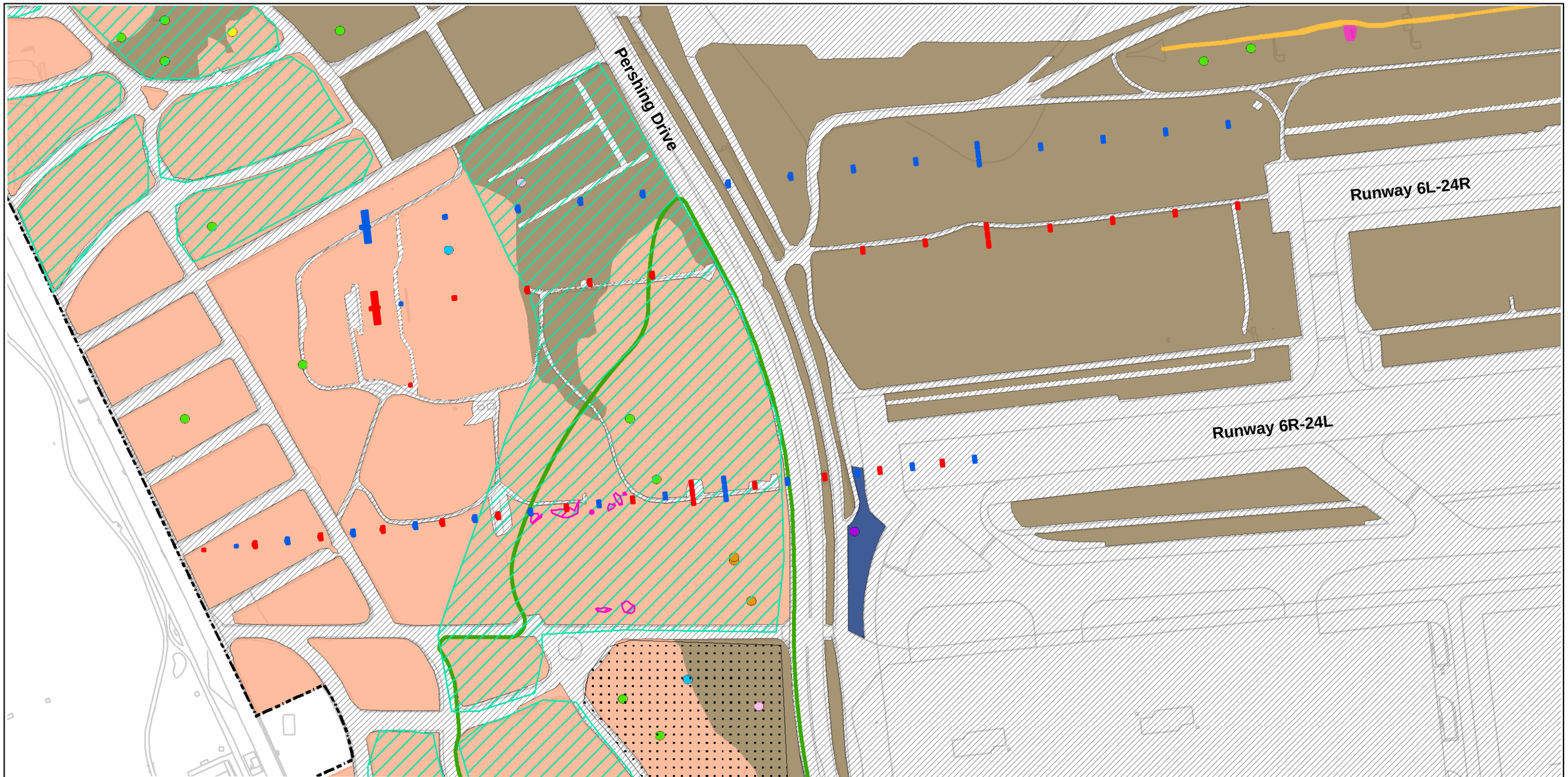
approximately 0.72 acre at the western boundary of the airfield at the end of Runway 6R/24L and adjacent to Pershing Drive, and is surrounded by developed and ruderal areas. Because this strip of Encelia Scrub is isolated, shows evidence of human disturbance, provides greatly diminished habitat value relative to larger contiguous habitat areas in the region, and includes non-native, invasive species, it is not consistent with the definition of the state-designated sensitive habitat. As such, impacts to Encelia Scrub would be less than significant.

Under the LAWA Staff-Recommended Alternative, relocation of navigational aids and construction of new service roads would result in permanent impacts to 0.89 acre of undeveloped area within the Los Angeles/El Segundo Dunes, including impacts to 0.54 acre of Disturbed Southern Foredune, and 0.35 acre of ruderal (refer to **Table SRA-2.3.3-2** and **Figure SRA-2.3.3-2**). Southern Foredune is a state-designated sensitive habitat with a global ranking of G2 and a state ranking of S2.1, indicating that there are 2,000-10,000 acres throughout both its global and state range, and that it is very threatened. Permanent loss of 0.54 acre of Disturbed Southern Foredune would occur in two locations: within the Habitat Restoration Area (0.19 acre) and north of the Habitat Restoration Area (0.35 acre). Given the relative rarity of Southern Foredune, and because these areas are contiguous with other habitat, thus providing better habitat quality and connectivity than isolated patches, the permanent loss of 0.54 acre of Disturbed Southern Foredune constitutes a substantial reduction in state-designated sensitive habitat, and would be a significant impact. Moreover, temporary impacts associated with minor grading and construction-related access roads would occur within Disturbed Southern Foredune and would be significant. The permanent loss of 0.35 acre of ruderal vegetation for new navigational aids and associated service roads, as well as additional temporary construction impacts, would not be significant, as ruderal vegetation is not a state- or locally-designated sensitive habitat. To address impacts to state-designated habitats associated with the relocation of navigational aids within the Dunes, Mitigation Measure MM-BIO (SPAS)-1, Replacement of State Designated Habitats, described in Section 2.3.3.2 below, is proposed. This measure would provide for restoration of habitat within the Dunes. With implementation of Mitigation Measure MM-BIO (SPAS)-1, impacts to sensitive habitats would be less than significant.

Under the LAWA Staff-Recommended Alternative, impacts to sensitive habitats associated with operation of the navigational aids would be less than significant, as maintenance and other operational activities would be limited to existing roads and graded pads or those constructed under the LAWA Staff-Recommended Alternative, and therefore would not result in any additional disturbance of or reduction in any federally-designated critical habitat, locally-designated natural communities including state-designated sensitive habitats, ESHAs, and habitat preservation areas designated pursuant to local ordinances. Operation of the proposed improvements would also not conflict with any local policies or ordinances protecting biological resources. Under both construction and operation of the improvements associated with the LAWA Staff-Recommended Alternative, there would be no conflict with the provisions of an adopted HCP, NCCP, or other approved local, regional, or state habitat conservation plans, as no such plan covers any portion of the biological resources study area. Under both construction and operation of the improvements associated with the LAWA Staff-Recommended Alternative, there would be no substantial reduction in a locally-designated natural habitat or plant community, as no such habitats or plant communities are associated with the biological resources study area.

Other Impacts

As noted above, construction activities associated with the LAWA Staff-Recommended Alternative would occur in the Dunes, both within and adjacent to the El Segundo Blue Butterfly Habitat Restoration Area. Implementation of LAX Master Plan Mitigation Measure MM-BC-1, Conservation of State-Designated Sensitive Habitat Within and Adjacent to the El Segundo Blue Butterfly Habitat Restoration Area, would ensure the protection of this habitat.



Note: Lewis' Evening Primrose identified at western end of north airfield in 1998 are not depicted on this figure, as a map of the population is not available.

0 300 ft
Scale

north

Source: Glenn Lukos Associates; Sapphos Environmental Inc, 2000/Ricondo & Associates 2011.
Prepared by: Glenn Lukos Associates, December 2012.

Legend

- Airport Property Line
- El Segundo Blue Butterfly Habitat Restoration Area
- Proposed Navigational Aids
- Existing Navigational Aids to be Removed
- Developed
- Disturbed Southern Foredune
- Encelia Scrub
- Ruderal
- Sandbar Willow Thicket
- Ruderal (Argo Drainage Channel)
- South Coast Branching Phacelia - Mapped in 2011 for SPAS EIR
- California Spineflower - Mapped in 1998 for Master Plan EIR
- Lewis' Evening Primrose - Mapped in 1998 for Master Plan EIR
- Loggerhead Shrike - 1998
- San Diego Horned Lizard - 1998
- Silvery Legless Lizard - 1998
- Silvery Legless Lizard - 2010
- Wintering Burrowing Owl - 1998
- Wintering Burrowing Owl - 2012

LAX Specific Plan Amendment Study Final EIR

Vegetation/Land Uses and Sensitive Species: LAWA Staff - Recommended Alternative

Figure
SRA - 2.3.3-2

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The LAWA Staff-Recommended Alternative would result in the loss of 21.06 habitat units (see **Table SRA-2.3.3-3**). In accordance with the LAX Master Plan mitigation program for biological resources, specifically, LAX Master Plan Mitigation Measure MM-BC-8, Replacement of Habitat Units, the loss of habitat units would be mitigated through a habitat replacement program. Mitigation Measure MM-BIO (SPAS)-14, Replacement of Habitat Units, described in Section 2.3.3.2 below, outlines the habitat replacement program as it would apply to the LAWA Staff-Recommended Alternative. Pursuant to this program, a habitat value of 0.8 would apply to the replacement acreage. Therefore, 26.33 acres would be required to mitigate the loss of habitat units.

The relocation of Lincoln Boulevard would result in the removal of mature trees. In addition, mature trees may be removed in conjunction with the use of Construction Staging Areas B, C, and D. Implementation of LAX Master Plan Mitigation Measure MM-BC-3, Conservation of Floral Resources: Mature Tree Replacement, would ensure that associated impacts would be less than significant.

Table SRA-2.3.3-1

Vegetation Associations/Land Use Types under the LAWA Staff-Recommended Alternative - North Airfield Improvements and Construction Staging Areas

Vegetation/Land Cover	Existing Acres	Acres Impacted	Total Acres w/Project
LAX East of Pershing Drive			
Disturbed Southern Foredune	0	0	0
Disturbed Southern Dune Scrub	2.69	2.69	0
Encelia Scrub	0.72	0	0.72
California Bulrush Marsh	1.31	1.31	0
Sandbar Willow Thicket	0.21	0.21	0
Ruderal (Argo Drainage Channel)	2.45	2.45	0
Ruderal	630.09	121.71	508.38
Ornamental	17.35	3.73	13.62
Developed			
Existing Developed Area	2,828.70	286.99	2,541.71
New Future Developed Area	NA	NA	434.47
Acquisition Areas[1]	NA	NA	22.23
Disturbed/Soil Stockpiles	15.49	15.38	0.11
Subtotal	**3,499.01**	**434.47**	**3,521.24**
Los Angeles/El Segundo Dunes			
Disturbed Southern Foredune	216.36	0	216.36
Disturbed Southern Dune Scrub	11.59	0	11.59
Encelia Scrub	0	0	0
California Bulrush Marsh	0	0	0
Sandbar Willow Thicket	0	0	0
Ruderal (Argo Drainage Channel)	0	0	0
Ruderal	33.56	0	33.56
Ornamental	1.78	0	1.78
Developed			
Existing Developed Area	52.23	0	52.23
New Future Developed Area	NA	NA	0
Disturbed/Soil Stockpiles	0	0	0
Subtotal	**315.52**	**0**	**315.52**
Total	**3,814.53**	**434.47**	**3,836.76**

[1] For purposes of this analysis, the LAUSD school site is not considered acquisition but, rather, is included in the "Developed" acreage numbers.

Source: Glenn Lukos Associates, 2012.

Table SRA-2.3.3-2

Vegetation Associations/Land Use Types under the LAWA Staff-Recommended Alternative - Navigational Aids

Vegetation/Land Use	Existing Acres	Acres Impacted	Total Acres w/Project
LAX East of Pershing Drive			
Disturbed Southern Foredune	0	0	0
Disturbed Southern Dune Scrub	2.69	0	2.69
Encelia Scrub	0.72	0.03	0.69
California Bulrush Marsh	1.31	0	1.31
Sandbar Willow Thicket	0.21	0	0.21
Ruderal(Argo Drainage Channel)	2.45	0	2.45
Ruderal	630.09	0.28	629.81
Ornamental	17.35	0	17.35
Developed			
Existing Developed Area	2,828.70	0.05	2,828.65
New Future Developed Area	NA	NA	0.36
Acquisition Areas[2]	NA	NA	22.23
Disturbed/Soil Stockpiles	15.49	0	15.49
Subtotal	**3,499.01**	**0.36**	**3,521.24**
Los Angeles/El Segundo Dunes[3]			
Disturbed Southern Foredune	216.36	0.54	215.82
Disturbed Southern Dune Scrub	11.59	0	11.59
Encelia Scrub	0	0	0
California Bulrush Marsh	0	0	0
Sandbar Willow Thicket	0	0	0
Ruderal (Argo Drainage Channel)	0	0	0
Ruderal	33.56	0.35	33.21
Ornamental	1.78	0	1.78
Developed			
Existing Developed Area	52.23	0	52.23
New Future Developed Area	NA	NA	0.89
Disturbed/Soil Stockpiles	0	0	0
Subtotal	**315.52**	**0.89**	**315.52**
Total	**3,814.53**	**1.25**	**3,836.76**

[1] For purposes of this analysis, the LAUSD school site is not considered acquisition but, rather, is included in the "Developed" acreage numbers.

[2] The acreage figures for future conditions represent conditions prior to implementation of LAX Master Plan Mitigation Measure MM-ET-4, which requires restoration of El Segundo blue butterfly habitat.

Source: Glenn Lukos Associates, 2012.

Table SRA-2.3.3-3

Habitat Unit Impacts and Required Mitigation - LAWA Staff Recommended Alternative

Vegetation Associations/Habitats[1]	Habitat Unit Value	Impacts (Acres)	Impacts (Habitat Units)	Acres Needed for Mitigation
LAX East of Pershing Drive - North Airfield Improvements and Construction Staging Areas				
Disturbed Southern Dune Scrub[2]	0.35	2.69	0.94	1.18
Encelia Scrub[2]	0.35	0	0	0
Ruderal[3]	0.15	121.71	18.26	22.82
Ornamental[4]	0.05	3.73	0.19	0.23
Disturbed/Soil Stockpiles[5]	0.1	15.38	1.54	1.92
LAX East of Pershing Drive - Navigational Aids				
Encelia Scrub[2]	0.35	0.03	0.01	0.01
Ruderal[3]	0.15	0.28	0.04	0.05
Los Angeles/El Segundo Dunes - Navigational Aids				
Ruderal[6]	0.25	0.35	0.09	0.11
TOTAL		**144.17**	**21.06**	**26.33**

Notes:

1 This analysis is based on the habitat unit methodology established in the LAX Master Plan EIR. Loss of habitats associated with jurisdictional aquatic features and state-designated habitat in the Los Angeles/El Segundo Dunes is addressed separately in this analysis.
2 Equivalent to Disturbed Foredune/Dune Scrub (as assessed in the Dunes) in the LAX Master Plan EIR.
3 Equivalent to Non-Native Grassland/Ruderal (as assessed at LAX east of Pershing Drive) in the LAX Master Plan EIR.
4 Equivalent to Landscaped in the LAX Master Plan EIR.
5 Equivalent to Disturbed/Bare Ground in the LAX Master Plan EIR.
6 Equivalent to Non-Native Grassland/Ruderal (as assessed in the Dunes) in the LAX Master Plan EIR.

Source: Glenn Lukos Associates, 2012.

Sensitive Plants

As discussed in Section 4.3, *Biological Resources*, of the SPAS Draft EIR, six sensitive plant species are either known to occur or have potential to occur in the biological resources study area, within the navigational aids relocation area and/or construction staging areas under the LAWA Staff-Recommended Alternative. Two species, Lewis' evening primrose and California spineflower, were identified in the Los Angeles/El Segundo Dunes during past surveys conducted for the LAX Master Plan EIR. As discussed in Section 4.3, *Biological Resources*, of the SPAS Draft EIR, Lewis' evening primrose was also detected on the westerly end of the north airfield, and is assumed to be present at locations affected by the relocation of navigational aids. One species, south coast branching phacelia, was detected in 2011 in the vicinity of the navigational aids relocation area. Two other recently recognized sensitive species, a subspecies of mesa horkelia and a variety of Orcutt's pincushion, have potential to occur within the Los Angeles/El Segundo Dunes, but surveys were conducted after the time of year when these species can be detected, so, although it cannot be confirmed that they occur within areas that would be affected by navigational aids relocation under this alternative, for purposes of this analysis, these taxa are assumed to occur. One species, southern tarplant, was previously detected in Construction Staging Area G and in two other locations not within the SPAS impact area, and was subsequently impacted as part of the Bradley West and Crossfield Taxiway projects. Southern tarplant was planted in the southwestern portion of the airport as mitigation for those impacts. During the course of work associated with the Bradley West and Crossfield Taxiway projects, Construction Staging Area G was modified such that it would no longer

support southern tarplant, and no impacts are proposed in the vicinity of the Southern Tarplant Mitigation Area, or the other two locations were southern tarplant was previously detected. Southern tarplant was not detected during 2011 focused surveys; however, given the history of occurrence on-site, for purposes of this analysis it is assumed that southern tarplant may occur within the biological resources study area, and specifically the north airfield and Construction Staging Areas B, C, and D.

The relocation of navigational aids under the LAWA Staff-Recommended Alternative, the construction of improvements in the north airfield, and the disturbance associated with the Construction Staging Areas B, C, and D would result in habitat alteration or removal and may result in a significant impact to these species, depending on the total population size present on-site and the percentage of the population that would be affected. As the number and distribution of the species varies from year to year and these fluctuations can be extreme, and the presence or absence of some species was not able to be determined during preparation of this EIR, it is assumed that significant impacts to sensitive plant species would occur as a result of construction of the LAWA Staff-Recommended Alternative. To address impacts to sensitive plant species, a series of mitigation measures is proposed, as described in Section 2.3.3.2 below, including MM-BIO (SPAS)-2, Conservation of Floral Resources: South Coast Branching Phacelia, MM-BIO (SPAS)-3, Conservation of Floral Resources: Lewis' Evening Primrose, MM-BIO (SPAS)-4, Conservation of Floral Resources: California Spineflower, MM-BIO (SPAS)-5, Conservation of Floral Resources: Mesa Horkelia, MM-BIO (SPAS)-6, Conservation of Floral Resources: Orcutt's Pincushion, and MM-BIO (SPAS)-7, Conservation of Floral Resources: Southern Tarplant. With implementation of these mitigation measures, impacts to sensitive plants would be less than significant.

Upon completion of construction, operation of facilities associated with the LAWA Staff-Recommended Alternative would not result in impacts to sensitive plant species, as operation would not involve additional disturbance of habitat, including maintenance access, as routine access would be limited to existing roads and roads constructed as part of the LAWA Staff-Recommended Alternative. Under the LAWA Staff-Recommended Alternative, there would be no substantial loss of individuals or the substantial reduction of existing habitat of a locally-designated species, as no such plant species are known to occur within the biological resources study area.

Sensitive Wildlife

Six sensitive wildlife species have been detected in and around the biological resources study area during surveys conducted for the LAX Master Plan EIR: Riverside fairy shrimp, El Segundo blue butterfly, western spadefoot toad, loggerhead shrike, western burrowing owl, and San Diego black-tailed jackrabbit. As previously discussed, Riverside fairy shrimp and western spadefoot toad are believed extirpated from the biological resources study area, and are not discussed further in this section.

As noted above, relocation of navigational aids in the Los Angeles/El Segundo Dunes associated with implementation of the LAWA Staff-Recommended Alternative would result in permanent impacts to at least 0.89 acre of undeveloped area in the Los Angeles/El Segundo Dunes, of which approximately 0.54 acre consists of state-designated sensitive habitat (Disturbed Southern Dune Scrub), and additional temporary impacts associated with project construction. The undeveloped areas in the Los Angeles/El Segundo Dunes support several species of sensitive arthropods and gastropods, silvery legless lizard, and coast horned lizard. As the permanent loss of 0.89 acre would not result in a substantial adverse effect, through the reduction of existing habitat, impacts to these species through habitat loss would be less than significant. However, construction activities could result in the loss of individuals through direct take of sensitive arthropod and gastropod species, the silvery legless lizard, and the coast horned lizard, which is considered to be a significant impact. Various detection methods are available to locate individuals and would be used to find and relocate them, in order to reduce the level of take. With implementation of Mitigation Measure MM-BIO (SPAS)-8, Conservation of Faunal Resources: Sensitive Reptiles, Arthropods, and Gastropods, described in Section 2.3.3.2 below, impacts to these sensitive wildlife species would be less than significant.

Loggerhead shrike may occasionally visit or forage in the AOA, but is not expected to nest within the AOA. Loggerhead shrike was reported to occur at the westerly end of the airfield in 1998, but has not

been detected in subsequent formal biological surveys within the biological resources study area for projects associated with the LAX Master Plan. However, LAWA's USDA Wildlife Hazard Biologist reports occasional sightings since 2005 in the parking lot adjacent to the Proud Bird restaurant in the southeast corner of LAX. The vast majority of the loggerhead shrike occurrences mapped in 1998 were in the Los Angeles/El Segundo Dunes and, since occurrences in the airfield are rare, it is assumed that the Los Angeles/El Segundo Dunes provide far greater habitat value for the shrike than the airfield. The areas of ruderal vegetation that would to be affected by runway relocation are directly adjacent to the current runways, and do not provide habitat value to loggerhead shrike under baseline conditions because of the proximity to these active runways. The sightings of shrikes in the urbanized area in the southwest corner of the airport indicate that the population on the airport utilizes both undeveloped areas as well as the edges of developed areas for foraging. The loss of ruderal habitat that is rarely used by the species does not constitute a substantial adverse effect through reduction of existing habitat, especially given that shrikes are known to use the edges of developed areas associated with LAX, and are not restricted to or rely heavily upon the ruderal habitat in the airfield. Therefore, impacts to loggerhead shrike through habitat loss within the AOA would be less than significant under the LAWA Staff-Recommended Alternative.

There is no potential for construction of the LAWA Staff-Recommended Alternative to result in loss of adult individuals, as loggerhead shrikes can avoid construction areas. Loggerhead shrikes are not known to nest in the airfield or the proposed staging areas, but if loggerhead shrikes were to nest within a construction or staging area, implementation could have a significant impact on this species through interference with nesting activity. With implementation of Mitigation Measure MM-BIO (SPAS)-9, Conservation of Faunal Resources: Loggerhead Shrike, described in Section 2.3.3.2 below, impacts to this sensitive wildlife species associated with use of construction or staging areas would be less than significant.

Loggerhead shrike is a resident species that has been documented to nest within the Los Angeles/El Segundo Dunes. In addition to observations made in 1998 surveys for the LAX Master Plan EIR, LAWA's USDA Wildlife Hazard Biologist has reported occasional sightings in the Los Angeles/El Segundo Dunes during the summer months, including sightings of fledglings. Relocation of navigational aids and construction of related service roads would result in the permanent loss of approximately 0.89 acre of open space area suitable for loggerhead shrike, as well as temporary impacts associated with construction, including temporary access roads. Since only a small proportion of habitat within the 302-acre dunes complex would be permanently affected, this does not constitute a substantial adverse effect, through the reduction of existing habitat, and thus impacts to loggerhead shrike through habitat loss in the Dunes would be less than significant. As discussed in Section 4.3, *Biological Resources*, of the SPAS Draft EIR, it is assumed that this species persists as a resident breeding species in the Los Angeles/El Segundo Dunes. Removal and replacement of navigational aids and service roads is therefore considered to result in a significant impact on this species through interference with nesting activity. With implementation of Mitigation Measure MM-BIO (SPAS)-9, Conservation of Faunal Resources: Loggerhead Shrike, described in Section 2.3.3.2 below, impacts to this sensitive wildlife species associated with the relocation of navigational aids would be less than significant.

Burrowing owl may occasionally occur on the edges of the AOA as wintering individuals. As previously discussed, a wintering burrowing owl was detected by Glenn Lukos Associates biologists and by LAWA personnel along the Argo Drainage Channel in December 2011 and at the western end of Runway 6R/24L by LAWA personnel in February 2012. For wintering burrowing owls that occasionally use the AOA, improvements associated with the north airfield and use of the construction staging areas would result in the loss of 121.71 acres of ruderal vegetation in the airfield and 2.45 acres of ruderal vegetation in the Argo Drainage Channel that could provide foraging area. However, 508.38 acres of ruderal vegetation would remain within the airfield, with additional foraging area available in the 302-acre Dunes, where burrowing owls were documented by the LAX Master Plan EIR to occur as wintering individuals. Burrowing owl home ranges have been calculated to comprise between 280 acres in irrigated farmland to

600 acres in pastureland.[7] Given that upwards of 770 acres of undeveloped open space would remain in the AOA and Dunes under the LAWA Staff-Recommended Alternative, there would be no substantial adverse effect through the reduction of habitat on burrowing owl, and impacts would be less than significant. For burrowing owl within the Los Angeles/El Segundo Dunes, relocation of navigational aids and related service roads would result in permanent impacts to 0.89 acre of open space ruderal vegetation and Disturbed Southern Foredune habitat, as well as limited temporary impacts associated with construction. Since impacts to this small amount of acreage do not constitute a substantial adverse effect, through the reduction of existing habitat, impacts to burrowing owl through habitat loss would be less than significant.

If burrowing owl is present in areas associated with construction, including the construction staging areas, Argo Drainage Channel, the AOA east of Pershing Drive, or the navigational aids relocation area in the Los Angeles/El Segundo Dunes, project implementation would have a significant impact on this species. With implementation of Mitigation Measure MM-BIO (SPAS)-10, Conservation of Faunal Resources: Burrowing Owl, described in Section 2.3.3.2 below, impacts to this sensitive wildlife species would be less than significant.

One individual San Diego black-tailed jackrabbit was found to use the southwestern airfield in 1997. Due to changes in site management since then, along with installation of airfield perimeter security fencing with a solid block base and tightly-spaced grids that greatly restrict or preclude wildlife movement, the species is likely extirpated from the biological resources study area. There is a very low chance that this species may persist within the AOA despite lack of recent detection. Since San Diego black-tailed jackrabbit represents a potential safety hazard to aviation (i.e., is an attractant to raptors, which can lead to a birdstrike hazard for aircraft), it is anticipated that the presence of an individual jackrabbit, albeit unlikely, would be addressed by LAWA's USDA Wildlife Hazard Biologist pursuant to FAA Advisory Circular No. 150/5200-33B "Hazardous Wildlife Attractants on or Near Airports" and LAWA's "LAX Wildlife Hazard Management Plan." San Diego black-tailed jackrabbit is not known to occur within the Los Angeles/El Segundo Dunes. Since this species is likely extirpated from the biological resources study area and, even if one or more individuals persist, impacts to this species through either habitat modification or loss of individuals would be less than significant.

Implementation of the LAWA Staff-Recommended Alternative would result in the permanent conversion of occupied habitat of the El Segundo blue butterfly within the Habitat Restoration Area associated with relocation of navigational aids, because the navigational aids relocation activities would occur in an area that is occupied by this species, albeit at very low densities due to the small quantity of host plants with low flowerhead density. In accordance with LAX Master Plan Mitigation Measures MM-ET-3, El Segundo Blue Butterfly Conservation: Dust Control, and MM-ET-4, El Segundo Blue Butterfly Conservation: Habitat Restoration, and the Biological Opinion for the project that was issued by the USFWS, impacts to the El Segundo blue butterfly and habitat occupied by the El Segundo blue butterfly would be addressed through dust control during construction, habitat replacement, and avoidance of the flight season. With implementation of these measures, impacts to El Segundo blue butterfly would be less than significant.

Use of proposed Construction Staging Areas B, C, D, and F under the LAWA Staff-Recommended Alternative would have the potential to result in the removal of mature trees used for nesting by raptors or birds. Such removal would have the potential to result in impacts to nesting birds or raptors protected under the MBTA and/or California Fish and Game Code Sections 3503, 3503.5, 3511, and 3513. The LAX Master Plan Final EIR concluded that removal of any mature ornamental trees would be a significant impact requiring replacement with native trees at a 2:1 ratio because the trees may provide nesting sites for raptors; however, raptor nesting in ornamental trees within the biological resources study area was not documented by the LAX Master Plan EIR.[8] Additionally, evidence of raptor nesting in ornamental trees

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7 Gervais, J. A., D. K. Rosenberg, and L. A. Comrack, Burrowing Owl (Athene cunicularia) in Shuford, W.D. and T. Gardali, editors. 2008. California Bird Species of Special Concern: A ranked assessment of species, subspecies, and distinct populations of birds of immediate conservation concern in California, Studies of Western Birds 1, Western Field Ornithologists, Camarillo, California, and California Department of Fish and Game, Sacramento, California, USA.

8 Sapphos Environmental, Inc., LAX Master Plan EIS/EIR, Technical Report 7, Biological Resources, Memoranda for the

within Construction Staging Area A was not found during field surveys conducted for the Bradley West Project in 2010, nor within the biological resources study area during field surveys conducted by Glenn Lukos Associates in 2011. Although the 2011 surveys were conducted on July 7, November 18, and December 1, 2011 at the end of, and outside of, the raptor breeding season (January 1 - September 15), past evidence of raptor nesting, such as nesting materials and whitewash, would likely have been detectable. Additionally, the majority of the ornamental trees in the biological resources study are not the types typically preferred by common raptor species in Southern California, with the exception of eucalyptus trees, which may be used by red-tailed and red-shouldered hawks, and palm trees, which may be used by American kestrels. Since the ornamental trees on-site are not subject to a tree-replacement ordinance, and are not known to provide nesting sites for sensitive raptors, removal of mature trees is not a significant impact unless such trees are documented to support nesting.

Under the LAWA Staff-Recommended Alternative, construction activities may result in substantial interference with nesting during the breeding season (March 15 to August 15) through either close proximity of construction activity or removal of vegetation that supports avian species afforded protection under the MBTA or Fish and Game Code 3503 or 3503.5. Such impacts would be significant. With implementation of Mitigation Measures MM-BIO (SPAS)-11, Conservation of Faunal Resources: Mature Tree Replacement - Nesting Raptors, and MM-BIO (SPAS)-12, Conservation of Faunal Resources: Nesting Birds/Raptors, described in Section 2.3.3.2 below, impacts to nesting birds and raptors would be less than significant.

Upon completion of construction, operation of the facilities associated with the LAWA Staff-Recommended Alternative would not result in significant impacts to sensitive wildlife species. In the Los Angeles/El Segundo Dunes, operation of the relocated navigational aids would be largely automated and/or controlled remotely. Vehicular access for maintenance would be limited to existing roads and cleared areas, and offroad activity would be limited to technicians on foot. Therefore, no sensitive species would be impacted either through habitat loss or direct take. Operations and maintenance of the airport improvements would be conducted following the same procedures currently in use, with continued maintenance mowing in the airfield. However, no sensitive species would be impacted through either habitat loss or direct take, except when required for hazardous wildlife management pursuant to FAA Advisory Circular No. 150/5200-33B "Hazardous Wildlife Attractants on or Near Airports" and LAWA's "LAX Wildlife Hazard Management Plan."

Under the LAWA Staff-Recommended Alternative, there would be no substantial loss of individuals or the substantial reduction of existing habitat of a locally-designated species, as no locally-designated wildlife species are known to occur within the biological resources study area. There are no wildlife movement/migration corridors associated with any portion of the biological resources study area, including the Argo Drainage Channel. Therefore, the LAWA Staff-Recommended Alternative would not result in interference with wildlife movement/migration corridors.

Jurisdictional Aquatic Features

The LAWA Staff-Recommended Alternative would have an impact on all USACOE and CDFG jurisdictional areas associated with the Argo Drainage Channel by structurally covering the Channel in order to relocate Runway 6L/24R 260 feet north of its current location. Impacts to USACOE jurisdictional areas would include 3.78 acres, of which 1.33 acres consists of wetlands vegetated with California Bulrush Marsh (1.31 acres) and Sandbar Willow Thicket (0.02 acre), and 2.45 acres consists of non-wetland waters of the U.S. vegetated with the ruderal (Argo Drainage Channel) association. Impacts to CDFG jurisdictional areas would include 3.97 acres, of which 2.45 acres consist of streambed and banks vegetated with the ruderal (Argo Drainage Channel) association, and 1.52 acres consist of vegetated riparian habitat (0.21 acre of Sandbar Willow Thicket and 1.31 acres of California Bulrush Marsh). These impacts would constitute a substantial alteration of the flow, bed, channel, or bank of rivers, streams, or

Record on Floral and Faunal Surveys, January 2001.

lakes as defined in Section 1600 of the State Fish and Game Code and a substantial adverse effect on federally-protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruptions, or other means, and would be significant. With implementation of Mitigation Measure MM-BIO (SPAS)-13, Replacement of Jurisdictional Aquatic Features, described in Section 2.3.3.2 below, impacts relating to USACOE and CDFG jurisdictional areas would be less than significant.

Indirect Impacts

Under the LAWA Staff-Recommended Alternative, increased concentrations of air pollutants would result from construction activities and from operations at build out in 2025 (see Section 2.3.2, *Air Quality*, of this chapter). Due to prevailing wind conditions, operational concentrations would be highest within the eastern portion of the airport, away from the locations of sensitive species. However, construction activities would result in increased concentrations of nitrogen dioxide (NO_2) at construction sites, which would occur in various locations, including those on the west end of the airport. Sensitive species within the Dunes are currently exposed to air pollutant concentrations from existing airport operations and other sources in the airport environs. As discussed in Section 4.3.3.3 of the SPAS Draft EIR, *Existing Effects from Light, Air Quality, and Noise*, the success of vegetation restoration efforts and increases in populations of the El Segundo blue butterfly indicate that flora and fauna at LAX are not adversely affected by existing air quality. Moreover, El Segundo blue butterfly populations do not correspond to annual aircraft populations. Similarly, it is not anticipated that implementation of the LAWA Staff-Recommended Alternative would result in significant indirect impacts to biological resources, including sensitive floral and faunal species.

Construction of the LAWA Staff-Recommended Alternative, particularly construction of airfield improvements at the west end of the north airfield in close proximity to the Los Angeles/El Segundo Dunes and the El Segundo Blue Butterfly Habitat Restoration Area, would have the potential to deposit fugitive dust within state-designated sensitive habitats that support a listed species, the El Segundo blue butterfly. With implementation of LAX Master Plan Mitigation Measures MM-BC-1, Conservation of State-Designated Sensitive Habitat within and Adjacent to the El Segundo Blue Butterfly Habitat Restoration Area, and MM-ET-3, El Segundo Blue Butterfly Conservation: Dust Control, impacts associated with fugitive construction dust would be less than significant.

The analysis of light emissions conducted for the LAX Master Plan EIR found that increased light would have no effect on the El Segundo blue butterfly, as it is a diurnal species, does not exhibit flight-to-light behavior, and remains perched around the coast buckwheat foodplant at night. With respect to other sensitive species, the analysis found that, although light emissions would be slightly increased within the Los Angeles/El Segundo Dunes, impacts to sensitive biological resources would be less than significant. An updated light analysis for the SPAS EIR, provided in Section 4.1, *Aesthetics*, of the SPAS Draft EIR, and further addressed by Section 2.3.1, *Aesthetics*, of this chapter, similarly shows that increased light emissions associated with the LAWA Staff-Recommended Alternative would not result in spillover into the Los Angeles/El Segundo Dunes or Habitat Restoration Area, due to their distance (135 or more feet), and the low profile of airfield-related lights. Light emissions associated with the relocated navigational aids within the Los Angeles/El Segundo Dunes would be similar to existing light emissions from this light source, as the number, color, intensity, and usage of the lighting would remain the same. As a result, impacts from light emissions on biological resources under the LAWA Staff-Recommended Alternative would be less than significant.

The analysis of potential noise impacts conducted for the LAX Master Plan found that maximum noise levels would not increase with implementation of the Master Plan, and impacts to sensitive biological resources from noise would be less than significant. The analysis of potential noise impacts for the SPAS EIR (see Section 2.3.10.1, *Aircraft Noise*, of this chapter) found that maximum noise levels within the Los Angeles/El Segundo Dunes and Habitat Restoration Area would decrease at two grid points and slightly increase at a third under the LAWA Staff-Recommended Alternative. Under baseline conditions, the maximum noise level at grid points 27, 28, and 37 in the Dunes is 101, 105.2, and 111.9 decibels, respectively. Under the LAWA Staff-Recommended Alternative at project buildout in 2025, the project

maximum noise level at the same grid points would be 92.5, 106.5, and 103.2 decibels, indicating a decrease for grid points 27 and 37, and a slight increase of 1.3 decibels for grid point 28, corresponding with the northerly move of Runway 6L/24R. Given that noise levels are already above the maximum threshold for those sensitive species with known thresholds, the effect of a rise of 1.3 decibels for grid point 28 would be speculative. Furthermore, multiple occurrences of sensitive species, including loggerhead shrike, burrowing owl, San Diego horned lizard, and silvery legless lizard, have been observed at grid points 27, 28, and 37 under baseline conditions, and it is assumed that the sensitive species that utilize the Dunes have habituated to the baseline noise level. As maximum noise levels would decrease over much of the Dunes under the LAWA Staff-Recommended Alternative, and the increase at grid point 28 would be minimal, the impacts to sensitive species from aircraft noise would be less than significant.

Construction noise originating in the airfield would have little effect on sensitive biological resources. Noise levels from the noisiest outdoor construction activities, independent of background ambient noise levels, are typically 86 dBA L_{eq}[9] at 50 feet from the noise source. These activities include excavation and grading. This type of sound typically dissipates at a rate of 4.5 dBA to 6.0 dBA for each doubling of distance. Based on a sound dissipation rate of 4.5 dBA per doubling of distance, a sound level of 86 dBA at 50 feet from the noise source would be approximately 81.5 dBA at a distance of 100 feet, 77 dBA at a distance of 200 feet, and so on. That sound drop off rate does not take into account any intervening shielding or barriers, such as structures or hills between the noise source and noise receptor. Under the LAWA Staff-Recommended Alternative, the nearest construction to the Los Angeles/El Segundo Dunes and associated sensitive biological resources where substantial excavation and grading would occur would be for the relocation of Runway 6L/24R and associated high-speed taxiway exits at the western end of the north airfield, which is roughly 275 feet from the Habitat Restoration Area. At that distance, construction noise levels would be expected to be less than 75 dBA at any given time. As discussed in the LAX Master Plan EIR, the level at which a noise event becomes a disturbance to the sensitive species in the Dunes is generally at L_{max}[10] of 95 dBA. Therefore, the impact of construction noise originating in the airfield on sensitive biological resources in the Dunes would be less than significant. As indicated in Section 2.3.10.3, *Construction Traffic and Equipment Noise*, of this chapter, the relocation of navigational aids would require little, if any, use of heavy-duty construction equipment, and therefore impacts would be less than significant.

Construction noise originating in the airfield may also affect sensitive biological resources in the airfield, such as burrowing owl and loggerhead shrike. Under the LAWA Staff-Recommended Alternative, construction noise associated with structurally covering the Argo Drainage Channel and the use of Construction Staging Area A would be the closest sources of noise to mapped locations of loggerhead shrike and burrowing owl. As Construction Staging Area A has been previously developed and in continuous use for the Bradley West and Crossfield Taxiway projects, the use of the area under the LAWA Staff-Recommended Alternative would not constitute a significant change from baseline noise levels and, as such, impacts would be less than significant. Regarding construction noise from covering the Argo Drainage Channel, as burrowing owls and loggerhead shrikes could avoid the area, impacts would be less than significant.

2.3.3.2 Mitigation Measures

Implementation of LAX Master Plan Mitigation Measures MM-BC-1, MM-ET-3, and MM-ET-4 would ensure that impacts to the El Segundo blue butterfly and the Habitat Restoration Area associated with the LAWA Staff-Recommended Alternative would be less than significant. Implementation of LAX Master Plan Mitigation Measure MM-BC-3 would ensure that impacts related to the removal of mature trees associated with the LAWA Staff-Recommended Alternative would be less than significant.

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9 L_{eq} = equivalent noise level.

10 L_{max} is the maximum or peak sound level during a noise event. The metric only accounts for the instantaneous peak intensity of the sound, and not for the duration of the event. As an aircraft passes by an observer, the sound level increases to a maximum level and then decreases.

To address the potential significant impacts to state-designated sensitive habitats; sensitive plants; sensitive wildlife, including nesting birds/raptors, and mature trees utilized by nesting raptors; and jurisdictional aquatic features associated with the LAWA Staff-Recommended Alternative, the following mitigation measures specific to SPAS are proposed:

- **MM-BIO (SPAS)-1. Replacement of State-Designated Sensitive Habitats.**[11]

  LAWA or its designee shall undertake mitigation for the loss of state-designated sensitive habitat within the Los Angeles/El Segundo Dunes, including the Habitat Restoration Area, by restoring areas of temporary disturbance and by restoring additional areas of sensitive habitat to compensate for temporary and permanent impacts. Installation of navigational aids and associated temporary construction impacts may result in impacts to state-designated sensitive habitat within the Los Angeles/El Segundo Dunes within habitat occupied by the El Segundo blue butterfly. Impacts to state-designated sensitive habitat within the Los Angeles/El Segundo Dunes shall be replaced at a ratio of 2:1 within the Los Angeles/El Segundo Dunes as described in the "Los Angeles/El Segundo Dunes Habitat Restoration Plan." The replacement of state-designated sensitive habitat shall be undertaken through restoration procedures as described in the "Los Angeles/El Segundo Dunes Habitat Restoration Plan." The restoration and enhancement of sensitive habitat as related to the establishment or enhancement of wildlife habitat shall consider and comply with the provisions of FAA Advisory Circular 150/5200-33B regarding hazardous wildlife attractants on or near airports. Additionally, restoration and enhancement shall take into account, as appropriate, the Memorandum of Agreement between the FAA and other federal agencies, including USFWS, pertaining to environmental conditions that could contribute to aircraft-wildlife strikes.

  Valley Needlegrass Grassland restoration efforts consist of site preparation, propagation and planting of Valley Needlegrass Grassland species, and maintenance and monitoring of the restoration site as described in the "Los Angeles/El Segundo Dunes Habitat Restoration Plan."

  Southern Foredune restoration efforts consist of site preparation, propagation, and planting of the species characteristic of the Southern Foredune community at the Los Angeles/El Segundo Dunes, and maintenance and monitoring of the restoration site as described in the "Los Angeles/El Segundo Dunes Habitat Restoration Plan."

- **MM-BIO (SPAS)-2. Conservation of Floral Resources: South Coast Branching Phacelia.**

  Prior to any work activities (i.e., vegetation clearing, invasive species removal and/or spraying, and sediment removal) within suitable habitat on the project site, including construction staging areas, pre-construction focused surveys shall be conducted during the period of March through August by a qualified botanist to determine the presence or absence of south coast branching phacelia. Known populations of this species shall be monitored to determine the best time to conduct pre-construction surveys. The surveys shall follow guidelines developed by the CNPS and the CDFG. If this species is not observed, no further mitigation shall be required; however, if it is identified within work areas, then further mitigation as described below is required.

  If this species is observed, LAWA or its designee shall prepare and implement a plan to compensate for the loss of individuals of the sensitive south coast branching phacelia. LAWA or its designee shall collect seed from those plants to be removed, and properly clean and store the collected seed until used. A mitigation site of suitable habitat equal to the area of impact shall be delineated within the boundaries of LAX or at a suitable off-site location. If a site at LAX is selected, site selection will occur in consultation with a qualified restoration biologist, as well as LAWA's USDA Wildlife Hazard Biologist and will be consistent with FAA Advisory Circular No. 150/5200-33B "Hazardous Wildlife Attractants on or Near Airports" and LAWA's "LAX Wildlife Hazard Management Plan" to avoid increasing wildlife hazards to aircraft. Ninety-percent of the collected seed shall be broadcast (distributed) after the first wetting rain with 10 percent maintained as a contingency and used as

[11] For purposes of the identified SPAS alternatives, this measure satisfies the intent of LAX Master Plan Mitigation Measure MM-BC-13.

needed to meet performance criteria. LAWA or its designee shall implement a monitoring plan to monitor the establishment of individuals of south coast branching phacelia for a period of not more than five years. Performance criteria shall include the establishment of an equal number of plants as that impacted in the first year following the distribution of seed within the mitigation site. Performance criteria shall also include confirmation of recruitment for two years following the first year flowering is observed and establishment of individuals throughout the mitigation area within three years following the first year flowering is observed.

- **MM-BIO (SPAS)-3. Conservation of Floral Resources: Lewis' Evening Primrose.**[12]

  Prior to any work activities (i.e., vegetation clearing, invasive species removal and/or spraying, and sediment removal) within suitable habitat on the project site, including construction staging areas, pre-construction focused surveys shall be conducted during the period of March through June by a qualified botanist to determine the presence or absence of Lewis' evening primrose. Known populations of this species shall be monitored to determine the best time to conduct pre-construction surveys. The surveys shall follow guidelines developed by the CNPS and the CDFG. If this species is not observed, no further mitigation shall be required; however, if it is identified within work areas, then further mitigation as described below is required.

  If this species is observed, LAWA or its designee shall prepare and implement a plan to compensate for the loss of individuals of the sensitive Lewis' evening primrose. LAWA or its designee shall collect seed from those plants to be removed, and properly clean and store the collected seed until used. A mitigation site of suitable habitat equal to the area of impact shall be delineated within the boundaries of LAX or at a suitable off-site location. If a site at LAX is selected, site selection will occur in consultation with a qualified restoration biologist, as well as LAWA's USDA Wildlife Hazard Biologist and will be consistent with FAA Advisory Circular No. 150/5200-33B "Hazardous Wildlife Attractants on or Near Airports" and LAWA's "LAX Wildlife Hazard Management Plan" to avoid increasing wildlife hazards to aircraft. Ninety-percent of the collected seed shall be broadcast (distributed) after the first wetting rain with 10 percent maintained as a contingency and used as needed to meet performance criteria. LAWA or its designee shall implement a monitoring plan to monitor the establishment of individuals of Lewis' evening primrose for a period of not more than five years. Performance criteria shall include the establishment of an equal number of plants as that impacted in the first year following the distribution of seed within the mitigation site. Performance criteria shall also include confirmation of recruitment for two years following the first year flowering is observed and establishment of individuals throughout the mitigation area within three years following the first year flowering is observed.

- **MM-BIO (SPAS)-4. Conservation of Floral Resources: California Spineflower.**

  Prior to any work activities (i.e., vegetation clearing, invasive species removal and/or spraying, and sediment removal) within suitable habitat on the project site, including construction staging areas, pre-construction focused surveys shall be conducted during the period of March through August by a qualified botanist to determine the presence or absence of California spineflower. Known populations of this species shall be monitored to determine the best time to conduct pre-construction surveys. The surveys shall follow guidelines developed by the CNPS and the CDFG. If this species is not observed, no further mitigation shall be required; however, if it is identified within work areas, then further mitigation as described below is required.

  If this species is observed, LAWA or its designee shall prepare and implement a plan to compensate for the loss of individuals of the sensitive California spineflower. LAWA or its designee shall collect seed from those plants to be removed, and properly clean and store the collected seed until used. A mitigation site of suitable habitat equal to the area of impact shall be delineated within the boundaries of LAX or at a suitable off-site location. If a site at LAX is selected, site selection will occur in

[12] For purposes of the identified SPAS alternatives, this measure satisfies the intent of LAX Master Plan Mitigation Measure MM-BC-2.

consultation with a qualified restoration biologist, as well as LAWA's USDA Wildlife Hazard Biologist and will be consistent with FAA Advisory Circular No. 150/5200-33B "Hazardous Wildlife Attractants on or Near Airports" and LAWA's "LAX Wildlife Hazard Management Plan" to avoid increasing wildlife hazards to aircraft. Ninety-percent of the collected seed shall be broadcast (distributed) after the first wetting rain with 10 percent maintained as a contingency and used as needed to meet performance criteria. LAWA or its designee shall implement a monitoring plan to monitor the establishment of individuals of California spineflower for a period of not more than five years. Performance criteria shall include the establishment of an equal number of plants as that impacted in the first year following the distribution of seed within the mitigation site. Performance criteria shall also include confirmation of recruitment for two years following the first year flowering is observed and establishment of individuals throughout the mitigation area within three years following the first year flowering is observed.

- **MM-BIO (SPAS)-5. Conservation of Floral Resources: Mesa Horkelia.**

  Prior to any work activities(i.e., vegetation clearing, invasive species removal and/or spraying, and sediment removal) within suitable habitat on the project site, pre-construction focused surveys shall be conducted during the period of February through September by a qualified botanist to determine the presence or absence of mesa horkelia subspecies puberula. Known populations of this taxon shall be monitored to determine the best time to conduct pre-construction surveys. The surveys shall follow guidelines developed by the CNPS and the CDFG. If the common *Horkelia cuneata* is identified by a qualified botanist, then no further mitigation is required. If the sensitive *Horkelia cuneata* ssp. *pupurbula* is identified within work areas, then further mitigation as described below is required.

  If this species is observed, LAWA or its designee shall prepare and implement a plan to compensate for the loss of individuals of the sensitive mesa horkelia subspecies puberula. LAWA or its designee shall collect seed from those plants to be removed, and properly clean and store the collected seed until used. A mitigation site of suitable habitat equal to the area of impact shall be delineated within the boundaries of LAX or at a suitable off-site location. If a site at LAX is selected, site selection will occur in consultation with a qualified restoration biologist, as well as LAWA's USDA Wildlife Hazard Biologist and will be consistent with FAA Advisory Circular No. 150/5200-33B "Hazardous Wildlife Attractants on or Near Airports" and LAWA's "LAX Wildlife Hazard Management Plan" to avoid increasing wildlife hazards to aircraft. Ninety-percent of the collected seed shall be broadcast (distributed) after the first wetting rain with 10 percent maintained as a contingency and used as needed to meet performance criteria. LAWA or its designee shall implement a monitoring plan to monitor the establishment of individuals of mesa horkelia for a period of not more than five years. Performance criteria shall include the establishment of an equal number of plants as that impacted in the first year following the distribution of seed within the mitigation site. Performance criteria shall also include confirmation of recruitment for two years following the first year flowering is observed and establishment of individuals throughout the mitigation area within three years following the first year flowering is observed.

- **MM-BIO (SPAS)-6. Conservation of Floral Resources: Orcutt's Pincushion.**

  Prior to any work activities (i.e., vegetation clearing, invasive species removal and/or spraying, and sediment removal) within suitable habitat on the project site, pre-construction focused surveys shall be conducted during the period of January through August by a qualified botanist to determine the presence or absence of Orcutt's pincushion (*Chaenactis glabriuscula* var. *orcuttiana*). Known populations of this taxon shall be monitored to determine the best time to conduct pre-construction surveys. The surveys shall follow guidelines developed by the CNPS and the CDFG. If the common *Chaenactis glabriuscula* is identified by a qualified botanist, then no further mitigation is required. If the sensitive *Chaenactis glabriuscula* var. *orcuttiana* is identified within work areas, then further mitigation as described below is required.

  If this species is observed, LAWA or its designee shall prepare and implement a plan to compensate for the loss of individuals of the sensitive Orcutt's pincushion. LAWA or its designee shall collect seed

from those plants to be removed, and properly clean and store the collected seed until used. A mitigation site of suitable habitat equal to the area of impact shall be delineated within the boundaries of LAX or at a suitable off-site location. If a site at LAX is selected, site selection will occur in consultation with a qualified restoration biologist, as well as LAWA's USDA Wildlife Hazard Biologist and will be consistent with FAA Advisory Circular No. 150/5200-33B "Hazardous Wildlife Attractants on or Near Airports" and LAWA's "LAX Wildlife Hazard Management Plan" to avoid increasing wildlife hazards to aircraft. Ninety-percent of the collected seed shall be broadcast (distributed) after the first wetting rain with 10 percent maintained as a contingency and used as needed to meet performance criteria. LAWA or its designee shall implement a monitoring plan to monitor the establishment of individuals of Orcutt's pincushion for a period of not more than five years. Performance criteria shall include the establishment of an equal number of plants as that impacted in the first year following the distribution of seed within the mitigation site. Performance criteria shall also include confirmation of recruitment for two years following the first year flowering is observed and establishment of individuals throughout the mitigation area within three years following the first year flowering is observed.

- **MM-BIO (SPAS)-7. Conservation of Floral Resources: Southern Tarplant.**

  Prior to any work activities (i.e., vegetation clearing, invasive species removal and/or spraying, and sediment removal) within suitable habitat on the project site, including construction staging areas, pre-construction focused surveys shall be conducted during the period of May through November by a qualified botanist to determine the presence or absence of southern tarplant. Known populations of this species shall be monitored to determine the best time to conduct pre-construction surveys. The surveys shall follow guidelines developed by the CNPS and the CDFG. If this species is not observed, no further mitigation shall be required; however, if it is identified within work areas, then further mitigation as described below is required.

  If this species is observed, LAWA or its designee shall prepare and implement a plan to compensate for the loss of individuals of the sensitive southern tarplant. LAWA or its designee shall collect seed from those plants to be removed, and properly clean and store the collected seed until used. A mitigation site of suitable habitat equal to the area of impact shall be delineated within the boundaries of LAX or at a suitable off-site location. If a site at LAX is selected, site selection will occur in consultation with a qualified restoration biologist, as well as LAWA's USDA Wildlife Hazard Biologist and will be consistent with FAA Advisory Circular No. 150/5200-33B "Hazardous Wildlife Attractants on or Near Airports" and LAWA's "LAX Wildlife Hazard Management Plan" to avoid increasing wildlife hazards to aircraft. Ninety-percent of the collected seed shall be broadcast (distributed) after the first wetting rain with 10 percent maintained as a contingency and used as needed to meet performance criteria. LAWA or its designee shall implement a monitoring plan to monitor the establishment of individuals of southern tarplant for a period of not more than five years. Performance criteria shall include the establishment of an equal number of plants as that impacted in the first year following the distribution of seed within the mitigation site. Performance criteria shall also include confirmation of recruitment for two years following the first year flowering is observed and establishment of individuals throughout the mitigation area within three years following the first year flowering is observed.

- **MM-BIO (SPAS)-8. Conservation of Faunal Resources: Sensitive Reptiles, Arthropods, and Gastropods.**[13]

  LAWA or its designee shall have a qualified restoration biologist conduct pre-construction surveys to determine the presence of individuals of sensitive arthropod and gastropod species, the silvery legless lizard, and the San Diego horned lizard within the proposed area of impact within the Los Angeles/El Segundo Dunes. Surveys will be conducted at the optimum time to observe these species using the methodology as described in Section 6.1 of the "Los Angeles/El Segundo Dunes

[13] For purposes of the identified SPAS alternatives, this measure satisfies the intent of relevant portions of LAX Master Plan Mitigation Measure MM-BC-9.

Habitat Restoration Plan," including pitfall traps and active opportunistic searching, as well as any additional appropriate methodology as determined by the qualified wildlife biologist. Immediately prior to grubbing of clearing of vegetation, all herbaceous and non-herbaceous plants will be individually shaken to flush out insects. Should an individual be observed, they will be relocated by a qualified wildlife biologist to suitable habitat for that species within the Habitat Restoration Area. Prior to construction, LAWA or its designee shall have a qualified wildlife biologist develop and implement a relocation plan to avoid the potential loss of individuals from the installation of navigational aids and associated temporary impact areas. Relocation efforts shall be undertaken by a qualified biologist.

- **MM-BIO (SPAS)-9. Conservation of Faunal Resources: Loggerhead Shrike.**[14]

  Vegetation removal for the proposed project shall be conducted outside the nesting season for the loggerhead shrike (March 15 to August 15), if feasible. If this is not feasible, a qualified wildlife biologist shall inspect the shrubs/trees at least 14 days prior to construction activities to ensure that no nesting shrikes are present. If a nest is present, construction avoidance measures implemented by the qualified wildlife biologist shall include flagging of all active nests and a 300-foot wide buffer area around the active nests. These construction avoidance measures will be coordinated with LAWA's USDA Wildlife Hazard Biologist and will be consistent with FAA Advisory Circular No. 150/5200-33B "Hazardous Wildlife Attractants on or Near Airports" and LAWA's "LAX Wildlife Hazard Management Plan" to avoid increasing wildlife hazards to aircraft. In addition, a Biological Monitor shall be present to ensure the buffer area is not infringed upon and vegetation clearing within the designated 300-foot buffer only takes place from August 16 to March 14.

- **MM-BIO (SPAS)-10. Conservation of Faunal Resources: Burrowing Owl.**[15]

  Prior to any work activities (i.e., vegetation clearing, invasive species removal and/or spraying, and sediment removal), a survey for burrows by a qualified wildlife biologist will be conducted by walking through the suitable habitat within the site (generally the Argo Drainage Channel and Los Angeles/El Segundo Dunes, as well as any other area deemed suitable by the qualified biologist) in accordance with CDFG-accepted protocols. If a work site contains burrows that could be used by burrowing owls, four additional surveys will be conducted during the burrowing owl breeding season (April 15 through July 15). If an active burrow is observed during the nesting season, the burrow will be protected until nesting activity has ended. Nesting activity for burrowing owl normally occurs from February 1 through August 31. To protect any active burrow, the following restrictions are required between February 1 and August 31 (or until burrows are no longer active as determined by a qualified wildlife biologist): (1) clearing limits will be established a minimum of 300 feet in any direction from any occupied nest and (2) access and surveying will be restricted within 200 feet of any occupied nest. Any encroachment into the 300/200 foot buffer area around the known nest will only be allowed if it is determined by a qualified wildlife biologist that the proposed activity will not disturb the nest occupants. These avoidance measures will be coordinated with LAWA's USDA Wildlife Hazard Biologist and will be consistent with FAA Advisory Circular No. 150/5200-33B "Hazardous Wildlife Attractants on or Near Airports" and LAWA's "LAX Wildlife Hazard Management Plan."

  If nesting individuals are observed, LAWA or its designee shall have a qualified wildlife biologist develop and implement a habitat replacement plan to compensate for the loss of habitat associated with the project. The habitat replacement plan shall replace lost habitat value with equal or greater habitat value, and shall follow the methodology outlined in the CDFG *Staff Report on Burrowing Owl Mitigation*.[16] The habitat replacement will occur in the Los Angeles/El Segundo Dunes in a location approved by LAWA's USDA Wildlife Hazard Biologist that will be consistent with FAA Advisory

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[14] For purposes of the identified SPAS alternatives, this measure satisfies the intent of relevant portions of LAX Master Plan Mitigation Measure MM-BC-9.

[15] For purposes of the identified SPAS alternatives, this measure satisfies the intent of relevant portions of LAX Master Plan Mitigation Measure MM-BC-9.

[16] State of California, Natural Resources Agency, Department of Fish and Game, Staff Report on Burrowing Owl Mitigation, March 7, 2012.

Circular No. 150/5200-33B "Hazardous Wildlife Attractants on or Near Airports" and LAWA's "LAX Wildlife Hazard Management Plan", or at an off-site location to avoid potential conflicts with aircraft activities at LAX.

Whether or not any nesting burrowing owls are identified on-site, after the end of the nesting period (August 31), LAWA or its designee will remove all burrows from the immediate area in and around the construction and construction staging areas on a monthly basis between September and January. Removal may include physically collapsing the burrows or installing one-way exit doors in burrow entrances. Such maintenance will continue annually until such time as construction areas are fully in use and/or developed and no longer contain suitable habitat for burrowing owls.

- **MM-BIO (SPAS)-11. Conservation of Floral Resources: Mature Tree Replacement - Nesting Raptors.**

  For those areas of the project site that have a potential for nesting raptors, prior to the initiation of construction activities during the nesting season (February 1 to June 30), all mature trees will be inspected for current or past raptor nesting activity. Inspections shall be conducted by a qualified biologist, and may be conducted outside of nesting season. The wildlife biologist shall identify active nests and/or evidence of past raptor nesting in mature trees to be removed from the construction area.

  LAWA or its designee shall compensate at a ratio of 2:1 for the loss of mature trees with either active nests or evidence of past raptor nesting, which would occur as a result of implementation of any of the project components. The species of newly planted replacement trees shall be local native tree species to the extent feasible. Each mitigation tree shall be at least a 15-gallon or larger specimen. The replacement will be implemented within the boundaries of LAX or at a suitable off-site location. It mitigation occurs within LAX boundaries, the replacement site and tree species will be determined in consultation with LAWA's USDA Wildlife Hazard Biologist and will be consistent with FAA Advisory Circular No. 150/5200-33B "Hazardous Wildlife Attractants on or Near Airports" and LAWA's "LAX Wildlife Hazard Management Plan" to avoid increasing wildlife hazards to aircraft.

- **MM-BIO (SPAS)-12. Conservation of Faunal Resources: Nesting Birds/Raptors.**

  For those areas of the project site that have a potential for nesting birds/raptors, if construction is scheduled to occur during the nesting season for birds/raptors (generally February 1 to June 30 for raptors and March 15 to August 15 for nesting birds), vegetation clearing for the proposed project shall be conducted outside the nesting season if feasible. If this is not feasible, then a qualified wildlife biologist shall inspect the shrubs/trees prior to project activities to ensure that no nesting birds/raptors are present. If the biologist finds an active nest within the construction area and determines that the nest may be impacted, the wildlife biologist will delineate an appropriate buffer zone; the size of the buffer zone will depend on the species and the type of construction activity. Only construction activities (if any) that have been approved by a Biological Monitor will take place within the buffer zone until the nest is vacated. The wildlife biologist shall serve as a construction monitor during those periods when construction activities shall occur near active nest areas to ensure that no inadvertent impacts on these nests shall occur. Netting or other bird exclusion methods shall be used to discourage birds from nesting in construction equipment and facilities, if determined by the wildlife biologist to be necessary. These construction avoidance measures will be coordinated with LAWA's USDA Wildlife Hazard Biologist and will be consistent with FAA Advisory Circular No. 150/5200-33B "Hazardous Wildlife Attractants on or Near Airports" and LAWA's "LAX Wildlife Hazard Management Plan" to avoid increasing wildlife hazards to aircraft.

- **MM-BIO (SPAS)-13. Replacement of Jurisdictional Aquatic Features.**

  LAWA will consult with USACOE to obtain a determination of the jurisdictional area associated with the Argo Drainage Channel, if any, within its jurisdiction pursuant to Section 404 of the Clean Water Act. Mitigation for impacts to the Argo Drainage Channel shall be determined in consultation with USACOE, and at a minimum will ensure that no net loss of wetlands occurs. For previous maintenance impacts to the Argo Drainage Channel, LAWA has restored/enhanced 2.44 acres of

wetlands at Ken Malloy Regional Park, which may be counted towards future impacts to the Argo Drainage Channel.

LAWA will consult with CDFG to obtain a determination of the jurisdictional area associated with the Argo Drainage Channel, if any, within its jurisdiction pursuant to Section 1600 of the Fish and Game Code. Mitigation for impacts to the Argo Drainage Channel shall be determined in consultation with CDFG, and at a minimum will ensure that no net loss of wetlands occurs. For previous maintenance impacts to the Argo Drainage Channel, LAWA has restored/enhanced 2.44 acres of wetlands at Ken Malloy Regional Park, which may be counted towards future impacts to the Argo Drainage Channel.[17]

If the Argo Drainage Channel is not found to be jurisdictional by USACOE, LAWA will consult with the Los Angeles Regional Water Quality Control Board (LARWQCB) to obtain a determination of the area associated with the Argo Drainage Channel that would be subject to Waste Discharge Requirements pursuant to the Porter Cologne Act, if any. If applicable, mitigation for impacts to the Argo Drainage Channel shall be determined in consultation with LARWQCB, with the 2.44 acres of wetlands noted above applied to final mitigation totals.

If a mitigation site at LAX is selected, site selection will occur in consultation with LAWA's USDA Wildlife Hazard Biologist and will be consistent with FAA Advisory Circular No. 150/5200-33B "Hazardous Wildlife Attractants on or Near Airports" and LAWA's "LAX Wildlife Hazard Management Plan" to avoid increasing wildlife hazards to aircraft.

- **MM-BIO (SPAS)-14. Replacement of Habitat Units.**[18]

LAWA or its designee shall undertake mitigation for the loss of habitat units resulting from implementation of the selected SPAS alternative. The habitat units shall be replaced at a 1:1 ratio within the Los Angeles/El Segundo Dunes, or at a suitable off-site location. Opportunities for compensation for the loss of habitat units include, but are not limited to, restoration of ruderal habitat to Valley Needlegrass Grassland, and/or Southern Foredune, removal and restoration of existing roadways to Southern Foredune; and restoration of Disturbed Dune Scrub/Disturbed Southern Foredune to Southern Foredune. A habitat value of 0.8 is considered to the maximum feasible target value for restoration and enhancement. The restoration and enhancement of habitat as related to the establishment or enhancement of wildlife habitat shall consider and comply with the provisions of FAA Advisory Circular 150/5200-33 regarding hazardous wildlife attractants on or near airports. Additionally, restoration and enhancement shall take into account, as appropriate, the Memorandum of Agreement between the FAA and other federal agencies, including USFWS, pertaining to environmental conditions that could contribute to aircraft-wildlife strikes.

Valley Needlegrass Grassland restoration efforts consist of site preparation, propagation and planting of species characteristic of the Valley Needlegrass Grassland community at the Los Angeles/El Segundo Dunes, and maintenance and monitoring of the restoration site. The species to be planted include native perennials as described in the Long-Term Habitat Management Plan for Los Angeles Airport/El Segundo Dunes. The characteristic species include nodding needlegrass (*Stipa cernua*): 1,500 plants/habitat unit; white everlasting (*Pseudognaphalium microcephalum*): 40 plants/habitat unit; doveweed (*Croton setigerus*): 40 plants/habitat unit; California croton (*Croton californicus*): 45 plants/habitat unit; and dune primrose (*Camissonia chieranthifolia*): 70 plants/habitat unit. Site preparation includes physical demarcation of the site, mapping of the restoration site onto a high resolution aerial photograph, and removal of all non-native species (weed abatement). Removal of

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17 The 2.44 acres of mitigation was required by USACOE and CDFG to compensate for the loss of wetland/riparian habitat from maintenance of the channel, including removal of all vegetation and remedial grading to allow unimpeded flows within the channel. Although the vegetation has been allowed to regrow, the loss of the resource has already been mitigated elsewhere, and the 2.44 acres should be counted towards the mitigation obligations that would be incurred with structural covering of the Argo Drainage Channel associated with Alternatives 1, 5, and 6. Any additional mitigation requirements established by USACOE or LARWQCB and CDFG beyond the 2.44 acres would require establishment of additional off-site mitigation.

18 For purposes of the identified SPAS alternatives, this measure satisfies the intent of LAX Master Plan Mitigation Measure MM-BC-8.

non-native herbaceous species shall take place by mowing prior to seed set, raking to remove cut material, and hand-pulling the remainder. Removal of non-native shrubs shall be undertaken by cutting and daubing with herbicide. Propagation and planting of nodding needlegrass shall be accomplished by propagation from seed collected on-site during late spring/early summer. Seed shall be properly cleaned, dried, and stored until used. In late summer, nodding needlegrass seed shall be propagated at an on-site nursery in two-inch thimble pots and properly maintained. Nodding needlegrass shall be planted at a rate of 1,500 plants per habitat unit within areas of ruderal vegetation, within the Los Angeles/El Segundo Dunes, which has undergone site preparation as described above. Planting shall take place in the fall or after the first wetting rain. Maintenance of restoration plantings shall consist of adequate irrigation and weed abatement. Given the irregularity of rainfall in Southern California, supplemental irrigation shall be provided for two years to ensure the successful establishment of mitigation plantings. Irrigation of the site shall be adjusted to adequately provide for the establishment of the out-plantings. Weed abatement shall take place on a quarterly basis for a period of five years. Monitoring shall be undertaken on a quarterly basis for the first three years following planting, and twice a year thereafter. Monitoring shall consist of qualitative and quantitative monitoring; quantitative monitoring shall take place once a year. Performance criteria to be met include the attainment of at least a 10 percent cover of native cover in the first year and 20, 30, 40 and 45 percent cover of native species over a five-year period as determined by the point-intercept transect method (the CDFG has adopted a 10 percent threshold of native cover as its criteria for significance of native grasslands). This plan assumes the performance criteria outlined herein shall be met. If monitoring discerns any failure in performance goals, remedial plantings shall be undertaken. Habitat restoration shall be conducted by a qualified habitat restoration specialist.

Southern Foredune restoration efforts consist of site preparation, propagation, and planting of the species characteristic of the Southern Foredune community at the Los Angeles/El Segundo Dunes, and maintenance and monitoring of the restoration site. The species to be planted include primary and secondary perennial plants as described in the Long-Term Habitat Management Plan for Los Angeles Airport/El Segundo Dunes. Site preparation, propagation, and planting, and maintenance and monitoring shall take place as described above. Performance criteria to be met include the attainment of 10, 20, 30, 40, and 45 percent cover of native species over a five-year period as determined by the point intercept method. The Long-Term Habitat Management Plan for Los Angeles Airport/El Segundo Dunes assumes the performance criteria stated above shall be met. If monitoring discerns any failure in performance goals, remedial plantings shall be undertaken. Habitat restoration shall be conducted by a qualified habitat restoration specialist.

Any combination of habitat replacement completed by LAWA or its designee drawn from the opportunities listed above that equals at least the number of habitat units that would be lost shall be considered sufficient replacement for loss of habitat units resulting from implementation of the selected SPAS alternative.

2.3.3.3 Level of Significance After Mitigation

Implementation of SPAS Mitigation Measures MM-BIO (SPAS)-1 through MM-BIO (SPAS)-14 would reduce all significant impacts to biological resources associated with the LAWA Staff-Recommended Alternative to a level that is less than significant.

2.3.4 Coastal Resources

2.3.4.1 Impacts Analysis

As noted in Section 2.3, impacts of the LAWA Staff-Recommended Alternative on coastal resources are only associated with the airfield components of Alternative 1, as evaluated in Section 4.4.6 of the SPAS Draft EIR, because the ground access improvements are not located within the coastal zone.

The LAWA Staff-Recommended Alternative would require changes to navigational aids currently located within the Dunes, including instrument landing light systems and other navigational aids, which must be in alignment with their respective runways. Under the LAWA Staff-Recommended Alternative, Runway

6L/24R would be relocated 260 feet north. The runway would also be extended 604 feet to the west; however, the existing Runway 6L landing threshold would remain in its current location. The landing threshold for Runway 6R would be relocated 104 feet to the east.

In order to accommodate the relocation of Runway 6L/24R, and the adjustment to the Runway 6R landing threshold, the instrument landing light systems, as well as other navigational aids associated with these runways, would be modified. Existing navigational aids would be replaced with new facilities, which would be installed to align with proposed runway configurations. Specifically, new Runway 6L/24R navigational aids would be located 260 feet north of the existing landing lights. A new localizer antenna, MTI radar reflector, and middle marker would also be located to the north of their current locations. Because the landing threshold for Runway 6L would be in the same longitudinal location, the navigational aids would not move east or west. A new service road would be developed to access the navigational aids associated with Runway 6L/24R. The new service road would be similar to existing service roads (i.e., existing paved roads would be used where feasible and new road surface would be graded and graveled to minimize erosion).

New navigational aids associated with Runway 6R/24L would be located 104 feet to the east to accommodate the easterly shift in the Runway 6R landing threshold. The middle marker would also be shifted 104 feet east. The localizer antennae would not need to be replaced. As navigational aids associated with Runway 6R/24L would be situated laterally, new navigational aids could be accessed by the existing service road.

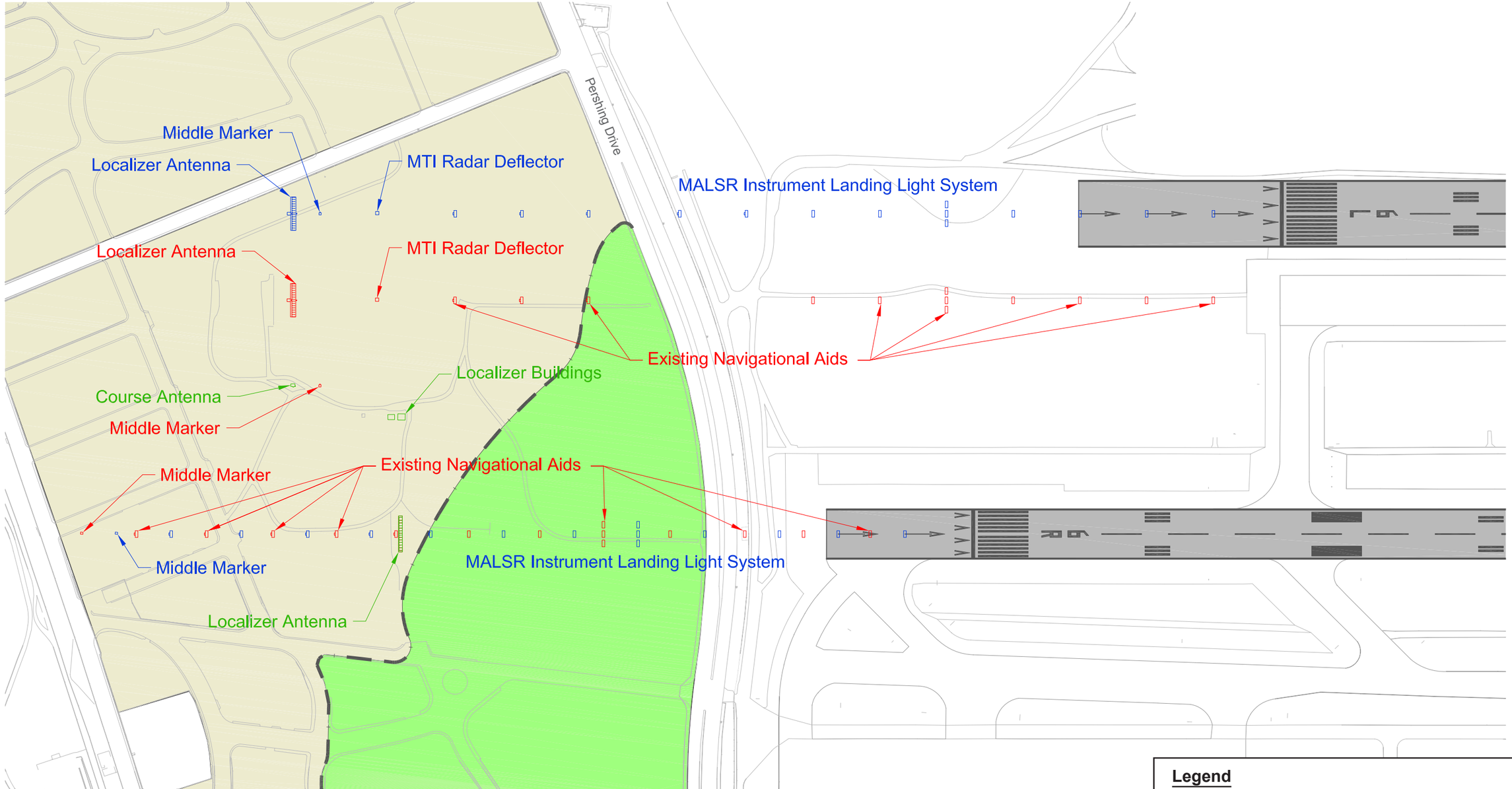
The planned facilities would be similar to existing facilities, which include navigational aids in the Dunes and on the north airfield. The proposed locations of the navigational aids for the LAWA Staff-Recommended Alternative are shown in **Figure SRA-2.3.4-1**.

As indicated previously, the Dunes are considered an ESHA. CCA coastal resource planning and management policies state that ESHAs shall be protected against any significant disruption of habitat values, and only uses dependent on those resources shall be allowed within these areas. Navigational aids are not a use that is dependent on the Dunes resources. In connection with approval of the LAX Master Plan, the FAA previously determined that the installation of new navigational aids and associated service roads at LAX associated with implementation of the LAX Master Plan was consistent, to the maximum extent practicable, with the California Coastal Management Program, pursuant to the requirements of the CZMA and the CCA, as discussed above. An additional consistency determination or certification from CCC may be required to permit implementation of the LAWA Staff-Recommended Alternative. In addition, the new navigational aids would require a Coastal Development Permit.

Navigational aid placements depend on the location of the runways. Under the LAWA Staff-Recommended Alternative, navigational aids must be placed in the proposed locations within the Dunes to comply with FAA requirements and ensure aircraft safety. The only new facilities that would be located in the Dunes are those that must be placed there due to FAA requirements, as specified in the Series 150 Advisory Circulars and as necessary for approval of the Airport Layout Plan.

The placement of navigational aids and an associated service road within the Dunes would not damage the overall quality of the coastal zone environment or its natural or artificial resources. The impacts on biological resources as a result of the installation of navigational aids and an associated service road within the Dunes are addressed in Section 2.3.3, *Biological Resources*, of this chapter which concludes that such impacts would be less than significant with implementation of existing LAX Master Plan and proposed SPAS mitigation measures, and that the Dunes would be protected from any significant disruption of habitat values. These impacts, and related mitigation measures, are discussed further below. The navigational aids would be the same in size, design, and lighting as the existing facilities that have existed in the Dunes for decades, and would continue to exist irrespective of the LAWA Staff-Recommended Alternative. Similar to the existing navigational aids, the new navigational aids would not be readily apparent from either Pershing Drive or Vista del Mar.

The LAWA Staff-Recommended Alternative would not inhibit the orderly, balanced utilization and conservation of coastal zone resources. All conservation plans and protections for the Dunes, discussed



Source: HNTB Corporation, Los Angeles International Airport Layout Plan, August 2010; Ricondo & Associates, Inc., 2011.
Prepared by: Ricondo & Associates, Inc., 2011.

LAX Specific Plan Amendment Study Final EIR	**Location of Proposed Navigational Aids - LAWA Staff - Recommended Alternative**	Figure **SRA - 2.3.4-1**

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above, would remain in effect, and the utilization of the coastal zone resources would be almost identical to the existing utilization. Therefore, the relocation of navigational aids and construction of an associated access road would not interfere with the goals of the CCA.

Sensitive Resources within the Coastal Zone

Under the LAWA Staff-Recommended Alternative, installation of navigational aids and an associated service road would directly affect state-designated sensitive habitat within the Dunes, including occupied habitat of the El Segundo blue butterfly, although this species is present within the navigational aids relocation area in very low densities due to the small quantity of host plants with low flowerhead density. Direct impacts to sensitive habitat, and to the El Segundo blue butterfly, would be less than significant with implementation of existing LAX Master Plan and proposed SPAS mitigation measures described in Section 2.3.3, *Biological Resources*, of this chapter (i.e., LAX Master Plan Mitigation Measures MM-BC-1, Conservation of State-Designated Sensitive Habitat Within and Adjacent to the El Segundo Blue Butterfly Habitat Restoration Area, and MM-ET-4, El Segundo Blue Butterfly Conservation: Habitat Restoration, and proposed SPAS Mitigation Measure MM-BIO (SPAS)-1, Replacement of State-Designated Habitats).

The replacement of navigational aids under the LAWA Staff-Recommended Alternative may result in significant impacts to five sensitive plant species--including Lewis' evening primrose, California spineflower, south coast branching phacelia, mesa horkelia, and Orcutt's pincushion--depending on the total population size present on-site and the percentage of the population that would be affected. Impacts to these sensitive plant species would be less than significant with implementation of proposed SPAS mitigation measures described in Section 2.3.3, *Biological Resources*, of this chapter (i.e., MM-BIO (SPAS)-2, Conservation of Floral Resources: South Coast Branching Phacelia, MM-BIO (SPAS)-3, Conservation of Floral Resources: Lewis' Evening Primrose, MM-BIO (SPAS)-4, Conservation of Floral Resources: California Spineflower, MM-BIO (SPAS)-5, Conservation of Floral Resources: Mesa Horkelia, and MM-BIO (SPAS)-6, Conservation of Floral Resources: Orcutt's Pincushion).

The replacement of navigational aids may also have significant impacts to sensitive wildlife species, including sensitive arthropods, silvery legless lizard, coast horned lizard, loggerhead shrike, and burrowing owl. Impacts to these sensitive wildlife species would be less than significant with implementation of proposed SPAS mitigation measures described in Section 2.3.3, *Biological Resources*, of this chapter (i.e., MM-BIO (SPAS)-8, Conservation of Faunal Resources: Sensitive Reptiles and Arthropods, MM-BIO (SPAS)-9, Conservation of Faunal Resources: Loggerhead Shrike, and MM-BIO (SPAS)-10, Conservation of Faunal Resources: Burrowing Owl).

As indicated in Section 2.3.3, *Biological Resources*, of this chapter, impacts to sensitive resources within the Dunes associated with operation of the navigational aids would be less than significant. Similarly, as discussed in Section 2.3.3, *Biological Resources*, of this chapter, indirect effects from jet exhaust emissions, light emissions, and noise would not significantly affect the El Segundo blue butterfly or other sensitive floral and faunal species within the Dunes. However, construction activities under the LAWA Staff-Recommended Alternative have the potential to result in deposition of fugitive dust within state-designated sensitive habitat, including habitat within the El Segundo Blue Butterfly Habitat Restoration Area. With implementation of the existing LAX Master Plan mitigation measures described in Section 2.3.3, *Biological Resources*, of this chapter (i.e., MM-ET-3, El Segundo Blue Butterfly Conservation: Dust Control), the potential indirect impacts to state-designated sensitive habitat due to construction activities would be less than significant.

2.3.4.2 Mitigation Measures

Implementation of mitigation measures described in Section 2.3.3, *Biological Resources*, of this chapter, including LAX Master Plan Mitigation Measures MM-BC-1, MM-ET-3, and MM-ET-4, and SPAS Mitigation Measures MM-BIO (SPAS)-1, MM-BIO (SPAS)-2, MM-BIO (SPAS)-3, MM-BIO (SPAS)-4, MM-BIO (SPAS)-5, MM-BIO (SPAS)-6, MM-BIO (SPAS)-8, MM-BIO (SPAS)-9, and MM-BIO (SPAS)-10, would ensure that impacts to sensitive resources within the coastal zone associated with the LAWA Staff-Recommended Alternative would be less than significant. Therefore, no additional mitigation measures specific to SPAS are required.

2.3.5 Cultural Resources

2.3.5.1 Impacts Analysis

As noted in Section 2.3, impacts of the LAWA Staff-Recommended Alternative on cultural resources are associated with the airfield/terminal components of Alternative 1 and the ground access components of Alternative 9, as evaluated in Section 4.5.6 of the SPAS Draft EIR.

In addition to the LAX Master Plan commitment and mitigation measures identified in Section 4.5.5 of the SPAS Draft EIR, and as discussed in Section 4.5.3.1 of the SPAS Draft EIR, new development at LAX is subject to compliance with a number of design and lighting related regulations and guidelines. Compliance with applicable regulations and guidelines is supported through LAWA's design review process where plans are reviewed by the Facilities Planning Division, other airport divisions, and by the City of Los Angeles Building and Safety Department as part of the permitting process. The Building and Safety Department distributes the plans as appropriate to other City departments including Planning, Public Works, and Cultural Affairs with final design approval required by the Cultural Affairs Commission. The following analysis assumes that new development at LAX would be carried out in compliance with pertinent LAX Master Plan commitments and mitigation measures, and with relevant LAX and City of Los Angeles design regulations and guidelines.

2.3.5.1.1 Historical Resources

Two eligible historical resources potentially affected by the LAWA Staff-Recommended Alternative are analyzed below: the Theme Building and Setting and the Union Savings and Loan Building.

The World War II Munitions Storage Bunker (eligible), Hangar One (listed), and the Intermediate Terminal Complex are located within the cultural resources study area but would not be directly or indirectly affected because of their distance from the LAWA Staff-Recommended Alternative improvements, as shown in Figure 4.5-1 in Section 4.5, *Cultural Resources*, of the SPAS Draft EIR. Hangar One (building number 4 in Figure 4.5-1) is situated within the far southeastern portion of the cultural resources study area. The site survey and review of the LAWA Staff-Recommended Alternative found that Hangar One would not be directly or indirectly affected by the LAWA Staff-Recommended Alternative, and no further investigation with regard to this resource was warranted. The World War II Munitions Storage Bunker (building 1 in Figure 4.5-1) is situated within the far western portion of the cultural resources study area. Review of the LAWA Staff-Recommended Alternative found that the World War II Munitions Storage Bunker would not be directly or indirectly affected by the LAWA Staff-Recommended Alternative and no further investigation with regard to this resource was warranted. The Intermediate Terminal Complex (building 3 in Figure 4.5-1) is situated in the far eastern portion of the cultural resources study area and would not be affected directly or indirectly by the LAWA Staff-Recommended Alternative. (This property was included in the 2011-2012 survey prior to this determination.) Therefore, no further analysis of this resource is provided in this section.

Other than the World War II Munitions Storage Bunker, Hangar One, the Theme Building and Setting, the Intermediate Terminal Complex, and the Union Savings and Loan Building, the remainder of surveyed properties did not meet the definition of a historical resource under State CEQA Guidelines Section 15064.5(a) and therefore the LAWA Staff-Recommended Alternative would have no impact to historical resources in relation to these properties.

Contributing features of the original Theme Building structure (extant original exterior and interior features) include, but are not necessarily limited to, the base, elevator core, extant original features of the restaurant space (excluding later alterations), public viewing platform, structural arches and footings, surrounding concrete wall/grille around base, pedestrian entrance, associated original hardscape features such as pedestrian patios and planters/planting beds, and surrounding pedestrian and vehicular circulation.

Contributing features of the Theme Building Setting include:

- The Central Service Facility Buildings (two similar one-story utility/office buildings with concrete arched roofs, remaining segment of original axial road alignment, associated concrete sidewalks and hardscape);
- The Primary Axial View between the Theme Building and the 1961 Airport Traffic Control Tower, including the axial road alignment and unobstructed view corridor between the 1961 Airport Traffic Control Tower and the Theme Building, from the Theme Building restaurant and public roof-top viewing platform, from the 1961 Airport Traffic Control Tower, and from vehicular and pedestrian circulation paths within the immediate vicinity of the view corridor;
- Although not eligible individually due to substantial later alterations, the 1961 Airport Traffic Control Tower remains recognizable; it retains its architectural form and distinctive control booth;
- Although substantially altered with numerous additions and upgrades necessitated by the large expansion in service since the 1960s, the general character of the airport setting from the 1960s and 1970s remains residually recognizable, including the site plan, horizontal forms and rectangular massing of the concourse buildings, their generally consistent scale and height, the figure-ground relationships of masses and voids, the relationships of spaces and use, general architectural character and materials (Jet Age/International Style, rectangular volumes, horizontality, metal and concrete, smooth surfaces, large expanses of glass, ribbon windows) the centrally located Theme Building which remains predominant within the U-shaped concourse and circulation complex, and the exterior terminals and associated airfields located to the north and south of the concourse area;
- Mid- and long-range outward looking views from the Theme Building's 80-foot level restaurant and 360-degree views from the roof-top viewing platform including mid-range views of the concourses and terminals, long-range views of the airfields, and distant views to the surrounding neighborhoods, mountains, and Pacific Ocean, which can still be experienced as originally conceived;
- Direct views of the Theme Building from the U-shaped vehicular and pedestrian circulation paths within the concourse complex; and
- Direct views of the Theme Building from the edges of the horizontal concourse levels, including views through the continuous horizontal strip windows directly facing the Theme Building from the south terminals.

The airfield and terminal improvements under the LAWA Staff-Recommended Alternative would have no direct impacts and no adverse indirect impacts on historical resources because of their design, distance, and intervening development. There would be no direct physical impacts to the Theme Building and Setting, and no interruption of related views that characterize the Theme Building and Setting would occur under the LAWA Staff-Recommended Alternative. The physical characteristics of the Theme Building and Setting would remain unaffected and no change in the significance of a historical resource would occur, pursuant to CEQA 15064.5(b)(1)(2).

With the exception of vantage points within the taller Theme Building, within the CTA, public views of the airfield and areas adjacent to the airport are blocked by the terminal buildings. Construction of airfield improvements, including the movement of Runway 6L/24R 260 feet north, the addition of a centerfield taxiway, the extension of Runway 6R/24L, improvements to Taxilane D and Taxiway E, and relocation of the service road, would have no adverse impact to the Theme Building and Setting since the general character of the airfield would remain and no intervening improvements would be constructed that would substantially obscure existing views of the airfield from the Theme Building.

The proposed terminal improvements, including the addition of a new Terminal 0, loss/modifications to concourse areas and/or gates at Terminals 1, 2, and 3, and the modification and northern extension of concourse area and gates at the Tom Bradley International Terminal (TBIT) and the future Midfield Satellite Concourse (MSC), would be compatible in design, scale, proportion and massing and would not have a direct impact or significant adverse indirect impact on the Theme Building and Setting. The proposed terminal improvements are located at the northern perimeter of the CTA and would be largely blocked from view from the Theme Building by the existing concourses. Furthermore, because of the

height limitations of the proposed terminal improvements and the incorporation of LAX Master Plan Commitment HR-1, Preservation of Historic Resources, which supports the preservation of significant historic/architectural resources through careful review of design and development adjacent to such resources to ensure modifications are carried out consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties, the impacts on the Theme Building and Setting from terminal improvements under the LAWA Staff-Recommended Alternative would be less than significant.

The ground access improvements under the LAWA Staff-Recommended would have significant impacts on the National Register-eligible Theme Building and Setting but no impact on the ineligible 1961 Airport Traffic Control Tower. With incorporation of Mitigation Measure MM-HA (SPAS)-2, Preservation of Historic Resources: Theme Building and Setting, described in Section 2.3.5.2.1 below, potentially significant impacts to the Theme Building and Setting would be avoided because views of the north and south elevations of the Theme Building would not be impaired by the APM. Potential indirect impacts to the Union Savings and Loan Building from the proposed ground access improvements, specifically, an elevated APM structure along 98th Street and extending over Sepulveda Boulevard, would be less than significant due to their proposed location within or north of the 98th Street right-of-way, their distance from the eligible Union Savings and Loan Building, and the incorporation of LAX Master Plan Commitment HR-1, Preservation of Historic Resources.

The ITF, proposed to be located between 96th Street and 98th Street west of Airport Boulevard, and the future Metro LAX/Crenshaw Light Rail Transit Station at/near Century and Aviation Boulevards, would not have any direct physical impacts or indirect impacts on identified eligible or listed historical resources in the cultural resources study area due to their distance from these resources. Likewise, the relocation of Lincoln Boulevard would have no impact on identified eligible and listed historical resources.

The proposed parking improvements under the LAWA Staff-Recommended Alternative would not be visible from the Theme Building or the Union Savings and Loan Building. The proposed parking in Manchester Square, located east of Aviation Boulevard and north of Century Boulevard, would have no impact on identified eligible or listed historical resources in the area due to its distance of approximately one mile or more to the east from these resources.

2.3.5.1.2 Archaeological Resources

The following addresses the potential for improvements associated with the LAWA Staff-Recommended Alternative to have an impact on known archaeological resource sites. Only those resource sites located in general proximity to the improvements are addressed. One potentially eligible site under CEQA (CA-LAN-2345) would not be affected by the LAWA Staff-Recommended Alternative because it is located far enough away from the alternatives to not be impacted.

All potentially significant impacts on archaeological resources associated with the LAWA Staff-Recommended Alternative would be less than significant with implementation of mitigation measures, as discussed later in this section.

Airfield improvements associated with Runway 6L/24R and construction of a centerfield taxiway would not have an impact on CA-LAN-2385H and P-19-100115 because these resources are not historical resources or unique archaeological resources under State CEQA Guidelines Section 15064.5 and Section 21083.2 of the Public Resources Code, respectively. Specifically, CA-LAN-2385H was likely identified out of context and no association determination can be made, which diminishes the potential to determine whether the site meets any of the eligibility criteria, and the lack of solid provenance data for P-19-100115 diminishes its potential to yield important information to the study of prehistory. In addition, isolate resources are unlikely to retain additional buried components that would yield important information to the study of prehistory. Therefore, impacts to CA-LAN-2385H and P-19-100115 would be less than significant.

Use of Construction Staging Area A would have an impact on CA-LAN-1118. This resource is not a historical resource or a unique archaeological resource under State CEQA Guidelines Section 15064.5 and Section 21083.2 of the Public Resources Code, respectively. This is a result of current and former

construction activities that have likely displaced components of the site from their original location and have consequently reduced the integrity of the site and diminished the potential to determine whether CA-LAN-1118 meets any of the eligibility criteria. Because this site has been determined ineligible for listing at the federal, state, and local level, impacts to CA-LAN-1118 would be less than significant.

No other previously recorded archaeological resources have been identified in the improvement areas associated with the LAWA Staff-Recommended Alternative. Despite the lack of recorded archaeological resources within the area affected by the LAWA Staff-Recommended Alternative, this alternative has the potential to disturb or destroy significant, undiscovered archaeological resources during construction excavations. However, with the exception of the north airfield and the navigational aids in the Los Angeles/El Segundo Dunes, the improvements associated with the LAWA Staff-Recommended Alternative are located in disturbed areas. The north airfield improvements and navigational aids would not require deep excavations, and the area subject to excavation for the navigational aids would be small. The lack of deep excavations reduces the potential to encounter undiscovered archaeological resources because deep excavations may encounter previously undisturbed soils conducive to retaining undiscovered archaeological resources. Shallow excavations are likely to be conducted in previously disturbed soils that are likely not conducive to retaining undiscovered archaeological resources because resources in these soils may have been destroyed or displaced from prior disturbances (e.g., rough grading or trenching, road/airstrip construction). Since improvements associated with the north airfield and navigational aids would include shallow excavations in disturbed soils, the likelihood of encountering undiscovered significant archaeological resources during construction is limited. Nevertheless, the potential for construction to affect previously unidentified archaeological resources is a significant impact. Mitigation Measure MM-HA (SPAS)-4, Conformance with LAX Master Plan Archaeological Treatment Plan (described in Section 2.3.5.2.2 below), is proposed to address significant impacts to previously unidentified archaeological resources by requiring construction activities to be undertaken in conformance with the ATP. In the event subsurface deposits are encountered, the ATP provides for evaluation and treatment of archaeological resources consistent with the Secretary of the Interior's Standards and Guidelines for Archaeological Documentation and other applicable guidance. Requirements outlined in the ATP include specific procedures for archaeological monitoring, identifying and assessing the significance of resources, and for the recovery and curation of resources when warranted. For example, an archaeological excavation program to remove the resources may be implemented, if deemed necessary. In addition, the ATP includes guidance on retaining a Native American monitor if Native American cultural resources are encountered. If human remains are found, LAWA will need to comply with the State Health and Safety Code regarding the appropriate treatment of those remains as outlined in the ATP. Finally, the ATP details the reporting requirements to document the archaeological monitoring effort and provides guidance as to the proper curation and archiving of artifacts in accordance with industry and federal standards. The procedures outlined in the ATP would reduce potentially significant impacts to previously unidentified archaeological resources associated with this alternative to a less than significant level.

2.3.5.2 Mitigation Measures

2.3.5.2.1 Historical Resources

Implementation of LAX Master Plan Commitment HR-1 would ensure that impacts to the Union Savings and Loan Building associated with the LAWA Staff-Recommended Alternative, would be less than significant. Therefore, no mitigation specific to SPAS is required for the LAWA Staff-Recommended Alternative relative to the Union Savings and Loan Building. However, even with implementation LAX Master Plan Commitment, HR-1 there would be a significant impact to the Theme Building and Setting as a result of the implementation of the APM under the LAWA Staff-Recommended Alternative. To address this impact, the mitigation measure specific to SPAS listed is proposed. The focus of Mitigation Measure MM-HA (SPAS)-2 is to provide specific guidance to ensure that alteration of the surrounding setting of the Theme Building in connection with the LAWA Staff-Recommended Alternative is undertaken in accordance with the Secretary of the Interior's Standards.

- **MM-HA (SPAS)-2. Preservation of Historic Resources: Theme Building and Setting.**

  Consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties, this measure will ensure that the historic character of the Theme Building and Setting will be retained and preserved. The Theme Building's integrity will be preserved and removal of distinctive materials or alteration of features, spaces, and spatial relationships that characterize the Theme Building and contribute to its eligibility will be avoided (Standards for Preservation 1-7). The contributing Setting of the Theme Building shall be protected and maintained (Standards for Rehabilitation and Guidelines for Rehabilitation) and changes to the features and spatial relationships of the CTA shall be undertaken in a manner consistent with the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitation, and shall be compatible with the historic materials, features, size, scale and proportion, and massing of the Theme Building to protect the integrity of the historic resource and its environment (Standards for Rehabilitation 9 and 10).

  The historic features of the Theme Building include the extant original exterior and interior features of the structure such as the base, elevator core, original features of the restaurant space, public viewing platform, structural arches and footings and associated original hardscape/landscape features and circulation elements immediately surrounding the structure (concrete wall/grille around base, pedestrian entrance, patios, planters/planting beds, and pedestrian and vehicular circulation). The removal of distinctive materials or alteration of features, spaces, and spatial relationships that characterize the Theme Building and contribute to its eligibility shall be avoided (Standards for Preservation 1-7). Necessary alterations to the Theme Building shall conform to the Secretary of the Interior's Standards for the Treatment of Historic Properties (Standards for Rehabilitation 9 and 10).

  Changes to the features and spatial relationships of the CTA that may remove or alter features, spaces, and spatial relationships that characterize the Setting of the Theme Building and contribute to the Theme Building's eligibility shall also be avoided (Standards for Rehabilitation 1-7). Necessary alterations to the Theme Building Setting shall conform to the Secretary of the Interior's Standards for Rehabilitation 9 and 10. Contributing features and views of the Theme Building's Setting include:

  - the two Central Service Facility Buildings and a segment of original axial road alignment and associated concrete sidewalks and hardscape;
  - the architectural form of the 1961 Airport Traffic Control Tower and its distinctive control booth;
  - the general character of the airport setting, including the centrally located and visually predominant Theme Building within the U-shaped concourse area, and the horizontal forms, rectangular massing and generally consistent scale and height of the concourse buildings and their Modern architectural character and materials (Jet Age/International Style, rectangular volumes, horizontality, metal and concrete, smooth surfaces, large expanses of glass, and ribbon windows);
  - the Primary Axial View between the Theme Building and the 1961 Airport Traffic Control Tower, including the axial road alignment and unobstructed view corridor between the 1961 Airport Traffic Control Tower and the Theme Building, the view to the 1961 Airport Traffic Control Tower from the Theme Building restaurant and public roof-top viewing platform, the view from the 1961 Airport Traffic Control Tower to the Theme Building, and the view from vehicular and pedestrian circulation paths within the immediate vicinity of the Primary Axial view corridor;
  - the mid- and long-range outward looking views from the Theme Building's 80-foot level restaurant and the 360-degree views from the roof-top viewing platform, including mid-range views of the concourses and terminals, long-range views of the airfields, and distant views to the surrounding neighborhoods, mountains, and Pacific Ocean;
  - direct views of the Theme Building from the U-shaped vehicular and pedestrian circulation paths within the concourse complex where, at a minimum, the upper portions of the Theme Building would be visible; and

- direct views of the Theme Building from the edges of the horizontal concourse levels, including views through the continuous horizontal strip windows directly facing the Theme Building from the south terminals where, at a minimum, the upper portions of the Theme Building would be visible.

Changes to non-contributing features and spatial relationships of the CTA that may indirectly impact the Theme Building and Setting shall be undertaken in a manner consistent with the Secretary of the Interior's Standards for Rehabilitation 9 and 10, and shall be compatible with the historic materials, features, size, scale and proportion, and massing of the Theme Building to protect the integrity of the historic resource and its environment. The design of the APM shall ensure that important contributing views of the north and south elevations of the Theme Building are not materially impaired.

Prior to the final design of the APM, a qualified historic preservation consultant shall be engaged by LAWA to review the compatibility of new design and construction components adjacent to the Theme Building for conformance with Secretary of the Interior's Standards that provide guidelines for sensitively and respectfully managing changes to the defining characteristics of a historic property's site and environment. With regard to adjacent new construction, Standard for Rehabilitation 9 recommends that destruction of historic materials that characterize the property be avoided where feasible, and that adjacent new work shall be compatible with the massing, size, scale, and architectural features of the historical resource to protect the historic integrity of the property and its environment. Standard for Rehabilitation 10 requires that new construction be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired. This mitigation measure and the required Standards conformance review by a qualified historic preservation consultant shall achieve and document compliance with the applicable Standards through the requisite plan reviews and sign-off of plans. In addition, a letter report will be provided to the City of Los Angeles Office of Historic Resources documenting the results.

2.3.5.2.2 Archaeological Resources

The following mitigation measure specific to SPAS has been developed to ensure compliance with the ATP, which incorporates the requirements of LAX Master Plan Mitigation Measures MM-HA-4 through MM-HA-10:

- **MM-HA (SPAS)-4. Conformance with LAX Master Plan Archaeological Treatment Plan.**

  Prior to initiation of grading and construction activities, LAWA will retain an on-site Cultural Resource Monitor (CRM), as defined in the LAX Master Plan MMRP Archaeological Treatment Plan (ATP), who will determine if the proposed project area is subject to archaeological monitoring. As defined in the ATP, areas are not subject to archaeological monitoring if they contain redeposited fill or have previously been disturbed. LAWA shall retain an archaeologist to monitor excavation activities in native or virgin soils in accordance with the detailed monitoring procedures and other procedures outlined in the ATP regarding treatment for archaeological resources that are accidentally encountered during construction. In accordance with the methods and guidelines provided in the ATP, the CRM will compare the known depth of redeposited fill or disturbance to the depth of planned grading activities, based on a review of construction plans. If the CRM determines that the proposed project area is subject to archaeological monitoring, a qualified archaeologist (an archaeologist who satisfies the Secretary of the Interior's Professional Qualifications Standards [36 CFR 61]) shall be retained by LAWA to inspect excavation and grading activities that occur within native material. The extent and frequency of inspection shall be defined based on consultation with the archaeologist. Following initial inspection of excavation materials, the archaeologist may adjust inspection protocols as work proceeds. Identification, evaluation, and recovery of cultural resources shall be conducted in accordance with the methods, guidelines, and measures established in the ATP. If Native American cultural resources are encountered, LAWA shall comply with guidance established in the ATP for retaining a Native American monitor. If human remains are found, LAWA shall comply with the State Health and Safety Code regarding the appropriate treatment of those remains as outlined in the ATP. Reporting shall be completed in conformance with the requirements established in the ATP to

document the archaeological monitoring effort and guidance as to the proper curation and archiving of artifacts in accordance with industry and federal standards.

2.3.5.3 Level of Significance After Mitigation

2.3.5.3.1 Historical Resources

With implementation of SPAS Mitigation Measure MM-HA (SPAS)-2, Preservation of Historic Resources: Theme Building and Setting, significant indirect impacts associated with changes to the setting and primary views of the Theme Building under the LAWA Staff-Recommended Alternative would be reduced to a level that is less than significant.

2.3.5.3.2 Archaeological Resources

Compliance with the ATP, as ensured by SPAS Mitigation Measure MM-HA (SPAS)-4, Conformance with LAX Master Plan Archaeological Treatment Plan, would reduce impacts to previously unidentified archaeological resources that may be discovered during construction of the LAWA Staff-Recommended Alternative to a level that is less than significant.

2.3.6 Greenhouse Gases

2.3.6.1 Impacts Analysis

As noted in Section 2.3, GHG emissions associated with the airfield/terminal components of Alternative 1 were combined with the GHG emissions associated with the ground access components of Alternative 9 to present GHG emissions associated with the LAWA Staff-Recommended Alternative. These emissions are within the range of emissions identified in Section 4.6.6 of the SPAS Draft EIR.

2.3.6.1.1 Construction Emissions

Annual construction GHG emissions for the LAWA Staff-Recommended Alternative before mitigation are presented in **Table SRA-2.3.6-1**. SCAQMD recommends that amortized GHG construction emissions (i.e., total construction emissions divided by the lifetime of the project, assumed to be 30 years) be added to operational emissions to evaluate significance.[19] As a result, construction-related significance is not determined on an individual basis for GHG emissions; rather, Section 2.3.6.1.2 below evaluates the significance of the combined construction-related and operations-related GHG emissions for the LAWA Staff-Recommended Alternative.

2.3.6.1.2 Operational Emissions

Operational GHG emissions, plus amortized construction GHG emissions, for the LAWA Staff-Recommended Alternative at buildout of the alternative in 2025 are presented in **Table SRA-2.3.6-2**. Also shown in **Table SRA-2.3.6-2** are the baseline operational GHG emissions in 2009-2010, as well as operational GHG emissions for Alternative 4 for comparative purposes (discussed below). The per capita (per passenger) emissions for baseline conditions and for the LAWA Staff-Recommended Alternative are identified at the bottom of each emissions column in the table, along with an indication of how much less, percentage-wise, the per capita emissions of the LAWA Staff-Recommended Alternative are compared to per capita emissions for baseline conditions. The determination of per capita emissions is based on 56.5 MAP for baseline (2009) conditions and 78.9 MAP for future (2025) baseline conditions. Where the per capita GHG emissions are not at least 16 percent less than those of baseline conditions, a significant impact is identified.

Incremental changes in GHG emissions associated with the LAWA Staff-Recommended Alternative, compared to baseline conditions, are summarized in **Table SRA-2.3.6-2**. As indicated in **Table SRA-**

[19] South Coast Air Quality Management District, Draft Guidance Document - Interim CEQA Greenhouse Gas (GHG) Significance Threshold, October 2008.

2.3.6-2, the majority of increases in GHG emissions compared to baseline conditions would be from aircraft operations, which is entirely attributable to the anticipated growth in airport activity levels that is common to 2025 buildout of any and all of the alternatives, including the LAWA Staff-Recommended Alternative. Although there would be a notable increase in aircraft emissions compared to baseline conditions, the airfield improvements under the LAWA Staff-Recommended Alternative would actually reduce GHG emissions for future conditions if no airfield improvements were implemented. This can be seen in comparing the aircraft emissions between the LAWA Staff-Recommended Alternative and Alternative 4, the latter of which includes no airfield improvements other than safety-related improvements. Under the LAWA Staff-Recommended Alternative, aircraft emissions in 2025 would be approximately one percent less than would otherwise occur if no airfield improvements were implemented. Under federal law, LAWA has no direct control over aircraft operations relative to GHG emissions; however, the airfield improvements proposed by LAWA and the ability of those improvements to enable aircraft to operate more efficiently (i.e., reduce the amount of time that aircraft are operating in the taxi/idle mode) would serve to reduce GHG emissions.

With regards to other increases in GHG emissions under the LAWA Staff-Recommended Alternative compared to baseline conditions, there would be an approximately 30 percent increase in GSE emissions and 36 percent increase in APU emissions, again being attributable to the projected growth in airport activity by 2025 independent of the alternatives. Vehicle-related GHG emissions at buildout of the LAWA Staff-Recommended Alternative would be slightly more than those of baseline conditions. Although the volume of airport-related traffic would increase substantially by 2025, compared to baseline conditions, due the aforementioned projected growth in airport activity, the ongoing implementation of motor vehicle emission control and fuel mileage standards in new vehicles along with the gradual transition to newer, cleaner, and more fuel efficient vehicles over time would result in reduced GHG emissions per vehicle by 2025.[20] The amount of per vehicle GHG emission reductions would largely offset the increase in the volume of vehicles projected to occur between the baseline year and 2025. In comparing the 2025 GHG emissions for the LAWA Staff-Recommended Alternative to those of Alternative 4 (i.e., the alternative with minimal improvements), the vehicle-related emissions of the LAWA Staff-Recommended Alternative would be less. This is primarily due to the improved parking infrastructure that would reduce the number of off-airport roadway trips. Stationary source GHG emissions for the LAWA Staff-Recommended Alternative, as well as all other alternatives, are anticipated to be greater than baseline conditions because of the additional airfield/terminal and ground access components.

On a per capita (per passenger) basis, the GHG emissions associated with implementation of the LAWA Staff-Recommended Alternative would be approximately 14.68 percent less than the per capita (per passenger) GHG emissions for baseline conditions. Notwithstanding that reduction in per capita GHG emissions would be a substantial improvement over baseline conditions, the reduction is less than the 16 percent targeted reduction reflected in the AB 32 Scoping Plan, which is the basis for the threshold of significance in this analysis; hence, the GHG emissions associated with the LAWA Staff-Recommended Alternative would be significant.

[20] The EMFAC2011 emission factors used to estimate GHG emissions for each alternative, including the LAWA Staff-Recommended Alternative, in 2025 do not include the GHG reductions anticipated to occur from implementation of several measures specifically included in the AB 32 Scoping Plan for future reductions. Such measures that were not included in the GHG emissions estimates for future conditions include those associated with continued implementation of the Pavley greenhouse gas vehicle standards (i.e., Pavley II) and Advanced Clean Cars improvements. As such, the on-road vehicle GHG emissions estimates for each alternative, including the LAWA Staff-Recommended Alternative, are conservative and would actually be lower than estimated with future implementation of these, and other, measures.

Table SRA-2.3.6-1

Total GHG Construction Emissions - LAWA Staff-Recommended Alternative

	$MTCO_2e$[1]/year	
Source	**Alt. 4**	**SRA**
Airfield/Terminal Construction	13,836	315,985
Ground Access Construction	32,196	66,130
Total	46,031	382,115
Amortized Total[2]	1,534	12,737

Notes:

Totals may not add due to rounding.

[1] $MTCO_2e$ = metric tons carbon dioxide equivalent

[2] Amortized total equals the grand total (airside plus ground access construction) divided by the lifetime of the project, assumed to be 30 years.

Source: Environmental Compliance Solutions, 2012; CDM Smith, 2012.

Table SRA-2.3.6-2

Incremental Changes in GHG Emissions Compared to Baseline Conditions - LAWA Staff-Recommended Alternative

Source	Baseline[1] $MTCO_2e$/year[2]	Incremental Increase or Decrease Compared to Baseline: Alt. 4 $MTCO_2e$/year[4]	Incremental Increase or Decrease Compared to Baseline: SRA[2] $MTCO_2e$/year[4]
Aircraft	634,424	332,648	322,013
Ground Support Equipment[2]	60,551	18,287	18,287
Auxiliary Power Units	44,380	16,160	16,160
Parking Facilities	108,784	-3,268	-9,985
On-Airport Roadways	48,865	-4,353	-5,582
On-Airport Stationary	66	8	77
On-Airport Subtotal	897,070	359,482	340,970
Building Electricity	7,763	956	9,107
Solid Waste Disposal	345	43	405
Indoor/Outdoor Water Usage	646	80	758
Off-Airport Roadways	1,404,778	100,450	78,560
Off-Airport Subtotal	1,413,532	101,528	88,830
Amortized Construction		1,534	12,737
Total Incremental Emissions		462,544	442,537
Total Emissions (Baseline + Increment)	**2,310,602**	**2,773,146**	**2,753,139**
Per Capita Emissions ($MTCO_2e$/year)	0.04090	0.03515	0.03489
Percent Reduction Compared to Baseline Conditions	**NA**	**14.06%**	**14.68%**
Significance Threshold		>16%	>16%
Significant Impact?		**Yes**	**Yes**

Notes:

1 Emissions totals may not add due to rounding.
2 $MTCO_2e$/year = metric tons carbon dioxide equivalent per year
3 GSE operations and activity levels are assumed to be directly related to aircraft activity levels; therefore, GSE emissions are the same for all future alternatives since aircraft activity is the same for all alternatives in 2025.

Source: CDM Smith, 2012.

2.3.6.2 Mitigation Measures

The LAWA Staff-Recommended Alternative includes mitigation measures to reduce construction equipment operations/duration, as described above. Additionally, GHG emissions associated with the LAWA Staff-Recommended Alternative would be reduced directly or indirectly through compliance with LAWA's Sustainable Airport Planning, Design and Construction Guidelines and/or the requirements of the City of Los Angeles Green Building Ordinance. There are no other feasible mitigation measures to reduce construction-related GHG emissions other than those already identified above in Section 4.6.5 and in Section 4.2, *Air Quality*, of the SPAS Draft EIR, as amended by corrections and additions to the SPAS Draft EIR identified in Chapter 5 of Part II of this Final EIR.

For operational impacts, the LAWA Staff-Recommended Alternative would comply with the requirements of the City of Los Angeles Green Building Ordinance and with LAWA policies and programs related to sustainability and reducing GHG emissions that are implemented on project-specific and on an airport-wide basis. As noted in OPR's Technical Advisory on CEQA and Climate Change, LAWA's programmatic

efforts to address GHG emissions agency-wide can be a more effective approach than mitigating GHG emissions at a project level.[21] **Tables SRA-2.3.6-3** and **SRA-2.3.6-4** present a comprehensive list of suggested mitigation measures for new development projects throughout the state of California. The list presented in **Table SRA-2.3.6-3** is prepared by the California Office of the Attorney General relative to addressing GHG emissions and climate change impacts within an EIR.[22] The list presented in **Table SRA-2.3.6-4** is prepared by OPR and presents examples of measures that have been used by some public agencies to reduce GHG emissions.[23] **Tables SRA-2.3.6-3** and **SRA-2.3.6-4** and text below indicate how the SPAS alternatives, including the LAWA Staff-Recommended Alternative, as well as LAWA's overall sustainability actions and objectives, relates to each of the applicable mitigation measures.

Table SRA-2.3.6-3

Evaluation of Potential GHG Mitigation Measures from the California Office of the Attorney General

Measure	Discussion
Energy Efficiency	
Incorporate green building practices and design elements.	New development occurring under any of the SPAS alternatives would be subject to the LAWA's sustainability guidelines (i.e., LAWA *Sustainable Airport Planning, Design and Construction Guidelines for Implementation on All Airport Projects* [LSAG] and/or the City of Los Angeles Green Building Ordinance). Those guidelines and Ordinance requirements address green building practices and design elements. LAWA requires new terminal facilities to achieve LEED® Silver certification.[1]
Meet recognized green building and energy efficiency benchmarks.	As noted above, all of the SPAS alternatives would be subject to LSAG and/or the Green Building Ordinance, which include provisions for energy efficiency and conservation. For example, the Green Building Ordinance requires that a project exceed CEC 2008 Energy Efficiency Standards by 15 percent.
Install energy efficient lighting (e.g., light emitting diodes [LEDs]), heating and cooling systems, appliances, equipment, and control systems.	The use of energy efficient lighting, systems, and equipment in new facilities and in the renovation/modification of existing facilities is standard practice by LAWA and is generally reflected in the requirements of the Green Building Ordinance.
Use passive solar design, e.g., orient buildings and incorporate landscaping to maximize passive solar heating during cool seasons, minimize solar heat gain during hot seasons, and enhance natural ventilation. Design buildings to take advantage of sunlight.	Utilization of passive solar design features in new development is an option available through LSAG and would be considered under any of the SPAS alternatives.
Install light colored "cool" roofs and cool pavements.	LSAG includes provisions for "heat island" reduction including the use of cool roofs as an option available under all of the SPAS alternatives.

21 State of California, Governor's Office of Planning and Research, Technical Advisory - CEQA and Climate Change: Addressing Climate Change through California Environmental Quality Act (CEQA) Review, June 19, 2008.

22 State of California Department of Justice, Office of the California Attorney General, Addressing Climate Change at the Project Level California Attorney General's Office, Available: http://ag.ca.gov/globalwarming/pdf/GW_mitigation_measures.pdf, accessed April 3, 2012.

23 State of California, Governor's Office of Planning and Research, Technical Advisory - CEQA and Climate Change Addressing Climate Change Through California Environmental Quality Act (CEQA) Review, Attachment 3, June 19, 2008.

Table SRA-2.3.6-3

Evaluation of Potential GHG Mitigation Measures from the California Office of the Attorney General

Measure	Discussion
Install efficient lighting, (including LEDs) for traffic, street, and other outdoor lighting.	As indicated above, the use of energy efficient lighting is standard practice by LAWA and would also occur in meeting the energy conservation requirements of the Green Building Ordinance, which would be applicable to all of the SPAS alternatives. With regard to traffic lights, LAWA and LADOT install LEDs for any major upgrades to existing signals or addition of new signals, which would also be the case with all of the SPAS alternatives.
Reduce unnecessary outdoor lighting.	Development of improvements involving outdoor lighting under any of the SPAS alternatives is anticipated to avoid any unnecessary lighting, as a means to help achieve the energy conservation requirements of the Green Building Ordinance.
Provide education on energy efficiency to residents, customers, and/or tenants.	Provisions for education of LAWA contractors, suppliers, tenants, and the community relative to the benefits of sustainability measures are included in the LSAG, which would apply to all of the SPAS alternatives.
Renewable Energy and Energy Storage	
Meet "reach" goals for building energy efficiency and renewable energy use.	While the ability to achieve "zero net energy" buildings in conjunction with any of the SPAS alternatives is uncertain, the energy efficiency and conservation provisions of Green Building Ordinance would support progress towards such a goal.
Install solar, wind, and geothermal power systems and solar hot water heaters.	Based on land constraints and airfield safety considerations, it is generally infeasible to install alternative energy systems at the airport. LAWA is, however, committed to, and a participant in, LADWP's "Green Power for LA" program, which promotes the use of green power provided through LADWP.
Install solar panels on unused roof and ground space and over carports and parking areas.	As noted above, land constraints and airfield safety considerations limit the opportunities for solar panels at the airport.
Where solar systems cannot feasibly be incorporated into the project at the outset, build "solar ready" structures.	Please see above.
Incorporate wind and solar energy systems into agricultural projects where appropriate.	Not applicable
Include energy storage where appropriate to optimize renewable energy generation systems and avoid peak energy use.	Although separate from SPAS, the LAX Central Utility Plant (CUP) Replacement Project, currently under construction, includes a thermal energy storage system (i.e., large tank below grade to store cooled water, which can reduce needs during peak energy use periods). The new CUP will help provide for the heating and cooling needs of the terminal improvements associated with all of the SPAS alternatives, except Alternative 4, which does not include terminal improvements.
Use on-site generated biogas, including CH_4, in appropriate applications.	Not applicable.

Table SRA-2.3.6-3

Evaluation of Potential GHG Mitigation Measures from the California Office of the Attorney General

Measure	Discussion
Use combined heat and power (CHP) in appropriate applications.	The CUP Replacement Project, described above, also includes cogeneration for the production of electricity from heat generated during the production of steam.
Water Conservation and Efficiency	
Incorporate water-reducing features into building and landscape design.	Provisions for incorporating water-reducing features into building and landscape design are included in the Green Building Ordinance, which would be applicable to all of the SPAS alternatives.
Create water-efficient landscapes.	Please see above.
Install water-efficient irrigation systems and devices, such as soil moisture-based irrigation controls and use water-efficient irrigation methods.	Please see above.
Make effective use of graywater. (Graywater is untreated household wastewater from bathtubs, showers, bathroom wash basins, and water from clothes washing machines. Graywater to be used for landscape irrigation.)	Not applicable; generation of such graywater from the types of uses associated with the SPAS alternatives would be negligible.
Implement low-impact development practices that maintain the existing hydrology of the site to manage storm water and protect the environment.	All of the SPAS alternatives would comply with the City's Low Impact Development (LID) Ordinance requirements, as applicable.
Devise a comprehensive water conservation strategy appropriate for the project and location.	As indicated above, the Green Building Ordinance includes provisions for water conservation, which would be applicable to all of the SPAS alternatives.
Design buildings to be water-efficient. Install water-efficient fixtures and appliances.	Please see above.
Offset water demand from new projects so that there is no net increase in water use.	Please see above.
Provide education about water conservation and available programs and incentives.	Provisions for education of LAWA contractors, suppliers, tenants, and the community relative to the benefits of sustainability measures, which water conservation is an element, are included in the LSAG.
Solid Waste Measures	
Reuse and recycle construction and demolition waste (including, but not limited to, soil, vegetation, concrete, lumber, metal, and cardboard).	The Green Building Ordinance includes provisions for waste reduction and management, including, but not limited to, reuse and recycling of construction and demolition waste, which would be applicable to all of the SPAS alternatives.
Integrate reuse and recycling into residential, industrial, institutional, and commercial projects.	In addition to the requirements of the Green Building Ordinance, LAWA has a comprehensive facility-wide solid waste diversion/recycling program at LAX. That program is described in Section 4.13.2, *Solid Waste*, of this EIR and would be applicable to all of the SPAS alternatives.
Provide easy and convenient recycling opportunities for residents, the public, and tenant businesses.	Please see above.

Table SRA-2.3.6-3

Evaluation of Potential GHG Mitigation Measures from the California Office of the Attorney General

Measure	Discussion
Provide education and publicity about reducing waste and available recycling services.	Please see above.
Land Use Measures	
Ensure consistency with "smart growth" principles - mixed-use, infill, and higher-density projects that provide alternatives to individual vehicle travel and promote the efficient delivery of services and goods.	Not applicable.
Meet recognized "smart growth" benchmarks.	Not applicable.
Educate the public about the many benefits of well-designed, higher density development.	Not applicable.
Incorporate public transit into the project's design.	Transit bus stops/connections for several municipalities are currently provided at LAX, in addition to the LAWA shuttle system between the CTA and the existing Metro Green Line Station. With the exception of Alternative 4, all of the SPAS alternatives include facilities that can improve and encourage transit use at the airport, such as the Intermodal Transportation Facility (ITF) (Alternatives 1, 2, 8, and 9), the Ground Transportation Center (GTC) and Intermodal Transportation Center (ITC) (Alternative 3), and the elevated/dedicated busway or Automated People Mover (APM) that would connect the CTA to the ITF and the future LAX/Crenshaw Metro Light Rail Station (Alternatives 1, 2, 8, and 9).
Preserve and create open space and parks. Preserve existing trees, and plant replacement trees at a set ratio.	Not applicable.
Develop "brownfields" and other underused or defunct properties near existing public transportation and jobs.	Not applicable.
Include pedestrian and bicycle facilities within projects and ensure that existing non-motorized routes are maintained and enhanced.	The improvements proposed under all of the SPAS alternatives would include provisions for pedestrian and bicycle facilities, as appropriate.
Transportation and Motor Vehicles	
Meet an identified transportation-related benchmark.	As noted above, all of the SPAS alternatives, except for Alternative 4, include improvements that can improve and encourage transit use at the airport. The success of these and other such measures can help reduce vehicle miles traveled (VMT). Reduction of VMT is a GHG reduction strategy recognized in the California Energy Commission's 2007 Staff Report *The Role of Land Use in Meeting California's Energy and Climate Change Goals*.
Adopt a comprehensive parking policy that discourages private vehicle use and encourages the use of alternative transportation.	While LAWA could develop and implement a parking policy that discourages private vehicles use, such ability would be limited to only those facilities controlled by LAWA. It is likely that the effect of such restrictions would be substantially diminished by the availability of many other privately-owned/operated parking facilities near the airport.
Build or fund a major transit stop within or near the development.	Please see the transit discussion in Land Use Measures above.

Table SRA-2.3.6-3

Evaluation of Potential GHG Mitigation Measures from the California Office of the Attorney General

Measure	Discussion
Provide public transit incentives such as free or low-cost monthly transit passes to employees, or free ride areas to residents and customers.	LAWA has a comprehensive rideshare and vanpool program available to all employees. LAWA's Rideshare Program offers financial incentives and discounts to participating employees. This program would continue agency-wide and is not particular to any specific SPAS alternative.
Promote "least polluting" ways to connect people and goods to their destinations.	Please see measures above regarding transit.
Incorporate bicycle lanes, routes, and facilities into street systems, new subdivisions, and large developments.	The improvements proposed under all of the SPAS alternatives would include provisions for bicycle facilities, as appropriate.
Require amenities for non-motorized transportation, such as secure and convenient bicycle parking.	Please see above.
Ensure that the project enhances, and does not disrupt or create barriers to, non-motorized transportation.	Please see measures above regarding facilities that would improve and enhance transit access.
Connect parks and open space through shared pedestrian/bike paths and trails to encourage walking and bicycling. Create bicycle lanes and walking paths directed to the location of schools, parks, and other destination points.	Not applicable.
Work with the school districts to improve pedestrian and bicycle access to schools and to restore or expand school bus service using lower-emitting vehicles.	Not applicable.
Institute teleconferencing, telecommute, and/or flexible work hour programs to reduce unnecessary employee transportation.	LAWA offers flexible work hour programs to employees, which would continue agency-wide and is not particular to any specific SPAS alternative.
Provide information on alternative transportation options for consumers, residents, tenants, and employees to reduce transportation-related emissions.	It is anticipated that the facilities described above relative to improving transit access at LAX would be reflected in the routes, schedules, and other information available from the affected transit agencies.
Educate consumers, residents, tenants, and the public about options for reducing motor vehicle-related GHG emissions. Include information on trip reduction; trip linking; vehicle performance and efficiency (e.g., keeping tires inflated); and low or zero-emission vehicles.	Beyond scope of project.
Purchase, or create incentives for purchasing, low or zero-emission vehicles.	The majority of LAWA's vehicle fleet is comprised of low-emission vehicles, and LAWA continues to increase that percentage. LAWA would continue that program agency-wide, which is not particular to any specific SPAS alternative.
Create a ridesharing program. Promote existing ridesharing programs e.g., by designating a certain percentage of parking spaces for ridesharing vehicles, designating adequate passenger loading and unloading for ridesharing vehicles, and providing a website or message board for coordinating rides.	Please see above regarding LAWA's existing ridesharing program.
Create or accommodate car sharing programs, e.g., provide parking spaces for car share vehicles at convenient locations accessible by public transportation.	LAWA would consider, and incorporate if feasible, this measure in the design of the transportation facilities associated with Alternatives 1, 2, 3, 8, and 9 (i.e., ITF,

Table SRA-2.3.6-3

Evaluation of Potential GHG Mitigation Measures from the California Office of the Attorney General

Measure	Discussion
	GTC, and ITC).
Provide a vanpool for employees.	Please see above regarding LAWA's existing vanpool program.
Create local "light vehicle" networks, such as neighborhood electric vehicle systems.	Not applicable.
Enforce and follow idling time limits for commercial vehicles, including delivery and construction vehicles.	The LAX Master Plan MMRP and state law include provisions to limit construction vehicle idling, which would apply to all of the SPAS alternatives.
Provide the necessary facilities and infrastructure to encourage the use of low or zero-emission vehicles.	Electric vehicle charging stations are available to the public near Parking Structure 1 within the CTA. Such facilities would continue to be available and possibly expanded, if/as feasible, in conjunction with all of the SPAS alternatives. Additionally, aircraft gate improvements associated with concourse modifications or additions under any of the SPAS alternatives, except for Alternative 4 which does not include such improvements, would accommodate electric ground support equipment (eGSE) charging stations.
Require best management practices in agriculture and animal operations to reduce emissions, conserve energy and water, and utilize alternative energy sources, including biogas, wind, and solar.	Not applicable.
Preserve forested areas, agricultural lands, wildlife habitat and corridors, wetlands, watersheds, groundwater recharge areas, and other open space that provide carbon sequestration benefits.	Not applicable.
Protect existing trees and encourage the planting of new trees. Adopt a tree protection and replacement ordinance.	The incorporation of trees and other landscaping into development plans for all of the SPAS alternatives will be considered, giving due consideration to federal requirements and guidelines related to airport safety (i.e., avoid/discourage bird attractants which may increase risk of birdstrike incidents).

[1] Los Angeles World Airports, Sustainability Report, June 2010.

Source: CDM Smith, 2012.

Table SRA-2.3.6-4

Evaluation of Potential GHG Reduction Measures from the Governor's Office of Planning and Research

Measure	Discussion
Land Use and Transportation	
Implement land use strategies to encourage jobs/housing proximity, promote transit-oriented development, and encourage high-density development along transit corridors. Encourage compact, mixed-use projects, forming urban villages designed to maximize affordable housing and encourage walking, bicycling, and use of public transit systems.	Not applicable.
Encourage infill, redevelopment, and higher-density development, whether in incorporated or unincorporated settings.	Not applicable.
Encourage new developments to integrate housing, civic, and retail amenities (jobs, schools, parks, and shopping opportunities) to help reduce VMT resulting from discretionary automobile trips.	Not applicable.
Apply advanced technology systems and management strategies to improve operational efficiency of transportation systems and movement of people, goods, and services.	All of the SPAS alternatives include ground transportation improvements designed to improve operational efficiency of transportation systems and movement of people.
Incorporate features into project design that would accommodate the supply of frequent, reliable, and convenient public transit.	Transit bus stops/connections for several municipalities are currently provided at LAX, in addition to the LAWA shuttle system between the CTA and the existing Metro Green Line Station. With the exception of Alternative 4, all of the SPAS alternatives include facilities that can improve and encourage transit use at the airport, such as the ITF (Alternatives 1, 2, 8, and 9), the GTC and ITC (Alternative 3), and the elevated/dedicated busway or APM that would connect the CTA to the ITF and the future LAX/Crenshaw Metro Light Rail Station (Alternatives 1, 2, 8, and 9).
Implement street improvements that are designed to relieve pressure on a region's most congested roadways and intersections.	Beyond the scope/control of the project.
Limit idling time for commercial vehicles, including delivery and construction vehicles.	The LAX Master Plan MMRP and state law include provisions to limit construction vehicle idling, which would apply to all of the SPAS alternatives.
Urban Forestry	
Plant trees and vegetation near structures to shade buildings and reduce energy requirements for heating/cooling.	The incorporation of trees and other landscaping into development plans for all of the SPAS alternatives will be considered, giving due consideration to federal requirements and guidelines related to airport safety (i.e., avoid/discourage bird attractants which may increase risk of birdstrike incidents).
Preserve or replace on-site trees (that are removed due to development) as a means of providing carbon storage.	Please see above regarding the planting of trees at the airport. Removal of existing mature trees due to development of any of the SPAS alternatives could be replaced off-site.
Green Buildings	
Encourage public and private construction of LEED®-certified (or equivalent) buildings.	LAWA requires new terminal facilities to achieve LEED® Silver certification.[1]

Table SRA-2.3.6-4

Evaluation of Potential GHG Reduction Measures from the Governor's Office of Planning and Research

Measure	Discussion
Energy Conservation Policies and Actions	
Recognize and promote energy saving measures beyond Title 24 requirements for residential and commercial projects.	The Green Building Code requires a project to exceed CEC 2008 Energy Efficiency Standards by 15 percent. All of the SPAS alternatives would be subject to the requirements of the Green Building Code.
Where feasible, include in new buildings facilities to support the use of low/zero carbon fueled vehicles, such as charging of electric vehicles from green electricity sources.	Electric vehicle charging stations are available to the public near Parking Structure 1 within the CTA. Such facilities would continue to be available and possibly expanded, if/as feasible, in conjunction with all of the SPAS alternatives. Additionally, aircraft gate improvements associated with concourse modifications or additions under any of the SPAS alternatives, except for Alternative 4 which does not include such improvements, would accommodate eGSE charging stations.
Educate the public, schools, other jurisdictions, professional associations, business, and industry about reducing GHG emissions.	Provisions for education of LAWA contractors, suppliers, tenants, and the community relative to the benefits of sustainability measures are included in the LSAG, which would apply to all of the SPAS alternatives.
Replace traffic lights, street lights, and other electrical uses to energy efficient bulbs and appliances.	The use of energy efficient lighting is standard practice by LAWA and would also occur in meeting the energy conservation requirements of the Green Building Ordinance, which would be applicable to all of the SPAS alternatives. With regard to traffic lights, LAWA and LADOT install LEDs for any major upgrades to existing signals or addition of new signals, which would also be the case with all of the SPAS alternatives.
Purchase Energy Star equipment and appliances for public agency use.	The utilization of Energy Star equipment is required by the Green Building Ordinance, as would apply to all of the SPAS alternatives.
Incorporate on-site renewable energy production, including installation of photovoltaic cells or other options.	Although separate from SPAS, the LAX CUP Replacement Project, currently under construction, includes a thermal energy storage system (i.e., large tank below grade to store cooled water, which can reduce needs during peak energy use periods). It also includes cogeneration for the production of electricity from heat generated during the production of steam. The new CUP will help provide for the heating and cooling needs of the terminal improvements associated with all of the SPAS alternatives, except Alternative 4, which does not include terminal improvements.
Execute an Energy Savings Performance Contract with a private entity to retrofit public buildings. This type of contract allows the private entity to fund all energy improvements in exchange for a share of the energy savings over a period of time.	Beyond the scope/control of the project.
Design, build, and operate schools that meet the Collaborative for High Performance Schools best practices.	Beyond the scope/control of the project.
Retrofit municipal water and wastewater systems with energy efficient motors, pumps, and other equipment, and recover wastewater treatment methane for energy production.	LAX has water efficient computer controlled irrigation systems. Energy efficient utility systems, including water conservation, are reflected in the requirements of the Green

Table SRA-2.3.6-4

Evaluation of Potential GHG Reduction Measures from the Governor's Office of Planning and Research

Measure	Discussion
	Building Ordinance, as would apply to all of the SPAS alternatives.
Convert landfill gas into energy sources for use in fueling vehicles, operating equipment, and heating buildings.	Beyond the scope/control of the project.
Purchase government vehicles and buses that use alternative fuels or technology, such as electric hybrids, biodiesel, and ethanol. Where feasible, require fleet vehicles to be low-emission vehicles. Promote the use of these vehicles in the general community.	The majority of LAWA's vehicle fleet is comprised of low-emission vehicles, and LAWA continues to increase that percentage. LAWA would continue that program agency-wide, which is not particular to any specific SPAS alternative. Also, as noted above, electric vehicle charging stations are available to the public near Parking Structure 1 within the CTA. Such facilities would continue to be available and possibly expanded, if/as feasible, in conjunction with all of the SPAS alternatives. Additionally, aircraft gate improvements associated with concourse modifications or additions under any of the SPAS alternatives, except for Alternative 4 which does not include such improvements, would accommodate eGSE charging stations.
Offer government incentives to private businesses for developing buildings with energy and water efficient features and recycled materials. The incentives can include expedited plan checks and reduced permit fees.	Beyond the scope/control of the project.
Offer rebates and low-interest loans to residents that make energy-saving improvements on their homes.	Beyond the scope/control of the project.
Create bicycle lanes and walking paths directed to the location of schools, parks, and other destination points.	Beyond the scope/control of the project.
Programs to Reduce Vehicle Miles Traveled	
Offer government employees financial incentives to carpool, use public transportation, or use other modes of travel for daily commutes.	LAWA has a comprehensive rideshare and vanpool program available to all employees. LAWA's Rideshare Program offers financial incentives and discounts to participating employees. This program would continue agency-wide and is not particular to any specific SPAS alternative.
Encourage large businesses to develop commute trip reduction plans that encourage employees who commute alone to consider alternative transportation modes.	Please see above.
Develop shuttle systems around business district parking garages to reduce congestion and create shorter commutes.	Beyond the scope/control of the project.
Create an online ridesharing program that matches potential carpoolers immediately through email.	LAWA's Rideshare Program, noted above, uses RideMatch.info which provides one-stop ride-matching services to employees. This program would continue agency-wide and is not particular to any specific SPAS alternative.
Develop a Safe Routes to School Program that allows and promotes bicycling and walking to school.	Beyond the scope/control of the project.

Table SRA-2.3.6-4

Evaluation of Potential GHG Reduction Measures from the Governor's Office of Planning and Research

Measure	Discussion
Programs to Reduce Solid Waste	
Create incentives to increase recycling and reduce generation of solid waste by residential users.	Beyond the scope/control of the project.
Implement a Construction and Demolition Waste Recycling Ordinance to reduce the solid waste created by new development.	LSAG includes provisions for waste reduction and management, including, but not limited to, reuse and recycling of construction and demolition waste, which would be applicable to all of the SPAS alternatives.
Add residential/commercial food waste collection to existing greenwaste collection programs.	LAWA has an ongoing waste reduction program.

[1] Los Angeles World Airports, Sustainability Report, June 2010.

Source: CDM Smith, 2012.

2.3.6.3 Level of Significance After Mitigation

Continued implementation of LAWA's existing practices and programs that promote sustainability and reduction in GHG emissions, along with compliance with the City of Los Angeles Green Building Ordinance, would help reduce GHG emissions associated with the LAWA Staff-Recommended Alternative; however, the GHG emissions associated with the LAWA Staff-Recommended Alternative would remain significant and unavoidable.

2.3.7 Hazards/Hazardous Materials

2.3.7.1 Human Health Risk Assessment

2.3.7.1.1 Impacts Analysis

As noted in Sections 2.3 and 2.3.1.1, emissions of toxic air contaminants (TAC) associated with the airfield/terminal components of Alternative 1 were combined with the TAC emissions associated with the ground access components of Alternative 9 to obtain TAC emissions associated with the LAWA Staff-Recommended Alternative. Risk calculations were then performed for these combined TAC emissions to identify human health risks.

This section describes incremental health impacts associated with inhalation of TAC released during construction and during airport operations following implementation of the LAWA Staff-Recommended Alternative. Environmental consequences considered in this analysis include cancer risks, chronic (long-term) non-cancer health hazards, and acute (short-term) non-cancer health hazards. Health impacts for on-airport workers from inhalation of TAC are also considered.

The discussion of TAC concentrations in air and associated health impacts focuses on MEI. A review of previous health risk assessments conducted for LAX projects[24,25] indicate that maximum TAC concentrations associated with LAX activities occur at the airport fence-line, and the concentrations decrease as one moves away from the airport. For this analysis, MEI were conservatively identified as individuals that work, reside, or attend school at the LAX fence-line. Since no such individuals currently work, reside, or attend school at the LAX fence-line, estimates of risk and hazard overestimate health risk that may actually accrue as a result of implementation of the LAWA Staff-Recommended Alternative. No exposures or risks within the community would be higher than those calculated for MEI, and the HHRA is protective for all people within the study area. Risks and hazard estimates evaluate incremental risk associated with releases of TAC from construction and operational activities (aircraft operations, on-site mobile sources, and off-site regional traffic). The baseline year for evaluating incremental impacts is 2009, which is representative of 2010 conditions. The horizon year for buildout of the LAWA Staff-Recommended Alternative for purposes of analysis is 2025.

Cancer risk and non-cancer health hazards are based on combined emission rates estimated for construction and airport operations after buildout of the LAWA Staff-Recommended Alternative, and on basic exposure assumptions used in the HHRA for the LAX Master Plan EIR, as revised to be consistent with recent USEPA and CalEPA guidance.[26,27] Cancer risks and non-cancer health hazards for MEI were calculated for adult residents, child residents 0 to 6 years of age, adult workers, and elementary-aged school children near or at fence-line locations where air concentrations for TAC were predicted. The discussion of human health risk emphasizes results for adult residents for cancer risks and for child residents for chronic non-cancer health hazards because these populations are expected to incur the greatest exposures to LAX-related emissions and would hence be subject to the greatest risks and hazards. For the acute non-cancer health hazard impact analysis, receptors were assumed to be located at grid points near or at the fence-line.

Methods used in the HHRA are protective and are more likely to overestimate than underestimate possible health risks. For example, as noted above, risks were calculated for residents and school children for locations near or at the LAX fence-line where TAC concentrations are predicted to be highest. Individuals are assumed to be exposed for almost all days of the year and for many years (e.g., 70 years for adult residents) to maximize estimates of exposure. Resulting incremental risk estimates are therefore upper-bound or ceiling predictions for people living, working, or attending school in the study area. If these upper-bound estimates do not exceed significance thresholds, then actual members of the population near LAX would also not experience risks or hazards that exceed these thresholds.

Calculations supporting the results presented in the following sections are provided in Attachment 1 of Part II of this Final EIR.

2.3.7.1.1.1 Cancer Risks

Peak SPAS-related cancer risks for the LAWA Staff-Recommended Alternative are summarized in **Table SRA-2.3.7.1-1** and shown in **Figure SRA-2.3.7.1-1**. Peak incremental cancer risk locations are the locations with the smallest negative increments (i.e., where beneficial impacts would be smallest). These locations are used to determine the significance of project impacts. However, these locations are not

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24 City of Los Angeles, Final Environmental Impact Report Los Angeles International Airport (LAX) Proposed Master Plan Improvements, April 2004.

25 City of Los Angeles, Los Angeles World Airports, Final Environmental Impact Report for Los Angeles International Airport (LAX) Bradley West Project, September 2009.

26 U.S. Environmental Protection Agency, Office of Emergency and Remedial Response, Risk Assessment Guidance for Superfund, Vol. I, Human Health Evaluation Manual (Part F, Supplemental Guidance for Inhalation Risk Assessment), Final, EPA-540-R-070-002, OSWER 9285.7-82, January 2009, Available:
http://www.epa.gov/oswer/riskassessment/ragsf/pdf/partf_200901_final.pdf.

27 California Environmental Protection Agency, Office of Environmental Health Hazard Assessment, Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments, August 2003, Available:
http://oehha.ca.gov/air/hot_spots/pdf/HRAguidefinal.pdf

necessarily the locations where cancer risks are highest (i.e., MEI) under either baseline conditions or conditions with implementation of the LAWA Staff-Recommended Alternative. Rather, MEI are identified as being at locations where DPM concentrations and, consequently, cancer risks are highest. At MEI locations, beneficial impacts are substantial - that is, incremental cancer risks are more negative than they are at most other locations along the LAX fence-line. Both peak incremental cancer risk locations and MEI locations are identified in **Figure SRA-2.3.7.1-1**.

Table SRA-2.3.7.1-1

Peak Incremental Cancer Risks for the LAWA Staff-Recommended Alternative

Receptor Type	Incremental Cancer Risks[1,2,3,4] (per million people)
Child Resident	-0.71
School Child	-0.14
Adult Resident	-8.3
Adult Worker	-4.8

Notes:

Peak incremental cancer risk locations are the locations with the smallest negative increments (i.e., where beneficial impacts would be smallest). These locations are used to determine the significance of project impacts.

1 Values provided are calculated using RAGS F methodology.
2 Incremental values indicate changes in the number of cancer cases per million people exposed as compared to baseline conditions. Estimates are rounded to two significant figures.
3 Negative values indicate a beneficial impact.
4 Maximum values indicated are not all located at the same grid location.

Source: CDM Smith, 2012.

As indicated in **Table SRA-2.3.7.1-1**, emissions from construction and operational activities for the LAWA Staff-Recommended Alternative would result in peak incremental cancer risks of -8 in one million for adult residents and -0.7 in one million for child residents. Peak incremental cancer risks for school children at the peak residential location and for adult workers are estimated to be -0.1 in one million and -5 in one million, respectively. These risk estimates are based on modeling that incorporates select quantifiable mitigation measures from the LAX Master Plan MMRP (see Section 4.7.1.5 of the SPAS Draft EIR), but otherwise assumes no additional mitigation. The incremental cancer risks for the adult resident and adult worker at the location for MEI are -467 in one million and -166 in one million, respectively.

The negative values indicate that, relative to baseline conditions in 2009, some TAC concentrations at the LAX fence-line and in the study area would decrease after implementing the LAWA Staff-Recommended Alternative. In most cases, these negative values are due primarily to reductions in emissions from on-road motor vehicles (cars and trucks carrying passengers and cargo to and from the airport). As emission standards for motor vehicles continue to become more stringent over time, and the motor vehicle fleet is replaced with newer, less-polluting cars and trucks, the daily emissions from these sources decrease substantially when compared to baseline (2009) conditions. The reduction in motor vehicle emissions occurs even though the total VMT for airport-related trips increases between the baseline (2009) period and 2025. This emissions reduction more than compensates for the growth in emissions from aircraft and APUs. Concentrations of DPM in air are anticipated to decrease, even considering releases of DPM during the construction phase (i.e., the increase in DPM emissions during construction would be less than the decrease in DPM emissions during operations). Since DPM is responsible for most of the cancer risk associated with emissions from LAX, a reduction in DPM results in an overall reduction in cancer risk.

Since all risks are reported as incremental with respect to 2009 baseline conditions, cancer risks are reported as negative values to indicate reduced cancer risk as compared to 2009 baseline conditions.[28]

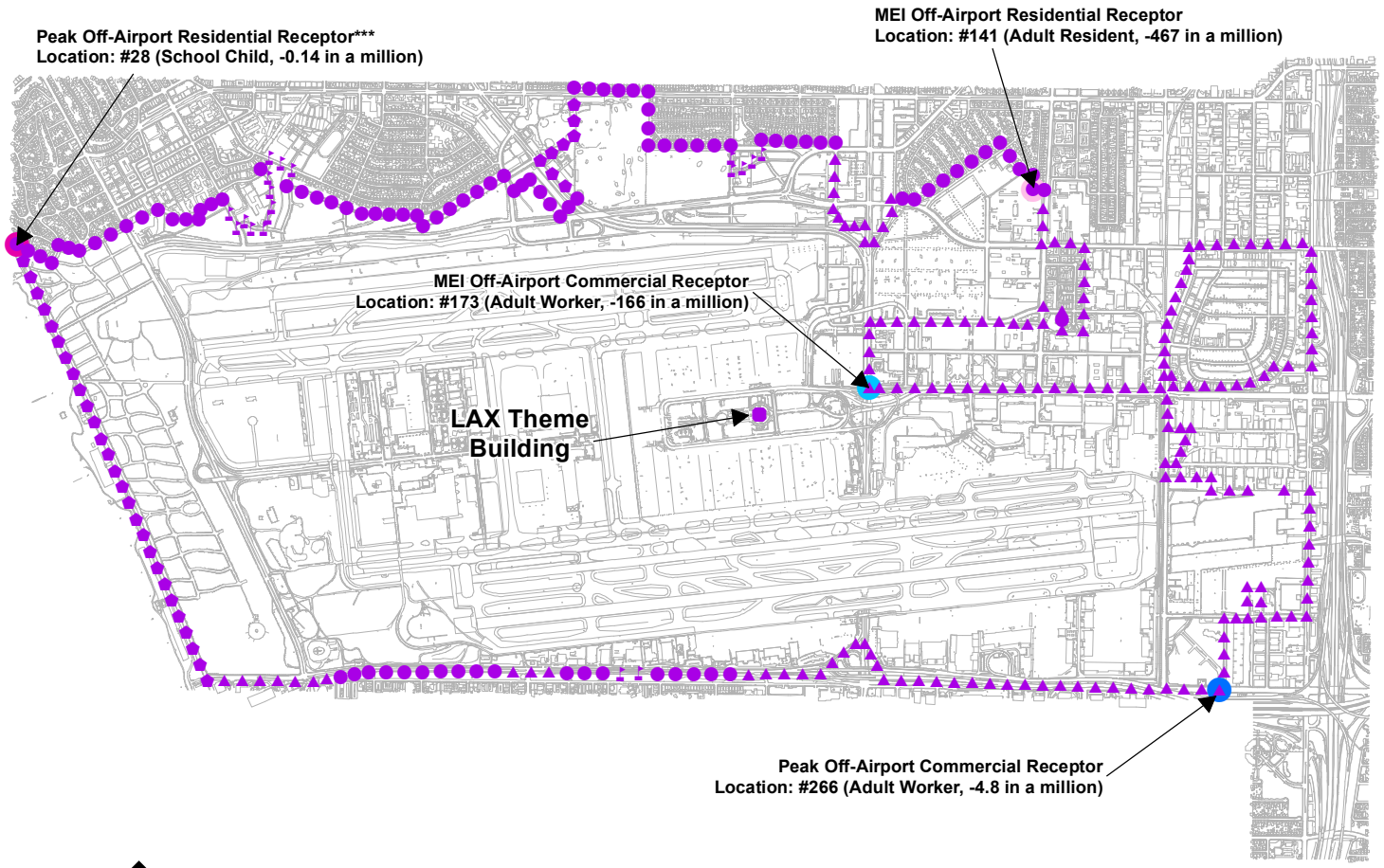
For example, if a population of adult residents was exposed to TAC concentrations at the peak location for 70 years after complete buildout of the LAWA Staff-Recommended Alternative, approximately 8 fewer cancer cases per million people exposed might occur as a result of changes to airport operations. Thus, for this receptor under the LAWA Staff-Recommended Alternative, a beneficial impact is predicted. Note that incremental risks reported in this HHRA do not consider the background cancer incidence in the United States, which is reported to be in the range of 1 in 3 to 1 in 2. Cancer risk reduction would therefore be realized against a very high background incidence.

Adult residents, for whom it is assumed exposure starts at birth and continues for 70 years, would have a greater change in incremental cancer risk than would children because of the long exposure. Emphasis is therefore placed on adults for purposes of determining significance. Changes in incremental cancer risks for children are not used since predicted cancer risks at a given location are less overall for children than are risks for adults. Information on childhood risks is provided to demonstrate the range of risk reduction for this alternative.

Exposure to DPM released during construction and airport operations contributed 86 percent of cancer risks for residents (adults and children) and school children, and 95 percent of cancer risks for adult workers. DPM concentrations in air in the study area are anticipated to be less for the LAWA Staff-Recommended Alternative than for 2009 baseline conditions. Unlike DPM, formaldehyde and 1,3-butadiene concentrations increased and incremental cancer risks considered individually for these TAC also increased. However, relatively small increases in risks from exposure to these TAC were more than offset by substantial decreases in DPM-related risks anticipated in 2025.

These estimates show that program-related cancer risks for all evaluated receptors (residential adults, residential children, school children, and adult workers) are predicted to be below the threshold of significance of 10 in one million for the LAWA Staff-Recommended Alternative and are expected to result in decreases in cancer risks due to anticipated decreases in DPM emissions. Therefore, cancer risk impacts to human health under the LAWA Staff-Recommended Alternative would be less than significant and would be beneficial. As noted above, these beneficial impacts are primarily due to ongoing implementation of more stringent motor vehicle emissions standards, cleaner future fleet mixes, and the decrease in stationary source emissions attributable to the replacement CUP, currently under construction. These reductions in future emissions, particularly those associated with future motor vehicle emissions, are anticipated to more than offset the estimated increases in other types of emissions, such as from aircraft, APU, and GSE.

[28] Incremental cancer risk estimates in most of the study area suggest smaller absolute decreases as compared to MEI estimates. In these locations, TAC concentrations are lower than they are at locations for MEI and risk reductions are generally similar on a percent of total (as opposed to incremental) cancer risk. As a hypothetical example, if total cancer risks at two locations were 8 and 4 x 10^{-6}, incremental cancer risks might be -2 and -1 x 10^{-6}. Note, however, that the decrease in DPM at all grid nodes in the study area is not uniform because differences in source locations and source strength between 2009 baseline conditions and the LAWA Staff-Recommended Alternative result in somewhat different distribution of TAC in dispersion model output. Thus, the best illustration of possible beneficial impacts comes from the analysis of incremental cancer risks on a grid node-by-grid node basis.



north

0 3,750 ft

Scale

Source: CDM Smith, 2012.

Legend

- Peak Off-Airport Commercial Receptor
- Peak Off-Airport Residential Receptor***
- MEI Off-Airport Commercial Receptor
- MEI Off-Airport Residential Receptor

Off-Airport Receptor Locations

- Off-Site Worker
- On-Site Occupational
- Residential
- Recreational
- School

Cancer Risk Classification

- < 0 (Negative)*
- 0 to ≤ 10 in a million**
- > 10 in a million

Notes:

* Negative incremental cancer risks indicate a beneficial impact. All incremental cancer risks for the LAWA Staff-Recommended Alternative are negative.

** Cancer risk threshold is 10 in 1 million. None of the incremental cancer risks exceed this threshold.

*** Because future schools could be sited in any area zoned as residential, school child receptors were evaluated at all residential grid nodes.

LAX Specific Plan Amendment Study Final EIR	Geographic Representation of Construction and Operational Incremental Cancer Risks by Receptor Type – LAWA Staff-Recommended Alternative	Figure SRA-2.3.7.1-1

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2.3.7.1.1.2 Chronic Non-Cancer Health Hazards

Acrolein and formaldehyde are the primary TAC of concern in emissions from LAX with respect to chronic non-cancer health hazards. Acrolein is responsible for the majority of predicted chronic non-cancer health hazards associated with LAX SPAS operations under the LAWA Staff-Recommended Alternative and is primarily associated with aircraft emissions. (For a detailed discussion of uncertainties regarding the presence of acrolein in aircraft emissions, see Section 7.3 of Technical Report S-9a of the LAX Master Plan Final EIR.) Primary sources of formaldehyde are emissions from gasoline and diesel powered equipment.

SPAS-related chronic non-cancer hazard indices for MEI for operational impacts under the LAWA Staff-Recommended Alternative are summarized in **Table SRA-2.3.7.1-2** and shown in **Figure SRA-2.3.7.1-2**. Chronic non-cancer hazard indices for adult residents and child residents are the same because RAGS, Part F methodology does not normalize hazard indices to body weight. For this reason, an adult+child resident receptor was not evaluated. An incremental hazard index equal to or greater than 1, the threshold of significance for chronic non-cancer effects, indicates some potential for adverse chronic non-cancer health effects. A hazard index less than 1 suggests that adverse chronic non-cancer health effects are not expected.

Table SRA-2.3.7.1-2

Peak Incremental Chronic Non-Cancer Health Hazards for Maximally Exposed Individuals for the LAWA Staff-Recommended Alternative

Receptor Type	Incremental Chronic Non-Cancer Hazards[1,2,3]
Child Resident	0.47
School Child	0.09
Adult Resident	0.47
Adult Worker	0.13

Notes:

Peak incremental chronic non-cancer health hazard locations are the locations with the greatest increment (i.e., where hazard impacts would be highest). These locations are used to determine the significance of project impacts.

1 Values provided are calculated using RAGS Part F methodology.
2 Incremental values indicate change as compared to baseline conditions. Estimates are rounded to two significant figures.
3 Maximum values indicated are not all located at the same grid location.

Source: CDM Smith, 2012.

SPAS-related chronic non-cancer health hazard indices for chemicals affecting the same target (i.e., the respiratory system) for the LAWA Staff-Recommended Alternative after full buildout are below the threshold of significance (HI of 1) for all receptor types. Incremental hazard indices are estimated to be 0.5 for both adult and child residents living at the peak hazard residential location, 0.09 for school children, and 0.1 for adult workers working at the peak hazard commercial location. These risk estimates are based on modeling that incorporates select quantifiable mitigation measures from the LAX Master Plan MMRP (see Section 4.7.1.5 of the SPAS Draft EIR), but otherwise assumes no additional mitigation.

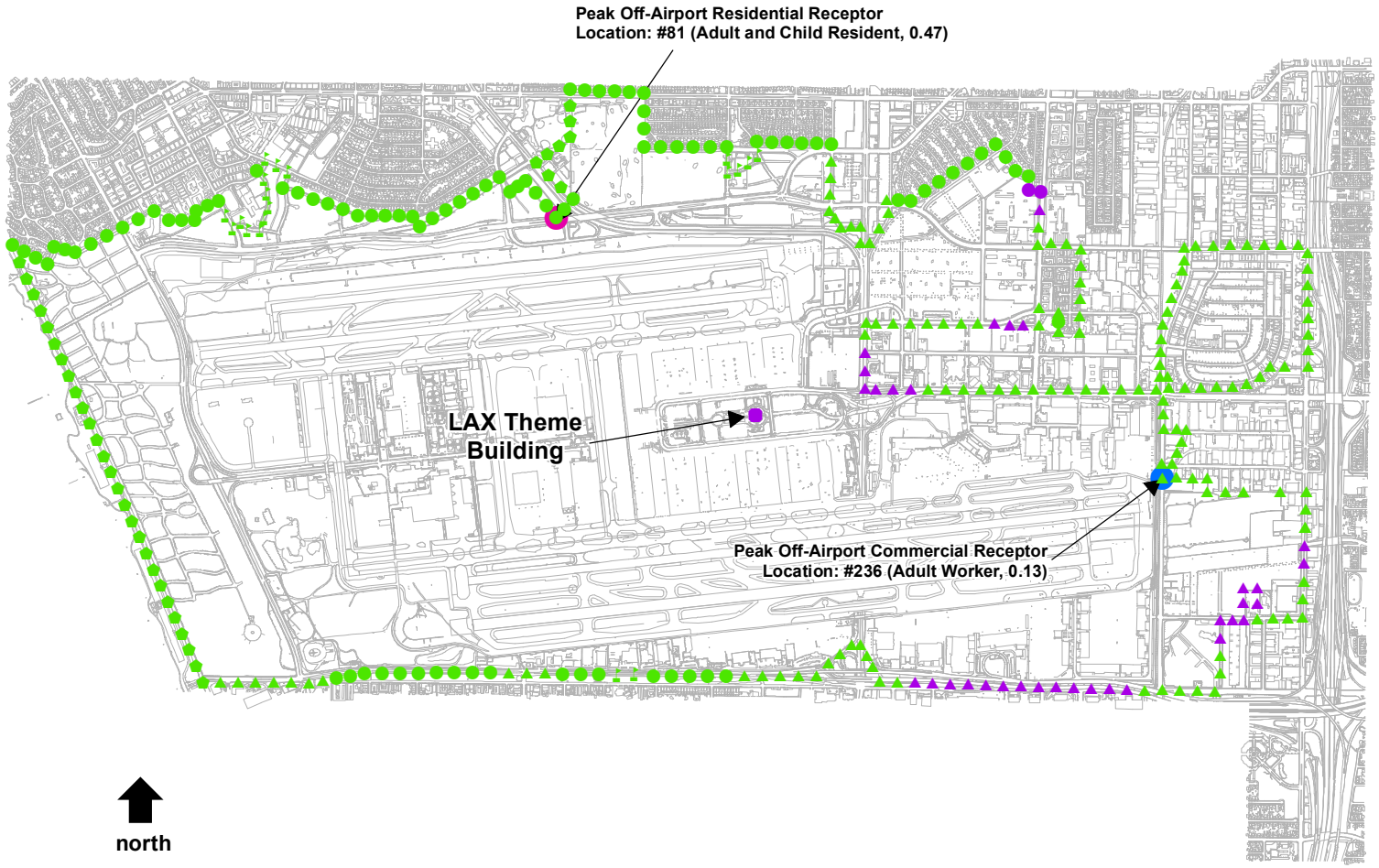
Hazard indices are primarily driven by release of acrolein in aircraft emissions. Acrolein at the peak hazard location contributes 78 percent to total hazard indices for residential receptors and school child receptors and formaldehyde contributes 15 percent. For the adult worker, the contributions are slightly

less, 74 percent from acrolein and 14 percent from formaldehyde. Similar to incremental cancer risks, decreases in modeled concentrations of some TAC, in this case DPM and chlorine, result in negative hazard indices that reduce the overall hazard index. However, although beneficial impacts attributable to decreases in modeled concentrations of DPM and chlorine offset the impacts attributable to increases in modeled concentrations of acrolein, overall total hazard indices are still positive (unlike cancer risks, where overall impact is negative (beneficial)). DPM contributes 5 percent to the total hazard indices for residential and school receptors, and 10 percent to the hazard index for the adult worker.

These estimates show that SPAS-related hazard indices for chemicals affecting the same target (i.e., the respiratory system) for all evaluated receptors (residential adults, residential children, school children, and adult workers) are predicted to be below the threshold of significance of 1 under the LAWA Staff-Recommended Alternative. Therefore, chronic non-cancer health hazard impacts under the LAWA Staff-Recommended Alternative would be less than significant.

2.3.7.1.1.3 Acute Non-Cancer Health Hazards

Acrolein and formaldehyde are the only TAC of concern in emissions from LAX that might be present at concentrations approaching the threshold for acute effects. Acrolein is responsible for the majority of all predicted acute non-cancer health hazards associated with LAX SPAS operations and is primarily associated with aircraft emissions. (For a detailed discussion of uncertainties regarding the presence of acrolein in aircraft emissions, see Section 7.3 of Technical Report S-9a of the LAX Master Plan Final EIR.) Acute exposures to acrolein may result in mild irritation of eyes and mucous membranes. Primary sources of formaldehyde are emissions from gasoline and diesel powered equipment. Acute effects for exposure to formaldehyde would typically include irritation to the eye and respiratory system and possibly adverse effects to the immune system. Maximum acute non-cancer health hazards associated with exposure to acrolein and formaldehyde from LAX SPAS operations under the LAWA Staff-Recommended Alternative are summarized in **Tables SRA-2.3.7.1-3** and **SRA-2.3.7.1-4**. **Figure SRA-2.3.7.1-3** shows the receptor locations with peak acrolein concentrations.



Legend

- Peak Off-Airport Commercial Receptor
- Peak Off-Airport Residential Receptor

Off-Airport Receptor Locations

- Off-Site Worker
- On-Site Occupational
- Residential
- Recreational
- School

Non-Cancer Hazard Classification

- < 0 (Negative)*
- 0 to ≤ 1**
- > 1

Notes:

* Negative incremental non-cancer hazard indices indicate a beneficial impact.

** Non-cancer hazard index threshold is 1. None of the incremental non-cancer hazard indices exceed this threshold.

Source: CDM Smith, 2012.

LAX Specific Plan Amendment Study Final EIR	**Geographic Representation of Construction and Operational Incremental Chronic Non-Cancer Hazards by Receptor Type – LAWA Staff-Recommended Alternative**	Figure **SRA-2.3.7.1-2**

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Table SRA-2.3.7.1-3

Acute Hazard Indices for Acrolein under the LAWA Staff-Recommended Alternative

Receptors	Summary of Acute Hazard Indices for Acrolein[1]
Residential Locations	
Maximum HI[2]	**3.0**[3]
Average HI	0.94
Minimum HI	0.03
Recreational Locations	
Maximum HI	**1.4**
Average HI	0.77
Minimum HI	0.45
Off-Airport Worker Locations	
Maximum HI	**1.6**
Average HI	0.77
Minimum HI	-0.06[4]
School Child Locations	
Maximum HI	**1.2**
Average HI	0.76
Minimum HI	0.22
Overall Off-Airport	
Maximum HI	**3.0**
On-Airport Construction Worker Location[5]	
Maximum HI	0.71

1 Maximum and minimum locations are not at the same location for each scenario.
2 HI = Hazard Index
3 **Bold** HIs are greater than the significance threshold of 1.
4 Negative values indicate a beneficial impact.
5 Only one on-airport location was assessed.

Sources: CDM Smith, 2012.

Table SRA-2.3.7.1-4

Acute Hazard Indices for Formaldehyde under the LAWA Staff-Recommended Alternative

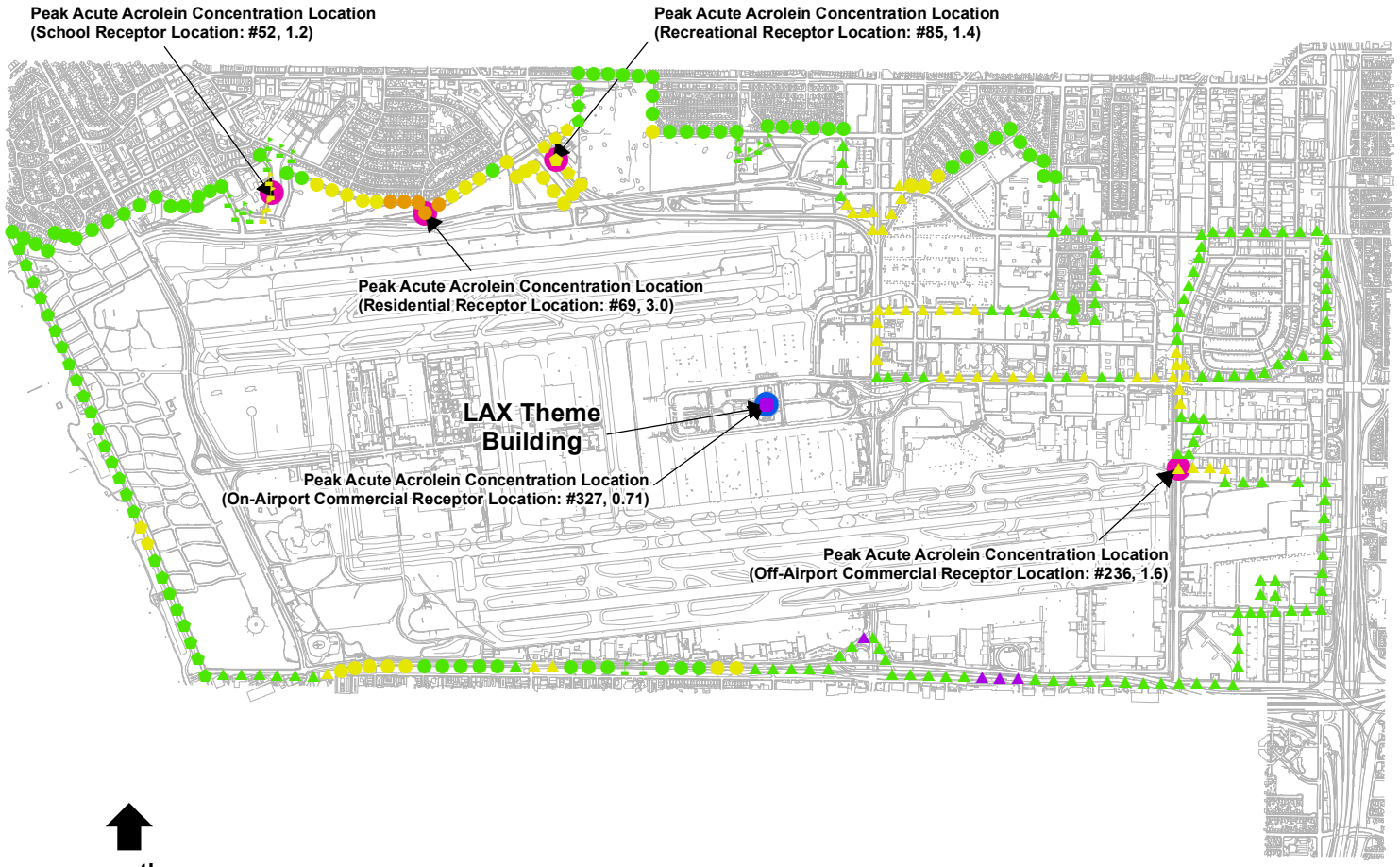
Receptors	Summary of Acute Hazard Indices for Formaldehyde[1]
Residential Locations	
Maximum HI[2]	0.64
Average HI	0.17
Minimum HI	-0.06[3]
Recreational Locations	
Maximum HI	0.29
Average HI	0.15
Minimum HI	0.08
Off-Airport Worker Locations	
Maximum HI	0.38
Average HI	0.12
Minimum HI	-0.09
School Child Locations	
Maximum HI	0.23
Average HI	0.13
Minimum HI	-0.01
Overall Off-Airport	
Maximum HI	0.64
On-Airport Construction Worker Location[4]	
Maximum HI	-0.1

1 Maximum and minimum locations are not at the same location for each scenario.
2 HI = Hazard Index
3 Negative values indicate a beneficial impact.
4 Only one on-airport location was assessed.

Sources: CDM Smith, 2012.

Acute non-cancer health hazards for TAC other than acrolein and formaldehyde are orders of magnitude below 1 and below the acute non-cancer health hazards estimated for short-term exposure to acrolein and formaldehyde. Potential acute non-cancer health hazard impacts resulting from other TAC and from combining TAC are discussed in the Uncertainties Section of Appendix G1, *Human Health Risk Assessment*. Acute results are provided in Attachment 1 of Part II of this Final EIR.

SPAS-related maximum acute hazard quotients for acrolein after buildout of the LAWA Staff-Recommended Alternative are estimated to be 3.0 for residents living at the peak hazard location, 1.2 for school children, 1.4 for recreational users, and 1.6 for off-site adult workers. 240 of 326 off-site grid nodes have incremental acute hazard quotients for acrolein of less than 1. Of the 86 grid nodes with incremental acute hazard quotients for acrolein greater than 1, only five of the grid nodes are greater than 2. These grid nodes are located north of Runway 6L/24R in the north airfield (grid nodes 66 to 70).



Legend

- Peak Acute Acrolein Concentration Location, 0 to ≤1**
- Peak Acute Acrolein Concentration Location, > 1

Off-Airport Receptor Locations

- Off-Site Worker
- On-Site Occupational
- Residential
- Recreational
- School

Acute Non-Cancer Hazard Classification for Acrolein

- < 0 (Negative)*
- 0 to ≤ 1**
- > 1 to ≤ 2
- > 2

Note:
* Negative incremental non-cancer hazard indices indicate a beneficial impact."

** Acute non-cancer hazard index threshold is 1.

north

0 3,750 ft

Scale

Source: CDM Smith, 2012.

LAX Specific Plan Amendment Study Final EIR	**Geographic Representation of Operational Incremental Acute Non-Cancer Hazards from Acrolein by Receptor Type – LAWA Staff-Recommended Alternative**	Figure **SRA-2.3.7.1-3**

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The acute REL for acrolein has an uncertainty factor of 60.[29] This factor indicates a moderate uncertainty in the REL based on specific sources of variability not addressed in the toxicological studies, such as individual variation and interspecies differences. Although the maximum acute hazard quotient for acrolein after buildout of the LAWA Staff-Recommended Alternative is greater than 1, it should be noted that the acute REL is set at or below a level at which no adverse health impacts are expected for the majority of the population. Hence, it represents the tail-end of a distribution and not a specific "bright line" beyond which adverse effects are certain; instead any adverse acute non-cancer health effects (mucous membrane irritation) would be part of a complex probabilistic process. Although the maximum acute hazard quotient estimated as 3.0 is above the threshold of significance of 1, the value is still close to the threshold for acute effects, given the uncertainty in the toxicity factor, and may represent minimal actual acute non-cancer health hazards. Thus, an acute hazard quotient of 3.0 does not mean that adverse effects would definitely occur in the receptor population; rather, it indicates that such effects cannot be ruled out on the basis of current knowledge.

SPAS-related maximum acute hazard quotients for formaldehyde under the LAWA Staff-Recommended Alternative are estimated to be 0.6 for residents living at the peak hazard location, 0.2 for school children, 0.3 for recreational users, and 0.4 for off-site adult workers.

Because maximum acute hazard quotients for acrolein for all analyzed receptors (residents, recreational users, school child, and off-site adult workers are slightly above the threshold of significance of 1, acute non-cancer health hazard impacts under the LAWA Staff-Recommended Alternative would be significant.

2.3.7.1.1.4 Health Effects for On-Airport Workers

Effects on on-airport workers were evaluated by comparing estimated maximum 1-hour air concentrations of TAC for the LAWA Staff-Recommended Alternative to the CalOSHA 8-hour PEL-TWAs.[30] Estimated on-airport air concentrations and PEL-TWAs for TAC of concern for the LAWA Staff-Recommended Alternative are presented in **Table SRA-2.3.7.1-5**. All estimates are based on modeling that incorporates select quantifiable mitigation measures from the LAX Master Plan MMRP (see Section 4.7.1.5 of the SPAS Draft EIR), but makes no other assumptions regarding mitigation.

Estimated maximum 1-hour air concentrations at the on-airport grid point under LAWA Staff-Recommended Alternative are a few to several orders of magnitude below PELs for all TAC. As air concentrations from airport emissions with implementation LAWA Staff-Recommended Alternative would not exceed those considered "acceptable" by CalOSHA standards, health impacts to on-airport workers would be less than significant.

Table SRA-2.3.7.1-5

Comparison of CalOSHA Permissible Exposures Limits to Maximum Estimated 8-Hour On-Airport Air Concentrations for the LAWA Staff-Recommended Alternative

TAC[1]	CAL OSHA PEL-TWA (mg/m^3)[3]	On-Airport Air Concentrations (mg/m^3)[2]
acetaldehyde	45	0.011
acrolein	0.25	0.0051
Benzene	3.19	0.012
Formaldehyde	0.92	0.031
Methanol	260	0.0039
methyl ethyl ketone	590	0.00040
phenol	19	0.0015
styrene	215	0.0010

29 California Environmental Protection Agency, Office of Environmental Health Hazard Assessment, Air Toxics Hot Spots Program Technical Support Document for the Derivation of Noncancer Reference Exposure Levels, December 2008.

30 California Occupational Safety and Health Administration, Permissible Exposure Limits for Chemical Contaminants, Table AC-1, Available: http://www.dir.ca.gov/Title8/5155table_ac1.html, accessed June 21, 2012.

Table SRA-2.3.7.1-5

Comparison of CalOSHA Permissible Exposures Limits to Maximum Estimated 8-Hour On-Airport Air Concentrations for the LAWA Staff-Recommended Alternative

TAC[1]	CAL OSHA PEL-TWA (mg/m^3)[3]	On-Airport Air Concentrations (mg/m^3)[2]
toluene	37	0.016
m-xylene	NA[4]	0.0065
o-xylene	NA	0.0044
p-xylene	NA	0.0031
Xylene (total)	435	0.0141
arsenic	0.01	0.0000023
chlorine	1.5	0.00036
copper	1	0.000014
mercury	0.025	0.000014
nickel	0.5	0.000010
vanadium[5]	0.05	0.000013
sulfates	NA	0.009

1 All TAC that were modeled for hourly concentrations and for which PEL-TWAs are available. TAC PEL-TWAs are not available for diesel exhaust and sulfates. Further, air dispersion modeling was conducted only for TAC identified as of concern for cancer risks and chronic non-cancer health hazards. As a result, a few TAC that have PEL-TWAs are not listed in this table because modeled concentrations were not available. These TAC include: 1,3-butadiene, ethylbenzene, naphthalene, n-hexane, chromium +6, lead, and manganese. PEL-TWA comparisons for these TAC were addressed in the LAX Master Plan EIR, which indicated that none of these TAC would present an important acute non-cancer health hazard. Uncertainties in the PEL-TWA analysis are discussed in the uncertainties section in Appendix G1.

2 Values listed are maximum 1-hour concentrations at on-airport location, receptor location #327, which represents concentrations in the middle of the CTA. These values represent reasonable estimates of 8-hour concentrations on-airport.

3 California Occupational Safety and Health Administration, Permissible Exposure Limits for Chemical Contaminants, Table AC-1, 2008, Available: http://www.dir.ca.gov/title8/5155table_ac1.html, accessed June 21, 2012.

4 NA = Not Available

5 Value listed for vanadium is for vanadium pentoxide, the most common form of vanadium.

Sources: CDM Smith, 2012.

2.3.7.1.2 Mitigation Measures

LAWA is committed to mitigating emissions to the maximum extent feasible from construction activities, temporary changes in operations associated with construction of the LAWA Staff-Recommended Alternative, and long-term operational activities at LAX. A comprehensive mitigation program was developed as part of the LAX Master Plan Final EIR and the specific means for implementing the mitigation measures, described in Section 4.2.5 of the SPAS Draft EIR, would also be applied to the LAWA Staff-Recommended Alternative. Although developed to address air quality impacts, this program would also reduce impacts to human health associated with exposure to TAC. Because (1) this mitigation program establishes a commitment and process for incorporating all technically feasible air quality mitigation measures into each component of the LAWA Staff-Recommended Alternative as that element is constructed, and (2) cancer risks and chronic non-cancer health hazards are below levels of significance, and cumulative impacts are minor based on regional data (see Section 2.4.7.1 of this chapter), no mitigation measures to reduce impacts to human health specific to SPAS are required to address cancer risks and chronic non-cancer health hazards. Regarding acute non-cancer health hazard impacts, the comprehensive mitigation program developed as part of the LAX Master Plan Final EIR and the specific means for implementing the mitigation measures, described in Section 4.2.5 of the SPAS Draft EIR, in addition to the SPAS-specific mitigation measures identified in Section 4.2.7, provide the most comprehensive means of ensuring impacts will be reduced to the maximum extent feasible. At the programmatic level of this EIR, there are no additional feasible measures available to address acute non-cancer health hazard impacts, which would remain significant. In addition, LAWA's construction contract

specifications include requirements from the LAX Master Plan Community Benefits Agreement that serve to reduce construction equipment emissions, particularly those related to diesel emissions. Such measures include: reduce vehicle and equipment idling times, comply with Tier 4 emission standards for non-road diesel equipment, retrofit existing diesel equipment with particulate filters and oxidation catalysts, replace aging equipment with new low-emission models, consider the use of alternative fuels for construction equipment. These reductions in emissions would translate into reductions in risks and hazard impacts.

2.3.7.1.3 Level of Significance After Mitigation

LAX Master Plan mitigation measures and SPAS-specific mitigation measures would reduce TAC emissions associated with the LAWA Staff-Recommended Alternative. However, even with implementation of these measures, acute non-cancer health hazards at some fence-line receptors would exceed the threshold of significance under the LAWA Staff-Recommended Alternative, compared to 2009 baseline conditions. As such, acute non-cancer health hazard impacts under the LAWA Staff-Recommended Alternative are considered to be significant and unavoidable.

2.3.7.2 Safety

2.3.7.2.1 Impacts Analysis

As noted in Section 2.3, impacts of the LAWA Staff-Recommended Alternative on safety are only associated with the airfield components of Alternative 1, as evaluated in Section 4.7.2.6 of the SPAS Draft EIR, as the analysis of safety focuses on aviation safety.

Birdstrikes

Under the LAWA Staff-Recommended Alternative, the Dunes west of the airport, an existing bird attractant at LAX, would not be modified in any way that would increase its attractiveness to birds or otherwise increase birdstrike hazards. Improvements within the Dunes would be limited to the relocation of navigational aids; no water features, ornamental landscaping (including trees), or other facilities that may serve as attractants to birds, and therefore increase the potential for birdstrikes, would be installed/planted within the Dunes, In conjunction with the relocation of Runway 6L/24R 260 feet northward, the entire length of the Argo Drainage Channel would be structurally covered, removing an existing bird attractant from the LAX vicinity. In addition, the total undeveloped area within the airfield, a potential attractant to birds, would also be reduced as discussed in Section 2.3.3, *Biological Resources*, of this chapter. Given the smaller amount of open space available on the airfield for potential use by birds, there would likely be a related reduction in the potential for birdstrikes.

The LAWA Staff-Recommended Alternative would result in the extension of Runway 6R/24L and the extension and relocation of Runway 6L/24R in the north airfield; however, no runways would be located within 10,000 feet of a solid waste landfill. No new facilities would be constructed or operational conditions implemented that would serve as attractants to birds. In accordance with FAA requirements, the airfield would continue to be maintained to avoid the ponding of water, the growth of vegetation, and the development of other conditions that may serve as attractants to nuisance wildlife, including birds. Therefore, under the LAWA Staff-Recommended Alternative, impacts with respect to birdstrikes would be less than significant.

Aviation Accidents, Incidents, and Runway Incursions

Airspace Surfaces

Implementation of the LAWA Staff-Recommended Alternative would include relocating Runway 6L/24R 260 feet northward, extending it 604 feet westward, and establishing dual displaced landing thresholds. The northern relocation would shift the existing Part 77 "Transitional Surface" northward and the establishment of the displaced landing threshold at the east end of the runway (i.e., Runway 24R) would shift the existing Approach Surface westward (i.e., in conjunction with the westward extension of the

runway, the landing threshold would also move 604 feet westward, allowing the touchdown point for aircraft to occur farther down the runway than under current baseline conditions). The establishment of a displaced landing threshold at the west end of the runway (Runway 6L) would effectively require aircraft to land (touchdown) at the same location they do today even though the runway was extended on the west end by 604 feet. As such, there would be no shift in the existing Approach Surface for Runway 6L.

The northerly shift of the Part 77 Transitional Surface would result in the southern portion of the existing apartment complex near Westchester Parkway and Lincoln Boulevard extending into that imaginary surface.

The relocation of Runway 6L/24R under the LAWA Staff-Recommended Alternative would also shift the existing Approach Surface for Runway 24R northward, resulting in a penetration of that imaginary surface by the upper portion the existing 5-story office building located at the northwest corner of Sepulveda Boulevard and Westchester Parkway. In addition to the upper portion of the building, the rooftop utilities (i.e., air conditioning and mechanical equipment) and a rooftop billboard would also extend into the Approach Surface. The upper portions of that building and utilities are currently within the Part 77 Transitional Surface of Runway 6L/24R.

Upper portions of the existing multi-story parking structure located immediately south of the aforementioned office building, which currently penetrate the Part 77 Transitional Surface of Runway 6L/24R, may also fall within the runway Approach Surface as a result of the runway relocation proposed under the LAWA Staff-Recommended Alternative.

Part 77 imaginary surfaces provide a means of identifying objects that require a more detailed safety analysis. This analysis, performed by the FAA, considers the airspace operations and safety requirements applicable to the Part 77 surface, as well as the nature, location, and extent of the object's penetration into the Part 77 surface. The analysis requires detailed runway design and engineering data not available at this conceptual level of planning, and would occur during the normal course of FAA review and approval of proposed airfield improvements. The analysis would set forth and define the appropriate means and measures to address potential safety concerns related to objects located within the Part 77 surface. As described in Section 4.7.2.3 of the SPAS Draft EIR, options for addressing potential safety hazards associated with objects located within controlled airspace areas can range widely and can include (1) doing nothing (i.e., for low-risk objects); (2) placing high-visibility markings and lighting on the object to make it highly visible to pilots and indicating such objects on avigation maps; (3) lowering, reducing, or removing the object, and; (4) modifying an approach or departure procedure to allow aircraft to safely navigate around or above an object that penetrates a Part 77 surface. The most appropriate option(s) would be determined in conjunction with detailed airfield improvement engineering and would be subject to FAA review and concurrence prior to FAA approval of an ALP amendment for such an airfield modification. Such measures would reduce this safety impact to a level that is less than significant. Secondary or indirect impacts associated with implementation of such options could range from no impact, such as in the case of low-risk objects that do not require any safety measures, to impacts typically associated with removal of an object/structure, such as temporary construction-related air quality, noise, and traffic impacts, visual impacts (i.e., changes in existing appearance), and land use impacts. Additional discussion and analysis of such secondary or indirect impacts is provided below at the end of the impacts analysis for the LAWA Staff-Recommended Alternative.

Airfield Surfaces

In conjunction with the northward relocation of Runway 6L/24R under the LAWA Staff-Recommended Alternative, construction of a centerfield parallel taxiway, along with associated exits and connections between the taxiway and two adjacent runways, would occur. Also occurring would be various extensions and realignments of Taxiway E and Taxilane D and the associated service road. The resultant runway and taxiway separation distances and allowances for various safety zone requirements (e.g., OFZ) would improve the ability of the north airfield to accommodate large aircraft including ADG V and ADG VI aircraft, compared to baseline conditions (2010). **Table SRA-2.3.7.2-1** delineates, for baseline conditions (2010) and each alternative, the maximum size aircraft, in terms of ADG, for which the

runways and parallel taxiways would meet FAA Airport Design Standards without needing approval of special operations restrictions, MOS, or waivers from FAA, unless otherwise noted in **Table SRA-2.3.7.2-1**.

As indicated in **Table SRA-2.3.7.2-1**, implementation of the LAWA Staff-Recommended Alternative would increase the separation distance between Runways 6L/24R and 6R/24L from 700 feet to 960 feet, but would not change the existing capabilities relative to allowing simultaneous arrivals and departures.

Under the LAWA Staff-Recommended Alternative, improvements to Taxiway E include straightening the western 2,190 feet and extending the east end by 950 feet (in conjunction with the easterly extension of Runway 6R/24L). Under the LAWA Staff-Recommended Alternative, improvements to Taxilane D would include extending it 745 feet west to provide a full-length taxilane and various segment relocations to straighten it and provide for ADG V capabilities. In conjunction with these taxiway/lane improvements, the adjacent vehicle service road would be relocated from between the active surface areas of those facilities to the northerly limit of the aircraft parking apron, south of Taxilane D. The improvements would enhance the accommodation of ADG IV, V, and VI aircraft on the north airfield.

The runway improvements proposed under the LAWA Staff-Recommended Alternative would modify several existing safety areas such as the RSA, runway OFA, RPZ, and runway OFZ. **Figure SRA-2.3.7.2-1** shows the runway safety areas associated with the LAWA Staff-Recommended Alternative. For Runway 6L/24R, the 260-foot northerly relocation would shift the runway safety areas accordingly, which, in turn, would require the realignment of Lincoln Boulevard, as shown in **Figure SRA-2.3.7.2-1**, and the covering of the Argo Drainage Channel. The combination of the runway improvements, associated improvements to Lincoln Boulevard and the Argo Drainage Channel, and establishment of displaced thresholds would bring all RSAs for the north airfield into compliance with FAA standards.

The proposed relocation of Runway 6L/24R 260 feet northward would shift the associated RPZ northward by that same amount, which would extend over existing developed uses near the east end of the runway that are not currently within the existing RPZ. **Figure SRA-2.3.7.2-2** delineates the location and current use of parcels within the RPZs associated with the LAWA Staff-Recommended Alternative and **Table SRA-2.3.7.2-2** summarizes the affected land uses. Although the RPZs would shift northward, the establishment of dual displaced landing thresholds would shift the existing approach RPZ for Runway 6L eastward by 104 feet and would shift the existing approach RPZ for Runway 24R westward by 604 feet. That westward shift would place the RPZ outside of any existing residential development (i.e., residences located east of Runway 24R would no longer be within the RPZ). Similarly, the establishment of dual displaced thresholds for Runway 6R/24L would maintain the length of the existing RPZ for Runway 24L even though the runway pavement would be extended eastward.

Table SRA-2.3.7.2-1

Summary of North Airfield Runways and Parallel Taxiways Compliance with FAA Airport Design Standards - LAWA Staff-Recommended Alternative

	Baseline Conditions (2010)	SRA
Maximum Aircraft Size (ADG Size) on Runways[1]		
Runway-to-Runway Separation		
Distance Between Rwy 6L/24R and Rwy 6R/24L	700 feet	960 feet
Simultaneous Arrivals and Departures		
In Visual Meteorological Conditions	Yes	Yes
In Instrument Meteorological Conditions	No	No
Runway-to-Taxiway Separation		
Distance Between Rwy 6L/24R and Centerfield Parallel Taxiway	NA[5]	500 feet
Good Weather - Maximum ADG Allowed On Runway 6L/24R[2]	NA[5]	VI[3]
Poor Weather - Maximum ADG Allowed On Runway 6L/24R[4]	NA[5]	V
Distance Between Rwy 6R/24L and Centerfield Parallel Taxiway/Taxiway E (Centerfield Taxiway/Taxiway E)	NA[5]/400 feet	460/400 feet
Good Weather - Maximum ADG Allowed On Runway 6R/24L[3]	VI[6]	V[8]
Poor Weather - Maximum ADG Allowed On Runway 6R/24L (Departures Only)[6]	VI[7]	V[8]
Maximum Aircraft Size (ADG Size) on Taxiways/lanes[1]		
Centerfield Parallel Taxiway - Maximum ADG Size Allowed (Distance between Runway 6L/24R and Runway 6R/24L)	NA[5]	500/460 feet
Good Weather[2]	NA[5]	V
Poor Weather[3]	NA[5]	V
Taxiway E - Maximum ADG Size Allowed	VI[7]	VI[9]
Taxilane D - Maximum ADG Size Allowed	III/VI[10]	V[11]

1 "Maximum ADG Allowed" defined as the largest aircraft, in terms of Aircraft Design Group (ADG), for which the subject runway or taxiway/lane meets FAA's Airport Design Standards without needing approval of special operations restrictions, modifications of standards (MOS), or waivers from FAA.

2 Good Weather = Approach visibility not lower than 1/2 mile.

3 Although separation meets standards for approach visibility above 1/2 mile, an MOS will be required because the runway is certified for approach visibility below 1/2 mile.

4 Poor Weather = Approach visibility below 1/2 mile; assumes Runway 6L/24R retains approach visibility minimums less than 1/2 mile.

5 No centerfield taxiway under this scenario.

6 Runway 6R/24L is designed to accommodate approaches when visibility is at or above 1/2 mile; departures may operate but no landings are permitted when approach visibility is below 1/2 mile.

7 Approved MOS allows ADG VI operations based on 400-foot separation.

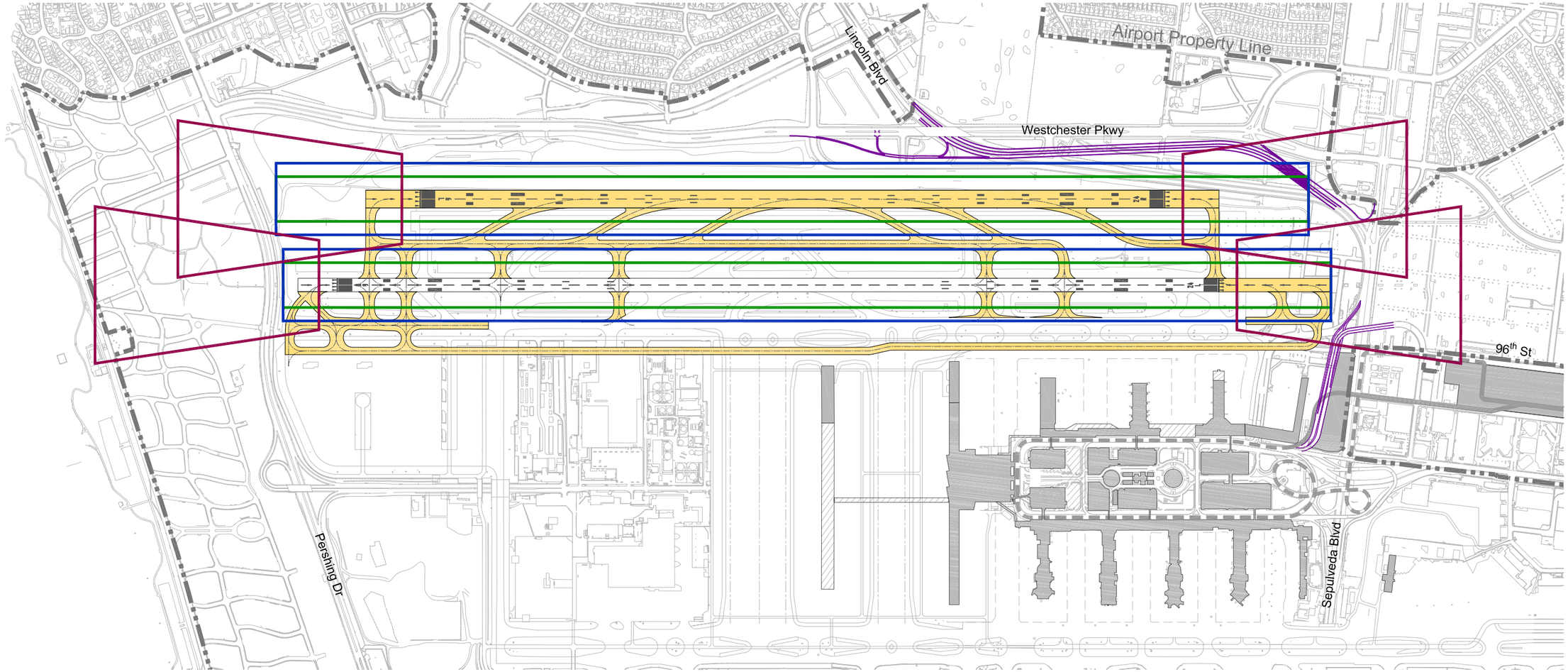
8 Approved MOS allowing ADG VI operations based on 400-foot separation is applicable only to Taxiway E; assumes 460-foot separation between Runway 6R/24L and centerfield taxiway is controlling dimension dictating Maximum ADG size allowed.

9 Approved MOS allows ADG VI operations based on 400-foot separation and is assumed extension to east and/or realignment to west will not affect current MOS status.

10 Taxilane D currently exists in only the eastern half of the north airfield and, due to variations in its alignment and nearby obstructions, ADG design compliance ranges from ADG III in the eastern portion to ADG IV in most of the western portion, and ADG VI between Taxiways R and S.

11 New ADG capability would apply consistently along entire length of taxilane, including the western extension under this alternative, which would create a full length taxiway.

Source: CDM Smith, Ricondo and Associates, 2012.



Note: Improvements depicted are conceptual only and do not represent engineered design.

Legend

- Runway Safety Area (RSA)
- Runway Object Free Area (OFA)
- Runway Protection Zone (RPZ)

0 1,200 ft
Scale

north

Prepared by: Ricondo & Associates, Inc., May 2012.

LAX Specific Plan Amendment Study Final EIR	**North Airfield Runway Safety Areas - LAWA Staff - Recommended Alternative**	Figure **SRA - 2.3.7.2-1**

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RUNWAY 6L APPROACH END

RUNWAY 24R APPROACH END

RUNWAY 6R APPROACH END

RUNWAY 24L APPROACH END

Notes: 1/ Rights of Way, Streets, Transmission Lines, Sewer, Utility Lines, Rivers and Lakes.
2/ This analysis excludes all parcels that fall within the airport property boundary.
3/ For planning purposes, all runways are assumed to have approaches with minimums less than 3/4 mile.

0 600 ft.
Scale

north

Prepared by: Ricondo & Associates, Inc., 2012.

Legend

- Approach RPZ
- Departure RPZ
- Central Portion of the RPZ
- Airport Property Boundary
- Commercial - Offices
- Commercial - Sales and Services
- Commercial - Parking
- Misc. - See Note 1
- Vacant

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**Parcels Within RPZ -
LAWA Staff - Recommended Alternative**

Figure
SRA - 2.3.7.2-2

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Table SRA-2.3.7.2-2

Parcels Within RPZ - LAWA Staff-Recommended Alternative

Parcels Inside Runway Protection Zones[1]		Commercial			Residential					
Approach End	Area	Parking	Sales and Services	Offices	Single	Multi	Vacant	Govern-ment	Misc.[2]	Total
Runway 6L	Approach RPZ	-	-	-	-	-	-	-	-	0
	Central Portion of RPZ	-	-	-	-	-	-	-	-	0
	Departure RPZ	-	-	-	-	-	-	-	-	0
	Total 6L Parcels	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**
Runway 24R	Approach RPZ	12	12	5	-	-	1	-	-	30
	Central Portion of RPZ	4	7	1	-	-	1	-	-	13
	Departure RPZ	1	7	2	-	-	-	-	-	10
	Total 24R Parcels	**12**	**12**	**5**	**0**	**0**	**1**	**0**	**0**	**30**
Runway 6R	Approach RPZ	-	-	-	-	-	-	-	5	5
	Central Portion of RPZ	-	-	-	-	-	-	-	-	0
	Departure RPZ	-	-	-	-	-	-	-	-	0
	Total 6R Parcels	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**5**	**5**
Runway 24L	Approach RPZ	4	1	-	-	-	-	-	-	5
	Central Portion of RPZ	-	-	-	-	-	-	-	-	0
	Departure RPZ	-	-	-	-	-	-	-	-	0
	Total 24L Parcels	**4**	**1**	**0**	**0**	**0**	**0**	**0**	**0**	**5**
Alternative Total[3]		**16**	**13**	**5**	**0**	**0**	**1**	**0**	**5**	**40**

[1] This analysis excludes all parcels that fall within the airport property boundary.
[2] Rights of way, streets, transmission lines, sewer, utility lines, rivers and lakes.
[3] Existing total may not equal the sum of the approach end parcels due to parcels falling within multiple approach end RPZs.

Source: U.S. Department of Transportation, Federal Aviation Administration, Advisory Circular 150/5300-13, Airport Design, September 29, 1989, as amended by Changes 1 - 18, December 30, 2011; LAWA Environmental Services Division, April 2011; Ricondo & Associates, Inc., May 2012.

Implementation of the LAWA Staff-Recommended Alternative would result in a change in the composition of land uses within the RPZ for Runway 6L/24R compared to baseline conditions. The presence of such uses under the LAWA Staff-Recommended Alternative may be considered incompatible with FAA design recommendations that RPZ areas be clear of all obstructions and occupied uses; however, it is not considered to pose a significant safety hazard compared to baseline conditions. The FAA, as the federal agency with primary responsible for aviation safety, takes into consideration the presence of potential obstructions and land uses within RPZ areas in the review of ALP amendments. Additionally, the FAA takes into consideration potential hazards, including but not limited to, obstructions and safety areas, as part of ongoing monitoring of requirements necessary for LAX to maintain federal Part 139 Airport Certification (14 CFR Part 139). Should the FAA determine that structures or land uses within RPZ areas pose a significant aviation safety hazard, appropriate means to reduce such potential hazards to acceptable levels would be identified. Such options can include, but not be limited to, marking/lighting obstructions, vacating occupied structures, or clearing a site of all uses and structures. Recognizing that neither FAA nor LAWA own the parcels within the RPZ for Runway 6L/24R that are highlighted in Figure 4.7.2-4 of the SPAS Draft EIR, the implementation of such measures would likely require that LAWA obtain sufficient control interest in the affected parcels, either through acquisition or establishment of an easement. In the event that FAA determines that structures or uses within the RPZ areas pose a significant safety hazard and measures such as those described above are required, implementation of

those measures could result in impacts to the environment. Such potential secondary or indirect impacts are described below, at the end of the impacts analysis for the LAWA Staff-Recommended Alternative.

The combination of physical lengthening of runways and establishment of displaced thresholds would change the existing declared distances for runways within the north airfield. Table 4.7.2-4 of the SPAS Draft EIR delineates the TORA, TODA, ASDA, and LDA distances resulting from implementation of the LAWA Staff-Recommended Alternative. As can be seen, in comparison to baseline conditions (2010), the majority (11 of 16) of the existing declared distances would increase in length, one would decrease in length (LDA for 24L), and the remaining four would remain unchanged. Increased distance provides greater length for aircraft to use, which is better particularly for large/heavy aircraft. Most commercial aircraft need approximately 8,000 linear feet for landing operations. In general, the changes in declared distances associated with the LAWA Staff-Recommended Alternative would benefit aircraft landing operations, particularly for large/heavy aircraft. The reduced length in the LDA for Runway 24L would still be well above the 8,000 feet normally required for most aircraft landing operations. Additionally, that runway is used primarily for departures, which would have additional take-off distances under this alternative.

Other Safety Considerations

As described in Section 4.7.2.3 of the SPAS Draft EIR, numerous safety studies have been prepared relative to aircraft operations on the north airfield. While the nature, approach, and scope of analysis may differ between the studies, there is general consensus between the studies that increased separation between runways and the addition of a centerfield parallel taxiway can reduce the potential for a runway collision or incursion and enhance safety, particularly as related to future operations involving a greater number of large aircraft. Additionally, the safety benefits of relocated and redesigned runway crossing points along the last-third of Runway 6R/24L, including the advantage of pilot visibility to the end of the runway, were noted in some of the studies. The airfield improvements proposed under the LAWA Staff-Recommended Alternative provide for these desired safety improvements.

Summary Conclusions Regarding the LAWA Staff-Recommended Alternative

Implementation of the LAWA Staff-Recommended Alternative would enhance the safety and efficiency of aircraft operating in the north airfield, compared to baseline conditions (2010), as follows:

- Achieves full compliance with RSA requirements;
- Shifts the arrival RPZ for Runway 24R westward, resulting in residences and the vehicle staging area west of Sepulveda Boulevard no longer being located within the RPZ;
- Provides greater amount of runway and taxiway facilities that meet FAA Airport Design Standards for ADG V and VI aircraft, particularly as related to separation requirements, thereby reducing the need for special operations restrictions, MOS, and waivers from FAA;
- Provides increased separation between runways and between runways and taxiways, which better enables taxiing and holding aircraft to stay clear of runway OFZ and RSA surfaces;
- Allows addition of a centerfield parallel taxiway that includes high-speed exits from Runway 6L/24R, which provides more time and options for FAA air traffic controllers to handle aircraft exiting the runway; more time and distance for the pilot of an arriving aircraft to exit the runway, slow down and hold before crossing Runway 6R/24L; and reduced potential for safety hazards/incursions;
- Improves the locations and design of crossing points (i.e., 90-degree crossing angle) at Runway 6R/24L, which provides better pilot visibility down Runway 6R/24L before crossing;
- Realigns/straightens Taxilane D to provide a full-length parallel taxiway designed for ADG V aircraft;
- Relocates vehicle service road adjacent to Taxiway E and Taxilane D out from between two active surfaces; and
- Provides more aircraft holding areas near the end of runways, thereby improving the ability for sequencing departures.

Implementation of the LAWA Staff-Recommended Alternative would not involve construction of a runway within 10,000 feet of a solid waste landfill or create an attractant to birds. In general, implementation of this alternative would enhance aircraft safety and efficiency, as summarized above, particularly with respect to better achieving compliance with FAA Airport Design Standards for operation of large aircraft.

The 260-foot northward shift of Runway 6L/24R would, however, result in a northward shift of the Part 77 imaginary surfaces placing or increasing portions of two multi-story structures within Part 77 Surfaces. As described above, a detailed safety evaluation would be completed in conjunction with FAA review of runway plans and an ALP amendment to determine what, if any, measures are warranted to address potential safety hazards associated with objects being located within controlled airspace areas. Such measures range from doing nothing (i.e., for low-risk objects), to placing high-visibility markings and lighting on the object to make it highly visible to pilots and indicating such objects on avigation maps, to lowering, reducing, or removing the object, and, in some cases, an approach or departure procedure will be modified to allow aircraft to safely navigate around or above an object that penetrates a Part 77 surface. Such measures would reduce this safety impact to a level that is less than significant. Secondary or indirect impacts associated with implementation of such options could range from no impact, such as in the case of low-risk objects that do not require any safety measures, to impacts typically associated with removal of an object/structure, such as temporary construction-related air quality, noise, and traffic impacts, visual impacts (i.e., changes in existing appearance), and land use impacts. Such secondary or indirect impacts are further addressed below. Implementation of the LAWA Staff-Recommended Alternative would result in a change in the composition of land uses within the RPZ for Runway 6L/24R compared to baseline conditions. The presence of such uses under the LAWA Staff-Recommended Alternative may be considered incompatible with FAA design recommendations that RPZ areas be clear of all obstructions and occupied uses; however, it is not considered to pose a significant safety hazard compared to baseline conditions. In the event that the FAA, as the lead federal agency responsible for aviation safety at LAX, considers that the structures and uses within the existing or future RPZ pose an aviation hazard, modifications to, or removal of, structures and uses in the RPZ may be required.

Potential Secondary or Indirect Impacts Associated with Measures to Address Potential Airspace Obstructions (Part 77) or Incompatible Structures/Uses Within RPZ Areas

To the extent that implementation of measures required to address potential airspace obstructions or incompatible structures/uses with RPZ areas, as determined in conjunction with FAA reviews, contemplates the removal or modification of existing structures and/or uses, the following types of secondary or indirect environmental impacts may occur. It is important to note that the certainty, timing, nature, and extent of, and the approach to, such removals or modifications have not been determined at this programmatic level of conceptual planning. Such information would be developed at more detailed levels of planning and is subject to consultation with the FAA. It should also be noted that if/when such removal or modification actions are required, the discretional approval(s) associated with such activity would be subject to CEQA compliance, at which time additional CEQA review specific to the proposed activity would be completed.

Aesthetics

To the extent that implementation of any measures required to address potential airspace obstructions or incompatible structures/uses requires the removal or modification of existing structures, it is not anticipated that there would be impacts related to obstructing, interrupting, or diminishing existing views, or impacts related to the introduction of features that conflict/contrast with the aesthetic elements of the area (such as theme, style, setbacks, density, massing, etc.). The removal or substantial modification of existing structures could impact the existing aesthetic character of the southern portion of the Westchester business district. It is possible that such an impact would be significant; however, given that the need for, and nature and timing of, any such removal or modification actions are currently unknown, it would be premature and speculative to reach a final conclusion of significance at this time.

Given the existing developed/urbanized nature of the affected areas, significant impacts related to new sources of light and glare are not expected to occur. It is likely that there would be a change in existing lighting and lighting intensity if/as existing structures and uses are removed or modified. Such impacts are anticipated to be less than significant; however, as noted above, it would be premature and speculative to reach a final significance conclusion at this time regarding this type of potential secondary impact.

Air Quality

The removal of existing structures, if required to address potential airspace obstructions or incompatible structures/uses, would result in construction-related air quality impacts from equipment operations, worker commute, materials deliveries, hauling off of demolition debris, and ground disturbance. Such activities would be greatest for the removal of multi-story structures located along Sepulveda Boulevard and on Westchester Parkway. Most notable from the equipment operation would be emissions from diesel-powered equipment, which can be particularly high in oxides of nitrogen (NO_x) emissions. This would also be the case for emissions associated with the use of diesel-powered trucks associated with the transport of materials to and from the work site. Such impacts would be reduced through implementation of the LAX Master Plan mitigation measures presented in Section 4.2, *Air Quality*, of the SPAS Draft EIR, for construction-related air quality impacts. For larger demolition projects involving substantial amounts of large equipment or scheduled to be completed within a relatively short period of time, it is possible that air quality impacts would be significant and unavoidable even with mitigation. As noted above, however, it would be premature and speculative to reach a final significance conclusion at this time regarding this type of potential secondary impact.

Regarding operations-related air quality impacts, it is anticipated that pollutant emissions at each affected site would be reduced from existing conditions, based on the removal of existing uses; however, to the extent that affected uses move to other locations nearby, there would only be a partial reduction in existing emissions. As noted above, it would be premature and speculative to reach a final significance conclusion at this time regarding this type of potential secondary impact.

Biological Resources

Areas most likely to be affected would be those that are currently developed (i.e., pose obstruction hazard or are an incompatible use), which, for the most part, are devoid of notable biological resources. Impacts to such resources would likely be less than significant; however, as noted above, it would be premature and speculative to reach a final significance conclusion at this time regarding this type of potential secondary impact.

Coastal Resources

Potentially affected areas are located on the east side of the north airfield. No impacts to coastal resources would occur.

Cultural Resources

To the extent that implementation of any measures required to address potential airspace obstructions or incompatible structures/uses requires modification or removal of existing structures and site grading, there is the potential for impacts to cultural resources including historic and archaeological resources, if any. Based on a review of aerial photographs of the Westchester business district in the 1950s and 1960s, it is possible that some structures along Sepulveda Boulevard within potentially affected areas are more than 45 years old, which would qualify them as being potentially historic. Depending on whether a formal evaluation(s) of such properties confirms that they meet all the requirements to be considered an historical resource, the removal or modification of existing structures could result in a significant impact. Such an impact could be reduced through implementation of the LAX Master Plan commitment and mitigation measures presented in Section 4.5, *Cultural Resources*, of the SPAS Draft EIR, for historical resources; however, given the possibility that complete removal of a structure(s) may be necessary, there is the potential that impacts to historical resources would be significant and unavoidable. As noted above, it would be premature and speculative to reach a final significance conclusion at this time regarding this type of potential secondary impact.

The subject area is largely developed/urbanized and natural surfaces and shallow subsurface areas have been subject to disturbance. As such, the potential for significant archaeological or paleontological resources to be present is generally considered to be low, particularly in instances where the necessary action is only to lower/remove a structure down to surface level. Implementation of the LAX Master Plan mitigation measures presented in Section 4.5, *Cultural Resources*, of the SPAS Draft EIR, for archaeological, would add to the likelihood that potential impacts to archaeological resources would be reduced to a level that is less than significant. Similarly, compliance with the LAX Master Plan MMRP Paleontological Management Treatment Plan[31] would reduce potential impacts to paleontological resources to a level that is less than significant.

Greenhouse Gases

Similar to air quality above, implementation of the measures identified above would likely result in emissions of greenhouse gases in conjunction with construction activities associated with removal or modification of existing structures, and a possible reduction in greenhouse gas emissions associated with the operation of existing uses within the affected areas. The reduction in operations-related greenhouse gas emissions would be partially offset or neutralized by the likelihood that many, if not most, affected uses would relocate elsewhere and continue operations. Greenhouse gas emissions could be significant; however, as noted above, it would be premature and speculative to reach a final significance conclusion at this time regarding this type of potential secondary impact.

Hazards/Hazardous Materials

To the extent that implementation of any measures required to address potential airspace obstructions or incompatible structures/uses requires the removal or modification of existing structures, such activities could encounter hazardous materials, primarily in the form of hazardous building materials such as asbestos, lead-based paint, polychlorinated biphenyls (PCBs), and the like. Based on past and present uses within and around the area being mostly commercial, office, and residential, it is not anticipated that major subsurface contamination exists within the area. More thorough investigations, such as preliminary site assessments (PSAs), Phase I/II site investigations, building inspections, etc., would be necessary to determine more definitely the nature and extent of hazardous materials/contamination, if any. Compliance with LAWA's *Procedure for the Management of Contaminated Materials Encountered During Construction*, (which facilitates the implementation of LAX Master Plan Commitment HM-2, Handling of Contaminated Materials Encountered During Construction), would address such potential impacts. In light of the existing uses within the potentially affected areas being primarily office and commercial, current operations are unlikely to be notable users/generators of hazardous materials. The removal of existing uses or replacement with lower intensity uses is not expected to result in significant operations-related impacts for hazardous materials; however, as noted above, it would be premature and speculative to reach a final significance conclusion at this time regarding this type of potential secondary impact.

Hydrology/Water Quality

Potentially affected areas are mostly developed/urbanized; hence, surface hydrology is characterized primarily by runoff flowing across impervious surfaces into the existing storm drain system, and water quality is characterized by typical urban stormwater pollutants (i.e., oil and grease, metals, nitrogen, fecal coliform, trash, etc.). Implementation of the above measures could result in reduced surface runoff to the extent that existing structures and impervious surfaces are removed, and also reduce or change urban stormwater pollutants to the extent existing urban uses are taken out of service or replaced with lower intensity uses. Construction activities associated with the removal or modification of existing structures could result in short-term erosion and sedimentation and other construction-related water quality pollutants (i.e., from fueling/servicing of construction equipment, storage of materials including temporary stockpiles of demolition debris, etc.). Mitigation of such construction-related pollutants would be accomplished through adherence with the requirement of the State Water Resources Control Board

[31] City of Los Angeles, Los Angeles World Airports, LAX Master Plan Mitigation Monitoring and Reporting Program, Paleontological Management Treatment Plan, December 2005.

General (Construction) Permit (2009-0009-DWQ). Hydrology and water quality impacts are anticipated to be less than significant; however, as noted above, it would be premature and speculative to reach a final significance conclusion at this time regarding this type of potential secondary impact.

Land Use and Planning

The potentially affected areas are designated in the City's General Plan for Commercial (Community) land use. Similarly, the subject areas are zoned for commercial uses, primarily C1-Light Commercial and C2-General Commercial. The removal of existing uses would not require a General Plan amendment or a change in zoning. The potential replacement of existing uses with other uses compatible with an RPZ would need to be reviewed in light of the provisions of the existing zoning relative to permitted and conditional uses. In general, however, the removal of existing uses and replacement with lower intensity uses is not expected to conflict with the existing land use plans for the area. Similarly, it not expected to create physical or functional incompatibility with existing land uses nearby. To the extent that implementation of any measures required to address potential airspace obstructions or incompatible structures/uses requires the removal of existing uses, implementation of LAX Master Plan Commitment RBR-1, *Residential and Business Relocation Program*, and LAX Master Plan Mitigation Measure MM-RBR-1, *Phasing for Business Relocations*, would reduce impacts associated with business relocation. With implementation of the commitment and mitigation measure, impacts related to business relocation would likely be reduced to a level that is less than significant; however, as noted above, it would be premature and speculative to reach a final significance conclusion at this time regarding this type of potential secondary impact.

Noise

To the extent that implementation of any measures required to address potential airspace obstructions or incompatible structures/uses requires the removal or modification of existing structures and site grading, construction-related noise could impact noise-sensitive receptors (i.e., residential development, a school, and a church) located along the east side of Sepulveda Eastway. These noise-sensitive receptors are located approximately 300 feet from structures along Sepulveda Boulevard. Based on the typical construction noise level of 89 dBA Community Noise Equivalent Level (CNEL) described in Section 4.10.3, *Construction Traffic and Equipment Noise*, of the SPAS Draft EIR, and an estimated existing ambient exterior noise level of approximately 70 dBA CNEL (based on the LAX Noise Standards Quarterly Report for Fourth Quarter 2010), construction-related noise at these receptors would be approximately 77 dBA CNEL. This would be more than 5 dBA above the existing ambient noise level and is considered a significant impact. Implementation of the LAX Master Plan commitments and mitigation measures presented in Section 4.10.3, *Construction Traffic and Equipment Noise*, of the SPAS Draft EIR, would reduce construction noise impacts. However, given that the design and effectiveness of such measures, such as the noise control plan, depend on site- and project-specific conditions that would be addressed at future, more detailed levels of planning, it cannot be definitively concluded at this time that all construction equipment noise impacts would be reduced to levels that are less than significant.

Public Services

To the extent that implementation of any measures required to address potential airspace obstructions or incompatible structures/uses requires the removal of existing uses or replacement with lower intensity uses, it is anticipated that the need for public services at the site would, in general, be reduced. No significant impacts to public services are expected to occur; however, as noted above, it would be premature and speculative to reach a final significance conclusion at this time regarding this type of potential secondary impact.

Transportation

To the extent that implementation of any measures required to address potential airspace obstructions or incompatible structures/uses requires the removal of existing uses or replacement with lower intensity uses, it is anticipated that existing trip generation within affected areas would, in general, be reduced. Construction activities associated with the removal or modification of existing structures would result in temporary construction-related traffic and possible lane closures and detours. The LAX Master Plan

commitments and mitigation measure presented in Section 4.12.2, *Off-Airport Transportation*, of the SPAS Draft EIR, would reduce construction traffic impacts. The specific application and efficacy of such measures are dependent on the particular characteristics of the construction activities, such as location, timing, and approach. Such information would be developed in the future as plans for removal/modification of structures are formulated. As such, it cannot be definitively concluded at this time that all construction traffic impacts would be reduced to levels that are less than significant.

Utilities

To the extent that implementation of any measures required to address potential airspace obstructions or incompatible structures/uses requires the removal of existing uses or replacement with lower intensity uses, it is anticipated that existing demands on utilities would, in general, be reduced. No significant impacts to utilities are expected to occur; however, as noted above, it would be premature and speculative to reach a final significance conclusion at this time regarding this type of potential secondary impact.

2.3.7.2.2 Mitigation Measures

The LAWA Staff-Recommended Alternative would not have a significant impact with respect to safety; therefore, no mitigation is required.

2.3.7.3 Hazardous Materials

2.3.7.3.1 Impacts Analysis

As noted in Section 2.3, impacts of the LAWA Staff-Recommended Alternative related to hazardous materials are associated with the airfield/terminal components of Alternative 1 and the ground access components of Alternative 9, as evaluated in Section 4.7.3.6 of the SPAS Draft EIR.

Contamination of Soil or Groundwater

Under the LAWA Staff-Recommended Alternative, an increase in hazardous materials use and hazardous waste generation during routine fueling and/or maintenance of aircraft, vehicles, and the APM as well as during construction, would increase the chances of a spill or release of substances that could result in contamination of soil or groundwater. As discussed in Section 4.7.3.3 of the SPAS Draft EIR, the handling and storage of hazardous substances are stringently regulated, as are releases of hazardous materials, including emergency response and clean up requirements. In addition, LAWA's *Procedure for the Management of Contaminated Materials Encountered During Construction*, which was prepared in accordance with LAX Master Plan Commitment HM-2, Handling of Contaminated Materials During Construction, includes specific procedures for handling hazardous materials, identifying risks and monitoring site conditions, and implementing best management practices (BMPs) and spill prevention and control measures to prevent spills, as well as emergency response procedures and notification requirements in the event of a spill.

Compliance with the Procedure would ensure that spills and releases would not create a hazard to the public or the environment, and would not result in contamination of soil or groundwater. Therefore, impacts would be less than significant.

Impacts to Current or Planned Remediation Efforts

Under the LAWA Staff-Recommended Alternative, grading and excavation would be conducted within various areas of the airport and in acquisition areas, including areas of known contamination and remediation, which are shown in Figure 4.7.3-1 of the SPAS Draft EIR. All of the sites identified in Figure 4.7.3-1 of the SPAS Draft EIR currently have, or have had, soil and/or groundwater contamination. Some of these sites have been closed (i.e., remediation has been completed to the satisfaction of regulatory agencies); at other sites, remediation is planned or underway, and some sites are still under investigation. There also may be areas of contamination not yet discovered. The LAWA Staff-

Recommended Alternative improvements that would require substantial excavation in areas of known contamination include:

- Intermodal Transportation Facility (ITF)
- Redesigned Entry Roadways
- Terminal 0
- Southerly relocation of Taxilane D and demolition of a portion of Terminal 1 concourse
- Automated People Mover

Numerous soil and groundwater remediation efforts are planned or underway both at LAX and within the acquisition areas. In some cases, the LAWA Staff-Recommended Alternative improvements would be in areas where remediation systems are located or may be planned in the future. Construction of these improvements and associated demolition of existing facilities have the potential to require temporary closure or reconfiguration of some of these remediation systems. Specifically, Park One (Former Honeywell/Allied Signal Aerospace) and Budget Rent-A-Car, have existing soil and groundwater remediation systems in areas of improvements. Improvements are also proposed near the Terminal 1 and 2 hydrant systems, both of which may require remediation in the future. As contamination at the Resort Rent-A-Car site has not been determined at this time, and no remediation is underway or planned, there would be no known conflicts with this site. The locations of these remediation sites are shown in Figure 4.7.3-1 of the SPAS Draft EIR. The LAWA Staff-Recommended Alternative improvements in the vicinity of these facilities may be initiated before the soil and groundwater remediation is complete.

The following LAWA Staff-Recommended Alternative components would have the potential for conflicts with ongoing remediation efforts within LAX and acquisition areas due to the substantial excavation required for their implementation and the nature and extent of remediation underway in these areas:

- ITF, located between 96th and 98th Streets and between Vicksburg Avenue and Airport Boulevard, and a portion of the APM alignment, both of which would be constructed on the Budget Rent-A-Car site.
- Redesigned entry roadways and Terminal 0, located between Sepulveda Boulevard and Terminal 1, which would be constructed on the Park One site.
- Southerly relocation of Taxilane D and demolition of a portion of the Terminal 1 concourse, which would occur at Terminals 1 and 2.
- Construction of parking east of Lot C may interfere with ongoing remediation at the Avis Rent-A-Car and Former National Car Rental sites.

Due to the extent of the VOC contamination associated with the Park One (Former Honeywell/Allied Signal Aerospace) site, it is possible that remediation will still be underway when construction of Terminal 0 and the redesigned entry roadways is initiated. Remediation for this site consists of an SVE system that includes small aboveground vessels for treating the soil vapor, pipes connecting the dry wells to the vessels, and groundwater monitoring wells. Due to the extent of excavation needed for the LAWA Staff-Recommended Alternative improvements, it is likely that part, or all, of the remediation system would have to be removed during construction, if it is still in operation at the time the SPAS improvements are constructed. This would entail destruction of the extraction wells and removal of underground piping and aboveground vessels. Removing the active remediation system at Park One for an extended period would interfere with existing clean up efforts. However, temporary cessation of remediation would not have any impacts on human health as groundwater beneath the site is not used for municipal purposes and contaminated soils lie beneath asphalt and would not be exposed.

Construction of the ITF and a portion of the APM is unlikely to interfere with ongoing remediation at the Budget Rent-A-Car site. The landowner is pursuing closure of this site and it is possible that such closure will be obtained prior to implementation of these improvements. If remediation systems are still in place at the time of construction, destruction and removal of these facilities is not expected to be required to construct the ITF and APM. If the landowner obtains closure of the site prior to implementation of these

improvements, there would be no potential for the LAWA Staff-Recommended Alternative improvements to interfere with remediation efforts.

The demolition of the northernmost portion of Terminal 1 and the southerly relocation of Taxilane D may come in contact with contaminated soils in the vicinity of Terminals 1 and 2. Contamination at these sites is currently being characterized, and no remediation has been planned at this time. If remediation is required at these sites, and is still ongoing when Taxilane D is relocated and the northern portion of Terminal 1 is demolished, these activities have the potential to interfere with remediation activities. Due to the localized nature of contamination at these locations, it is expected that remediation activities, if required, could be maintained during taxiway relocation and modifications to Terminal 1.

To prevent SPAS-related construction from interfering with planned or ongoing remediation such that environmental contamination is exacerbated or permanent clean up of sites prevented, LAWA would implement LAX Master Plan Commitment HM-1, Ensure Continued Implementation of Existing Remediation Efforts. Implementation of this commitment would ensure that remediation projects would be completed to the extent possible and necessary before constructing SPAS improvements, or that alternate clean up methods would be implemented during construction to prevent contaminant migration, if necessary. As part of this commitment, remediation systems would be reinstated following the completion of construction, if required. Therefore, impacts associated with interference with remediation efforts would be less than significant.

Impacts to Construction Workers from Exposure to Hazardous Materials

As noted above, the LAWA Staff-Recommended Alternative improvements that pose the potential for construction workers to encounter contamination during construction include the ITF, APM, Terminal 0, redesigned roadways, southerly relocation of Taxilane D, and demolition of a portion of Terminal 1 concourse, as they would entail major excavation in areas of known soil and/or groundwater contamination. In addition, it is possible that, during other construction activities for implementation of the LAWA Staff-Recommended Alternative, previously unidentified soil and/or perched groundwater contamination could be encountered.

Exposure of construction workers to contaminated materials would be minimized by implementing the measures required by federal, state, and local laws and regulations. These include OSHA and CalOSHA standards, which establish exposure limits for workers; require protective equipment or other protective measures, when warranted; and require employers to provide a written health and safety program, worker training, emergency response training, and medical surveillance. Nevertheless, due to the amount of grading and excavation that would be undertaken to implement the LAWA Staff-Recommended Alternative, and the number of SPAS improvements that may be undertaken concurrently by different contractors throughout the construction period, LAWA would comply with the *Procedure for the Management of Contaminated Materials Encountered During Construction*, which was prepared in accordance with LAX Master Plan Commitment HM-2, Handling of Contaminated Materials During Construction, and identifies procedures associated with identification and handling of excavated contaminated materials. The Procedure requires, among other things, preparation of a site-specific Health and Safety Plan that incorporates OSHA and CalOSHA regulations, as well as FAA and LAWA health and safety requirements in order to minimize the risk of injury to site workers and the general public; trained hazardous waste operations and emergency response (HAZWOPER) personnel; characterization of areas where contaminated soils are encountered through preparation of Site Sampling and Analyses Plans, as well as specific procedures for handling such materials, identifying risks, and monitoring site conditions; and implementation of BMPs and spill prevention and control measures to prevent spills, as well as emergency response procedures and notification requirements in the event of a spill. Compliance with the Procedure would ensure that contaminated materials encountered during construction are properly identified, stored, remediated, and disposed of in accordance with all applicable regulations, including those governing worker health and safety. As such, impacts to construction workers associated with the excavation of contaminated materials would be less than significant.

Impacts Related to the Implementation of Emergency Response Activities

Implementation of the LAWA Staff-Recommended Alternative would alter ground access to, from, and around LAX. A lack of adequate access could impair the effective implementation of emergency response activities by impeding the movement of emergency vehicles. During construction, local roadway and/or lane closures would occur for varying periods; however, local access would be adequately maintained through detours and diversions, and emergency access would be coordinated and ensured through LAX Master Plan Commitment C-1, Establishment of a Ground Transportation/Construction Coordination Office, and LAX Master Plan Commitments ST-9, ST-12, ST-14, ST-17, ST-18, ST-19, ST-21, and ST-22. In addition, as indicated in Section 2.3.12.1, *On-Airport Transportation*, of this chapter, roadways within the CTA would operate at an acceptable level of service under the LAWA Staff-Recommended Alternative. As a result, the implementation of emergency response activities would not be impaired, and impacts would be less than significant.

2.3.7.3.2 Mitigation Measures

Implementation of LAX Master Plan Commitment HM-1, and compliance with the *Procedure for the Management of Contaminated Materials Encountered During Construction*, developed in accordance with LAX Master Plan Commitment HM-2, would ensure that impacts related to hazardous materials associated with the LAWA Staff-Recommended Alternative would be less than significant. Implementation of LAX Master Plan Commitments C-1, ST-9, ST-12, ST-14, ST-17, ST-18, ST-19, ST-21, and ST-22 would ensure that impacts relating to the impairment of the implementation of emergency response activities associated with the LAWA Staff-Recommended Alternative would be less than significant. Therefore, no mitigation measures specific to SPAS are required.

2.3.8 Hydrology/Water Quality

2.3.8.1 Impacts Analysis

This section describes the environmental impacts specific to the LAWA Staff-Recommended Alternative as they relate to hydrology (drainage) and water quality. As noted in Section 2.3, impacts of the LAWA Staff-Recommended Alternative on hydrology and water quality are associated with the airfield/terminal components of Alternative 1 and the ground access components of Alternative 9, as evaluated in Section 4.8.6 of the SPAS Draft EIR. It should be noted that the increase in impervious area within the hydrology/water quality study area (HWQSA) under the LAWA Staff-Recommended Alternative, discussed below, is the same as that associated with Alternative 1. Although the LAWA Staff-Recommended Alternative includes parking in the existing Avis rental car lot, whereas Alternative 1 does not, the Avis rental car lot is impervious under baseline conditions and this area would remain impervious under all of the SPAS alternatives. See Figures 2 through 9 in Appendix H of the SPAS Draft EIR.

The drainage analysis addresses changes in impervious area and how these changes would be expected to affect the potential for flooding to occur, and the potential to substantially alter the existing drainage pattern of the site or area through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site. As described in Section 4.8.2 of the SPAS Draft EIR, the drainage analysis is based on calculations of total impervious area. Detailed land use designations and impervious area calculations and results for the LAWA Staff-Recommended Alternative are presented in Appendix H, *Hydrology and Water Quality*, of the SPAS Draft EIR.[32] A summary of impervious area values by land use that are used as the indicator for potential for hydrology impacts for the baseline conditions and for the LAWA Staff-Recommended Alternative are presented in **Table SRA-2.3.8-1**.

[32] The analysis of the LAWA Staff-Recommended Alternative in Appendix H is provided under the designation "Alternative 1."

Table SRA-2.3.8-1

Total Impervious Area and Percent Change within the HWQSA Baseline (2010) Conditions, LAWA Staff-Recommended Alternative

		Impervious Area (acres)	
Area	**2010 Baseline**	**SRA**	**Change from Baseline (%)**
Santa Monica Bay	1,981	2,013	1.6
Dominguez Channel	1,101	1,162	5.5
HWQSA	3,082	3,174	3.0

Source: CDM Smith, 2012.

The water quality analysis estimates the storm water pollutant loads that would be discharged to receiving water bodies, describes potential sources for dry weather flows as compared to baseline conditions, and evaluates the effects of construction associated with the LAWA Staff-Recommended Alternative. As described in Section 4.8.2 of the SPAS Draft EIR, storm water pollutant loads are based on EMC data and calculations of annual runoff volumes. Detailed land use designations, average annual runoff volumes, pollutant load calculations and results for the LAWA Staff-Recommended Alternative are presented in Appendix H, *Hydrology and Water Quality*, of the SPAS Draft EIR. A summary of the storm water pollutant loading related to the LAWA Staff-Recommended Alternative is presented in **Table SRA-2.3.8-2**. Water quality impacts associated with dry weather flows and construction activities are evaluated qualitatively.

Table SRA-2.3.8-2

Estimated Average Annual Pollutant Loads and Percent Change Within HWQSA - Baseline (2010) Conditions, LAWA Staff-Recommended Alternative

		Total Pollutant Load (lb/yr)	
Pollutant	**2010 Baseline**	**SRA**	**Change from Baseline (%)**
Total Suspended Solids	267,761	236,371	-11.7
Total Phosphorus	1,758	1,794	2.0
Total Kjeldahl Nitrogen	8,144	8,166	0.3
Total Copper	371	390	4.9
Total Lead	67	70	3.7
Total Zinc	1,988	2,060	3.6
Oil and Grease	15,245	15,997	4.9
5-Day Biochemical Oxygen Demand	55,976	55,268	-1.3
Chemical Oxygen Demand	321,325	328,690	2.3
Ammonia	2,047	2,090	2.1
Total Coliform Bacteria[1]	2.61E+11	2.72E+11	4.0
Fecal Coliform Bacteria[1]	1.26E+11	1.30E+11	3.0
Fecal Enterococcus Bacteria[1]	1.53E+10	1.40E+10	-8.0

[1] Expressed in organisms/year.

Source: CDM Smith, 2012.

Under the LAWA Staff-Recommended Alternative, there would be improvements to the airfield, terminal, and ground access as described in Section 2.2, LAWA Staff-Recommended Alternative Description, of

this chapter. The distinguishing changes associated with this alternative relative to hydrology and water quality are the northerly movement and westerly extension of Runway 6L/24R, conversion of the unlined Argo Drainage Channel into a concrete box culvert (9,857 linear feet), conversion of open space to accommodate the realignment of Lincoln Boulevard, conversion of industrial area for the Intermodal Transportation Facility (ITF), conversion of the Manchester Square area to parking use and a CONRAC, and the addition of an APM system.

Hydrology

Under the LAWA Staff-Recommended Alternative, the total impervious area within the HWQSA would increase by approximately 92 acres as compared to baseline conditions of 3,082 acres.[33] Since much of the area surrounding the airport in both the Santa Monica Bay and Dominguez Channel watersheds is developed (i.e., impervious) under baseline conditions, this change would represent a marginal increase (3.0 percent) in regional impervious area.

The changes in impervious area would not be evenly distributed between the Santa Monica Bay and Dominguez Channel watersheds when compared to baseline conditions. The impervious area within the Santa Monica Bay Watershed would increase 32 acres or 1.6 percent, occurring primarily within the Argo sub-basin due to the runway and taxiway improvements, while the impervious area within the Dominguez Channel Watershed would increase by 61 acres or 5.5 percent (see Table 4 in Appendix H, *Hydrology and Water Quality*, of the SPAS Draft EIR).

Previous studies indicate that, under baseline conditions, the conveyance capacity of drainage infrastructure within the Argo sub-basin and the Imperial sub-basin (in this case, including both the Pershing and Imperial components of the sub-basin) is adequate for the LADPW 50-year storm, while the Dominguez Channel sub-basin infrastructure would flood under these same conditions.[34,35] Detailed analysis of the Argo and Imperial sub-basins and the Dominguez Channel sub-basin capacities under this design storm for the LAWA Staff-Recommended Alternative was not conducted, given the conceptual level of planning associated with all SPAS alternatives at this time as discussed in Section 4.8.2 of the SPAS Draft EIR. As shown in **Table SRA-2.3.8-1**, the increase in impervious surface in the portion of the HWQSA tributary to Santa Monica Bay, which includes both the Argo and Imperial sub-basins, is 1.6 percent, which would result in a very small net increase in peak flow rates to be conveyed by the drainage systems serving these areas. It is possible that this increase could cause one or more existing on-site or off-site storm drains to reach or exceed the design capacity, which would be a significant impact. Also as shown in **Table SRA-2.3.8-1**, the increase in impervious surface in the portion of the HWQSA tributary to Dominguez Channel is 5.5 percent, which would result in a net increase in peak flow rates to be conveyed by the drainage systems serving these areas. As previously noted, the Dominguez Channel is currently over capacity off-site and downstream from LAX; therefore, a 5.5 percent increase in peak flow rates from LAX, which represents a portion of the total tributary area to the Dominguez Channel, would add to the capacity deficiency, which would be a significant impact.

LAWA would continue to implement applicable recommendations resulting from LAX Master Plan Commitment HWQ-1, Conceptual Drainage Plan, including improvements designed to address deficiencies, if any, in the drainage system that would occur at buildout of the LAX Master Plan. Such improvements would reduce flooding impacts associated with development of the LAWA Staff-Recommended Alternative; however, given that those recommended improvements were designed based on the approved LAX Master Plan development program, flooding impacts of the LAWA Staff-

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33 As noted previously, this increase in impervious area within the HWQSA is the same as that associated with Alternative 1. Although the LAWA Staff-Recommended Alternative includes parking in the existing Avis rental car lot, whereas Alternative 1 does not, the Avis rental car lot is impervious under baseline conditions and this area would remain impervious under all of the SPAS alternatives. See Figures 2 through 9 in Appendix H of the SPAS Draft EIR.

34 City of Los Angeles, Los Angeles World Airports, Revised Hydrology Report for Los Angeles International Airport North Perimeter Storm Drain, prepared by Parsons, Brinckerhoff, Quade & Douglas, Inc., December 2001.

35 City of Los Angeles, Los Angeles World Airports, Final On-Site Hydrology Report for Los Angeles International Airport, prepared by Parsons, Brinckerhoff, Quade & Douglas, Inc., October 2002.

Recommended Alternative would be significant. As described in Section 2.3.8.2 below, a new mitigation measure, MM-HWQ (SPAS)-1, Conceptual Drainage Plan Revision and Update, is proposed to tailor the Conceptual Drainage Plan recommendations to the specific characteristics of the selected SPAS alternative. With implementation of Mitigation Measure MM-HWQ (SPAS)-1, the hydrology impacts associated with the LAWA Staff-Recommended Alternative would be less than significant.

Under the LAWA Staff-Recommended Alternative, all facilities receiving and conveying storm water from the airport would be below ground pipes or concrete lined, including the Argo Drainage Channel, which would be structurally covered to support the weight of an aircraft for its entire length. Therefore, any increases in storm water peak flow rates or changes in the drainage infrastructure would not result in substantial erosion or siltation either on-site or off-site and the impact of erosion or siltation due to runoff from the airport would be less than significant for all drainage facilities.

Water Quality

Storm Water Pollutant Loads

Under the LAWA Staff-Recommended Alternative, the estimated annual total pollutant load generated within the HWQSA would increase for most constituents compared to baseline conditions. Specifically, greater estimated loads are predicted for all constituents except for total suspended solids, 5-day Biochemical Oxygen Demand (BOD_5), and fecal enterococcus bacteria when compared to baseline conditions. The increases in estimated loads would range from 0.3 percent for total Kjeldahl Nitrogen to 4.9 percent for copper and oil and grease.

With respect to debris loads, activities within airfield improvement areas are not a significant generator of debris compared to the potential load generated within ground access improvement areas (e.g., parking lots). Within the airport improvement areas, there is no public access to these areas so sources of debris are minimal compared to public access areas. Additionally, debris sources are minimized as a result of implementation of source control measures conducted by LAWA and its tenants under the SWPPP. The LAWA Staff-Recommended Alternative does include ground access improvements which could potentially increase debris loads. The complete model results are presented in Table 6 in Appendix H, *Hydrology and Water Quality*, of the SPAS Draft EIR. The increases in pollutant loads would be a significant impact.

LAWA would continue to implement applicable recommendations resulting from LAX Master Plan Commitment HWQ-1, Conceptual Drainage Plan, including BMPs to address water quality impacts associated with increased pollutant loads from buildout of the LAX Master Plan. Such BMPs would reduce the water quality impacts associated with development of the LAWA Staff-Recommended Alternative; however, given that those recommended improvements were designed based on the approved LAX Master Plan development program, pollutant load increases associated with the LAWA Staff-Recommended Alternative are assumed to be significant. As described in Section 2.3.8.2 below, a new mitigation measure, MM-HWQ (SPAS)-1, Conceptual Drainage Plan Revision and Update, is proposed to tailor the Conceptual Drainage Plan recommendations, including BMPs, to the specific characteristics of the selected SPAS alternative. As part of the update to the existing Conceptual Drainage Plan for LAX, LAWA would integrate the applicable BMP requirements related to SUSMP and the City's LID Ordinance. Additionally, the existing source control BMPs currently employed by LAWA as identified in the LAX SWPPP would also serve to decrease the potential for additional pollutant loading as a result of intensification of airport activities. Routine maintenance such as sweeping and inspections would be performed more frequently and in direct proportion to the increase in frequency of airport activities. With implementation of Mitigation Measure MM-HWQ (SPAS)-1, the water quality impacts associated with the LAWA Staff-Recommended Alternative would be less than significant.

Dry Weather Flows

As discussed in Section 4.8.2 of the SPAS Draft EIR, sources of dry weather flows within the HWQSA are associated with activities that include outdoor maintenance of vehicles; building and grounds maintenance; aircraft and ground vehicle fueling, painting, stripping, and washing; limited de-icing; and

chemical and fuel transport and storage. While implementation of the LAWA Staff-Recommended Alternative, would not in itself result in an intensification of such airport-related activities, the natural growth in airport activity projected to occur by 2025 (i.e., growth from 56.5 million annual passengers (MAP) in 2009 to 78.9 MAP in 2025 under all alternatives, including the LAWA Staff-Recommended Alternative) would increase such activities. These activities would likely result in an increase in the source of pollutants within the HWQSA and the potential for release of dry weather flows containing pollutants. However, LAWA and its tenants would continue to implement measures required under the SWPPP and periodically update the SWPPP as necessary to reflect the current conditions and level of activity to prevent or minimize the introduction of pollutants and discharge of dry weather flows.

In addition, within the Santa Monica Bay Watershed, the Imperial retention basin is designed to capture dry weather flows. While the increase potential for spills and leaks as a result of increasing level of activity under all alternatives, including the LAWA Staff-Recommended Alternative, could result in an increase in pollutant loads to receiving water bodies, compliance with existing regulations and airport procedures, particularly the LAX SWPPP, would reduce the likelihood of dry weather discharges and impacts associated with hazardous materials spills. With such continued compliance, the pollutant load generated from dry weather flows would not be expected to increase and the associated impact would be less than significant.

Construction Impacts

As required under the SWRCB General Permit for Construction Activities, LAWA has prepared stormwater BMP guidance instructions in the Design and Construction Handbook applicable to airport improvement projects.[36] This document outlines the procedures for preparing and implementing a construction SWPPP before beginning any construction operations so that the activities are in compliance with the general permit. These requirements include:

- Developing and implementing a construction SWPPP, specifying BMPs that will prevent all construction pollutants from contacting storm water with the intent of keeping all products of erosion from moving off-site into receiving waters
- Eliminating or reducing non-storm water discharges to storm sewer systems and surface waters
- Performing inspections of all BMPs

Temporary construction BMPs specified in the manual include:

- Soil stabilization (erosion control) techniques such as seeding and planting, mulching, and check dams
- Sediment control methods such as detention basins, silt fences, and dust control
- Contractors' training programs
- Material transfer practices
- Waste management practices such as providing designated storage areas and containers for specific waste for regular collection
- Roadway cleaning/tracking control practices
- Vehicle and equipment cleaning and maintenance practices
- Fueling practices

Construction under the LAWA Staff-Recommended Alternative would likely create sources of pollution that would affect water quality if not controlled through implementation of BMPs. Since the improvements under this alternative would affect an area greater than one acre, LAWA's existing construction policy would require the development of project-specific construction SWPPPs in compliance with the state's

[36] City of Los Angeles, Los Angeles World Airports, Design and Construction Handbook, June 2011.

construction permit. Temporary construction BMPs that would likely be considered and incorporated into each project-specific SWPPP, as appropriate, could include:

- Soil stabilization (erosion control) techniques such as seeding and planting, mulching, and check dams
- Sediment control methods such as detention basins, silt fences, and dust control
- Contractor training programs
- Material transfer practices
- Waste management practices such as providing designated storage areas and containers for specific waste for regular collection
- Roadway cleaning/tracking control practices
- Vehicle and equipment cleaning and maintenance practices
- Fueling practices

By following the procedures outlined in the SWPPP and employing the appropriate BMPs from the list above and any additional BMPs required in project-specific construction SWPPPs, impacts to water quality associated with construction activities would be less than significant.

2.3.8.2 Mitigation Measures

Hydrology and Water Quality

To address impacts to hydrology and water quality associated with the LAWA Staff-Recommended Alternative, the following mitigation measure specific to SPAS is proposed:

- **MM-HWQ (SPAS)-1. Conceptual Drainage Plan Revision and Update.**

  In conjunction with the design of any SPAS alternative that may be selected, LAWA will revise and update the Los Angeles International Airport Conceptual Drainage Plan (CDP), to account for changes in the nature, location, design, and timing, if known, of the improvements under that alternative as compared to the LAX Master Plan approved in 2004, which is the basis for the 2005 CDP. Consistent with the requirements of LAX Master Plan Commitment HWQ-1, which established the framework for the CDP, the necessary revisions and updates will occur in accordance with FAA guidance and to the satisfaction of the City of Los Angeles Department of Public Works, Bureau of Engineering and Bureau of Sanitation - Watershed Protection Division based on the drainage/flood control and storm water quality requirements of each agency. The CDP revision and update shall take into account:

  - Changes in existing surface hydrology and water quality characteristics at LAX since preparation of the 2005 CDP;
  - Current regulatory programs related to water quality, such as the application of Standard Urban Stormwater Mitigation Plan (SUSMP) and Low Impact Development (LID) requirements by the City Bureau of Sanitation - Watershed Protection Division;
  - Surface hydrology and water quality improvements proposed separate from SPAS, such as the City of Los Angeles Bureau of Sanitation Stormwater Infiltration and Treatment Facility, but related to treatment of storm water from/at LAX; and
  - Changes in projected future area-wide drainage flows and surface water pollutant loading within the LAX Master Plan project area, as affected by the selected SPAS alternative and by other existing or proposed improvement projects at LAX that were not assumed in the 2005 CDP.

  The CDP revision and update will provide the basis and specifications by which detailed drainage improvement plans shall be designed in conjunction with site engineering specific to each improvement associated with any selected SPAS alternative, as well as the remaining LAX Master Plan improvements that would not change due to the SPAS alternative, including, if necessary,

improvements to address increased erosion and sedimentation. Consistent with the requirements for the 2005 CDP, the drainage system design and identification of needed improvements shall be based upon providing flood protection for a minimum 10-year storm event. As also required in the 2005 CDP, water quality treatment BMPs, which may include infiltration basins/systems, bioretention, vegetated swales, detention/retention basins/systems, media filtration, water quality inlets, catch basin inlet devices, and hydrodynamic separators, in addition to source control measures and good housekeeping practices, shall be incorporated to minimize the effect of airport operations on surface water quality to below the level of significance and to prevent a net increase in pollutant loads to surface water resulting from the overall LAX Master Plan improvements including if/as modified by any selected SPAS alternative.

2.3.8.3 Level of Significance After Mitigation

Hydrology

Implementation of Mitigation Measure MM-HWQ (SPAS)-1, Conceptual Drainage Plan Revision and Update, would reduce the hydrology impacts associated with the LAWA Staff-Recommended Alternative to a level that is less than significant.

Water Quality

Implementation of Mitigation Measure MM-HWQ (SPAS)-1, Conceptual Drainage Plan Revision and Update, would reduce the water quality impacts associated with the LAWA Staff-Recommended Alternative to a level that is less than significant.

2.3.9 Land Use and Planning

2.3.9.1 Impacts Analysis

As noted in Section 2.3, impacts of the LAWA Staff-Recommended Alternative related to land use and planning are associated with the airfield/terminal components of Alternative 1 and the ground access components of Alternative 9, as evaluated in Section 4.9.6 of the SPAS Draft EIR.

This analysis of land use impacts addresses inconsistencies with applicable general plans, specific plans, and regional plans, and policies as well as land use incompatibility due to physical impacts associated with aircraft noise exposure within the study area. A project is consistent with a general plan and related planning documents, if considering all its aspects, it will further the objectives and policies of the general plan or not obstruct their attainment.[37] Nevertheless, in certain instances, amendments to the various plans are proposed to ensure precise consistency. As part of this analysis, the discussion below evaluates the consistency of the LAWA Staff-Recommended Alternative with the existing LAX Specific Plan, as amended, recognizing that as part of SPAS, the LAX Specific Plan may be amended. The land use incompatibility analysis is focused on incompatibility associated with aircraft noise exposure. The analysis evaluates future (2025) noise levels associated with the LAWA Staff-Recommended Alternative compared to baseline (2009) conditions. However, the vast majority of the change in future conditions compared to baseline conditions is attributable to growth in aviation activity anticipated to occur at LAX by 2025. Aircraft-related noise impacts that are attributable to project-related changes in the airfield configuration are identified in Section 2.3.10.1, *Aircraft Noise*, of this chapter.

While operational and construction impacts associated with noise, air quality, traffic, safety, and degraded views have the potential to impact land uses, these effects are addressed in Sections 2.3.10.2, *Road Traffic Noise*; 2.3.10.3, *Construction Traffic and Equipment Noise*; 2.3.10.4, *Transit Noise and Vibration*;

[37] A given project need not be in perfect conformity with each and every policy nor does state law require precise conformity of a proposed project with every policy or land use designation for a site. (*Sierra Club v. County of Napa* (2004) 121 Cal.App.4th 1490; see also *San Franciscans Upholding the Downtown Plan v. City & County of San Francisco* (2002) 102 Cal.App.4th 656; *Sequoyah Hills Homeowners Assn. v. City of Oakland* (1993) 23 Cal.App.4th 704, 719.)

2.3.2, *Air Quality*; 2.3.12.2, *Off-Airport Transportation*; 2.3.7.2, *Safety*; and 2.3.1, *Aesthetics*, of this chapter.

Changes in Development

The LAWA Staff-Recommended Alternative includes various components that are particularly pertinent to the analysis of land use impacts. These components are the relocation of Runway 6L/24R 260 feet north; extension of Runway 6R/24L; construction of a new Intermodal Transportation Facility (ITF); public parking and a Consolidated Rental Car Facility (CONRAC) within Manchester Square; employee parking in the existing Avis Rent-A-Car lot (east of lot C); a commercial vehicle holding lot; and construction of an elevated Automated People Mover (APM) primarily along 98th Street, to connect Manchester Square, the ITF, and stations within the Central Terminal Area (CTA), with a planned connection to the future Metro LAX/Crenshaw Light Rail Transit Station at/near Century and Aviation Boulevards; realignment of Lincoln Boulevard to the north with a portion below grade and covered; and modifications to navigational aids in the Dunes.

To accommodate airfield, terminal, ground access, and parking improvements, this alternative would acquire approximately 26 acres of primarily airport-related uses, such as parking, transportation, and rental car facilities, and would convert a site owned by the Los Angeles Unified School District (LAUSD), and currently occupied by two charter schools, to airport uses, as presented in **Table SRA-2.3.9-1**. The locations of the acquisition areas and school site associated with the LAWA Staff-Recommended Alternative are shown in Figure 2-12, in Chapter 2, *Project Description*, of the SPAS Draft EIR. As shown in Figure 2-12, the area to be acquired is between 96th and 98th Streets, west of Airport Boulevard. Upon acquisition, this area would be used for the ITF. The 5-acre LAUSD-owned site is located within Manchester Square and includes two charter schools (Bright Star Secondary Charter Academy and Stella Middle Charter Academy). Under the LAWA Staff-Recommended Alternative, this area would be developed as airport parking and a CONRAC. The need, if any, for acquisition associated with changes in the Runway 6L/24R RPZ would be determined by FAA in later stages of planning and, therefore, is not addressed in this EIR. However, Section 2.3.7.2, *Safety*, of this chapter, identifies land uses within the RPZ.

Table SRA-2.3.9-1

LAWA Staff-Recommended Alternative
Acquisition Area Land Use

Institutional	2 Charter Schools[1]
Number of Businesses	4
Floor Area[2]	
Retail	16,700 sf
Office	2,000 sf
Light Industrial	
Acres by Land Use[2]	
Parking	11 ac
Rental Car	1 ac
Retail	1 ac
Office	3 ac
Institutional	5 ac
Vacant	4 ac
Light Industrial	0 ac
Easement/Utilities	0 ac
Total Acreage[2]	**26 ac**

Table SRA-2.3.9-1

LAWA Staff-Recommended Alternative
Acquisition Area Land Use

Notes:

sf = square feet
ac = acres

[1] The two charter schools are Bright Star Secondary Charter Academy (grades 9-12) and Stella Middle Charter Academy (grades 5-8), with a respective 2011-2012 enrollment of 246 and 505 students.
[2] All totals are approximate.

Source: City of Los Angeles, Los Angeles World Airports, LAX Master Plan Program Alternative D Draft Relocation Plan, April 2004.

Implementation of the LAWA Staff-Recommended Alternative would result in the removal of some community-serving uses within the eastern portions of the airport on property owned by LAWA, including an urgent care facility, Burger King Restaurant, Travelodge Hotel, Denny's Restaurant, and Avis Rental Car facility in order to accommodate ground access, parking, and rental car facilities.

Consistency with Land Use Plans - On-Airport Land

LAX Plan

The LAX Plan is the community plan that establishes the land use policy framework for LAX and it is also a part of the City General Plan. The proposed airfield, concourse, and terminal improvements, commercial vehicle holding lot, parking areas, and CONRAC are consistent with the corresponding Airport Airside and Airport Landside land use designations shown on the LAX Plan. While the LAWA Staff-Recommended Alternative would be consistent with the LAX Plan, this alternative includes the following amendments to ensure precise consistency with the LAX Plan. Figures 1 and 2 of the LAX Plan would be amended to reflect the relocation of Runway 6L/24R 260 feet north, easterly extension of Runway 6R/24L, realignment of Lincoln Boulevard and related conversion of a small portion of area designated as LAX Northside to Airport Airside, as well as modifications to the airport boundaries associated with the smaller acquisition area of the LAWA Staff-Recommended Alternative as compared to the approved LAX Master Plan. In addition, the listing of uses within the Airport Landside area, and policies specifically associated with these uses, would be amended to reflect the elimination of Yellow Light and non-Yellow Light Projects associated with the LAX Master Plan (specifically, restricted access within the CTA; the GTC; ITC; the location of the CONRAC; APM 1 between the ITC, CONRAC, and CTA; and West Employee Parking facility).

The relocation of Runway 6L/24R would require changes to navigational aids within the Dunes Specific Plan Area, which is designated as Open Space in the LAX Plan. Development within Open Space is limited to existing and relocated navigational aids. Since the planned navigational aids would be similar in function and number to the existing facilities and a Habitat Restoration Plan (HRP) is underway as part of the approved LAX Master Plan, this use would be consistent with the Open Space designation of the LAX Plan, as further described below for the Dunes Specific Plan.

Therefore, as changes to on-airport facilities under the LAWA Staff-Recommended Alternative would be consistent with underlying LAX Plan land use designations, with amendment of the plan to reflect the changes noted above and ensure precise consistency, no conflicts with land use designations would occur.

The LAWA Staff-Recommended Alternative would be consistent with the goals and corresponding policies of the LAX Plan. The airfield, terminal, and ground access improvements would strengthen the role of LAX in the regional network and contribute to the local economy (Goals 1 and 3, respectively), while enhancing safety and security (Goal 2) by improvements in airfield design, decentralization of parking and ground access facilities, and provision of more queuing space for vehicles through the redesigned entryway, which would provide additional space for security screening. The LAWA Staff-Recommended Alterative would be consistent with Goal 4 by reducing the amount of acquisition required as compared to the LAX Master Plan, and limiting improvements within the Dunes to the required relocation of navigational aids. Under this alternative, LAX Master Plan measures would be incorporated into project design, and measures would be implemented to reduce air quality impacts (see Section 2.3.2, *Air Quality*, of this chapter). Consistent with Goal 5 to promote neighborhood compatibility, with the displaced landing threshold on Runway 6L/24R associated with this alternative, residences would no longer be located within the runway RPZ. Consistency with Goal 5 would also be achieved through the use of airport buffer areas, landscaping, and ongoing coordination with surrounding residences and property owners. Finally, the LAWA Staff-Recommended Alternative would be consistent with Goal 6 to improve ground access to LAX through a secure and efficient ground connection system and redirecting traffic away from local roads. Traffic to the CTA on local roadways would benefit from the development of parking and a CONRAC facility within Manchester Square, the ITF, and an APM between these facilities, as well as provision of a connection to the future Metro LAX/Crenshaw Light Rail Transit Station.

The LAWA Staff-Recommended Alternative would also be consistent with policies associated with the Airport Airside, Airport Landside, LAX Northside, and Open Space land use designations. Within the Airport Airside land use designation, the LAWA Staff-Recommended Alternative would develop a balanced airfield (P1), restrict the number of gates to 153 (P2), and improve parking, including employee parking (P3) through proposed airfield and ground access improvements. Proposed improvements are not located in proximity to residential areas (P4).

Regarding Airport Landside policies, as addressed later in this section, the LAWA Staff-Recommended Alternative would not result in significant land use incompatibilities with adjacent land uses (P1) and would not be located adjacent to residential areas (P6). In addition, the LAWA Staff-Recommended Alternative supports the intent of Airport Landside Policies P2, P3, and P4 by providing an APM that connects parking and a CONRAC facility within Manchester Square, the ITF, and the CTA, and links these facilities to the future Metro LAX/Crenshaw Light Rail Transit Station and the regional ground transportation network. This alternative also provides adequate parking facilities (P5).

Within LAX Northside, no changes are proposed with the exception of the Lincoln Boulevard realignment. Although this would reduce the amount of commercial areas proposed for development within LAX Northside east of Lincoln Boulevard, a landscaped buffer area would still be retained between LAX Northside and residential uses to the north (P1). Additional discussion of LAX Northside is provided below under the heading LAX Specific Plan.

As previously described, the LAWA Staff-Recommended Alternative would be consistent with Open Space Policies P1 and P2 to protect and restore habitat areas, since implementation of an HRP to complete restoration in the Dunes would be required in association with relocation of navigational aids.

The LAWA Staff-Recommended Alternative would be consistent with policies related to safety, by providing runway realignment and taxi separation for larger aircraft maneuvering areas and clearances (P1), adequate aircraft queue space (P2), and a center taxiway (P3); relocation of Terminal 3 to provide for improved taxiway spacing (P5); and RPZs in conformance with FAA safety requirements (P7 and P8).

Based on the above, the LAWA Staff-Recommended Alternative would be consistent with policies of the LAX Plan, with precise consistency supported through the specified amendments to the LAX Plan. Therefore, impacts would be less than significant.

LAX Specific Plan

The LAX Specific Plan provides regulatory controls and ensures the orderly development of LAX and LAX Northside, consistent with the LAX Plan. The proposed airfield, concourse, and terminal improvements,

commercial vehicle holding lot, parking areas, APM, and CONRAC under the LAWA Staff-Recommended Alternative are consistent with the corresponding LAX-A Zone: Airport Airside Sub-Area and LAX-L Zone: Airport Landside Sub-Area as shown on the LAX Specific Plan. While the LAWA Staff-Recommended Alternative would be consistent with the LAX Specific Plan, this alternative includes amendments to ensure precise consistency with the LAX Specific Plan. The movement of Runway 6L/24R 260 feet to the north and the related realignment of Lincoln Boulevard would occur within most of Area 8 and a portion of Area 9 of the LAX Northside Sub-Area south of Westchester Parkway.[38] The realignment would reduce the use of Areas 8 and 9 for future development, and would require the relocation of an existing radar tower in Area 9. Since land uses proposed within LAX Northside would be affected, an amendment to the LAX Specific Plan would be included with the LAWA Staff-Recommended Alternative. In addition, Map 1 and Map 2 would be amended to reflect modifications to the airport boundaries associated with the smaller acquisition area of the LAWA Staff-Recommended Alternative as compared to the approved LAX Master Plan. Based on the above, the LAWA Staff-Recommended Alternative would be consistent with the LAX Specific Plan, with precise consistency supported through the specified amendments to the LAX Specific Plan. Therefore, impacts would be less than significant.

Los Angeles Airport/El Segundo Dunes Specific Plan

The Dunes Specific Plan[39] limits development within the Dunes and establishes a Dune Habitat Preserve. As stated in the Dunes Specific Plan, existing airport navigational and safety facilities are permitted within the Dune Habitat Preserve and development of additional navigational and safety facilities, to the extent consistent with federal requirements, requires a Coastal Development Permit.[40] Although this alternative would require changes to navigational aids within the Dune Habitat Preserve, the application for, and review and approval of, a Coastal Development Permit would include provisions for the preservation of habitat values (i.e., sensitive dune habitat is recognized as Environmentally Sensitive Habitat Area (ESHA), which are afforded special protection under Section 30240 the California Coastal Act). Furthermore, implementation of LAX Master Plan and proposed SPAS mitigation measures would ensure the conservation, enhancement, and restoration of state-designated sensitive habitat, as well as the protection of sensitive species in the Dunes, as described in Section 2.3.3, *Biological Resources*, of this chapter. Therefore, the LAWA Staff-Recommended Alternative would be consistent with the Los Angeles Airport/El Segundo Dunes Specific Plan, and impacts would be less than significant.

LAX Street Frontage and Landscape Development Plan Update

The LAWA Staff-Recommended Alternative would be subject to the design standards and review procedures presented in the LAX Street Frontage and Landscape Development Plan Update. Implementation of new airfield, terminal, and ground access improvements carried out in compliance with the Landscape Development Plan, would be consistent with the objectives of the plan relating to the enhancement of 1) the visual and aesthetic appeal of streets, buffer areas, and open spaces surrounding LAX; 2) pedestrian, bicycle, and vehicular circulation on streets internal to and surrounding LAX; and 3) LAX's compatibility with adjacent land uses, neighborhoods and communities. Additional aesthetic features of the Landscape Development Plan, as they relate to the LAWA Staff-Recommended Alternative and its perimeter, are also discussed in Section 2.3.1, *Aesthetics*, of this chapter and include the preparation of a Neighborhood Compatibility Program (NCP), which outlines interface treatments along the airport perimeter for the purpose of "ensuring that the airport complements surrounding properties and neighborhoods" and addresses issues relating to compatibility (i.e., landscape buffers,

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38 Under the currently adopted LAX Specific Plan, Areas 8 and 9 of LAX Northside are designated for commercial uses. Under the proposed LAX Northside Plan Update, Areas 8 and 9 are designated as Airport Support, because their potential commercial uses is limited, due to the close proximity to the LAX north airfield and associated noise impacts, safety requirements, and height restrictions.

39 City of Los Angeles, Department of City Planning, Los Angeles Airport/El Segundo Dunes Specific Plan (Ordinance No. 167,940), June 28, 1992, amended by Ordinance 169,767, approved August 6, 1994.

40 In addition to, and separate from, the requirement for a Coastal Development Permit, federal approval(s) of any improvements within the Dunes (i.e., the Coastal Zone) would require a Coastal Act Consistency Determination/Consistency Certification - see Section 2.3.4, *Coastal Resources*, of this chapter.

noise, light spillover, odor, and vibration). These entail the provision and maintenance of landscaped buffer areas along the northerly boundary area of the airport, which include setbacks, landscaping, screening, or other appropriate view-sensitive measures with the goal of avoiding land use conflicts, shielding lighting, enhancing privacy, and better screening views of airport facilities from adjacent residential uses; locating airport uses and activities with the potential to adversely affect nearby residential land uses through noise, light spillover, odor, vibration, and other consequences of airport operations and development, as far from adjacent residential neighborhoods, as feasible; and providing community outreach efforts to property owners and occupants when new development on airport property is in proximity to and could potentially affect nearby residential uses. Furthermore, the Landscape Development Plan identifies street, landscaping, and neighborhood compatibility requirements specific to the main types of Master Planned projects and/or land uses, including LAX gateways and entry corridors, passenger terminals and facilities, airfield/open space areas, parking lots and parking structures, and the LAX Northside Plan area. Provisions of the Landscape Development Plan would be implemented for the LAWA Staff-Recommended improvements, through conformance with standard LAWA plan and design review procedures. Based on the above, the LAWA Staff-Recommended Alternative would be consistent with the LAX Street Frontage and Landscape Development Plan Update and, therefore, impacts would be less than significant.

Acquisition and Relocation

The businesses proposed for acquisition under the LAWA Staff-Recommended Alternative are identified within the LAX Master Plan Draft Relocation Plan. As such, they would be eligible for relocation assistance as described in LAX Master Plan Commitment RBR-1, Residential and Business Relocation Program. LAX Master Plan Mitigation Measures MM-RBR-1, Phasing for Business Relocations, and MM-RBR-2, Relocation Opportunities through Aircraft Noise Mitigation Program, would also serve to identify suitable relocation sites. Furthermore, the acquired areas would be subject to LAX Master Plan Commitment LU-2, Establishment of a Landscape Maintenance Program for Parcels Acquired Due to Airport Expansion, which requires that, following demolition, these areas would be fenced, landscaped, and maintained if there are delays in development for airport purposes.[41]

With implementation of the LAWA Staff-Recommended Alternative, existing leases for the urgent care facility, Travelodge Hotel, Burger King Restaurant, Denny's Restaurant, and Avis Rental Car facility would be terminated; these businesses are not subject to relocation provisions, as they are located on LAWA property. Relocation of these uses would be a business decision. The sites of the businesses affected by development of the LAWA Staff-Recommended Alternative would also be subject to LAX Master Plan Commitment LU-2, Establishment of a Landscape Maintenance Program incorporated in the LAX Street Frontage and Landscape Development Plan Update.

The acquisition areas presented in **Table SRA-2.3.9-1** above are all located within the boundaries of the LAX Plan and LAX Specific Plan, within land use and zoning designations of LAX Plan-Airport Landside and LAX Specific Plan LAX-L Zone: Airport Landside Sub-Area, which corresponds with the land uses proposed for these sites under the LAWA Staff-Recommended Alternative. Therefore, no changes to existing General Plan or zoning designations are required and no General Plan or zoning inconsistencies would occur, and impacts would be less than significant.

Consistency with Land Use Plans - Off-Airport Land

SCAG 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy

The RTP/SCS has mobility as an important component of sustainability and integrated planning. The LAWA Staff-Recommended Alternative would be consistent with the policy framework of the RTP/SCS aviation forecast, as it would improve the transportation system without changing the practical capacity of LAX from 78.9 MAP, the same practical capacity included in the approved LAX Master Plan.

[41] These requirements are also incorporated in the LAX Street Frontage and Landscape Development Plan Update.

The LAWA Staff-Recommended Alternative would also be consistent with other policies of the RTP/SCS by providing substantial ground access improvements, including the modification of Sky Way, parking within a portion of Manchester Square, and development of an elevated APM along 98th Street connecting the CTA, the proposed ITF, and the future Metro LAX/Crenshaw Light Rail Transit Station near Century and Aviation Boulevards, while also providing connectivity to other public transit. Regional aviation demand forecasts and policies developed for the RTP/SCS are presented below in the discussion of the AAGA Appendix. Consistency with the majority of the policies presented in the AAGA Appendix, and incorporation of LAX Master Plan commitments and mitigation measures, would avoid potential conflicts with RTP/SCS policies. Therefore, the LAWA Staff-Recommended Alternative would be consistent with the RTP/SCS, and impacts would be less than significant. Please also see Response to Comment SPAS-AR00001-2 in Chapter 3, *Comments and Responses*, of Part II of this Final EIR which includes a table that analyzes the consistency of the SPAS alternatives, including the LAWA Staff-Recommended Alternative, with Goals 1 through 9 of the RTP/SCS.

SCAG 2012-2035 RTP/SCS Aviation and Airport Ground Access Appendix

As indicated in Section 4.9.3.1 of the SPAS Draft EIR, SCAG's adopted Aviation Decentralization Strategy calls for making substantial airport ground access improvements throughout the region, with the short-term program emphasizing the relief of bottlenecks around airports through arterial, intersection, and interchange improvements, and increasing transit access to the airports. As discussed above, the LAWA Staff-Recommended Alternative includes substantial ground access and transit improvements in the areas surrounding LAX, which would further the AAGA Appendix policies regarding Airport Land Use Compatibility and Environmental Impacts, as well as the broader RTP/SCS goals pertaining to mobility, accessibility, and productivity of the transportation system, as the additional improvements to arterials, intersections, and interchanges would continue to be supported and implemented in the areas surrounding LAX. Additional consistency discussion of the LAWA Staff-Recommended Alternative with applicable policies is provided in Appendix I-1, *Land Use and Planning* of the SPAS Draft EIR.[42] Furthermore, because the LAWA Staff-Recommended Alternative would not change activity levels at LAX, it would not conflict with policies focused on decentralization of aviation demand and promoting the use of airports in less populated areas.

The airport ground access project list in the AAGA Appendix contains major projects at and around LAX which have been completed, and progress with regards to the improvement of additional arterials, intersections, and interchanges is ongoing. The AAGA Appendix also proposes a new list of ground access improvement projects around LAX for 2012-2035.[43] In addition to these proposed and ongoing roadway improvements, the ground access improvements proposed under the LAWA Staff-Recommended Alternative would include the modification of Sky Way, parking within a portion of Manchester Square, and development of an APM connecting the CTA, the ITF, Manchester Square, and the future Metro LAX/Crenshaw Light Rail Transit Station near Century and Aviation Boulevards, while also providing connectivity to other public transit. Therefore, the LAWA Staff-Recommended Alternative would be consistent with the relevant policies and projects included in the AAGA Appendix, and impacts would be less than significant.

SCAG 2004 Compass Blueprint Growth Vision

The LAWA Staff-Recommended Alternative would be consistent with the underlying goals of the Growth Vision plan, through improvements within a Compass 2% Strategy Opportunity Area. As discussed above, development of the LAWA Staff-Recommended Alternative would involve major ground access improvements that would serve to further Growth Vision principles in the Compass 2% Strategy Opportunity Areas, therefore demonstrating consistency with SCAG's core principles, which are intended

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42 The analysis of the LAWA Staff-Recommended Alternative in Appendix I-1 is provided under the designations of "Alternative 1" and "Alternative 9."

43 Southern California Association of Governments, 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy: Aviation and Airport Ground Access Appendix, adopted April 4, 2012, Available: http://rtpscs.scag.ca.gov/Documents/2012/final/SR/2012fRTP_Aviation.pdf, accessed April 2012, pp. 122-124.

to improve mobility for all residents, foster livability in all communities, enable prosperity for all people, and promote sustainability for future generations. Implementation of the LAWA Staff-Recommended Alternative would improve mobility for residents and foster livability in nearby communities by constructing ground access improvements and providing transit connectivity, including the modification of Sky Way, parking within a portion of Manchester Square, and development of an APM connecting the CTA, the ITF, Manchester Square, and the future Metro LAX/Crenshaw Light Rail Transit Station. Implementation of the LAWA Staff-Recommended Alternative would enable prosperity by improving LAX airfield facilities, terminal facilities, and surface transportation systems, which would increase employment and foster economic growth. Additional discussion of consistency of LAWA Staff-Recommended Alternative with applicable Growth Vision principles is provided in Appendix I-1, *Land Use and Planning*, of the Draft EIR.

In addition, implementation of ground access improvements proposed under the LAWA Staff-Recommended Alternative would promote sustainability by focusing development in an existing urban center and would be integrated with existing and future public transit facilities, including but not limited to, the Crenshaw/LAX Transit Corridor, which is part of Metro's regional light rail/transit system, that would reduce vehicle miles traveled (VMT) by supporting alternative means of travel to and from LAX and other areas. Furthermore, terminal and other facility improvements would be designed in compliance with LAWA's Sustainability Plan and incorporate applicable performance standards in LAWA's Sustainable Airport Planning, Design and Construction Guidelines.[44] The replacement of old and inefficient terminal buildings and mechanical systems with new buildings, which incorporate state of the art energy-efficient materials and systems, would further promote sustainability. The LAWA Staff-Recommended Alternative would be consistent with the Growth Vision plan, and impacts would be less than significant.

Los Angeles County Airport Land Use Plan

As described in Section 4.9.3.1 of the SPAS Draft EIR, the ALUP provides policies to promote land use compatibility and limit noise and safety conflicts in areas surrounding airports. The LAWA Staff-Recommended Alternative, including proposed airfield, terminal, and ground access improvements, would require an amendment to, and determination of consistency with, the approved ALUP. The proposed airfield improvements would be designed in conformance with FAA safety requirements, as set forth in FAR Part 77, and would be consistent with ALUP policies that address RPZs and limit uses within these zones. For more information regarding RPZs and navigation, refer to the Section 4.7.2, *Safety*, of the SPAS Draft EIR.

The LAWA Staff-Recommended Alternative would not conflict with the general and noise-related policies of the ALUP. These policies focus on ensuring that new development in areas surrounding the airport is compatible with airport operations, encouraging the land recycling of incompatible uses, and encouraging local agencies to inform prospective property owners of aircraft noise exposure in areas where high noise levels exist or are anticipated. Although some areas would be newly exposed to high noise levels, LAWA would continue to adhere to the guidelines of the California Airport Noise Standards and make progress towards achieving full compatibility of all eligible land uses affected by aircraft noise under the ANMP, in compliance with ALUP policy.[45,46] As the LAWA Staff-Recommended Alternative includes amendments to the LAX Specific Plan, a review and consistency determination by the ALUC would be required, as described in Section 4.9.3.1, Regional and State Plans, of the SPAS Draft EIR. Based on the above, the LAWA Staff-Recommended Alternative would be consistent with the policies of the ALUP, and impacts would be less than significant.

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44 LAWA's Sustainable Airport Planning, Design and Construction Guidelines and included checklists are currently being revised to ensure consistency with the recent changes to the State building code and the Los Angeles Green Building Ordinance.

45 LAX operates under a variance to the California Airport Noise Standards (Noise Standards) that was effective February 13, 2011 and was issued for a period of three years. The variance remains in effect so long as LAWA submits another application one month prior to the expiration date and continues to demonstrate that programs are being implemented to reduce noise impacts.

46 California Department of Transportation, "In the Matter of the Noise Variance Application of: City of Los Angeles, Los Angeles World Airports (Los Angeles International Airport)," Case No. L2010041216, ordered January 14, 2011, decision effective date February 13, 2011.

2011 Caltrans California Airport Land Use Planning Handbook

The LAWA Staff-Recommended Alternative would be consistent with the objectives of the Caltrans Handbook. With regard to the noise objective, which seeks to minimize the number of people exposed to frequent and/or high levels of aircraft noise capable of disrupting noise-sensitive uses, LAWA would continue to implement residential soundproofing under the ANMP. Concerning the overflight objective, which requires notification of people near airports of the presence of overflights in order to minimize or avoid annoyance associated with these conditions, LAWA would continue with programs in place which make available to the public information regarding the presence of overflights through the LAX Internet Flight Tracking System and Early Turn Notification Program. LAWA also provides the ability for residents and others to voice complaints regarding aircraft noise through the noise complaint hotline or online.[47] The Caltrans Handbook safety objective, which seeks to minimize risks associated with potential aircraft accidents by providing for the safety of people and property on the ground, and by enhancing the chances of survival of the occupants or aircraft involved in an accident, would be supported through implementation of runway, taxiway, taxilane, and other airfield improvements. In addition, the airspace protection objective, which seeks to avoid development of land use conditions that could pose hazards to flight and increase the risk of an accident occurring, would be upheld through compliance with requirements and criteria related to airspace obstructions, and through conformance with guidelines on the avoidance of wildlife.[48] In regard to airspace obstructions, the LAWA Staff-Recommended Alternative would avoid safety hazards that could result in incompatible land uses through compliance with City of Los Angeles Planning and Zoning Code, Section 12.50, Airport Approach and Zoning Regulations and FAR Part 77.[49,50] These regulations establish development restrictions and building height limits to minimize hazardous occurrences. The need, if any, for acquisition or other appropriate measures associated with changes in the RPZs will be determined by the FAA in later stages of planning and therefore are not addressed in this EIR. However, Section 2.3.7.2, *Safety*, of this chapter identifies land uses within the RPZ. Based on the above, the LAWA Staff-Recommended Alternative would be consistent with the objectives of the Caltrans Handbook and, therefore, impacts would be less than significant.

City of Los Angeles

Los Angeles Citywide General Plan Framework

The City of Los Angeles General Plan Framework's primary objective is to support the viability of the City's residential neighborhoods and commercial districts, particularly by encouraging sustainable growth in proximity to transportation corridors and transit stations. The LAWA Staff-Recommended Alternative would support this primary objective of the Framework by implementing the proposed airfield, terminal, and ground access improvements. Ground access improvements would be in proximity to transportation corridors surrounding LAX, such as Lincoln Boulevard and Century Boulevard, and the new connection to the LAX/Metro Light Rail Station would be developed along Aviation Boulevard and 98th Street, thereby encouraging sustainable growth in the City's commercial districts.

Policy 7.3.4 of the Economic Development Chapter of the Framework Element is to recognize the crucial role that LAX plays in future employment growth by supporting planned airport expansion and modernization that mitigates its negative impacts. Development of the LAWA Staff-Recommended

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47 City of Los Angeles, Los Angeles World Airports, LAX Noise Management, Available: http://www.lawa.org/welcome_lax.aspx?id=788, accessed January 2012.

48 California Department of Transportation, "In the Matter of the Noise Variance Application of: City of Los Angeles, Los Angeles World Airports (Los Angeles International Airport)," Case No. L2010041216, ordered January 14, 2011, decision effective date February 13, 2011.

49 14 CFR, FAR Part 77, Safe, Efficient Use and Preservation of the Navigable Airspace, Subpart C, "Standards for Determining Obstructions to Air Navigation or Navigational Aids or Facilities."

50 Los Angeles Municipal Code, Planning and Zoning Code, Article 2, Specific Planning - Zoning, Comprehensive Zoning Plan, Section 12.50, "Airport Approach Zoning Regulations."

Alternative would implement this policy by modernizing airfield, terminal, and ground access facilities at LAX, while mitigating impacts, resulting in future economic and employment growth.

Objective 3.9 of the Land Use Chapter of the Framework Element is to reinforce existing and encourage new community centers which accommodate a broad range of uses that serve the needs of adjacent residents, promote neighborhood and community activity, are compatible with adjacent neighborhoods, and are developed to be desirable places in which to live, work, and visit, both in daytime and nighttime. The LAWA Staff-Recommended Alternative would not have an effect on this objective since development within the Lincoln Boulevard/Manchester Boulevard Community Center would be limited to the realignment of Lincoln Boulevard, which is not located adjacent to existing commercial or residential areas.

Objective 3.10 of the Land Use Chapter of the Framework Element calls for reinforcing existing regional centers that accommodate a broad range of uses that serve, provide job opportunities, and are accessible to the region, and are compatible with adjacent land uses and are developed to enhance urban lifestyles. The ground access improvements planned under the LAWA Staff-Recommended Alternative --including parking within a portion of Manchester Square, the ITF, and the APM that would link these uses to the CTA and to the future Metro LAX/Crenshaw Light Rail Transit Station near Century and Aviation Boulevards--would be located within the designated LAX/Century Boulevard Regional Center. By contributing to a hub of regional bus and rail transit both day and night, the ground access improvements proposed would directly support development of the Regional Center concept.

The Framework Open Space and Conservation Chapter includes a Citywide Greenways Network that shows an open space system established for active and passive recreational uses that includes portions of the Dunes, Dockweiler State Beach, and Vista del Mar. Under the LAWA Staff-Recommended Alternative, the only changes proposed within the Dunes are changes in navigational aids. The LAX Plan, which designates the Dunes as Open Space, limits uses to existing and relocated navigational aids, restoration and maintenance of the Dunes Habitat Reserve, a park, and other ancillary facilities. The policies that guide development in the area set a priority for protecting existing state-designated sensitive habitat areas and providing sites for habitat restoration or replacement with native habitat. The LAWA Staff-Recommended Alternative would not change uses in the Dunes and would therefore be consistent with the Framework's recommendation for active or passive recreational uses in this area. Based on the above, the LAWA Staff-Recommended Alternative would be consistent with the Framework Element and, therefore, impacts related to conflicts with plans and regulations would be less than significant.

City of Los Angeles Transportation Element

The LAWA Staff-Recommended Alternative would involve ground access improvements, including alterations to the existing circulation system. Changes to the surrounding roadways and transportation system, and their associated potential impacts, are discussed further in Section 2.3.12.2, *Off-Airport Transportation*, of this chapter. Roadway realignments, changes, and additions, once approved as an amendment to the Transportation Element would ensure precise consistency with the Transportation Element.

Implementation of the ground access features of the LAWA Staff-Recommended Alternative would be consistent with Policy 5.4 of the Transportation Element, regarding the establishment of master plans, including ground access plans, to guide future development of LAX. Based on the above, the LAWA Staff-Recommended Alternative would be consistent with the Transportation Element, and impacts related to conflicts with plans and regulations would be less than significant.

City of Los Angeles 2010 Bicycle Plan

The 2010 Bicycle Plan contains goals, objectives and policies aimed at promoting bicycling in the City and in the LAX Master Plan area, including the creation of the Backbone Network and the Neighborhood Network, which would link Regional Centers in the City. The 2010 Bicycle Plan updates the Bicycle Plan referenced in LAX Master Plan Commitment LU-5, Comply with City of Los Angeles Transportation Element Bicycle Plan.

The LAWA Staff-Recommended Alternative improvements, including the parking facility and CONRAC in Manchester Square and the ITF, would include provisions for bicycle parking and, therefore, would be consistent with the 2010 Bicycle Plan's main objectives, including Policy 1.2.3 (to increase the supply of quality bicycle parking), Policy 1.3.2 (to maximize bicycle amenities at transit stops, including the creation of Clean Mobility Hubs/Bicycle Commuter Centers) and Policy 2.3.5 (maintenance of safe bikeways, in coordination with City agencies). The LAWA Staff-Recommended Alternative would not conflict with the existing or planned bicycle lanes/paths in the LAX area, including those along Pershing Drive, Imperial Highway, Westchester Parkway, Sepulveda Boulevard, Century Boulevard, Vicksburg Avenue, Jenny Avenue, and Aviation Boulevard. Although the LAWA Staff-Recommended Alternative includes the realignment of Lincoln Boulevard, with a portion covered and below grade, the 2010 Bicycle Plan does not limit the use of bicycles in tunnels, which are an acceptable option for providing continuity of the bikeway network.[51] While the LAWA Staff-Recommended Alternative would be consistent with the 2010 Bicycle Plan, the realignment of Lincoln Boulevard (identified as a future Backbone Bikeway Network) would be included as amendments to the 2010 Bicycle Plan, including the Designated Bikeways Map to ensure precise consistency. Furthermore, LAX Master Plan Commitment LU-5, Comply with City of Los Angeles Transportation Element Bicycle Plan ensures bicycle access and parking facilities will be provided at ground access facilities and parking outside the CTA, to the extent feasible; and provide bicycle facilities, such as lockers and showers, where feasible, to promote employee bicycle use. Based on the above, the LAWA Staff-Recommended Alternative would be consistent with the 2010 Bicycle Plan. Therefore, impacts related to conflicts with plans and regulations would be less than significant.

City of Los Angeles Noise Element

The Noise Element contains goals, objectives, policies, and programs regarding transportation noise and land use compatibility in order to reduce airport-related noise impacts. The LAWA Staff-Recommended Alternative would be consistent with Objective 1, Policy 1.1, and related Programs P1, P2, P3 and Objective 3, Policy 3.1, and related Programs P11, P12, P13, P16, and P17 by participating in LAWA's current noise mitigation program. The LAWA Staff-Recommended Alternative would also include measures to address non-airport related noise (Objective 2) as described in Sections 2.3.10.2, *Road Traffic Noise*; 2.3.10.3, *Construction Traffic and Equipment Noise*; 2.3.10.4, *Transit Noise and Vibration*; and 2.4.10, *Cumulative Noise*, of this chapter. Although some areas would be newly exposed to high noise levels, LAWA would continue to adhere to the guidelines of the California Airport Noise Standards and make progress towards achieving full compatibility of all eligible uses affected by aircraft noise under the ANMP. Based on the above, the LAWA Staff-Recommended Alternative would be consistent with the City of Los Angeles Noise Element, and impacts related to conflicts with plans and regulations would be less than significant.

Westchester-Playa del Rey Community Plan

Implementation of the LAWA Staff-Recommended Alternative would be consistent with the goals and objectives of the Westchester-Playa del Rey Community Plan, by increasing safety, security, and efficient operational capabilities to serve passenger demand throughout the region. The LAWA Staff-Recommended Alternative would be consistent with Community Plan objectives created to address issues related to implementation of the LAX Master Plan, including Objective 20-1 to coordinate the development of LAX with that of Westchester-Playa del Rey and surrounding communities; Objective 20-2 to utilize land acquisition, buffering, transitional uses, and other effective measures to mitigate noise and other impacts to the Community Plan Area; Objective 20-3 to improve the system of transportation providing access to and within LAX and all of its ancillary facilities, in order to mitigate traffic impacts and congestion in the community; and Objective 20-4 to operate LAX in a manner that results in economic and other benefits for the Westchester-Playa del Rey community.

With regards to Objective 20-1, coordination of LAX development with the surrounding communities would continue through implementation of LAX Master Plan Commitment LU-4, Neighborhood

[51] City of Los Angeles, Department of City Planning, 2010 Bicycle Plan: A Component of the City of Los Angeles Transportation Element, adopted by Los Angeles City Council March 1, 2011, Chapter 3.

Compatibility Program, use of LAWA's website, public input opportunities through the environmental review process for individual LAX projects (including the SPAS EIR), and other ongoing outreach efforts through LAWA's LAX Master Plan Stakeholder Liaison Office. The LAWA Staff-Recommended Alternative would be consistent with Objective 20-2, as development would be subject to the design standards and review procedures presented in the LAX Street Frontage and Landscape Development Plan Update, and LAWA would implement LAX Master Plan Commitment LU-4, which include provisions to maintain a buffer between the airport and residents located in the communities of Westchester and Playa del Rey, as well as other provisions that serve to reduce or avoid airport-related impacts on the community. The ground access improvements proposed under the LAWA Staff-Recommended Alternative would be consistent with Objective 20-3, as the transportation system in the LAX area would be upgraded with ground access improvements, including an APM along 98th Street with connections to the CTA, the ITF, the future Metro LAX/Crenshaw Light Rail Transit Station, and other public transit. Objective 20-4 would be supported by the LAWA Staff-Recommended Alternative through the provision of economic opportunities associated with employment. As such, implementation of the LAWA Staff-Recommended Alternative would be consistent with the goals and objectives of the Community Plan and, therefore, impacts related to conflicts with plans and regulations would be less than significant.

South Los Angeles Community Plan

The South Los Angeles Community Plan includes policies to promote land use compatibility and preserve existing housing stock. The LAWA Staff-Recommended Alternative would not obstruct implementation of these policies. Although some areas would be newly exposed to high noise levels, LAWA would continue to adhere to the guidelines of the California Airport Noise Standards and make progress towards achieving full compatibility of all eligible uses affected by aircraft noise under the ANMP. Based on the above, the LAWA Staff-Recommended Alternative would be consistent with the policies of the South Los Angeles Community Plan, and impacts related to conflicts with plans and regulations would be less than significant.

West Adams-Baldwin Hills-Leimert Community Plan

The LAWA Staff-Recommended Alternative would be consistent with West Adams-Baldwin Hills-Leimert Community Plan policies related to residential land use compatibility. Furthermore, no areas would be newly exposed to high noise levels. Based on the above, the LAWA Staff-Recommended Alternative would be consistent with the policies of the West Adams-Baldwin Hills- Leimert Community Plan, and impacts related to conflicts with plans and regulations would be less than significant.

Incompatible Land Use

This analysis addresses the second significance threshold provided in Section 4.9.4 of the SPAS Draft EIR.

Noise

The environmental impacts of high noise levels on noise-sensitive uses under the LAWA Staff-Recommended Alternative are described here. This analysis identifies significant impacts on those noise-sensitive uses newly exposed to noise levels 65 CNEL or higher, increases of 1.5 CNEL or higher within the 65 CNEL or higher noise contours, and increases in noise levels below 65 CNEL compared to 2009 baseline conditions.

The acreage and number of residential uses and non-residential noise-sensitive facilities that would be exposed to noise levels of 65, 70, and 75 CNEL are presented in Table SRA-2.3.10.1-2, in Section 2.3.10.1, *Aircraft Noise*, of this chapter. Areas exposed to these high noise levels under the LAWA Staff-Recommended Alternative are also presented by jurisdiction and 65, 70, and 75 CNEL in Appendix I-2, *Land Use and Planning*, Table 5, and Table 6 of the SPAS Draft EIR.[52] These tables, as

[52] The analysis of the LAWA Staff-Recommended Alternative in Appendix I-2 is provided under the designation of "Alternative 1."

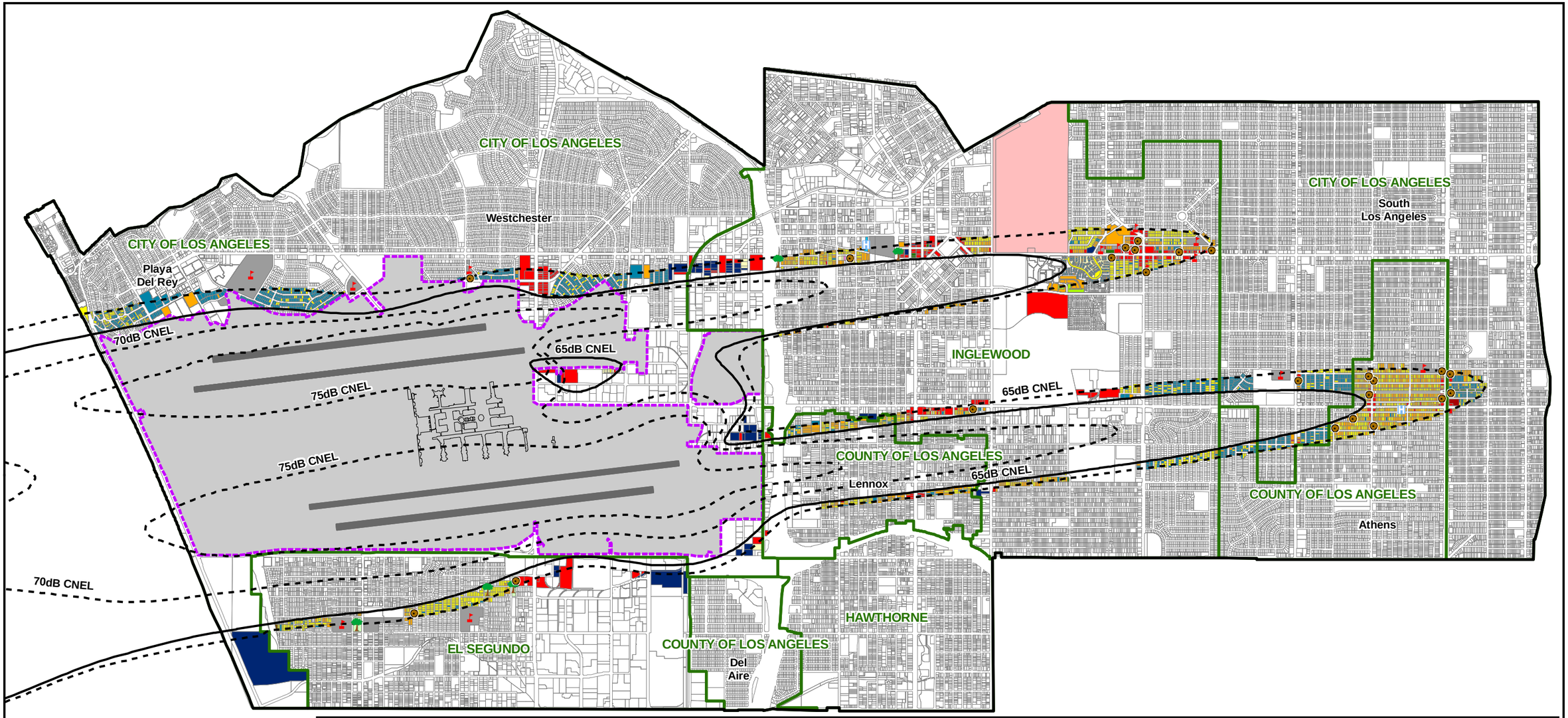
well as Table 1 and Table 2 in Appendix I-2, *Land Use and Planning*, of the SPAS Draft EIR provide the basis for comparison with 2009 baseline conditions.

Changes in Overall Noise Exposure

Shifts in the noise contours depicting changes in noise exposure from 2009 baseline conditions to the LAWA Staff-Recommended Alternative in 2025 are shown in **Figure SRA-2.3.9-1**. Compared to 2009 baseline conditions, the most notable changes under the LAWA Staff-Recommended Alternative would include an increase in noise exposure within the City of Inglewood and City of Los Angeles. As shown in Table SRA-2.3.10.1-2, under the LAWA Staff-Recommended Alternative, the overall net change in total area (on- and off-airport) exposed to 65 CNEL or higher noise levels in 2025 would increase by 1,450 acres compared to 2009 baseline conditions. Compared to 2009 baseline conditions, the overall number of incompatible land uses would be increased by 4,370 dwelling units, 13,160 residents, and 43 non-residential noise-sensitive facilities by 2025.

Newly Exposed Areas

Under the LAWA Staff-Recommended Alternative, some areas would be newly exposed to 65 CNEL or higher noise levels in 2025 compared to 2009 baseline conditions. Residential uses and non-residential noise-sensitive facilities newly exposed to 65 CNEL noise levels are presented in **Table SRA-2.3.9-2**. As shown in **Table SRA-2.3.9-2**, 4,918 dwelling units, 13,445 residents, and 44 non-residential noise-sensitive facilities would be newly exposed in 2025 compared to 2009 baseline conditions. Impacts on these noise-sensitive uses would be considered incompatible under Title 21. Also considered incompatible under Title 21 are all residential areas having habitable exterior areas including balconies, patios, and yards exposed to noise levels of 75 CNEL or higher (even if interior noise levels are reduced to 45 CNEL). This outdoor noise standard is also referenced in a more limited fashion under the 14 CFR Part 150 Land Use Compatibility Guidelines. As stated in 14 CFR Part 150, certain outdoor land uses, such as parks, that are exposed to noise levels above 75 CNEL may be considered incompatible. These standards recognize that high noise levels have the potential to affect outdoor speech and the quality of outdoor activities. Under this alternative, two parks and 4.07 acres (41 units) of residential uses would be newly exposed to noise levels of 75 CNEL or higher compared to 2009 baseline conditions. No schools would be newly exposed to these noise levels (see Appendix I-2, *Land Use and Planning*, Tables 7 and 8 of the SPAS Draft EIR). Although exposure of non-residential noise-sensitive facilities to outdoor noise levels in the 65 to 75 CNEL range is not considered to be a significant impact under CEQA, areas exposed to these noise levels would still have some impact on outdoor speech and the quality of outdoor activities. With implementation of LAX Master Plan Mitigation Measure MM-LU-1, these impacts would be less than significant with the exception of interim impacts prior to completion of noise insulation or land recycling, and impacts on residential uses with outdoor private habitable areas, or parks that would be newly exposed to noise levels of 75 CNEL or higher. These residual impacts would remain significant.



Legend

- School
- Places of Worship
- Hospital
- Hospital - Convalescent, Nursing Homes
- Library
- Park
- Single Family Residential
- Multiple Family Residential
- Mobile Home
- School
- Places of Worship
- Hospital
- Hospital - Convalescent, Nursing Homes
- Library
- Park
- Commercial
- Industrial
- Government
- Cemetery
- Compatible with Title 21
- Does Meet Title 24 Requirements
- Recreation
- Vacant, Assumed Vacant
- Runways
- Airport Boundary
- 2009 65 CNEL Contour
- SRA 65, 70, or 75 CNEL Contour
- Aircraft Noise Study Area
- Jurisdictional Border

0 3,500 ft
Scale north

Source: CDM Smith, 2012; ESRI ArcGIS Online, 2011; Ricondo & Assoc., 2012; PCR Services Corporation, 2012.
Prepared by: PCR Services Corporation, 2012.

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LAWA Staff-Recommended Alternative vs. Baseline (2009) Conditions- Areas Newly Exposed

Figure
SRA - 2.3.9-1

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Table SRA-2.3.9-2

LAWA Staff-Recommended Alternative - Newly Exposed Residential Uses and Non-Residential Noise-Sensitive Facilities (Compared to Baseline 2009 Conditions)

	LA City	LA County	El Segundo	Inglewood	Hawthorne	Totals[1]
Residential						
Single-Family						
Units	307	483	200	536	0	1,526
Acres[1]	38.22	65.21	33.55	82.12	0.00	219.09
Population[2]	745	1,616	405	1,354	0	4,120
Multi-Family						
Units	565	1,416	77	1,334	0	3,392
Acres[1]	17.03	69.26	4.99	68.89	0.00	160.17
Population[2]	1,192	4,671	164	3,298	0	9,325
Total Residential						
Units	872	1,899	277	1,870	0	4,918
Acres[1]	55.25	134.47	38.53	151.02	0.00	379.27
Population[2]	1,937	6,287	569	4,652	0	13,445
Noise-Sensitive (Non-Residential)[3]						
Schools						
Number	4	1	2	7	0	14
Acres	47.72	6.17	18.99	7.30	0.00	80.17
Places of Worship						
Number	4	8	2	9	0	23
Acres	1.67	2.12	1.17	5.56	0.00	10.51
Hospitals						
Number	0	0	0	0	0	0
Acres	0.00	0.00	0.00	0.00	0.00	0
Convalescent Hospitals						
Number	0	1	0	1	0	2
Acres	0.00	0.17	0.00	1.40	0.00	1.57
Parks						
Number	0	0	3	2	0	5
Acres	0.00	0.00	6.16	1.19	0.00	7.35
Libraries						
Number	0	0	0	0	0	0
Acres	0.00	0.00	0.00	0.00	0.00	0.00
Total Noise-Sensitive (Non-Residential)						
Number	8	10	7	19	0	44
Acres[1]	49.38	8.46	26.32	15.45	0.00	99.61
Other Compatible Uses (Acres)	209.59	25.02	103.36	440.88	0	778.86
Total Acres Newly Exposed (off-airport)[1,4]	**314.22**	**167.95**	**168.21**	**607.35**	**0.00**	**1,257.73**

1 Totals may not add due to rounding.
2 Population contains 2010 census data.
3 For a description of newly exposed non-residential noise-sensitive facilities refer to Appendix I-2, *Land Use and Planning*, Table 10 of the SPAS Draft EIR.
4 Total acres based on parcels and do not include roads.

Source: Ricondo & Associates, Inc., PCR Services Corporation, 2012.

Increases in 1.5 CNEL

Some noise-sensitive uses would experience a noise increase of 1.5 CNEL or higher within the 65 CNEL or higher noise contours in 2025. The number of residential units, population, and non-residential noise-sensitive facilities experiencing this level of noise increase within the 65 CNEL contour in 2025 compared to 2009 baseline conditions is presented in **Table SRA-2.3.9-3**. As shown in **Table SRA-2.3.9-3**, 5,296

dwelling units, 13,608 residents, and 48 non-residential noise-sensitive facilities would experience substantial noise level increases in 2025. A listing of noise-sensitive receptors that would be newly exposed to 65 CNEL or higher noise levels or experience a 1.5 CNEL or higher increase within the 65 CNEL or higher noise contours as a result of the LAWA Staff-Recommended Alternative compared to 2009 baseline conditions is presented in Table 10 in Appendix I-2, *Land Use and Planning*, of the SPAS Draft EIR. With implementation of LAX Master Plan Mitigation Measure MM-LU-1, these impacts would be less than significant with the exception of interim impacts prior to completion of noise insulation or land recycling, and impacts on residential uses with outdoor private habitable areas, or parks that would be newly exposed to noise levels of 75 CNEL or higher. These residual impacts would remain significant.

Table SRA-2.3.9-3

LAWA Staff-Recommended Alternative - 1.5 CNEL Increase
(Compared to Baseline 2009 Conditions)

	LA City	LA County	El Segundo	Inglewood	Hawthorne	Totals[1]
Residential						
Single-Family						
Units	264	291	204	637	0	1,396
Acres[1]	33.69	40.03	36.23	96.39	0.00	206.36
Population[2]	572	988	388	1,723	0	3,672
Multi-Family						
Units	918	820	42	2,120	0	3,900
Acres[1]	25.75	40.71	2.46	98.21	0.00	167.13
Population[2]	1,566	2,706	80	5,585	0	9,937
Total Residential						
Units	1,182	1,111	246	2,757	0	5,296
Acres[1]	59.45	80.74	38.69	194.61	0.00	373.49
Population[2]	2,138	3,694	468	7,308	0	13,608
Noise-Sensitive (Non-Residential)[3]						
Schools						
Number	7	3	1	8	0	19
Acres	64.37	23.17	11.73	35.63	0.00	134.91
Places of Worship						
Number	3	3	1	12	0	19
Acres	1.45	1.04	0.53	9.41	0.00	12.42
Hospitals						
Number	0	0	0	0	0	0
Acres	0.00	0.00	0.00	0.00	0	0.00
Convalescent Hospitals						
Number	0	0	0	1	0	1
Acres	0.00	0.00	0.00	1.40	0.00	1.40
Parks						
Number	5	0	2	2	0	9
Acres	194.74	0.00	2.82	1.19	0.00	198.74
Libraries						
Number	0	0	0	0	0	0
Acres	0.00	0.00	0.00	0.00	0.00	0
Total Noise-Sensitive (Non-Residential)						
Number	15	6	4	23	0	48
Acres[1]	260.55	24.21	15.07	47.63	0.00	347.47
Total Area (Acres)[1,4]	**320.00**	**104.95**	**53.76**	**242.24**	**0.00**	**720.95**

1 Totals may not add due to rounding.
2 Population contains 2010 census data.
3 For a description of newly exposed non-residential noise-sensitive facilities refer to Appendix I-2, *Land Use and Planning*, Table 10 of the SPAS Draft EIR.
4 Total area based on parcels and do not include roads.

Source: Ricondo & Associates, Inc., PCR Services Corporation, 2012.

Increase In Noise Levels Below 65 CNEL

As presented in Section 2.3.10.1, *Aircraft Noise*, of this chapter, under the LAWA Staff-Recommended Alternative, two non-residential noise-sensitive facilities (places of worship) would be exposed to increases of 3 CNEL between 60 and 65 CNEL. Both of these uses are located in the City of Los Angeles in the Westchester community. No noise-sensitive uses would be exposed to increases of 5 CNEL or higher below 60 CNEL.

Noise Exposure Effects by Jurisdiction

Noise exposure effects for residential uses and non-residential noise-sensitive facilities exposed to 65 CNEL or higher noise levels, 1.5 CNEL or higher increases at or above 65 CNEL, and 75 CNEL under the LAWA Staff-Recommended Alternative are presented by jurisdiction in **Table SRA-2.3.9-4**.

Table SRA-2.3.9-4

LAWA Staff-Recommended Alternative - Residential Uses and Non-Residential Noise-Sensitive Facilities Noise Exposure Effects by Jurisdiction (Compared to Baseline 2009 Conditions)

Impact Category	LA City	LA County	El Segundo	Inglewood	Hawthorne
65 CNEL					
Change in Acres Exposed[1]	443	243	128	514	0
Newly Exposed Residential Units	872	1,899	277	1,870	0
Newly Exposed Residential Population	1,937	6,287	569	4,652	0
Newly Exposed Noise-Sensitive Facilities[2]	8	10	7	19	0
1.5 CNEL Increase above 65 CNEL					
Residential Units Exposed	1,182	1,111	246	2,757	0
Residential Population Exposed	2,138	3,694	468	7,308	0
Noise-Sensitive Facilities Exposed[2]	15	6	4	23	0
75 CNEL					
Newly Exposed Residential Acres	0.00	4.07	0.00	0.00	0
Newly Exposed Residential Units	0	41	0	0	0
Newly Exposed Parks	1	0	1	0	0

[1] Off-airport; area based on Appendix I-2, *Land Use and Planning*, Table 5 of the SPAS Draft EIR.

[2] The number of non-residential noise-sensitive facilities exposed to 65 CNEL and higher and/or 1.5 CNEL increase above 65 CNEL is derived from Appendix I-2, *Land Use and Planning*, Table 10 of the SPAS Draft EIR.

Source: PCR Services Corporation, 2012.

2.3.9.2 Mitigation Measures

Implementation of LAX Master Plan Commitments LU-2 and RBR-1, and LAX Master Plan Mitigation Measures MM-RBR-1 and MM-RBR-2 would ensure that impacts relative to acquisition and relocation and other affected parcels on LAWA property (LAX Master Plan Commitment LU-2 only) associated with the LAWA Staff-Recommended Alternative would be less than significant. Implementation of LAX Master Plan Commitments LU-4, and LU-5 would ensure the impacts related to plan consistency associated with the LAWA Staff-Recommended Alternative would be less than significant. In addition, amendments to the LAX Plan and LAX Specific Plan; amendments to the City of Los Angeles Transportation Element; and amendments to the City of Los Angeles Bicycle Plan are included, and would ensure precise consistency with these plans. As consistency with these plans would be supported through these amendments, no mitigation measures associated with plan inconsistencies are required.

Implementation of LAX Master Plan Mitigation Measure MM-LU-1 would reduce, but not eliminate, aircraft noise impacts on residential uses and non-residential noise-sensitive facilities newly exposed to noise levels of 65 CNEL or higher associated with the LAWA Staff-Recommended Alternative. No additional mitigation measures are available to address aircraft noise.

2.3.9.3 Level of Significance After Mitigation

LAX Master Plan commitments and mitigation measures would reduce aircraft noise impacts associated with the LAWA Staff-Recommended Alternative. However, certain residential uses and non-residential noise-sensitive facilities affected by aircraft noise would still be exposed to high noise levels due to interim impacts prior to completion of noise insulation or land recycling. In addition, parks and certain residential uses with outdoor private habitable areas would be newly exposed to noise levels of 75 CNEL or higher. As such, residual aircraft noise impacts for the LAWA Staff-Recommended Alternative are considered to be significant and unavoidable.

2.3.10 Noise

2.3.10.1 Aircraft Noise

2.3.10.1.1 Impacts Analysis

As noted in Section 2.3, impacts of the LAWA Staff-Recommended Alternative related to aircraft noise are only associated with the airfield components of Alternative 1, as evaluated in Section 4.10.1.6 of the SPAS Draft EIR. The evaluation of aircraft noise impacts (under the threshold provided in Section 4.10.1.4.1 of the SPAS Draft EIR) includes a comparison of aircraft noise levels associated with completion of the LAWA Staff-Recommended Alternative by 2025 to the aircraft noise levels associated with baseline (2009) conditions. Passenger activity levels at LAX between 2009 and 2025 are forecast to increase from approximately 56.5 MAP to 78.9 MAP for all SPAS alternatives, including the LAWA Staff-Recommended Alternative, which would be accompanied by an increase in the number of daily flights at LAX, as well as an anticipated change in the fleet mix (i.e., size and types of aircraft) during that time. As shown in **Table SRA-2.3.10.1-1**, the number of average annual daily aircraft operations is forecasted to increase from 1,493 in 2009 to 1,937 in 2025. The number of heavy (aircraft weighing over 300,000 pounds, identified as "SWB" (Small Wide-Body Aircraft), "LWB" (Large Wide-Body Aircraft), and "NLA" (New Large Aircraft) in **Table SRA-2.3.10.1-1**) jet operations in 2025 is projected to increase to 441 on an average day from 239 in 2009, while the number of non-jet (i.e., propeller) aircraft operations in 2025 is projected to decrease to 148 on an average day from 158 in 2009. The proportion of light jets in the fleet mix would shrink slightly in 2025 as compared to 2009.

Table SRA-2.3.10.1-1

LAWA Staff-Recommended Alternative
Forecast Daily Aircraft Operations (2025)

	Aircraft Operations by Category[1]								Percent of Annual Operations							
Condition	NJT	SJT	SNB	LNB	SWB	LWB	NLA	Total	NJT	SJT	SNB	LNB	SWB	LWB	NLA	Total
2009 Conditions	158	259	630	207	87	151	1	1,493	11%	17%	42%	14%	6%	10%	0%	100%
Future (2025) Conditions	148	344	741	263	218	194	29	1,937	8%	18%	38%	14%	11%	10%	2%	100%

Notes:

NJT = Non-Jet Aircraft
SJT = Small Jet Aircraft
SNB = Small Narrow-Body Aircraft
LNB = Long Narrow-Body Aircraft
SWB = Small Wide-Body Aircraft
LWB = Large Wide-Body Aircraft
NLA = New Large Aircraft
Totals may not add to 100 percent due to rounding.

[1] Data represents an AAD of operation (annual traffic/365).

Source: Ricondo & Associates, Inc., 2011 SIMMOD output files and 2011 INM output files.

Table 5 in Appendix J1-1, *Aircraft Noise Technical Analysis*, of the SPAS Draft EIR, shows the allocation of operations, by aircraft category, to the north and south airfields for baseline (2009) conditions and for future (2025) conditions associated with the LAWA Staff-Recommended Alternative.[53]

The following impacts analysis provides a discussion of operational conditions assumed as part of the LAWA Staff-Recommended Alternative and a comparison of the future (2025) aircraft noise levels of the LAWA Staff-Recommended Alternative to the baseline (2009) noise levels with respect to CNEL noise exposure contours, and classroom disruption. Also provided, for the purpose of calculating the LAWA Staff-Recommended Alternative's contribution to cumulative impacts, is a comparison of the future (2025) aircraft noise levels to the future (2025) aircraft noise levels that would otherwise occur without such improvements. Discussion of the nighttime awakening methodology is provided in Section 4.10.1.2.3.1 of the SPAS Draft EIR.

The improvements to the north airfield under the LAWA Staff-Recommended Alternative, operating in conjunction with the existing configuration of the south airfield, along with the forecasted growth in activity at LAX by 2025 would change the airport's 2009 noise exposure pattern. The following considerations contributing to the noise exposure pattern for the LAWA Staff-Recommended Alternative in 2025 include the following:

- An increase in the number of daily aircraft operations from 1,493 in 2009 to 1,937 in 2025.
- The number of average day heavy jet operations would increase from 239 in 2009 to 441 in 2025, while the number of average day propeller aircraft operations would decrease from 158 in 2009 to 148 in 2025. The proportion of light jets in the fleet mix would be less in 2025 as compared to 2009. See **Table SRA-2.3.10.1-1** for specific details regarding the fleet mix.
- Relocation of Runway 6L/24R 260 feet north of its existing location.
- Extension of Runway 24L end 1,250 feet east of existing location.

[53] The analysis of the LAWA Staff-Recommended Alternative in Appendix J1-1 is provided under the designation of "Alternative 1."

- An anticipated shift of 15 percent of the small wide-body aircraft operations from the south airfield to the north airfield, as facilitated by the north airfield and terminal improvements. Those and other assumptions regarding runway utilization proportions are shown in Appendix J1-1, *Aircraft Noise Technical Analysis*, of the SPAS Draft EIR.
- Provision of additional Runway 6L/24R high-speed runway exits.
- As in existing conditions, consistent with the airport's current Preferential Runway Use Policy, inboard Runways 6R/24L and 7L/25R would be used principally for takeoffs, and outboard Runways 6L/24R and 7R/25L would be used principally for landings.
- As assumed in the analysis of 2009 conditions and reflected in the airport's current Preferential Runway Use Policy, the inboard runways would be preferred for both landings and takeoffs between 10:00 p.m. and 7:00 a.m. to abate noise over communities north and south of the airport when demand levels are low.
- As assumed in the analysis of 2009 conditions, between midnight and 6:30 a.m., current Over-Ocean procedures would be used, weather permitting, to abate noise over communities east of the airport. Aircraft using Over-Ocean procedures typically land on Runway 6R and take off on Runway 25R, but can also land on Runway 7L and take off on Runway 24L.
- Turboprop aircraft departing to the west would not turn to the east/southeast below 3,000 feet mean sea level (MSL). With this measure, turboprop aircraft would reach higher altitudes and over the water before they turn south and then back to the east over the communities immediately south of the airport. The effects of this measure would be beyond the contours of significant noise exposure.

The first two of these factors would result in a general increase in the overall size of the LAWA Staff-Recommended Alternative noise exposure contour in 2025, as compared to 2009 conditions, because more total noise energy would be generated within the airport environs on an average day with an increase in aircraft operations, and particularly heavy jet aircraft operations. The 260 feet northward relocation of Runway 6L/24R for landings on Runway 24R is expected to change the arrival and landing noise 260 feet north compared to 2009 conditions. The relocation of the high-speed runway exits for landings on Runway 24R would provide additional exits for heavy aircraft to use when landing on Runway 24R, as the current locations of the exits preclude heavy aircraft from using them. This change is not expected to increase the overall size of the CNEL noise exposure contours, because aircraft would be able to exit with reduced reverse thrust. The Runway 24L extension of 1,250 feet to the east is expected to move start-of-takeoff roll noise levels to the northwest and northeast behind the runway end, and slightly increase due to the additional small wide-body departures from Runway 24L. With the extension, the enhanced balance of small wide-body aircraft departures between the south and north airfields is expected to decrease start-of-takeoff roll noise from Runway 25R to the east.

Figure SRA-2.3.10.1-1 presents the overall CNEL contours, ranging from 60 CNEL to 75 CNEL, estimated at buildout of the LAWA Staff-Recommended Alternative in 2025.

2.3.10.1.1.1 Comparison of LAWA Staff-Recommended Alternative Aircraft Noise and Baseline (2009) Conditions

The noise exposure contours for the LAWA Staff-Recommended Alternative 2025 Conditions are depicted in **Figure SRA-2.3.10.1-2** The area depicted by the magenta line indicates areas newly exposed to increases larger than 1.5 decibels and above 65 CNEL dBA. The most notable change from the baseline (2009) conditions to the LAWA Staff-Recommended Alternative conditions is attributable to the projected growth in aircraft activity from 2009 to 2025. As the number of aircraft operations grows, it is expected that the area exposed to significant levels of aircraft noise will grow as well. While the noise exposure contours for the LAWA Staff-Recommended Alternative are larger in comparison to baseline (2009) conditions, the overall shape of the contours remains similar. With the 260-foot shift of Runway 6L/24R to the north, the 65 CNEL noise exposure contour for the north airfield is expected to expand more to the north than to the south, particularly with respect to the north side along the arrival path to Runway 6L/24R.

The following provides a geographic description of the LAWA Staff-Recommended Alternative noise exposure contours compared to baseline (2009) conditions.

65 CNEL Contour

The LAWA Staff-Recommended Alternative 65 CNEL noise exposure contours east of I-405 would extend approximately 3,500 feet farther east than under the baseline (2009) conditions. The 65 CNEL noise exposure contour resulting from aircraft using the north airfield would extend to South 2nd Avenue and from aircraft using the south airfield would extend to South Hoover Street. The increase in the area exposed to aircraft noise to the east of the airport would largely result from the increase in aircraft operations and assumed change in fleet mix from 2009 to 2025. The north airfield 65 CNEL noise exposure contour east of I-405 is also expected to extend approximately 260 feet farther north as a result of the relocation of Runway 6L/24R.

West of I-405, the LAWA Staff-Recommended Alternative 65 CNEL noise exposure contour would widen along the approach to the north runways as a result of the north shift in Runway 6L/24R, the increase in operations, an increase in the proportion of aircraft using the north airfield, and changing fleet mix. The 65 CNEL noise exposure contour along the approach to the south runways also widens to a lesser extent and can be attributed to the increase in operations.

The noise pattern along the departure sections to the north and south airfields would be wider under the LAWA Staff-Recommended Alternative than the baseline (2009) conditions, which is attributable to the north shift in Runway 6L/25R and the larger number of departures in 2025.

70 CNEL Contour

The reasons for changes in the LAWA Staff-Recommended Alternative 70 CNEL noise exposure contours as compared to baseline (2009) conditions are the same as those defined above for the 65 CNEL noise exposure contour. The north airfield 70 CNEL noise exposure contour extends just beyond South Cedar Street east of I-405. The south airfield 70 CNEL noise exposure contour extends slightly beyond England Avenue. East of I-405, the 70 CNEL noise exposure contours extend beyond West Westchester Parkway on the north and to South Sycamore Avenue on the south.

75 CNEL Contour

The 75 CNEL noise exposure contours for the LAWA Staff-Recommended Alternative exhibit the same patterns as baseline (2009) conditions, but for the north airfield, the 75 CNEL noise exposure area shifted northward matching the relocation of Runway 6L/24R and the westward extension of Runway 6R/24L. The additional length of Runway 6L/24R allows for additional heavy aircraft departures, slightly increasing the size of the 75 CNEL noise exposure contour departure area, but the 75 CNEL noise exposure contour still remains on airport property.

Affected Noise-Sensitive Uses

Table SRA-2.3.10.1-2 provides an overview of the land area, population, dwellings, and number of non-residential noise-sensitive facilities within the CNEL noise exposure contours associated with the LAWA Staff-Recommended Alternative, as well as the differences between these facilities' exposure to aircraft noise compared to baseline (2009) conditions. As indicated in **Table SRA-2.3.10.1-2**, the LAWA Staff-Recommended Alternative scenario would result in a net increase of the land area within the 65 CNEL noise exposure contours, as well as increase in the number of dwellings, population, and non-residential noise-sensitive facilities located within the 65 CNEL (or higher) noise exposure contours. Specifically, an additional 13,160 people, 4,370 additional dwelling units, and 43 additional non-residential noise-sensitive facilities are expected to be exposed to 65 CNEL or higher noise exposure levels, compared to baseline (2009) conditions.

Table SRA-2.3.10.1-2

LAWA Staff-Recommended Alternative Noise Exposure Effects - Comparisons to Baseline (2009) Conditions and to 2025 "No Additional Improvements" Conditions

Noise Level Range	Total Acreage Over Land[3]	Off-Airport Area (Acres)[3]	Total Dwellings	Estimated Population	Non-Residential Noise-Sensitive Facilities
LAWA Staff-Recommended Alternative (2025) Noise Exposure					
65-70 CNEL	3,502	2,973	11,113	29,914	75
70-75 CNEL	2,227	930	3,409	11,186	18
75 > CNEL	2,028	99	119	498	3
65 ≥ CNEL	**7,757**	**4,002**	**14,641**	**41,598**	**96**
Change from Baseline (2009) Conditions[1,2]					
65-70 CNEL	700	974	2,985	8,975	34
70-75 CNEL	306	304	1,344	4,013	7
75 > CNEL	445	50	41	172	2
65 ≥ CNEL	**1,450**	**1,329**	**4,370**	**13,160**	**43**
Cumulative Contribution - Change from 2025 "No Additional Improvements" Conditions[1,2]					
65-70 CNEL	-8	14	--162	-1,047	-3
70-75 CNEL	-25	-4	-66	-176	0
75 > CNEL	45	5	-5	-21	1
65 ≥ CNEL	**12**	**15**	**-233**	**-1,244**	**-3**

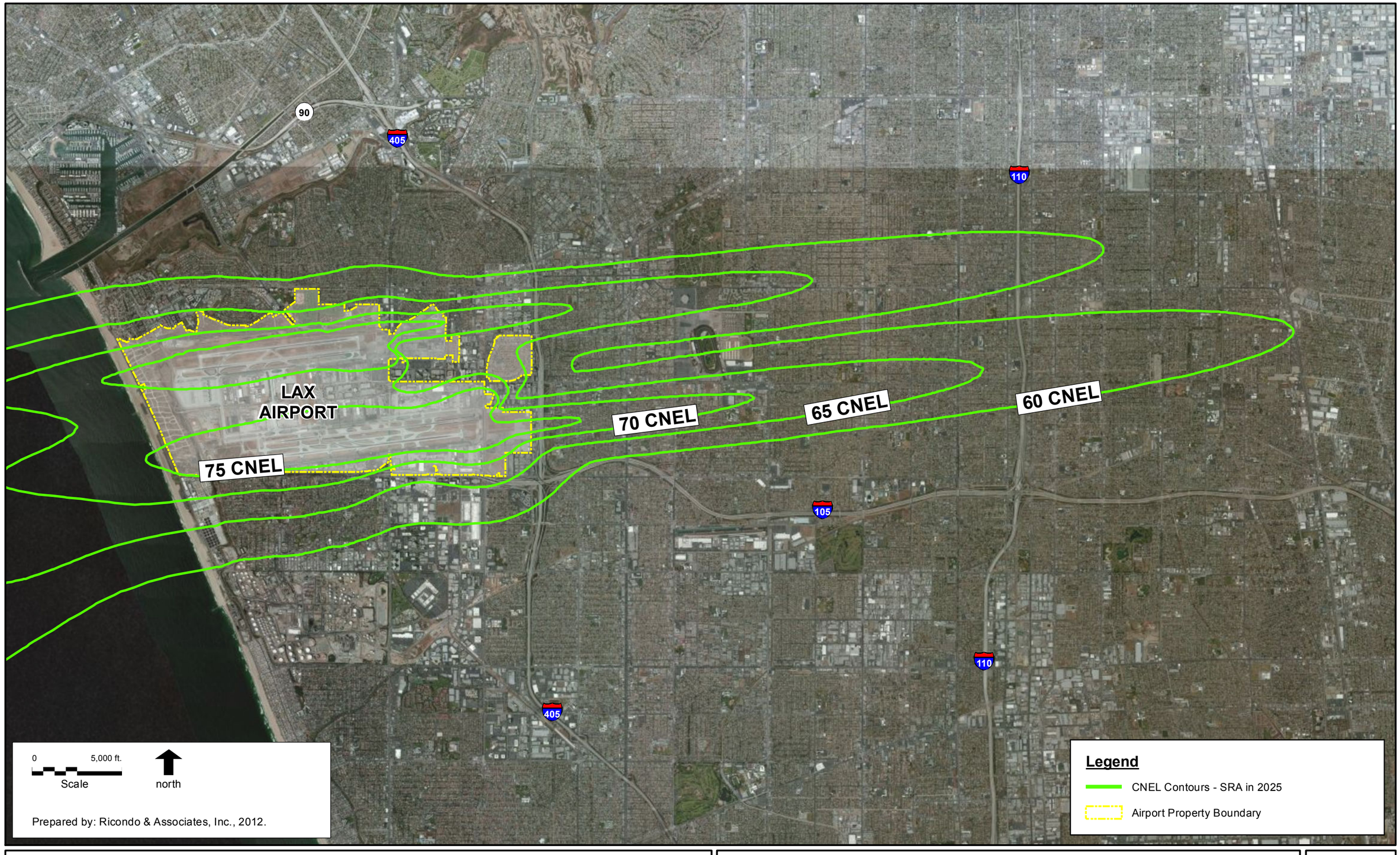
1 A positive value indicates that the future alternative increases the number of impacts; a negative number indicates that the future alternative decreases the number of impacts. The number indicates the net difference. Some areas would experience increased noise while other areas would experience a decrease in noise levels. Section 2.3.9, *Land Use and Planning*, of this chapter details the number of noise-sensitive uses newly exposed to 65 CNEL or higher noise levels.

2 Population and dwelling information is reported using a year 2010 U.S. Census data base for CNEL comparisons.

3 Acreage totals may not add due to rounding.

Source: Ricondo & Associates, Inc., 2012 (CNEL noise exposure contours); PCR, 2012 (population, dwelling unit, acreage, and non-residential noise-sensitive facilities; GIS spatial analysis).

For the purposes of the cumulative analysis, **Table SRA-2.3.10.1-2** also provides a comparison between the aircraft noise exposure levels associated with the LAWA Staff-Recommended Alternative in 2025 and the aircraft noise exposure levels projected to occur in 2025 without additional improvements to the north airfield (i.e., "2025 'No Additional Improvements' Conditions"). The comparison between the LAWA Staff-Recommended Alternative (2025) to 2025 "No Additional Improvements" is used to identify the alternative's contribution to cumulative impacts. Based on that comparison, implementation of the LAWA Staff-Recommended Alternative would result in 1,244 fewer people, 233 fewer dwelling units, and 3 less non-residential noise-sensitive facilities being exposed to 65 CNEL or higher aircraft noise levels in 2025 than would otherwise occur with no modifications to the north airfield.



LAX Specific Plan Amendment Study Final EIR	**CNEL Contours Overview - LAWA Staff-Recommended Alternative in 2025**	**Figure SRA - 2.3.10.1-1**

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Table SRA-2.3.10.1-3 details the numbers of residential and other noise-sensitive facilities that would be exposed to aircraft noise levels in excess of the threshold of significance for CNEL, as defined in Section 4.10.1.4.1 of the SPAS Draft EIR. Specifically, these noise-sensitive uses would be exposed to 65 CNEL or greater with at least a 1.5 CNEL increase as compared to baseline (2009) conditions. The totals shown in **Table SRA-2.3.10.1-3** not only include the noise-sensitive receptors that would be newly exposed to 65 CNEL or greater with at least a 1.5 CNEL increase, but also those that are currently/already exposed to 65 CNEL or higher and would experience at least a 1.5 CNEL increase, and therefore impacts would be significant.

Table SRA-2.3.10.1-3

Significant Noise Impacts - LAWA Staff-Recommended Alternative Compared to Baseline (2009) Conditions

	Exposed to ≥ 65 CNEL and 1.5 CNEL Increase LAWA Staff-Recommended Alternative
Population	13,608
Dwelling Units	5,296
Non-Residential Noise-Sensitive Facilities	
Schools	19
Places of Worship	19
Hospitals	0
Convalescent Hospitals	1
Parks	9
Libraries	0
Total Non-Residential Noise-Sensitive Facilities	**48**

Source: Ricondo & Associates, Inc., 2012 (1.5 CNEL or higher noise exposure contours); PCR, 2012 (population, dwelling unit, acreage, and non-residential noise-sensitive facilities; GIS spatial analysis).

As illustrated in **Figure SRA-2.3.10.1-2**, the significant impacts would be located principally along the approach to the north and south airfield. Within this area are an estimated 5,296 dwellings and 13,608 residents, as well as 48 non-residential noise-sensitive facilities, including 19 schools, 19 places of worship, 9 parks, and 1 convalescent hospital.

While there would also be increases in existing noise levels in areas beyond the 65 CNEL contour (i.e., areas with exterior noise levels less than 65 dBA CNEL), such increases would not rise to the level of being a significant impact. Relative to cumulative impacts, **Table SRA-2.3.10.1-4** discloses the population, dwellings, and non-residential noise-sensitive facilities that would, as a result of the LAWA Staff-Recommended Alternative, experience increases of 1.5 CNEL or higher within the 65 CNEL noise exposure contour, as compared to 2025 "No Additional Improvements" Conditions. Based on that comparison, an estimated 538 dwellings and 1,127 residents, as well as 5 non-residential noise-sensitive facilities, including 2 schools, 1 place of worship, and 2 parks would be affected.

Table SRA-2.3.10.1-4

Noise Impacts of LAWA Staff-Recommended Alternative Compared to 2025 "No Additional Improvements" Conditions

	Exposed to ≥ 65 CNEL and 1.5 CNEL Increase LAWA Staff-Recommended Alternative
Population	1,127
Dwelling Units	538
Non-Residential Noise-Sensitive Facilities	
Schools	2
Places of Worship	1
Hospitals	0
Convalescent Hospitals	0
Parks	2
Libraries	0
Total Non-Residential Noise-Sensitive Facilities	**5**

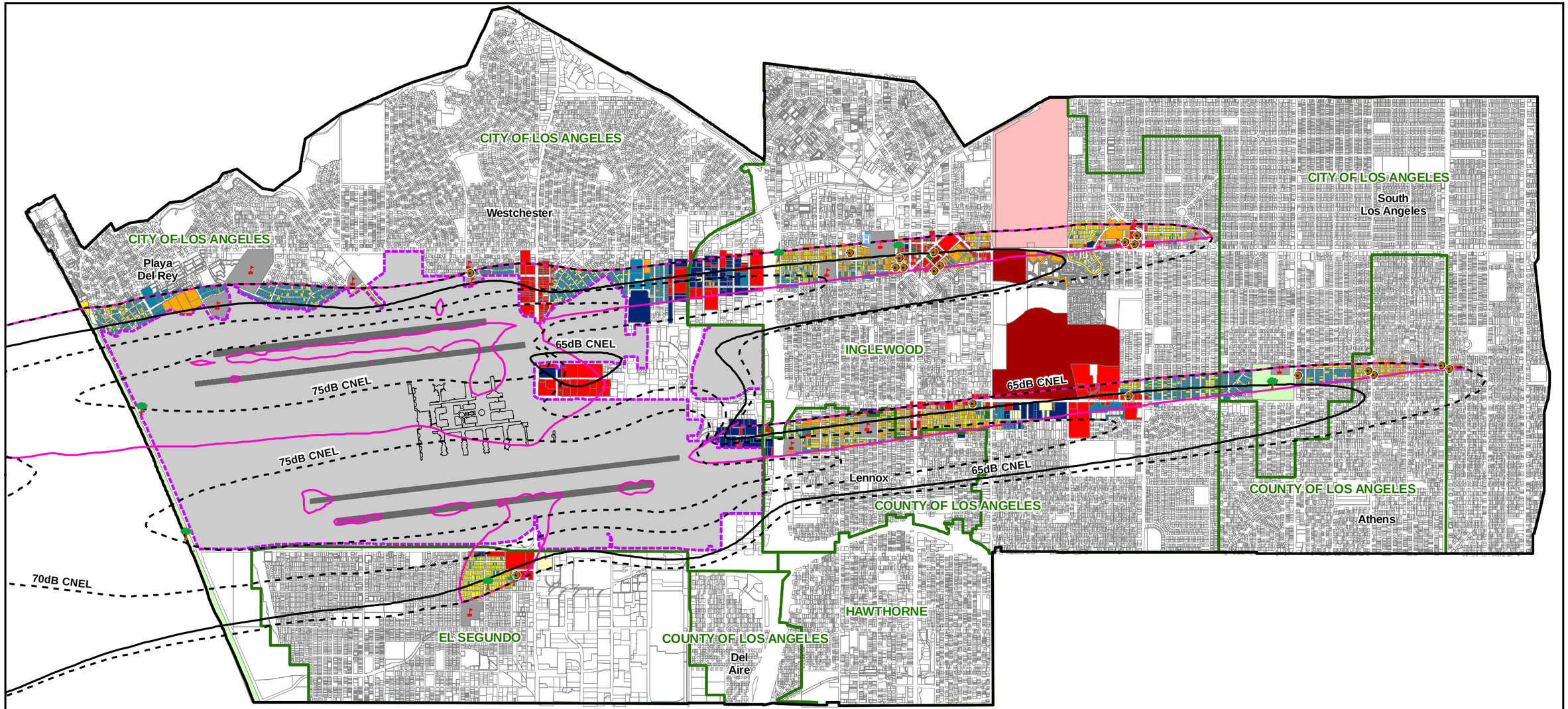
Source: Ricondo & Associates, Inc., 2012 (1.5 CNEL or higher noise exposure contours); PCR, 2012 (population, dwelling unit, acreage, and non-residential noise-sensitive facilities; GIS spatial analysis).

2.3.10.1.1.2 Single Event Aircraft Noise Exposure

In addition to the CNEL noise exposure contours prepared for the LAWA Staff-Recommended Alternative, a grid point analysis of single event aircraft noise was conducted to determine potential significant impacts associated with nighttime awakenings and classroom disruption. The results are presented below.

2.3.10.1.1.2.1 Nighttime Awakenings

The awakening probability contours, estimated using the ANSI method (see Section 4.10.1.2.3.1 of the SPAS Draft EIR), representing a 75 percent chance, a 50 percent chance, and a 25 percent chance of awakening at least once per night for the LAWA Staff-Recommended Alternative at buildout in 2025 are shown in **Figure SRA-2.3.10.1-3**. Also shown in **Figure SRA-2.3.10.1-3** are the equivalent percentage contours estimated to occur in 2025 if no airfield improvements were implemented (i.e., 2025 Without Alternative). Specifically, where the probability of awakening contour associated with aircraft operations under the LAWA Staff-Recommended Alternative extends beyond the equivalent contour associated with operations under the existing airfield configuration, the difference area (i.e., the area between the two contours) shaded in yellow represents an increase in the probability of awakening. Conversely, where the probability of awakening contour associated with the LAWA Staff-Recommended Alternative contracts and does not extend as far as the equivalent contour associated with the existing airfield configuration, the difference area shaded in green represents a decrease in the probability of awakening. The depiction of contours for the three different probabilities of awakenings (75 percent, 50 percent, and 25 percent) is intended to provide an overall indication of generally where and how the probability of sleep awakenings would change with implementation of the LAWA Staff-Recommended Alternative. Changes in the intervening areas (i.e., areas beyond and between the 75 percent and 50 percent contours, and beyond and between the 50 percent and 25 percent contours) would generally follow the same trends as shown in **Figure SRA-2.3.10.1-3**. While the color shading shown in **Figure SRA-2.3.10.1-3** delineates the contribution of the LAWA Staff-Recommended Alternative to change in the cumulative probability of awakening, the general nature, direction, and change in the probability of awakenings shown in the figure is also generally representative of the changes that would occur under the LAWA Staff-Recommended Alternative to the 2009 contours shown in Figure 4.10.1-13 of the SPAS Draft EIR.



Legend

- School
- Places of Worship
- Hospital
- Hospital - Convalescent, Nursing Homes
- Library
- Park
- Single Family Residential
- Multiple Family Residential
- Mobile Home
- School
- Places of Worship
- Hospital
- Hospital - Convalescent, Nursing Homes
- Library
- Park
- Commercial
- Industrial
- Government
- Cemetery
- Compatible with Title 21
- Does Meet Title 24 Requirements
- Recreation
- Vacant, Assumed Vacant
- Runways
- Airport Boundary
- 2009 65 CNEL Contour
- SRA 65, 70, or 75 CNEL Contour
- 1.5 CNEL Increase Contour
- Aircraft Noise Study Area
- Jurisdictional Border

0 3,500 ft
Scale north

Source: CDM Smith, 2012; ESRI ArcGIS Online, 2011; Ricondo & Assoc., 2012; PCR Services Corporation, 2012.
Prepared by: PCR Services Corporation, 2012.

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LAWA Staff-Recommended Alternative vs. Baseline (2009) Conditions - 1.5 CNEL or Higher Increase within the 65 CNEL or Higher Contour

Figure
SRA - 2.3.10.1-2

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As shown in **Figure SRA-2.3.10.1-3**, there would be a slight increase in the probability of awakenings in areas towards the north, decreases in the probability of awakenings in the central areas east of the airport along the flight paths between the north airfield and the south airfield, and a negligible change in the probability of awakenings in areas towards the southeast and south. **Table SRA-2.3.10.1-5** indicates the project's contribution to cumulative changes in affected population within each of the three probability of awakenings contours under the LAWA Staff-Recommended Alternative. The changes shown in the table represent the populations that would occur within each probability contour with implementation of the airfield improvements proposed under the LAWA Staff-Recommended Alternative compared to the populations that would otherwise be within each probability contour if there were no airfield improvements (i.e., 2025 With Alternative vs. 2025 Without Alternative). That latter population, against which the alternative's impact is measured, includes 6,074 people within the 75 percent probability contour, 69,429 people within the 50 percent probability contour, and 260,088 people within the 25 percent probability contour. **Table SRA-2.3.10.1-5** shows an overall net decrease in population within the three probability contours evaluated.

Table SRA-2.3.10.1-5

LAWA Staff-Recommended Alternative's Contribution to the Cumulative Change in Affected Population for 75 Percent, 50 Percent, and 25 Percent Probability of Awakening At Least Once - Compared to 2025 "No Additional Runway Improvements"

	Probability of Awakening at Least Once During the Night			
LAWA Staff-Recommended Alternative	**75%**	**50%**	**25%**	**Average**
Change in Affected Population - Increase or (Decrease)	(210)	(984)	(5,843)	
Percent Change in Affected Population - Increase or (Decrease)	(3.46%)	(1.42%)	(2.25%)	(2.37%)

Note:

Numbers in parentheses () are negative (i.e., a decrease in affected population).

Source: Ricondo & Associates, 2012.

Based on the information presented above, implementation of the LAWA Staff-Recommended Alternative would not result in a substantial increase in the probability of nighttime awakenings under the project level and cumulative analyses; therefore, the impact would be less than significant and the project's contribution to cumulative impacts would not be cumulatively considerable (i.e., less than significant).

2.3.10.1.1.2.2 Classroom Disruption

Baseline (2009) conditions related to school facilities and classroom disruption is provided in Tables 4.10.1-4, 4.10.1-5, and 4.10.1-6 of the SPAS Draft EIR. The numbers of schools that would exceed the thresholds of significance for classroom disruption, as defined in Section 4.10.1.4.3 of the SPAS Draft EIR, under the LAWA Staff-Recommended Alternative are presented in **Table SRA-2.3.10.1-6**. Under the LAWA Staff-Recommended Alternative, as compared to baseline (2009) conditions, one additional school is projected to be newly exposed at the 55 interior dBA (L_{max}), which relates to momentary disruption of speech intelligibility, and the overall number of individual noise events at schools would increase. **Table SRA-2.3.10.1-7** provides the names and locations of the schools that would be exposed to single noise events above 55 interior dBA. The school identified in bold text, Jefferson Elementary School, would be newly exposed to average number of daily events and duration above 55 interior dBA, as compared to baseline (2009) conditions, and impacts would therefore be significant.

Table SRA-2.3.10.1-6

**Schools Exposed to Single Event Noise Levels -
LAWA Staff-Recommended Alternative Compared to Baseline (2009) Conditions**

Impact Category	LAWA Staff-Recommended Alternative Exposed	Compared to Baseline (2009) Conditions	
		Net Change	Newly Exposed - Impacted
Exposure ≥ 55 dBA (L_{max})			
Number of Public Schools	7	1	1
Number of Private Schools	2	0	0
Average Number of Events/School	32	6	N/A
Average Seconds/Event	2	0	N/A
Exposure ≥ 65 dBA (L_{max})			
Number of Public Schools	0	0	0
Number of Private Schools	0	0	0
Exposure ≥ 35 dBA ($L_{eq(h)}$)			
Number of Public Schools	20	7	7
Number of Private Schools	10	1	1

Source: Ricondo & Associates, Inc., 2012 (INM school location exterior noise levels); PCR, 2012 (school location and name database; GIS spatial analysis).

Table SRA-2.3.10.1-7

**Average Daily Minutes Above Threshold, Average Number of Daily Events, and Average Event Duration (in Seconds) Above 55 Interior dBA Speech Interference Levels -
LAWA Staff-Recommended Alternative During the Average School Day (8:00 a.m. - 4:00 p.m.)**

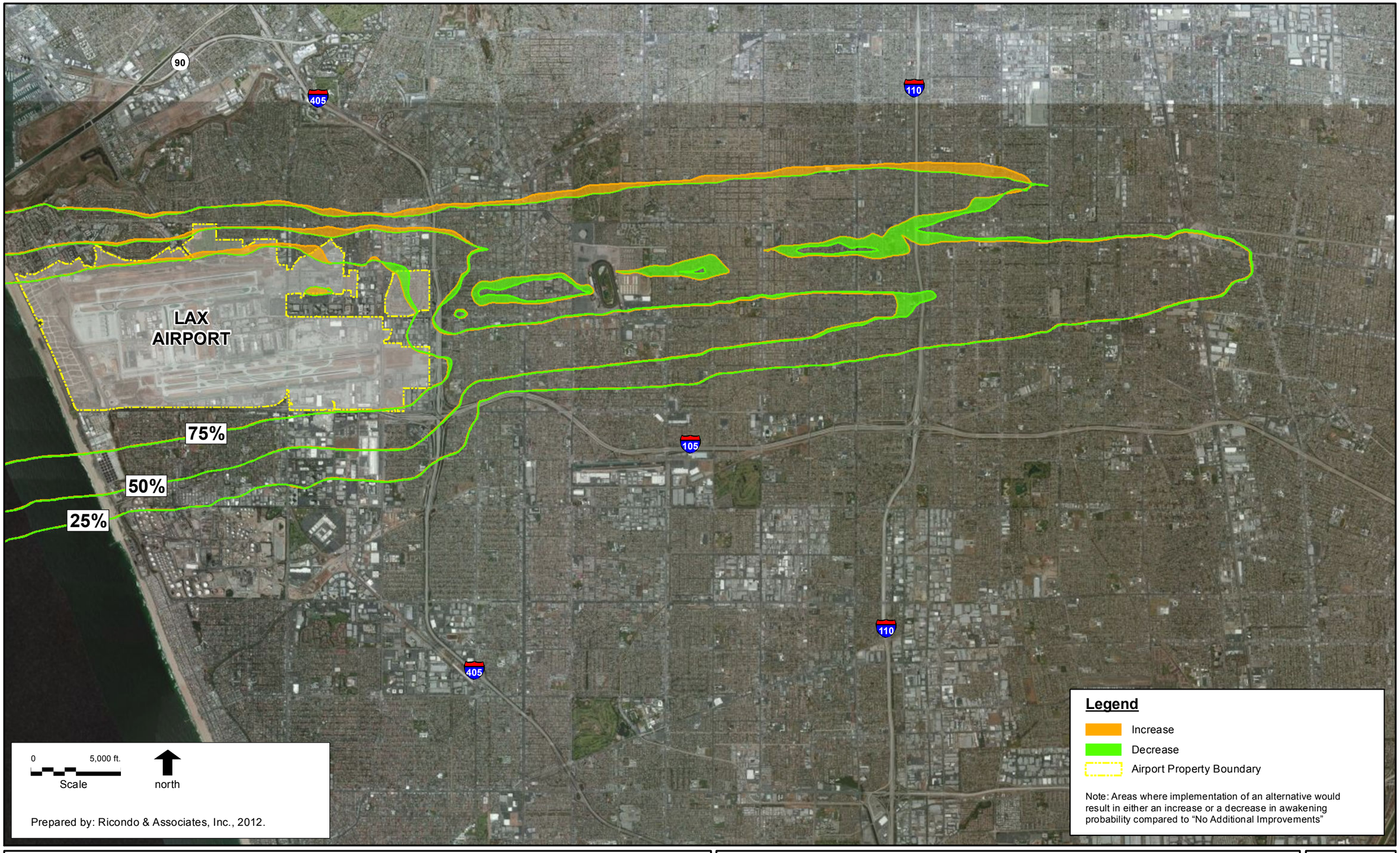
Grid ID	School	X Coord	Y Coord	LAWA Staff-Recommended Alternative		
				TA-84	Events	Avg. D
	Public Schools					
PBS019	Buford Elementary School	1.378	-0.3156	0.7	27.7	1.5
PBS035	Felton Elementary School	1.2997	-0.0854	1.7	57.2	1.8
PBS047	Hillcrest Continuation High School	1.5006	0.9081	0.9	23.2	2.3
PBS055	**Jefferson Elementary School**	**1.7352**	**0.0244**	**0.7**	**27.5**	**1.5**
PBS105	Oak Street Elementary School	1.2636	0.7715	1.1	25.2	2.6
PBS114	Animo Leadership High School	0.8325	0.6503	0.2	22.8	0.5
PBS123	Dolores Huerta Elementary School	2.2755	-0.0716	2.2	57.2	2.3
	Private Schools					
PVS051	Inglewood Christian School	1.9923	0.9699	0.2	6.4	1.9
PVS062	Training and Research Foundation - Inglewood Southside	2.4891	-0.0125	1.9	37.9	3.0

Notes:

TA-84 = Total number of minutes (events multiplied by average durations) per school day that exceed an exterior noise level of 84 decibels (L_{max}), which equates to an interior noise level of 55 dBA (L_{max}) at indicated school.
Events = number of events to which the site is exposed on an average annual school day that exceed 84 dBA (L_{max}).
Avg. D = average duration of each event in seconds during the average annual school day that exceeds 84 dBA (L_{max}).
School(s) identified in bold text would be newly exposed to significant impacts.

Source: Ricondo & Associates, Inc., 2012 (INM school location exterior noise levels); PCR, 2012 (school location and name database; GIS spatial analysis).

No schools would be newly exposed above 65 interior dBA (L_{max}) speech interference Levels.



LAX Specific Plan Amendment Study Final EIR	**ANSI Awakening Probability Contours - LAWA Staff-Recommended Alternative Compared to 2025 "No Additional Improvements" Conditions**	**Figure SRA - 2.3.10.1-3**

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The assessment of the number of schools that would experience interior dBA $L_{eq(h)}$ levels equal to or higher than 35 dBA $L_{eq(h)}$ in the classroom indicates that under the LAWA Staff-Recommended Alternative, seven public schools and one private school would be newly exposed to this level as compared to baseline (2009) conditions. **Table SRA-2.3.10.1-8** provides the names and locations of the schools that would be exposed to noise levels above 35 $L_{eq(h)}$, and therefore impacts would be significant.

Table SRA-2.3.10.1-8

Hourly Equivalent Noise Level at LAX Area Schools Newly Exposed to ANSI 35 $L_{eq(h)}$ Thresholds - LAWA Staff-Recommended Alternative During the Average School Day (8:00 a.m. - 4:00 p.m.)

				8 Hour L_{eq} Values[1]
Grid ID	**School**	**X Coord**	**Y Coord**	**LAWA Staff-Recommended Alternative**
	Public Schools			
PBS009	95th Street Preparatory School	4.9156	0.4002	35.1
PBS050	Inglewood High School	1.809	1.0683	36.6
PBS086	Bright Star Secondary Charter Academy and Stella Middle Charter Academy	0.84	0.3486	35.3
PBS101	Manhattan Place Elementary School	4.1002	0.3601	35.6
PBS107	Paseo del Rey Magnet School	-2.0558	0.8652	35
PBS201	Albert Monroe Middle School	3.2061	-0.1862	35.2
PBS215	Wish Charter Elementary	-0.0775	0.853	38.3
	Private Schools			
PVS029	K. Anthony Elementary School	3.2633	1.1998	34

[1] Noise levels are computed by converting 24-hour exterior L_{eq} data to 8-hour exterior L_{eq} data by adding 4.8 L_{eq} to the computed 24-hour level, and then subtracting 28.8 decibels for exterior to interior attenuation produced by average construction techniques at area schools (as measured by LAWA), to result in interior hourly L_{eq} values interior attenuation produced by average construction techniques at area schools (as measured by LAWA), to result in interior hourly L_{eq} values.

Source: Ricondo & Associates, Inc., 2012 (INM school location exterior noise levels); PCR, 2012 (school location and name database; GIS spatial analysis).

2.3.10.1.2 Mitigation Measures

As discussed in Section 4.10.1.7 of the SPAS Draft EIR, the abatement and mitigation of aircraft noise may be accomplished in two general ways: 1) by reducing the loudness of the noise source or increasing the distance of the noise source from the receptor on the ground or 2) by modifying the receptor to make it less affected by noise.

This section discusses potential abatement of noise by modifications of the noise source. Section 2.3.9, *Land Use and Planning*, of this chapter, discusses the modification of the noise-sensitive receptors for noise mitigation.

The LAWA Staff-Recommended Alternative would entail a northbound shift of the centerlines of Runways 6L/24R. Relocated Runway 6L/24R is planned 260 feet north of the existing Runway 24R centerline. The noise abatement measures and classroom disruption and children's ability to learn presented in Section 4.10.1.5 of the SPAS Final EIR would continue to be implemented, as would all other current measures. Land use measures to mitigate noise impacts, that are not related to classroom disruption are identified and discussed in Section 2.3.9, *Land Use and Planning*, of this chapter. To continue noise abatement techniques, new/replacement procedures are assumed for westerly departures from each relocated runway end to ensure that aircraft reach the coastline before making turns.

2.3.10.1.3 Level of Significance After Mitigation

Although LAX Master Plan Commitment N-1 and LAX Master Plan Mitigation Measure MM-N-4 would reduce aircraft noise impacts compared with conditions that would exist without those measures, they cannot fully mitigate the noise impacts associated with implementation of the LAWA Staff-Recommended Alternative. Further, no other operational noise abatement measures are available to fully mitigate the noise impacts of the LAWA Staff-Recommended Alternative.

Table SRA-2.3.10.1-9 summarizes the number of dwellings and noise-sensitive facilities subject to significant noise impacts.

Table SRA-2.3.10.1-9

LAWA Staff-Recommended Alternative
Increase of 1.5 CNEL Within 65 CNEL Compared to Baseline (2009) Conditions

Effect Category	LAWA Staff-Recommended Alternative
Dwellings	5,296
Non-Residential Noise-Sensitive Facilities	48

Source: Ricondo & Associates, Inc., 2012 (1.5 CNEL or higher noise exposure contours); PCR, 2012 (population, dwelling unit, acreage, and non-residential noise-sensitive facilities; GIS spatial analysis).

Table SRA-2.3.10.1-10 summarizes the increase in schools subject to significant single event noise exposure.

Table SRA-2.3.10.1-10

Additional Schools Exposed to Significant Noise Impacts for
LAWA Staff-Recommended Alternative
2025 Noise Exposure

	LAWA Staff-Recommended Alternative
Schools - Exposure to Interior Noise of	
$\geq$ 55 dBA L_{max}	1
$\geq$ 65 dBA L_{max}	0
$\geq$ 35 dBA $L_{eq(h)}$	8

Source: Ricondo & Associates, Inc., 2012 (INM school location exterior noise levels); PCR, 2012 (population, dwelling unit and school databases; GIS spatial analysis).

As described in Section 2.3.9, *Land Use and Planning*, of this chapter, LAX Master Plan Mitigation Measure MM-LU-1, Implement Revised Aircraft Noise Mitigation Program, would incorporate all eligible dwellings and non-residential noise-sensitive facilities that are newly exposed to noise levels 65 CNEL or higher into the Aircraft Noise Mitigation Program (ANMP) to mitigate the significant noise impacts described in **Table SRA-2.3.10.1-9**.

LAX Master Plan Mitigation Measures MM-LU-3, Conduct Study of the Relationship Between Aircraft Noise Levels and the Ability of Children to Learn, and MM-LU-4, Provide Additional Sound Insulation for Schools Shown by MM-LU-3 to be Significantly Impacted by Aircraft Noise, would ultimately serve to mitigate adverse noise impacts on schools presented in **Table SRA-2.3.10.1-10**.

Together, the LAX Master Plan noise and land use mitigation measures are intended to fully mitigate the significant noise impacts that would be caused by the LAWA Staff-Recommended Alternative. Because the land use mitigation measures would take several years to fully implement, it is possible that significant noise impacts would be experienced in the area after implementation of the LAWA Staff-Recommended Alternative but before the mitigation measures are fully implemented. Thus, significant and unavoidable interim noise impacts would be experienced over an indeterminate period of time. In addition, as further discussed in Section 2.3.9, *Land Use and Planning*, of this chapter, certain residential uses with outdoor private habitable areas, or parks would be newly exposed to noise levels of 75 CNEL or higher. These noise impacts would also be significant and unavoidable.

2.3.10.2 Road Traffic Noise

2.3.10.2.1 Impacts Analysis

As noted in Section 2.3, impacts of the LAWA Staff-Recommended Alternative related to road traffic noise are only associated with the ground access components of Alternative 9, as evaluated in Section 4.10.2.6 of the SPAS Draft EIR.

Table SRA-2.3.10.2-1 presents the predicted road traffic noise level, in terms of CNEL, for each receptor location for baseline (2010) conditions with a hypothetical assumption that the LAWA Staff-Recommended Alternative is in place, and also shows the associated change in CNEL as compared to baseline (2010) conditions without SPAS. **Table SRA-2.3.10.2-2** provides similar type information for future (2025) conditions, that is, predicted road traffic noise levels, in CNEL, at buildout of the LAWA Staff-Recommended Alternative in 2025 as compared to the future noise levels that are predicted to occur in 2025 without the LAWA Staff-Recommended Alternative. The following describes the impacts specific to the LAWA Staff-Recommended Alternative.

Table SRA-2.3.10.2-1

Change in Roadway Noise Levels - Baseline (2010) Conditions Without and With the LAWA Staff-Recommended Alternative

	dBA CNEL Baseline (2010)		
	Baseline (2010)	With SRA	
Receptor ID	Without SPAS		Change from Baseline
RD1	65.1	65.3	0.2
RD2	69.2	69.1	-0.1
RD3	72.6	72.7	0.1
RD4	69.8	70.0	0.2
RD5	58.5	57.9	-0.6
RD6	58.0	57.6	-0.4
RD7	63.5	62.0	-1.5
RD8	66.3	67.4	1.1
RD9	63.5	63.6	0.1
RD10	62.4	62.4	0.0
RD11	59.1	60.1	1.0
RD12	63.9	63.7	-0.2
RD13	67.5	67.5	0.0
RD14	54.7	54.7	0.0
RD15	71.6	71.5	-0.1

Source: CDM Smith, 2012.

Table SRA-2.3.10.2-2

Change in Roadway Noise Levels - Future (2025) Conditions Without and With the LAWA Staff-Recommended Alternative

	dBA CNEL Future (2025)		
		With SRA	
Receptor ID	Future (2025) Without SPAS		Change from Future w/o SPAS
RD1	65.7	65.5	-0.2
RD2	70.7	70.0	-0.7
RD3	73.2	73.2	0.0
RD4	70.4	70.4	0.0
RD5	59.0	59.6	0.6
RD6	58.2	59.0	0.8
RD7	63.1	64.6	1.5
RD8	68.0	67.6	-0.4
RD9	64.4	64.5	0.1
RD10	64.5	64.5	0.0
RD11	59.5	60.1	0.6
RD12	64.6	64.5	-0.1
RD13	69.5	69.4	-0.1
RD14	54.8	55.6	0.8
RD15	72.2	72.3	0.1

Source: CDM Smith, 2012.

The changes in baseline (2010) road traffic noise with implementation of the LAWA Staff-Recommended Alternative, as compared to baseline (2010) conditions without SPAS, would range from a decrease of 1.5 dBA CNEL at RD7 to a maximum increase of 1.1 dBA CNEL at RD8.

The changes in future (2025) road traffic noise with implementation of the LAWA Staff-Recommended Alternative, as compared to future (2025) conditions without SPAS, would range from a decrease of 0.7 dBA CNEL at RD2 to a maximum increase of 1.5 dBA CNEL at RD7. The predicted changes in road traffic noise levels for future (2025) conditions at the 15 receptor locations would all be less than a 3 dBA increase in CNEL; therefore, the road traffic noise impacts associated with the LAWA Staff-Recommended Alternative would be less than significant.

2.3.10.2.2 Mitigation Measures

Impacts associated with road traffic noise under the LAWA Staff-Recommended Alternative would be less than significant; therefore, no mitigation measures specific to SPAS are required.

2.3.10.3 Construction Traffic and Equipment Noise

2.3.10.3.1 Impacts Analysis

As noted in Section 2.3, impacts of the LAWA Staff-Recommended Alternative related to construction traffic and equipment noise are associated with construction activities associated with the airfield/terminal components of Alternative 1 and the ground access components of Alternative 9, as evaluated in Section 4.10.3.6 of the SPAS Draft EIR.

Construction Traffic Noise

Construction traffic noise would be generated by both trucks and employee vehicles. As part of the traffic-related LAX Master Plan commitments identified in Section 4.10.3.5 of the SPAS Draft EIR, a construction traffic management plan would be prepared with each improvement project and would seek

to locate haul routes away from noise-sensitive receptors. Additionally, construction-related trucks would be restricted to designated routes ensuring that these vehicles utilize the nearby freeways and major arterials to the maximum extent and minimize use of local roadways. As indicated in Section 4.10.3.2 of the SPAS Draft EIR, traffic volumes on roads with good operating conditions (i.e., LOS B or better) would have to increase more than three-fold to reach the CEQA threshold of significance of a 5 dBA increase, and would need to increase even more on roads with poor operating conditions (i.e., LOS C or worse). The construction routes applicable to the LAWA Staff-Recommended Alternative are intentionally designated for freeways and major arterials around the airport, avoiding minor arterials and local streets. These freeways and major arterials are high-volume routes that are already at LOS C or worse. Although specific construction-related information such as schedules, durations, equipment and manpower estimates, are not known at this time for the LAWA Staff-Recommended Alternative, construction-related traffic would not result in a doubling or tripling of existing daily traffic volumes on streets around the airport, particularly given the LAX Master Plan commitments to utilize freeways and major arterials. For a recent major construction project at LAX, the Bradley West Project, the highest peak-hour construction trip estimate for the highest peak-quarter of construction activity, which included the possibility of a 60 percent temporary surge in construction activity over normal peak construction activities, projected a total of 1,226 construction trips.[54] That estimate includes a "passenger car equivalent" adjustment to all truck trips, whereby each medium-duty truck trip is counted as two passenger car trips and each heavy-duty truck trip is counted as 2.5 passenger car trips. Notwithstanding that total trip generation would be distributed to, and dispersed between, several different streets, that total trip generation is well below the existing traffic volumes on the freeways and major arterial streets around LAX and would not result in a tripling of traffic volumes (please see the traffic count data in Appendix K2, *Off-Airport Transportation*, of the SPAS Draft EIR[55]). As a result, the construction traffic noise impact associated with the LAWA Staff-Recommended Alternative would be less than significant.

Construction Equipment Noise

As described in Section 4.10.3.3 of the SPAS Draft EIR, the existing ambient CNEL within noise-sensitive areas to the north, east, and south of LAX, range from approximately 65 to 70 dBA. A significant impact is considered to occur if construction equipment noise exceeds the baseline ambient exterior noise level by 5 dBA or more at a noise sensitive use. Based on the 24-hour construction site CNEL of 89 dBA at 50 feet from the source, which would dissipate at 4.5 dB per doubling of distance, the approximate distances from construction activities to the 70 and 75 dBA CNELs (i.e., points at which construction equipment noise would result in a 5 dBA increase over the baseline ambient exterior noise level of 65 to 70 dBA CNEL) would be 925 feet and 425 feet, respectively. In other words, noise-sensitive uses in areas with an existing ambient CNEL of 65 dBA would be significantly impacted if SPAS-related construction activity occurred within a distance of 925 feet or less. If the existing ambient CNEL is 70 dBA, a significant impact would occur if construction activities occurred within 425 feet or less. These distances do not account for any intervening topography, buildings, or other obstructions that would reduce the noise reaching the receptors; hence, the impacts analysis is conservative.

It should be noted that the second and third thresholds of significance presented in Section 4.10.3.4 of the SPAS Draft EIR indicate a significant construction noise impact would occur if one or both of the following conditions occur: (1) if project-related construction noise results in a 5 dBA or more increase in the existing ambient noise level at noise-sensitive uses; or (2) if project-related construction noise results in a 5 dBA increase over ambient exterior noise levels at noise-sensitive uses during particular times of the week - specifically, between the hours of 9:00 p.m. and 7:00 a.m. Monday through Friday, before 8:00 a.m. or after 6:00 p.m. on Saturday, or at any time on Sunday. As further described below, the first of those two conditions is considered to be the more restrictive of the two. Therefore, the analysis in this section addresses the second and third significance thresholds.

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54 City of Los Angeles, Los Angeles World Airports, Final Environmental Impact Report for Los Angeles International Airport (LAX) Bradley West Project, Table 4.3-7, September 2009.

55 The analysis of the LAWA Staff-Recommended Alternative in Appendix K2 is provided under the designation "Alternative 9."

As described in Section 4.10.3.2 of the SPAS Draft EIR and delineated in Table 4.10.3-2 of the SPAS Draft EIR, it is anticipated that the majority of construction activities would occur during daytime hours, primarily within a Monday through Friday work week. It is likely, however, that there may be some limited periods when construction is scheduled to occur during both the daytime and nighttime hours. During such periods, it is anticipated that nighttime construction would have lower equipment activity levels than otherwise would occur during the daytime and certain hours are unlikely to have any activity. Table 4.10.3-2 of the SPAS Draft EIR indicates the estimated construction activity level for each hour of the day under this conservative "worst-day" construction scenario and Table 4.10.3-3 of the SPAS Draft EIR, delineates the hourly average sound level for each hour. In focusing on the hourly activity levels and associated hourly average sound levels for the greatest time span when this significance criterion would be applicable (i.e., 9:00 p.m. on a Friday to 8:00 a.m. on a Saturday, the overall construction-related hourly average noise level at 50 feet during this period would be 82.3 dBA L_{eq} (Note: Although the affected time period for a Saturday starts earlier than 9:00 p.m., construction activities are not anticipated to occur on Sundays; hence, the longer duration of 9 p.m. to 8 a.m. was assumed for the analysis).

As indicated above, under the second significance threshold, 24-hour construction site CNEL would dissipate and be less than significant at approximately 925 feet (where existing levels are 65 dBA CNEL), and 425 feet (where existing levels are 70 dBA CNEL).

As described in Section 4.10.3.3 of the SPAS Draft EIR, the existing ambient average hourly noise level during the evening/nighttime period at the subject noise-sensitive areas is estimated to range from approximately 59 dBA L_{eq} to 65+ dBA L_{eq}. Based on an evening/nighttime construction activity average hourly noise level of 82.3 dBA L_{eq} at 50 feet, construction activities would be less than significant at 830 feet, under the third significance threshold, assuming the quieter nighttime ambient noise level of 59 dBA L_{eq}.

Given that a significant impact would occur under the second significance threshold at 925 feet of a noise-sensitive use, and 830 feet under the third significance threshold, the analyses below use the more conservative distance under the second significance threshold.

The impact analyses below discuss various noise-sensitive receptors which are considered representative of other nearby noise-sensitive receptors, described in Section 4.10.3.3 of the SPAS Draft EIR.

Impacts from Airfield Improvements

Residential Uses In Playa del Rey

Residential development at the south end of Playa del Rey would be over 1,300 feet from the closest point of construction associated with the LAWA Staff-Recommended Alternative, that being the relocation of navigational aids within the Los Angeles/El Segundo Dunes due to the 260-foot northward shift of Runway 6L/24R. Given the existing ambient noise level of 68 dBA CNEL in that area of Playa del Rey, construction activities would need to occur within a distance of approximately 585 feet in order to result in construction noise that is 5 dBA higher than the baseline exterior noise level.[56] As such, construction equipment noise impacts in Playa del Rey would be less than significant.

Saint Bernard High School

This facility, located on the east side of Fallmouth Avenue north of Westchester Parkway, could be impacted by construction noise from the improvements required for the Argo Drainage Channel (i.e., cover/enclose the channel to meet runway safety requirements associated with relocation of Runway 6L/24R). Although the western portion of the Argo Drainage Channel is approximately 950 feet from the southern tip of the school site, it is likely that the limits of construction would extend northward, to provide

[56] This is a worst-case analysis that assumes a full complement of construction equipment producing a combined noise level of 89 dBA at 50 feet; however, the relocation of navigational aids would likely require very few pieces of construction equipment, resulting in noise levels of less than 89 dBA.

for equipment maneuvering on top of the banks along the channel, and be less than 925 feet from the school site, which would result in significant construction equipment noise impacts.

Residential Uses Along Southern Edge of Westchester

The existing residences closest to LAX, along the south side of West 91st Street, generally between and near Stanmoor Drive and Rayford Drive, would potentially be affected by construction noise from the improvements required for the Argo Drainage Channel. Similar to the discussion above under Saint Bernard High School, the Argo Drainage Channel is located approximately 950 feet from the nearest residence; hence, significant construction equipment noise impacts would occur.

Park West Apartments Northwest on Lincoln Boulevard South of La Tijera Boulevard

This apartment complex is near the west end of the Lincoln Boulevard improvement (i.e., realignment) area associated with relocation of Runway 6L/24R. Construction activity for the nearby roadway improvements (i.e., the realignment of Lincoln Boulevard) would result in significant construction equipment noise impacts to apartment residents. Additionally, the southern end of the apartment complex is approximately 650 feet from the Argo Drainage Channel and approximately 750 feet from the 260-foot northward shift of Runway 6L/24R; hence, the apartment complex would also be subject to significant construction equipment noise impacts from those improvements proposed under the LAWA Staff-Recommended Alternative.

Residential Uses Along West 88th Street between Liberator Avenue and Sepulveda Westway

The northward realignment of Lincoln Boulevard, which would accompany the northward relocation of Runway 6L/24R under the LAWA Staff-Recommended Alternative, would occur approximately 1,100 feet away from (south of) the residential uses along West 88th Street between Liberator Avenue and Sepulveda Westway. Based on distance alone, not including the noise attenuation function of the existing 8-foot-high noise wall along West 88th Street and the 15- to 20-foot high noise walls along portions of La Tijera and West 88th Place, no significant construction noise impacts are expected to occur in this area under the LAWA Staff-Recommended Alternative.

Impacts from Ground Access Improvements

Remaining Residences Within Belford

The majority of the Belford area has been cleared of residential uses; however, there are a few residences currently remaining, including along the west side of Belford Avenue south of 96th Street, which are approximately 500 feet from the eastern edge of the Intermodal Transportation Facility (ITF) proposed under the LAWA Staff-Recommended Alternative, and approximately 500 feet north of the APM proposed along 98th Street. Should those residences still remain and be occupied at the time of ITF, parking, and APM development, there is the potential for significant impacts from construction equipment noise. Additionally, the existing Avis Car Rental facility located directly west of Belford would be converted to surface parking. Given the proximity of this site to residences that currently remain at the eastern edge of Belford, the construction activities associated the removal of the rental car facilities and development of new parking would result in significant noise impacts. As such, the potential construction equipment noise impacts from development of the ITF, parking, and APM under the LAWA Staff-Recommended Alternative are considered significant.

Noise-Sensitive Uses Within Manchester Square

Similar to Belford, the majority of Manchester Square has been cleared of residential development; however, there are currently some remaining units, primarily apartment complexes. There are also school facilities (Bright Star Secondary Charter Academy and Stella Middle Charter Academy) within Manchester Square. It is possible that the development of surface parking and the CONRAC under the LAWA Staff-Recommended Alternative would be sequenced to occur in phases over the course of several years. Should noise-sensitive uses still be present at the time Manchester Square is developed for surface parking, significant construction equipment noise impacts would occur. Additionally, construction of the eastern end of the APM system, which would terminate at Manchester Square, would

result in significant construction equipment noise impacts should occupied residential units be present in the southwest portion of Manchester Square at the time of development. As such, the potential for construction equipment noise from development of surface parking, CONRAC, and APM system under the LAWA Staff-Recommended Alternative are considered significant.

Animo Leadership Charter High School[57]

This school facility is located at the northeast corner of Aviation Boulevard and Arbor Vitae Street, across from Manchester Square. Under the LAWA Staff-Recommended Alternative, development of surface parking in Manchester Square would result in significant construction equipment noise impacts at the school site (i.e., construction activities would occur as close as approximately 75 feet from the school site).

Residential Uses Within City of Inglewood

Although there are residential units in Inglewood that are nominally within 925 feet of the Manchester Square surface parking lot proposed under the LAWA Staff-Recommended Alternative, such units are on the east side of the I-405 Freeway, which effectively removes them from the project site area and would mask the SPAS-related construction noise with the intervening freeway noise that is not otherwise attenuated by the existing noise wall/barrier located along the eastern edge of the freeway. Therefore, construction equipment noise impacts would be less than significant.

Construction Noise Control Measures

LAX Master Plan Commitments ST-16, ST-18, and ST-22 and LAX Master Plan Mitigation Measures MM-N-7 through MM-N-10 would reduce construction equipment noise impacts. However, at this level of planning, it cannot be concluded that the construction equipment noise impacts described above would be fully mitigated; hence, the impacts above for the LAWA Staff-Recommended Alternative are considered at this time to be significant.

Construction Staging Areas

As described in Section 4.10.3.2 of the SPAS Draft EIR, the analysis of construction noise impacts addresses impacts associated with the airfield/terminal improvements and the ground access improvements under the LAWA Staff-Recommended Alternative. That analysis is presented in Section 2.3.10.3.1 above. The construction noise analysis also addresses impacts associated with the potential construction staging areas associated with the LAWA Staff-Recommended Alternative. The following describes potential noise impacts associated with the development and use of each construction staging area.

Construction Staging Area A

Residential Uses In Playa del Rey

The western edge of Construction Staging Area A is approximately 1,000 feet from Playa de Rey. The western portion of Construction Staging Area A is already developed for, and used as, a construction staging area; consequently, the need for major grading or improvements at the site is unlikely. Site improvements, if any, would likely occur during daytime hours, which would avoid the evening and nighttime penalties associated with CNEL values. Based on the average construction activity noise level (non-penalized) of 86 dBA at a distance of 50 feet and an existing ambient noise level of 68 dBA CNEL in

[57] At the publication time of the Notice of Preparation for the SPAS Draft EIR, October 2010 (i.e., the baseline year for the EIR impacts analysis), the Animo Leadership Charter High School was located at the northeast corner of Aviation Boulevard and Arbor Vitae Street, across from Manchester Square. This school, however, has subsequently moved to a new location in Lennox, approximately 2.5 miles from the current site (see http://www.dailybreeze.com/news/ci_21358340/animo-leadership-has-new-lennox-campus-and-new, accessed on December 10, 2012). In order to provide a consistent basis of comparison, the impacts discussion for the LAWA Staff-Recommended Alternative contained herein assumes the location of the Animo Leadership Charter High School to be at its former location at the northeast corner of Aviation Boulevard and Arbor Vitae Street, across from Manchester Square.

that area of Playa del Rey, the distance at which that sound level would dissipate to 73 dBA (i.e., a 5 dBA increase over the baseline ambient exterior noise level) is approximately 370 feet, which is well short of Playa de Rey. While the specifics of how Construction Staging Area A would be used are not currently known and would be determined in the future in conjunction with more detailed development plans, it is generally anticipated that use of the site would be for construction contractor trailers/offices, equipment and materials storage, and light- to medium-assembly of construction components. Construction staging activity is likely to occur primarily, if not entirely, in the daytime hours and largely involve street-legal vehicles that are quieter than off-road construction equipment. Based on existing information, construction equipment noise impacts to residential uses in Playa del Rey from the development and use of Construction Staging Area A would be less than significant.

Saint Bernard High School

As described above, construction activity associated with improvements to Construction Area A would likely be limited in nature and have a noise level of approximately 86 dBA at 50 feet. Based on an existing ambient noise level of 65 dBA CNEL estimated for the school site, construction activities would need to be approximately 585 feet or more away in order to avoid a 5 dBA increase over existing ambient noise levels. The distance between the southern portion of the school site and northern edge of Construction Staging Area A is slightly less than this distance (i.e., separation distance is approximately 550 feet). As such, construction equipment noise impacts to Saint Bernard High School from development and use of Construction Staging Area A would be significant.

Residential Uses Along Southern Edge of Westchester

Construction noise impacts to the residential uses along the southern edge of Westchester associated with the development and use of Construction Staging Area A, which is approximately 650 feet south of the nearest residence in the subject residential area, would be less than significant.

Park West Apartments Northwest on Lincoln Boulevard South of La Tijera Boulevard

The eastern portion of Construction Staging Area A is situated approximately 250 feet south of the apartment complex, across Westchester Parkway. The subject area is already fully improved for and currently used as a construction staging area; consequently, no other notable improvements are anticipated to occur. Given the past and present construction staging uses at the site and the fact that it does not have direct access to the airfield or other main areas of the airport, it is anticipated that future use of the area would primarily involve materials storage and light assembly during daytime hours, and possibly construction contractor trailer/offices. It is possible, however, that other types of construction staging activities could occur within the subject area from time to time that would result in noise levels reaching 86 dBA at 50 feet. Such occurrences would result in significant construction noise impacts to the nearby apartments.

Construction Staging Areas B, C, and D

Residential Uses Along West 88th Street between Liberator Avenue and Sepulveda Westway

Construction Staging Areas C and D are proposed immediately south of the residential area north of West 88th Street between Liberator Avenue and Sepulveda Westway. Potential Construction Staging Area B is situated south of Areas C and D.

Construction Staging Area B is flat and not expected to require notable improvements. It is anticipated that future use of the area for most of the alternatives would likely involve materials storage and light assembly during daytime hours, and possibly construction contractor trailer/offices. Under the LAWA Staff-Recommended Alternative, which involves northward relocation of Runway 6L/24R, it is anticipated that Construction Staging Area B may be more actively used in conjunction with the associated realignment of Lincoln Boulevard. The proposed realignment would extend through much of Construction Staging Area B, placing it in close proximity of, and use for, the Lincoln Boulevard realignment construction activities. Given its distance from the nearest residential development (i.e., approximately 1,000 feet away) and the presence of the existing 8-foot-high block wall along the north side of West 88th

Street, between residents to the north and the subject construction staging area, no significant noise impacts would occur from the use of Construction Staging Area B.

Construction Staging Area C is flat and not expected to require notable improvements. Given its distant location from the airfield and other main areas of the airport, it is anticipated that future use of the area would likely involve materials storage and light assembly during daytime hours, and possibly construction contractor trailer/offices. An existing 8-foot-high block wall is located along the north side of West 88th Street, between residents to the north and the subject construction staging area.

Construction Staging Area D is already improved as, and has long been used for, staging of LAX construction and soundproofing activities and includes a block wall approximately 15 to 20 feet tall along the northern and western edges of the site (i.e., between the interior of the site and residential areas to the north and northwest, in addition to the aforementioned block wall along the north side of West 88th Street). No additional construction staging area improvements are expected.

Based on the nature, location, and anticipated use of Construction Staging Areas B, C, and D, construction equipment noise impacts to nearby residential areas would be less than significant.

Construction Staging Area E

Remaining Residences Within Belford

The improvement and use of Belford for Construction Staging Area E poses the potential for construction equipment noise to occupied residences if they are still remaining at the time the area is needed for construction staging. Given that the portions of Belford that would likely be used for construction staging have been, or will have been, cleared and leveled, it is not expected that substantial improvements would be necessary to ready the site for construction staging. Although most of the site has been cleared and portions with residential uses remaining are very limited, it is possible that construction staging activities could occur within 575 feet of occupied residential uses, if any, remaining at the time. Therefore, construction equipment noise impacts are considered significant.

Construction Staging Area F

Noise-Sensitive Uses Within Manchester Square

The potential improvement and use of Manchester Square for construction staging poses the potential for construction equipment noise impacts to noise-sensitive uses at the site such as any remaining occupied residential units and/or the existing school facilities, if active. For the same reasons described above for Belford, construction equipment noise impacts to residential uses and schools within Manchester Square from staging activities could occur in close proximity. Therefore, construction equipment noise impacts are considered significant.

Animo Leadership Charter High School[58]

This school facility is located at the northeast corner of Aviation Boulevard and Arbor Vitae Street, across from Manchester Square. Under the LAWA Staff-Recommended Alternative, development of surface parking in Manchester Square would result in significant construction equipment noise impacts at the school site (i.e., construction activities would occur as close as approximately 75 feet from the school site).

Residential Uses Within City of Inglewood

Although there are residential units in Inglewood that are nominally within 925 feet of the Manchester Square surface parking lot proposed under the LAWA Staff-Recommended Alternative, such units are on the east side of the I-405 Freeway, which effectively removes them from the project site area and would mask the SPAS-related construction noise with the intervening freeway noise that is not otherwise

[58] See footnote 57 with regard to the pending relocation of this facility.

attenuated by the existing noise wall/barrier located along the eastern edge of the freeway. Therefore, construction equipment noise impacts would be less than significant.

Construction Staging Area G

Residential Uses Within Del Aire

Development and use of the Continental City site for construction staging would occur north of the Del Aire residential area. Although such activity would occur as close as 800 feet from residences in Del Aire, such construction staging activity would occur at approximately the same elevation as Del Aire, at which the existing 8-foot-high cinderblock wall along the northern edge of Del Aire would serve to attenuate potential noise impacts. Based on the above, construction equipment noise impacts are less than significant.

2.3.10.3.2 Mitigation Measures

Implementation of LAX Master Plan Mitigation Measures MM-N-7 through MM-N-10 and LAX Master Plan Commitments ST-16, ST-18, and ST-22 would reduce construction equipment noise impacts associated with the LAWA Staff-Recommended Alternative. No additional measures are available to address construction equipment noise.

2.3.10.3.3 Level of Significance After Mitigation

LAX Master Plan commitments and mitigation measures would reduce construction equipment noise impacts associated with the LAWA Staff-Recommended Alternative. However, given that the design and effectiveness of such measures, such as the noise control plan, depend on site- and project-specific conditions that would be addressed at future, more detailed levels of planning, it cannot be definitively concluded at this time that all construction equipment noise impacts would be reduced to levels that are less than significant. No additional measures are available to address construction equipment noise. As such, construction equipment noise impacts for the LAWA Staff-Recommended Alternative are considered to be significant and unavoidable.

2.3.10.4 Transit Noise and Vibration

2.3.10.4.1 Impacts Analysis

As noted in Section 2.3, impacts of the LAWA Staff-Recommended Alternative related to transit noise and vibration are only associated with the ground access components of Alternative 9, as evaluated in Section 4.10.4.7 of the SPAS Draft EIR.

2.3.10.4.1.1 Transit Noise

Table SRA-2.3.10.4-1 presents the estimated project-related transit noise levels at each receptor location for the LAWA Staff-Recommended Alternative. The calculation assumptions and worksheets for the estimated noise levels shown in **Table SRA-2.3.10.4-1** are presented in Appendix J3, *Transit Noise and Vibration*.[59] The following describes the impacts particular to the LAWA Staff-Recommended Alternative.

[59] The analysis of the LAWA Staff-Recommended Alternative in Appendix J3 is provided under the designation "Alternative 9."

Table SRA-2.3.10.4-1

Ambient Noise Levels With Addition of Transit Noise Associated the LAWA Staff-Recommended Alternative

Receptor	Baseline Ambient Noise Level (CNEL)	Transit Noise Levels: Ambient Noise Level With Addition of Transit Noise (CNEL) APM
Receptor 1 - Radisson Hotel	68 dBA	68 dBA
Receptor 2 - Courtyard by Marriott[1]	67 dBA	68 dBA
Receptor 2A - Courtyard by Marriott[2]	67 dBA	NA
Receptor 3 - Sheraton Hotel[1]	69 dBA	69 dBA
Receptor 3A - Sheraton Hotel[2]	69 dBA	NA
Receptor 4 - Crown Plaza Hotel	68 dBA	68 dBA
Receptor 5 - Embassy Suites[1]	68 dBA	69 dBA
Receptor 5A - Embassy Suites[2]	68 dBA	NA
Receptor 6 - Renaissance Hotel[1]	67 dBA	68 dBA
Receptor 6A - Renaissance Hotel[2]	67 dBA	NA
Receptor 7 - Four Points Sheraton	67 dBA	68 dBA
Receptor 8 - Marriott Hotel	69 dBA	69 dBA
Receptor 9 - Hilton Hotel[1]	70 dBA	72 dBA
Receptor 9A - Hilton Hotel[2]	70 dBA	NA

Notes:

NA = Not applicable
Noise levels shown in bold text indicate an increase of 3 dBA or more.
LAX Master Plan Mitigation Measure MM-N-11 was not quantitatively accounted for in Table SRA-2.3.10.4-1.

[1] Receptor location nearest to 98th Street - see Figure 4.10.4-2 of the SPAS Draft EIR.
[2] Receptor location nearest to Century Boulevard - see Figure 4.10.4-2 of the SPAS Draft EIR.

Source: CDM Smith, 2012.

Under the LAWA Staff-Recommended Alternative, an elevated APM would be constructed between Manchester Square and the CTA, primarily using the 98th Street corridor. The APM would be fully automated (driverless). The pinched-loop system would operate with a round trip time of approximately 19 minutes. The system would operate 24 hours a day. The nature and design of the APM system for the LAWA Staff-Recommended Alternative, relative to rubber-tire or steel-wheel, are unknown at this time. For analysis purposes, it is assumed that the system would be steel-wheel, recognizing that the noise characteristics of a rubber-tire system would be generally similar.

The additional noise from the APM operations proposed under the LAWA Staff-Recommended Alternative would result in an increase in ambient noise levels of approximately 2 dBA CNEL or less at all of the receptor locations. As such, the LAWA Staff-Recommended Alternative would not result in significant transit noise impacts. It should be noted that, although the APM route along 98th Street for the LAWA Staff-Recommended Alternative is the same as the same segment of APM1 under Alternative 3, the APM noise levels along 98th Street for the LAWA Staff-Recommended Alternative would be substantially lower than those of Alternative 3 because the former has far fewer hourly trips and shorter trains than the latter. Under Alternative 3, all passenger traffic to and from the CTA, except for FlyAways, would utilize the APM system, whereas under the LAWA Staff-Recommended Alternative, the CTA would remain open to various modes of traffic and only a limited portion of the passenger traffic would utilize the APM.

2.3.10.4.1.2 Transit Vibration

Based on the adjusted vibration level curve for Rapid Transit or Light Rail Vehicles described in Section 4.10.4.3.2 of the SPAS Draft EIR, the highest ground-borne vibration level associated with the APM system under the LAWA Staff-Recommended Alternative would be 72.3 VdB at a distance of 10 feet from the APM centerline. The hotel nearest to the APM route along 98th Street would be approximately 35+ feet from the APM centerline (Receptor 9 - the Hilton Hotel). As such, the estimated ground-borne vibration levels at the nearest hotel area would be approximately 67 VdB, which is less than the threshold of significance of 72 VdB. Therefore, transit-related ground-borne vibration under the LAWA Staff-Recommended Alternative would be less than significant.

2.3.10.4.2 Mitigation Measures

Impacts associated with transit noise and vibration under the LAWA Staff-Recommended Alternative would be less than significant; therefore, no mitigation measures specific to the LAWA Staff-Recommended Alternative are required.

2.3.11 Public Services

As discussed in the revised LAX SPAS EIR Notice of Preparation/Initial Study (October 2010), provided in Appendix A, *Notice of Preparation/Scoping*, of the SPAS Draft EIR, the proposed project does not include any residential development, schools, park/recreation areas, or library facilities. Furthermore, the proposed project would not result in a direct physical impact or alteration to any public park/recreation areas or public libraries. The LAWA Staff-Recommended Alternative would require the acquisition of a Los Angeles Unified School District (LAUSD) parcel with two charter schools. Impacts related to these schools are address in Section 2.3.9, *Land Use and Planning*, of this chapter, and were determined to be less than significant.

Employment and visitor-related demand for parkland, libraries, and schools is considered to be less than significant. Therefore, impacts related to schools, parks/recreation areas, and libraries do not require any further analysis and are not addressed herein.

2.3.11.1 Fire Protection

2.3.11.1.1 Impacts Analysis

As noted in Section 2.3, impacts of the LAWA Staff-Recommended Alternative on fire protection are associated with the airfield/terminal components of Alternative 1 and the ground access components of Alternative 9, as evaluated in Section 4.11.1.6 of the SPAS Draft EIR. The LAWA Staff-Recommended Alternative includes various features that are particularly relevant to the analysis of impacts to fire protection services. These features include airfield facility and terminal improvements, ground access improvements and parking, and the reconfiguration or relocation of the on-airfield fuel truck filling station.

Airfield Improvements

Airfield improvements under the LAWA Staff-Recommended Alternative would include the movement of Runway 6L/24R 260 feet north, the addition of a centerfield taxiway, extension of Runway 6R/24L, improvements to Taxilane D and Taxiway E, and relocation of the service road. These improvements would provide a greater amount of runway and taxiway facilities that meet FAA Airport Design Standards for Aircraft Design Group (ADG) V and VI aircraft under certain operating conditions, particularly as related to separation requirements, thereby reducing the need for special operations restrictions, modifications of standards, and waivers from FAA. Additionally, the LAWA Staff-Recommended Alternative includes the addition of a center parallel taxiway, which would provide safety benefits related to arriving and departing aircraft on the adjacent runways. As described in Section 2.3.7.2, *Safety*, of this chapter, these improvements to the north airfield under the LAWA Staff-Recommended Alternative would enhance the safety and efficiency of the airfield, thereby decreasing the potential need for emergency fire

response associated with airfield accidents. Furthermore, Fire Station 80 was recently relocated and expanded to better accommodate the size, volume, and emergency response equipment associated with future operations and newer generation aircraft. The relocated ARFF Fire Station 80 is currently better situated relative to the midpoints of the outermost runways (Runway 6L/24R on the north airfield and Runway 7R/25L on the south airfield), and this more centralized location enables personnel to better respond to emergencies on the airfield. In addition, LAX Master Plan Commitments FP-1, LAFD Design Recommendations, and PS-2, Fire and Police Facility Space and Siting Requirements, as well as enforcement of FAR and fire code requirements, would ensure maintenance of adequate response times, staffing, equipment, facilities, and emergency access in association with airfield improvements. Therefore, impacts to fire protection services related to airfield improvements under the LAWA Staff-Recommended Alternative would be less than significant.

Terminal Modifications

Under the LAWA Staff-Recommended Alternative, terminal improvements include the addition of Terminal 0, modifications to concourse area and/or gates at Terminals 1 and 2, replacement of the Terminal 3 concourse, and the northern extension of concourse areas and gates at Tom Bradley International Terminal (TBIT) and the future Midfield Satellite Concourse (MSC).

Development of new terminal areas could increase demand for fire protection and emergency services and the need for new, expanded, consolidated, or relocated fire protection facilities compared to baseline conditions due to expanded terminal areas and increases in passenger activity over time. However, LAX Master Plan Commitments FP-1, LAFD Design Recommendations, and PS-2, Fire and Police Facility Space and Siting Requirements, as well as enforcement of FAR and fire code requirements, would ensure maintenance of adequate response times, facilities, and emergency access. Potential impacts associated with staffing, equipment, and facilities would also be continually evaluated and addressed pursuant to standard LAFD procedures and fire code requirements. Furthermore, as previously indicated, Fire Station 80 located at LAX was recently expanded substantially in size to better serve future airport operations, and Fire Station 5 was substantially increased in size when it was relocated in 2006. These upgraded facilities and the recently completed ARCC are expected to enhance fire protection and support demand for fire services at LAX into the foreseeable future. Therefore, impacts to fire protection services associated with terminal improvements would be less than significant.

Ground Access Improvements and Parking

Under the LAWA Staff-Recommended Alternative, a new Intermodal Transportation Facility (ITF) would be constructed that would include public parking, bus/shuttle areas, and remote passenger pick up/drop off. Additional public parking and a CONRAC would be located in Manchester Square. An APM would be constructed linking the Manchester Square parking to the CTA, with stops at the future Metro LAX/Crenshaw Light Rail Station and the new ITF.

Construction of the ITF, APM, and other ground access improvements would reduce traffic congestion and curb-front demands, which would reduce the potential for automobile collisions, automobile/pedestrian conflicts, and automobile-related emergency response incidents at the airport compared to baseline conditions. Improved traffic flow associated with the new ground access facilities is also expected to improve response times for fire protection services. Nonetheless, development of these new ground access facilities may increase the need for fire protection services in order to respond to calls and provide service to these areas.

Relative to the need for new, expanded, consolidated, or relocated fire protection facilities, recent expansion and upgrades to Fire Station 80 and Fire Station 5 have substantially upgraded fire protection services at LAX and, as a result, any need for new or expanded fire protection facilities is expected to be limited. Furthermore, potential impacts to fire protection and emergency services would be reduced by LAX Master Plan Commitments FP-1 and PS-2. LAX Master Plan Commitment FP-1, LAFD Design Recommendations, addresses coordination with LAFD regarding emergency access and other design needs to ensure that fire protection service levels are maintained. LAX Master Plan Commitment PS-2, Fire and Police Facility Space and Siting Requirements, would require ongoing consultation with LAFD to

evaluate and refine, as necessary, program requirements for fire facilities. This coordination would ensure that final plans for ground access-related improvements under the LAWA Staff-Recommended Alternative adequately support future facility needs, including space requirements, siting, and design. Potential impacts associated with staffing and equipment would also be continually evaluated and addressed pursuant to standard LAFD procedures and fire code requirements. Furthermore, fire facilities serving LAX have been recently expanded to improve service at LAX. Therefore, impacts to fire protection services associated with ground access improvements would be less than significant.

Removal/Reconfiguration of Existing Facilities

Under the LAWA Staff-Recommended Alternative, the on-airfield fuel truck filling station located at the north end of the LAXFUEL Fuel Farm would be reconfigured or relocated within the Airfield Operations Area (AOA). If relocation of the on-airfield fuel truck filling station is necessary, existing fire protection and safety features associated with the station would be maintained at the relocated site. In addition, LAFD personnel are trained in techniques for fighting hydrocarbon fires. For these reasons, impacts to fire protection services associated with the potential relocation of the on-airfield fuel truck filling station would be less than significant. Additional discussion of emergency response is provided in Section 2.3.7.3, *Hazardous Materials*, of this chapter.

Construction

Under the LAWA Staff-Recommended Alternative, traffic congestion associated with construction of the proposed improvements would have the potential to hamper or delay emergency response. However, temporary roadway delays would be reduced or avoided through LAX Master Plan Commitment C-1, Establishment of a Ground Transportation/Construction Coordination Office. The Ground Transportation/Construction Coordination Office, which is now in place, would ensure, among other things, proper coordination and planning with fire protection agencies to reduce effects from construction on traffic, emergency access, and response times. In addition, LAX Master Plan Commitments ST-9, ST-12, ST-14, ST-17, ST-18, ST-19, ST-21, and ST-22 would serve to further reduce potential traffic congestion during construction. In the event construction activities were to result in deterioration of traffic conditions, use of emergency sirens, alternate response routes, and multiple station responses when necessary would help facilitate emergency access and response as occurs under current congested conditions. Therefore, impacts to emergency response times related to construction of the proposed improvements would be less than significant.

2.3.11.1.2 Mitigation Measures

Implementation of LAX Master Plan Commitments FP-1, PS-1, PS-2, C-1, ST-9, ST-12, ST-14, ST-17, ST-18, ST-19, ST-21, and ST-22 would ensure that impacts relative to fire and emergency services associated with the LAWA Staff-Recommended Alternative would be less than significant. Therefore, no mitigation measures specific to SPAS are required.

2.3.11.2 Law Enforcement

2.3.11.2.1 Impacts Analysis

As noted in Section 2.3, impacts of the LAWA Staff-Recommended Alternative on law enforcement are associated with the airfield/terminal components of Alternative 1 and the ground access components of Alternative 9, as evaluated in Section 4.11.2.6 of the SPAS Draft EIR.

The LAWA Staff-Recommended Alternative contains various features that are particularly relevant to the analysis of law enforcement impacts. These features include airfield facility and terminal improvements, ground access improvements and parking, and removal and relocation of a future LAWAPD facility.

Airfield Improvements

Airfield improvements under the LAWA Staff-Recommended Alternative would include movement of Runway 6L/24R 260 feet north, the addition of a centerfield taxiway, extension of Runway 6R/24L, improvements to Taxilane D and Taxiway E, and relocation of the service road. These improvements would provide a greater amount of runway and taxiway facilities that meet FAA Airport Design Standards for Aircraft Design Group (ADG) V and VI aircraft under certain operating conditions, particularly as related to separation requirements, thereby reducing the need for special operations restrictions, modifications of standards, and waivers from FAA. Additionally, the LAWA Staff-Recommended Alternative includes the addition of a center parallel taxiway, which would provide safety benefits related to arriving and departing aircraft on the adjacent runways. As described in Section 2.3.7.2, *Safety*, of this chapter, the safety and efficiency of the north airfield would be enhanced under the LAWA Staff-Recommended Alternative compared to baseline condition, thereby decreasing demand on law enforcement services associated with airfield accidents. Therefore, impacts to law enforcement services and facilities associated with these improvements would be less than significant.

Terminal Modifications

Under the LAWA Staff-Recommended Alternative, terminal improvements include the addition of Terminal 0, modifications to concourse area and/or gates at Terminals 1 and 2, replacement of the Terminal 3 concourse, and the modification and northern extension of concourse areas and gates at Tom Bradley International Terminal (TBIT) and the future Midfield Satellite Concourse (MSC).

Development of new terminal areas could increase demand for law enforcement services and police functions compared to baseline conditions due to expanded terminal areas and increases in passenger activity over time. Additional LAWAPD officers would be needed for staffing at TSA screening checkpoints in accordance with TSA regulations. However, significant impacts on law enforcement services due to terminal modifications would be avoided with implementation of LAX Master Plan Commitments LE-1, Routine Evaluation of Manpower and Equipment Needs, and LE-2, Plan Review. These LAX Master Plan commitments would ensure that LAWAPD and LAPD continue to routinely evaluate and provide additional officers, supporting administrative staff, facilities, and equipment to keep pace with forecast increases in activity and development at LAX in order to maintain a high level of law enforcement services. This would be achieved through LAWA notification to LAWAPD and LAPD regarding pending development and construction and through LAWA review of status reports on law enforcement services at LAX. LAX Master Plan Commitment LE-2, Plan Review, would ensure that, during the design phase of terminal improvements and other major airport development, LAPD, LAWAPD, and other law enforcement agencies would be consulted to review plans so that, where possible, environmental contributors to criminal activity, such as poorly-lit areas and unsafe design, are reduced. Thus, impacts to law enforcement services and facilities due to terminal improvements under the LAWA Staff-Recommended Alternative would be less than significant.

Ground Access Improvements and Parking

Under the LAWA Staff-Recommended Alternative, a new Intermodal Transportation Facility (ITF) would be constructed that would include public parking, bus/shuttle areas, and remote passenger pick-up/drop-off. Additional parking and a CONRAC would be located in Manchester Square. An APM would be constructed linking the Manchester Square parking to the CTA, with stops at the future Metro LAX/Crenshaw Light Rail Station and the new ITF.

Construction of the ITF, APM, and other ground access improvements would reduce traffic congestion and curb-front demands, which would reduce the potential for automobile collisions, automobile/pedestrian conflicts, and automobile-related emergency response incidents, and improve the overall safety and security characteristics of the airport. Improved traffic flow associated with the new ground access facilities is also expected to improve response times for law enforcement. Nonetheless, additional LAWAPD and LAPD personnel may be required to provide security and police functions in association with the new ITF and APM. Additionally, parking facility improvements under the LAWA Staff-Recommended Alternative would increase the number of vehicles parked at LAX that could potentially

result in a corresponding increase in vehicle-related incidents (e.g., auto thefts and auto break-ins) compared to baseline conditions.

Potential impacts on law enforcement staffing and services due to ground access improvements would be reduced to a less than significant level with implementation of LAX Master Plan Commitments LE-1, Routine Evaluation of Manpower and Equipment Needs, and LE-2, Plan Review. These commitments would ensure that law enforcement staffing, facilities, and equipment keep pace with forecast increases in activity and development at LAX, and would require consultation with law enforcement agencies in the development of new facilities, including ground access facilities. Thus, impacts to law enforcement services and facilities associated with ground access and parking improvements under the LAWA Staff-Recommended Alternative would be less than significant.

Removal of Existing Facilities

Under the LAWA Staff-Recommended Alternative, the existing LAWAPD station and associated facilities located at West 96th Street would be removed. LAWA is planning a future LAX Public Safety Building and Supporting Facilities independent of SPAS. The site for this planned facility is still under consideration. The future LAX Public Safety Building and Supporting Facilities would consolidate existing facilities and personnel under one roof, creating a larger, more modern and efficient facility that would result in an improvement and expansion of LAWAPD facilities. In addition, the new facility would be sited to ensure that adequate response times are maintained. The LAX Public Safety Building and Supporting Facilities is proposed to occur within approximately the next 5 years and is considered in this EIR as a cumulative project (see Chapter 5, *Cumulative Impacts*, of the SPAS Draft EIR). LAX Master Plan Commitments PS-1, Fire and Police Facility Relocation Plan, and PS-2, Fire and Police Facility Space and Siting Requirements, would reduce impacts associated with removal of the LAWAPD facilities. Nevertheless, because the location, timing, and characteristics of the replacement LAX Public Safety Building and Supporting Facilities have yet to be determined, and these factors as well as gaps in service could occur and degrade service and response times, impacts on LAWAPD facilities would be significant. Mitigation for these impacts is provided in Section 2.3.11.2.2 below.

Construction

Under the LAWA Staff-Recommended Alternative, traffic congestion associated with construction activities would have the potential to hamper or delay response times and increase traffic patrol and other law enforcement activities. Potential impacts related to construction would be reduced or avoided with implementation of LAX Master Plan Commitment C-1, Establishment of a Ground Transportation/Construction Coordination Office. The Ground Transportation/Construction Coordination Office, which is now in place, would ensure, among other things, proper coordination and planning with law enforcement agencies to reduce effects from construction on traffic, emergency access, and response times. In addition, LAX Master Plan Commitments ST-9, ST-12, ST-14, ST-17, ST-18, ST-19, ST-21, and ST-22 would serve to reduce traffic impacts during construction. Nonetheless, in the event construction activities were to result in deterioration of traffic conditions, use of emergency sirens, alternate response routes, and multiple station responses when necessary would help facilitate law enforcement access and response as occurs under current congested conditions. Therefore, impacts to law enforcement services related to construction of improvements under the LAWA Staff-Recommended Alternative would be less than significant.

2.3.11.2.2 Mitigation Measures

Implementation of LAX Master Plan Commitments LE-1 and LE-2 would ensure that impacts to law enforcement related to terminal modifications and/or ground access improvements associated with the LAWA Staff-Recommended Alternative would be less than significant. LAX Master Plan Commitments C-1, ST-9, ST-12, ST-14, ST-17, ST-18, ST-19, ST-21, and ST-22 would ensure that traffic impacts during construction under the LAWA Staff-Recommended Alternative would be less than significant. LAX Master Plan Commitments PS-1 and PS-2 would reduce, but not eliminate, impacts to LAWAPD facilities

associated with the LAWA Staff-Recommended Alternative as a result of the removal and relocation of LAWAPD station and facilities located at West 96th Street.

To address the potential significant impacts to law enforcement services as a result of the removal and relocation of the LAWAPD station and facilities located at West 96th Street associated with the LAWA Staff-Recommended Alternative, the following mitigation measure specific to SPAS is proposed:

- **MM-LE (SPAS)-1. LAWAPD Replacement Facilities.**

  Prior to removal of the existing LAWAPD station and facilities located at West 96th Street, LAWA shall complete an effective phased transition to the planned LAX Public Safety Building and Supporting Facilities. In the event the LAX Public Safety Building and Supporting Facilities is not yet completed, LAWA shall make arrangements for interim facilities to temporarily accommodate the displaced facilities. Plans and provisions for temporary and/or permanent replacement facilities shall be developed in consultation with LAWAPD and the facility shall be sited to support adequate emergency response times and distances. The existing LAWAPD station and facilities shall not be removed unless and until adequate emergency response times and distances can be achieved without it, as determined in consultation with LAWAPD.

2.3.11.2.2.1 Environmental Impacts of Mitigation Measure MM-LE (SPAS)-1

To the extent that implementation of Mitigation Measure MM-LE (SPAS)-1, LAWAPD Replacement Facilities, requires interim facilities to temporarily accommodate displaced LAWAPD facilities, secondary or indirect environmental impacts may occur under the LAWA Staff-Recommended Alternative. It is important to note that such facilities would not be required if the LAX Public Safety Building and Supporting Facilities is constructed prior to the need to remove the existing LAWAPD station and facilities. It should also be noted that if/when such temporary facilities are required, the discretional approval(s) associated with such activity would be subject to CEQA compliance, at which time additional CEQA review specific to the proposed activity would be completed.

If interim facilities are required, it is expected that such facilities would be housed within existing available building space and/or would consist of temporary structures, such as trailers and modular buildings. Functions such as patrols and emergency response would have to be located in relatively close proximity to the existing LAWAPD facilities in order to provide adequate response times and distances to the uses served by the existing facilities. Administrative functions could be housed in a separate location, which could include the western portion of the airport, LAX Northside, or another location. As potential temporary sites at or near LAX are highly developed and are surrounded by urban uses, impacts associated with the temporary facilities would be limited. Interim facilities would not be expected to change transportation patterns at or around the airport, nor would such facilities be located in an aesthetically sensitive area, as the airport and its environs are highly developed. As the interim facilities would be housed in existing building space and/or trailers and modular buildings, construction activities, if any, would be limited and construction-related impacts, such as noise and air quality, would be less than significant.

2.3.11.2.3 Level of Significance After Mitigation

Implementation of SPAS Mitigation Measure MM-LE (SPAS)-1, LAWAPD Replacement Facilities, would reduce potential impacts to law enforcement facilities associated with the LAWA Staff-Recommended Alternative to a level that is less than significant.

2.3.12 Transportation

2.3.12.1 On-Airport Transportation

2.3.12.1.1 Impacts Analysis

As noted in Section 2.3, impacts of the LAWA Staff-Recommended Alternative related to on-airport transportation are only associated with the ground access components of Alternative 9, as evaluated in Section 4.12.1.9 of the SPAS Draft EIR. As described in Section 4.12.1.2 of the SPAS Draft EIR, traffic-related impacts pertaining to SPAS alternatives, including the LAWA Staff-Recommended Alternative, were assessed by conducting the following comparisons: (1) the baseline (2009) conditions with addition of the SPAS alternative measured against baseline (2009) conditions without the alternative; and (2) future (2025) conditions with addition of the SPAS alternative measured against the future (2025) conditions without the alternative to calculate the SPAS alternatives' contribution to cumulative impacts. The thresholds described in Section 4.12.1.4 of the SPAS Draft EIR were used to determine the significance of impacts. The following presents the results of those comparisons for the LAWA Staff-Recommended Alternative.

2.3.12.1.1.1 Analysis Relative to Baseline (2009) Conditions

This comparison focuses on the change in traffic conditions in 2009 if the proposed improvements included as part of the LAWA Staff-Recommended Alternative were in place in 2009, as measured against the baseline (2009) conditions.

LAWA Staff-Recommended Alternative

Curbside Impacts

Table SRA-2.3.12.1-1 provides the impact comparison of the terminal curbside operations for the Baseline (2009) With LAWA Staff-Recommended Alternative traffic conditions compared to the baseline (2009) traffic conditions. The associated LOS worksheets for the curbside analyses are provided in Appendix K1, *On-Airport Transportation*, of the SPAS Draft EIR.[60] As indicated in **Table SRA-2.3.12.1-1**, implementation of the LAWA Staff-Recommended Alternative would not result in significant impacts to the airport's arrivals or departures level curbsides.

CTA Intersection Impacts

Table SRA-2.3.12.1-2, provides the impact comparison of the signalized intersection operations for the Baseline (2009) With LAWA Staff-Recommended Alternative traffic conditions compared to the baseline (2009) traffic conditions. As shown in **Table SRA-2.3.12.1-2**, implementation of the LAWA Staff-Recommended Alternative would not result in significant impacts to on-airport intersections.

[60] The analysis of the LAWA Staff-Recommended Alternative in Appendix K1 is provided under the designation "Alternative 9."

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Table SRA-2.3.12.1-1

Baseline (2009) Conditions - Peak Period Curbside Impacts - LAWA Staff-Recommended Alternative

				Baseline (2009)		SRA Analysis			
						Baseline (2009) With SRA		Impact of SRA	
	Peak Period	Curbside	Zone[1]	Equiv. V/C	LOS	Equiv. V/C	LOS	Change in V/C	Significant Impact?
Departures	Terminal 1	-	Drop off	0.739	D	0.580	C	-0.160	No
	Terminal 2	-	Drop off	0.397	A	0.301	A	-0.096	No
	Terminal 3	-	Drop off	0.670	D	0.495	B	-0.175	No
	TBIT	-	Drop off	0.828	D	0.434	A	-0.394	No
	Terminal 4	-	Drop off	0.713	D	0.364	A	-0.349	No
	Terminal 5	-	Drop off	0.698	D	0.520	B	-0.178	No
	Terminal 6	-	Drop off	0.724	D	0.491	B	-0.233	No
	Terminal 7	-	Drop off	0.452	B	0.361	A	-0.091	No
Arrivals	Terminal 1	Inner	Passenger Cars/Limo	0.261	A	0.224	A	-0.037	No
	Terminal 1		Overall Average	0.868	D	0.327	A	-0.540	No
		Outer	Green Zone (FlyAway, Buses, Long Distance Vans)	0.790	D	0.263	A	-0.527	No
		Outer	Blue Zone (LAX Shuttle, Airline Connections)	0.553	B	0.000	A	-0.553	No
		Outer	Red Zone (Hotel/Courtesy)	1.374	F	1.374	F	0.000	No
		Outer	Purple Zone (RAC Shuttles)	0.754	C	0.000	A	-0.754	No
		Inner	Orange Zone (Shared Ride Vans)	0.796	D	0.000	A	-0.796	No
	Terminal 2	Inner	Passenger Cars/Limo	0.121	A	0.121	A	0.000	No
	Terminal 2		Overall Average	0.873	D	0.323	A	-0.550	No
		Outer	Green Zone (FlyAway, Buses, Long Distance Vans)	0.645	B	0.215	A	-0.430	No
		Outer	Blue Zone (LAX Shuttle, Airline Connections)	0.523	A	0.000	A	-0.523	No
		Outer	Red Zone (Hotel/Courtesy)	1.399	F	1.399	F	0.000	No
		Outer	Purple Zone (RAC Shuttles)	0.874	D	0.000	A	-0.874	No
		Outer/Inner	Orange Zone (Shared Ride Vans)	0.923	E	0.000	A	-0.923	No
	Terminal 3	Inner	Passenger Cars/Limo	0.080	A	0.080	A	0.000	No
	Terminal 3		Overall Average	1.311	F	0.743	C	-0.568	No
		Outer	Green Zone (FlyAway, Buses, Long Distance Vans)	0.888	E	0.296	A	-0.592	No
		Outer	Blue Zone (LAX Shuttle, Airline Connections)	0.583	B	0.000	A	-0.583	No
		Outer	Red Zone (Hotel/Courtesy)	3.419	F	3.419	F	0.000	No
		Outer	Purple Zone (RAC Shuttles)	0.641	B	0.000	A	-0.641	No
		Outer/Inner	Orange Zone (Shared Ride Vans)	1.026	F	0.000	A	-1.026	No
	TBIT	Inner	Passenger Cars/Limo	0.325	A	0.292	A	-0.032	No
	TBIT		Overall Average	0.753	C	0.255	A	-0.498	No
		Outer	Green Zone (FlyAway, Buses, Long Distance Vans)	0.641	B	0.214	A	-0.427	No
		Outer	Blue Zone (LAX Shuttle, Airline Connections)	0.542	B	0.000	A	-0.542	No
		Outer	Red Zone (Hotel/Courtesy)	1.061	F	1.061	F	0.000	No
		Outer	Purple Zone (RAC Shuttles)	0.596	B	0.000	A	-0.596	No
		Outer/Inner	Orange Zone (Shared Ride Vans)	0.923	E	0.000	A	-0.923	No
	Terminal 4	Inner	Passenger Cars/Limo	0.167	A	0.167	A	0.000	No
	Terminal 4		Overall Average	1.137	F	0.509	A	-0.628	No
		Outer	Green Zone (FlyAway, Buses, Long Distance Vans)	0.848	D	0.283	A	-0.566	No
		Outer	Blue Zone (LAX Shuttle, Airline Connections)	0.938	E	0.000	A	-0.938	No
		Outer	Red Zone (Hotel/Courtesy)	2.262	F	2.262	F	0.000	No
		Outer	Purple Zone (RAC Shuttles)	0.712	C	0.000	A	-0.712	No
		Outer/Inner	Orange Zone (Shared Ride Vans)	0.923	E	0.000	A	-0.923	No
	Terminal 5	Inner	Passenger Cars/Limo	0.306	A	0.306	A	0.000	No
	Terminal 5		Overall Average	1.244	F	0.574	B	-0.670	No
		Outer	Green Zone (FlyAway, Buses, Long Distance Vans)	1.282	F	0.427	A	-0.855	No
		Outer	Blue Zone (LAX Shuttle, Airline Connections)	1.040	F	0.000	A	-1.040	No
		Outer	Red Zone (Hotel/Courtesy)	2.442	F	2.442	F	0.000	No
		Outer	Purple Zone (RAC Shuttles)	0.534	A	0.000	A	-0.534	No

Table SRA-2.3.12.1-1

Baseline (2009) Conditions - Peak Period Curbside Impacts - LAWA Staff-Recommended Alternative

				Baseline (2009)		SRA Analysis: Baseline (2009) With SRA		SRA Analysis: Impact of SRA	
	Peak Period	Curbside	Zone[1]	Equiv. V/C	LOS	Equiv. V/C	LOS	Change in V/C	Significant Impact?
		Outer/Inner	Orange Zone (Shared Ride Vans)	0.923	E	0.000	A	-0.923	No
	Terminal 6	Inner	Passenger Cars/Limo	0.259	A	0.222	A	-0.037	No
	Terminal 6		Overall Average	1.120	F	0.443	A	-0.677	No
		Outer	Green Zone (FlyAway, Buses, Long Distance Vans)	1.625	F	0.542	B	-1.083	No
		Outer	Blue Zone (LAX Shuttle, Airline Connections)	0.769	C	0.000	A	-0.769	No
		Outer	Red Zone (Hotel/Courtesy)	1.672	F	1.672	F	0.000	No
		Outer	Purple Zone (RAC Shuttles)	0.611	B	0.000	A	-0.611	No
		Outer/Inner	Orange Zone (Shared Ride Vans)	0.923	E	0.000	A	-0.923	No
	Terminal 7	Inner	Passenger Cars/Limo	0.276	A	0.276	A	0.000	No
	Terminal 7		Overall Average	0.914	E	0.344	A	-0.570	No
		Outer	Green Zone (FlyAway, Buses, Long Distance Vans)	0.801	D	0.267	A	-0.534	No
		Outer	Blue Zone (LAX Shuttle, Airline Connections)	0.793	D	0.000	A	-0.793	No
		Outer	Red Zone (Hotel/Courtesy)	1.451	F	1.451	F	0.000	No
		Outer	Purple Zone (RAC Shuttles)	0.601	B	0.000	A	-0.601	No
		Outer/Inner	Orange Zone (Shared Ride Vans)	0.923	E	0.000	A	-0.923	No

[1] Weighted Average of Drop off only Common Zone and Drop off and Pick Up Allocated Zone.

Source: Ricondo & Associates, Inc., 2012.

Table SRA-2.3.12.1-2

Baseline (2009) Conditions - Peak Period CTA Signalized Intersection Impacts - LAWA Staff-Recommended Alternative

	Baseline (2009) Without Alternative		SRA Impact Analysis: Baseline (2009) SRA		SRA Impact Analysis: Impact of SRA	
Intersection	V/C	LOS	V/C	LOS	Change in V/C	Significant Impact?
1. World Way North and Sky Way (Upper Level)	0.530	A	0.473	A	-0.06	No
2. World Way South and West Way (Upper Level)	0.589	A	0.542	A	-0.05	No
3. World Way South and East Way (Upper Level)	0.134	A	0.134	A	0.00	No
4. World Way North and Sky Way (Lower Level)	0.517	A	0.398	A	-0.12	No
5. World Way North and Sky Way (Lower Level Relocated)	-	-	0.417	A	-	No
6. East Way and World Way South (Lower Level)	0.192	A	0.185	A	-0.01	No
7. World Way South and Center Way (Exit) (Lower Level)	0.650	B	0.550	A	-0.10	No

Source: Ricondo & Associates, Inc., using TRAFFIX and Synchro 7, January 2012.

CTA Roadway Link Impacts

Table SRA-2.3.12.1-3 provides the impact comparison of the roadway link operations for the Baseline (2009) With LAWA Staff-Recommended Alternative traffic conditions compared to the baseline (2009) traffic conditions. As shown in **Table SRA-2.3.12.1-3**, implementation of the LAWA Staff-Recommended Alternative would not result in significant impacts to on-airport roadway links.

2.3.12.1.1.2 Analysis Relative to Future (2025) Conditions (Cumulative Analysis)

This comparison focuses upon the project's contribution to cumulative impacts by calculating the change in traffic for the Future (2025) With Alternative traffic conditions compared to the Future (2025) Without Alternative traffic conditions. This analysis addresses whether the change in future (2025) conditions with implementation of the LAWA Staff-Recommended Alternative would exceed the thresholds defined in Section 4.12.1.4 of the SPAS Draft EIR (i.e., whether the alternative's contributions would be cumulatively considerable). These cumulative scenarios were also compared against baseline conditions.

LAWA Staff-Recommended Alternative

Curbside Impacts

Table SRA-2.3.12.1-4 delineates the contribution of the LAWA Staff-Recommended Alternative to cumulative impacts by comparing the terminal curbside operations for the Future (2025) With LAWA Staff-Recommended Alternative traffic conditions to the Future (2025) Without Alternative traffic conditions. The associated LOS worksheets for the curbside analyses are provided in Appendix K1, *On-Airport Transportation*. As shown in **Table SRA-2.3.12.1-4**, implementation of the LAWA Staff-Recommended Alternative, in conjunction with other cumulative projects, would not result in a change to the volume to capacity levels at the airport's departures or arrivals level curbsides that exceeds the aforementioned thresholds, with the exception of the TBIT arrivals level inner curbsides. The cumulative impact at the TBIT inner curbside is considered to be significant, and the contribution of the LAWA Staff-Recommended Alternative would be cumulatively considerable. Mitigation Measure MM-ST(OA) (SPAS)-1, defined in Section 2.3.12.1.2 below, is proposed to mitigate this impact.

CTA Intersection Impacts

Table SRA-2.3.12.1-5 delineates the contribution of the LAWA Staff-Recommended Alternative to cumulative impacts by comparing the Future (2025) With LAWA Staff-Recommended Alternative traffic conditions measured against the Future (2025) Without Alternative traffic conditions. As shown in **Table SRA-2.3.12.1-5**, implementation of the LAWA Staff-Recommended Alternative, in conjunction with other cumulative projects, would not result in a change to the volume to capacity levels of on-airport intersections that exceeds the aforementioned thresholds, with the exception of the World Way South and Center Way intersection (Intersection #9) during the arrivals level peak hour. The cumulative impact to this intersection is considered to be significant, and the contribution of the LAWA Staff-Recommended Alternative to this cumulative impact would be cumulatively considerable. This impact is unavoidable as potential measures to mitigate this impact are infeasible, as explained in Section 2.3.12.1.2 below.

CTA Roadway Link Impacts

Table SRA-2.3.12.1-6 delineates the contribution of the LAWA Staff-Recommended Alternative to cumulative impacts by comparing the CTA roadway link operations for the Future (2025) With LAWA Staff-Recommended Alternative traffic conditions measured against the Future (2025) Without Alternative traffic conditions. As shown in **Table SRA-2.3.12.1-6**, implementation of the LAWA Staff-Recommended Alternative, in conjunction with other cumulative projects, would not result in a change to the volume to capacity levels of on-airport roadway links that exceeds the aforementioned thresholds, with the exception of Link "LF" on the arrivals level outer curbside adjacent to Terminal 1. The cumulative impact to this roadway link is considered to be significant and the contribution of the LAWA Staff-Recommended

Alternative to this cumulative impact would be cumulatively considerable. Mitigation Measure MM-ST(OA) (SPAS)-2, defined in Section 2.3.12.1.2 below, is proposed to mitigate this impact.

2.3.12.1.1.3 Analysis of Public Parking Impacts

As discussed in Section 4.12.1.3.6 of the SPAS Draft EIR, the airport offers public parking in both the CTA and remotely. To estimate the airport's future (2025) public parking demands for spaces in both the CTA parking structures and in the airport's remote lots, the baseline daily public parking demands for both types of facilities were used. These baseline (2009) daily parking space demands were converted to Future (2025) conditions based on the change in the baseline (2009) and future (2025) peak month originating and terminating passengers at the airport. **Table SRA-2.3.12.1-7** shows that the airport's public parking supply in each of the Future (2025) alternative scenarios is sufficient to accommodate the airport's estimated future (2025) public parking demand for all the alternatives, including the LAWA Staff-Recommended Alternative, which are assumed to be 15 percent greater than the space demand to account for fluctuations in vehicle arrivals in the facilities. Therefore, impacts associated with parking are considered less than significant.

2.3.12.1.1.4 Analysis of Construction Impacts

2.3.12.1.1.4.1 Project Impacts

Construction activities and related construction vehicle trips associated with the LAWA Staff-Recommended Alternative would impact on-airport traffic conditions including those related to existing curbside, intersection, and roadway link operations.

At this programmatic level of planning and analysis, there are not yet any particular construction plans or construction schedules for the LAWA Staff-Recommended Alternative. It would be speculative at this time to estimate the numbers, locations, and timing of construction-related trips for the LAWA Staff-Recommended Alternative and quantify the on-airport transportation system impacts. In general terms, it is anticipated that construction-related traffic generated within the CTA, such as that associated with terminal modifications, realignment of Sky Way, construction of the west end of the APM segment within the CTA, would add to existing traffic volumes within the CTA, which, in turn, could adversely affect curbside operations, intersection movements, and roadway link flows. To the extent that LAWA Staff-Recommended Alternative-related construction within the CTA requires temporary lane closures and detours, on-airport traffic conditions could be impacted. The above types of construction-related impacts to the on-airport surface transportation system could result in substantial congestion and substantial inconvenience to motorists on a regular or frequent basis.

Table SRA-2.3.12.1-3

Baseline (2009) Conditions - Peak Period CTA Roadway Link Impacts - LAWA Staff-Recommended Alternative

		Baseline (2009) Without Alternative		SRA Impact Analysis			
				Baseline (2009) With SRA		Impact of SRA	
Link ID	Level/Link Location	V/C	LOS	V/C	LOS	Change in V/C	Significant Impact?
	Departures						
UA	Westbound World Way North, east of East Way (upper level roadway entrance)	0.708	C	0.560	A	-0.15	No
UB	Southbound East Way, south of World Way North	0.125	A	0.121	A	0.00	No
UC	Southbound East Way, south of EP1	0.114	A	0.110	A	0.00	No
UD	Southbound East Way, south of EP7	0.103	A	0.099	A	0.00	No
UE	Westbound World Way North, west of East Way intersection	0.616	B	0.537	A	-0.08	No
UF	Southbound West Way, south of World Way North	0.348	A	0.335	A	-0.01	No
UG	Southbound West Way, south of P2 entrance	0.343	A	0.330	A	-0.01	No
UH	Westbound ramp from West Way to Center Way	0.025	A	0.025	A	0.00	No
UI	Eastbound ramp from Center Way to West Way	0.089	A	0.089	A	0.00	No
UJ	Southbound West Way, south of Center Way ramp	0.375	A	0.362	A	-0.01	No
UK	Southbound West Way, south of EP5 - entering World Way South	0.364	A	0.351	A	-0.01	No
UL	Westbound World Way, west of West Way	0.562	A	0.413	A	-0.15	No
UM	Southbound World Way, south of EP3	0.639	B	0.385	A	-0.25	No
UN	Southbound World Way, south of EP4	0.564	A	0.361	A	-0.20	No
UO	Eastbound World Way South, east of West Way	0.780	C	0.615	B	-0.17	No
UP	Northbound East Way - north of World Way South	0.071	A	0.071	A	0.00	No
UQ	Eastbound World Way South, east of East Way	0.691	B	0.577	A	-0.11	No
UR	Upper level Exit (south and east)	0.357	A	0.342	A	-0.02	No
US	Upper level recirculation/exit (north)	0.341	A	0.280	A	-0.06	No
UT	Transfer to lower level & exit (north)	0.594	A	0.472	A	-0.12	No
UU	Upper level recirculation	0.028	A	0.028	A	0.00	No
UV	Upper level recirculation & entrance	0.316	A	0.413	A	0.10	No
UW	Entrance from Sky Way	0.185	A	0.168	A	-0.02	No
UX	Entrance from east/south	0.433	A	0.392	A	-0.04	No
	Arrivals						
CA	Center Way North eastbound east of World Way	0.068	A	0.063	A	-0.01	No
CE	Center Way North, east of P3 exit	0.161	A	0.158	A	0.00	No
CF	Center Way South, east of P4 exit	0.140	A	0.140	A	0.00	No
CG	Northbound West Way, south of Center Way	0.073	A	0.073	A	0.00	No
CH	Northbound West Way, north of Center Way	0.073	A	0.073	A	0.00	No
CI	Southbound West Way, south of World Way North	0.401	A	0.380	A	-0.02	No
CJ	Southbound West Way, south of P2B exit	0.201	A	0.190	A	-0.01	No
CK	Southbound West Way, south of Center Way	0.170	A	0.162	A	-0.01	No
CL	Southbound West Way, south of P5 entrance	0.261	A	0.245	A	-0.02	No
CM	Eastbound Center Way North, east of West Way intersection	0.192	A	0.187	A	-0.01	No
CN	Eastbound Center Way South, east of West Way intersection	0.140	A	0.140	A	0.00	No
CO	Eastbound Center Way North, east of P2B exit	0.235	A	0.232	A	0.00	No
CQ	Eastbound Center Way North, east of P2A exit	0.235	A	0.232	A	0.00	No
CU	Eastbound Center Way North, east of Theme Way	0.249	A	0.246	A	0.00	No
CW	Northbound East Way north of Center Way	0.072	A	0.069	A	0.00	No
CX	Northbound East Way, south of Center Way	0.072	A	0.069	A	0.00	No
CY	Southbound East Way, north of Center Way	0.109	A	0.106	A	0.00	No
CZ	Southbound East Way, south of Center Way	0.109	A	0.106	A	0.00	No
CAA	Southbound East Way, south of P19 exit	0.109	A	0.106	A	0.00	No
CAB	Eastbound Center Way, east of East Way	0.233	A	0.230	A	0.00	No
CAC	Eastbound Center Way, east of P1 exit	0.268	A	0.265	A	0.00	No
CAD	Center Way, east of P1 exit	0.268	A	0.265	A	0.00	No
CAE	Northbound Return/exit roadway, north of Center Way	0.008	A	0.007	A	0.00	No
CAF	Eastbound Center Way, east of Return/exit roadway	0.346	A	0.344	A	0.00	No
CAG	Eastbound Center Way, east of P7 exit	0.393	A	0.391	A	0.00	No
CAH	Eastbound Center Way, east of LAWA surface public parking lot entrance	0.393	A	0.391	A	0.00	No
CAI	Eastbound Center Way, east ramp from upper level	0.368	A	0.367	A	0.00	No
CAJ	Eastbound Center Way, east of LAWA employee parking lot exit	0.368	A	0.367	A	0.00	No

Table SRA-2.3.12.1-3

Baseline (2009) Conditions - Peak Period CTA Roadway Link Impacts - LAWA Staff-Recommended Alternative

		SRA Impact Analysis					
		Baseline (2009) Without Alternative		Baseline (2009) With SRA		Impact of SRA	
Link ID	Level/Link Location	V/C	LOS	V/C	LOS	Change in V/C	Significant Impact?
CAK	Return roadway, north of Center Way	0.234	A	0.200	A	-0.03	No
CAL	Return roadway, west of Century Boulevard slip ramp	0.153	A	0.102	A	-0.05	No
CAM	Ramp from upper level to eastbound Center Way	0.294	A	0.294	A	0.00	No
CAN	Ramp from upper level to return/exit	0.423	A	0.274	A	-0.15	No
CAO	Return/exit roadway, south of World Way North	0.165	A	0.101	A	-0.06	No
CAP	Northbound Sky Way, north of World Way North	0.185	A	0.000	A	-0.19	No
LA	Westbound World Way North at Sky Way	0.375	A	0.337	A	-0.04	No
LB	Terminal 1 outer curb, west of P8 exit	0.452	A	0.410	A	-0.04	No
LC	Terminal 1 outer curb, west of inner curb exit 1	0.521	A	0.376	A	-0.15	No
LD	Terminal 1 outer curb, west of P9 exit and inner curb exit 2	0.578	A	0.406	A	-0.17	No
LE	Terminal 1 outer curb, west of East Way	0.538	A	0.358	A	-0.18	No
LF	Outer curb, west of inner curb entrance from Terminal 1	0.888	D	0.781	C	-0.11	No
LG	Terminal 2 outer curb, west of exit to inner curb	0.531	A	0.385	A	-0.15	No
LH	Terminal 2 outer curb, west of Theme Way	0.912	E	0.801	D	-0.11	No
LI	Terminal 2 outer curb, west of P10 exit	0.903	E	0.792	C	-0.11	No
LJ	Terminal 2 outer curb, west of P10 exit	0.640	B	0.383	A	-0.26	No
LK	Terminal 2 outer curb, west of exit to inner curb	0.713	C	0.506	A	-0.21	No
LL	Terminal 2 outer curb, west of P11 exit	0.699	B	0.495	A	-0.20	No
LM	Terminal 2 outer curb, west of inner curb entrance from Terminal 2	0.686	B	0.476	A	-0.21	No
LO	Terminal 2 outer curb, west of West Way	0.601	B	0.413	A	-0.19	No
LP	Terminal 2 outer curb, west of exit to inner curb	6.409	F	5.556	F	-0.85	No
LQ	Terminal 3 outer curb, west of P12 exit	0.688	B	0.440	A	-0.25	No
LR	Terminal 3 outer curb, west of P13 exit	0.879	D	0.357	A	-0.52	No
LS	Terminal 3 outer curb, west of entrance from inner curb	0.871	D	0.371	A	-0.50	No
LT	TBIT outer curb, south of exit to inner curb	0.735	C	0.309	A	-0.43	No
LU	TBIT outer curb, south of Center Way	0.707	C	0.296	A	-0.41	No
LV	TBIT outer curb, south of exit to inner curb	0.721	C	0.304	A	-0.42	No
LW	TBIT outer curb, south of entrance from inner curb	1.146	F	0.573	A	-0.57	No
LX	Terminal 4 outer curb, east of exit to inner curb	0.874	D	0.325	A	-0.55	No
LY	Terminal 4 outer curb, east of P14 exit	0.691	B	0.255	A	-0.44	No
LAA	Terminal 4 outer curb, east of P15 exit	0.691	B	0.255	A	-0.44	No
LAB	Terminal 4 outer curb, after entrance from inner curb	4.061	F	1.289	F	-2.77	No
LAC	Outer curb, east of West Way	0.632	B	0.323	A	-0.31	No
LAD	Terminal 5 outer curb, after exit to inner curb	0.472	A	0.323	A	-0.15	No
LAE	Terminal 5 outer curb, east of P17 exit	0.739	C	0.380	A	-0.36	No
LAF	Terminal 5 outer curb, east of inner curb entrance/exit	0.483	A	0.276	A	-0.21	No
LAG	Terminal 6 outer curb, east of P18 exit	0.859	D	0.701	C	-0.16	No
LAH	Terminal 6 outer curb, east of P9 exit	0.427	A	0.276	A	-0.15	No
LAI	Terminal 6 outer curb, east of exit to inner curb	0.767	C	0.304	A	-0.46	No
LAJ	Outer curb, east of East Way	0.495	A	0.285	A	-0.21	No
LAK	Terminal 7 outer curb, east of inner curb entrance/exit	0.471	A	0.268	A	-0.20	No
LAL	Terminal 7 outer curb, east of P20 exit	0.696	B	0.563	A	-0.13	No
LAM	Terminal 7 outer curb, east of exit to inner curb	0.399	A	0.254	A	-0.14	No
LAN	Terminal 7 outer curb, after P21 exit	0.431	A	0.264	A	-0.17	No
LAO	Terminal 7 outer curb, after entrance from inner curb	0.299	A	0.239	A	-0.06	No
LAP	Terminal 7 outer curb, after P13 exit	0.363	A	0.299	A	-0.06	No
LAQ	Terminal 8 outer curb, east of inner curb entrance/exit	0.363	A	0.299	A	-0.06	No
LAR	Terminal 8 outer curb, after inner curb entrance	0.370	A	0.306	A	-0.06	No
LAS	Lower level exit 1 (south)	0.527	A	0.468	A	-0.06	No
LAT	Lower level exit 2 (east)	0.601	B	0.527	A	-0.07	No
LAU	Entrance from Sky Way	0.196	A	0.000	A	-0.20	No
IA	Terminal 1 inner curb, east	0.063	A	0.037	A	-0.03	No
IB	Terminal 1 inner curb, center	0.203	A	0.142	A	-0.06	No
IC	Terminal 1 inner curb, west	0.274	A	0.119	A	-0.16	No
ID	Inner curb between Terminal 1 and Terminal 2	0.000	A	0.000	A	0.00	No
IE	Terminal 2 inner curb, east	0.044	A	0.040	A	0.00	No
IF	Terminal 2 inner curb, center	0.034	A	0.031	A	0.00	No

Table SRA-2.3.12.1-3

Baseline (2009) Conditions - Peak Period CTA Roadway Link Impacts - LAWA Staff-Recommended Alternative

				SRA Impact Analysis			
		Baseline (2009) Without Alternative		Baseline (2009) With SRA		Impact of SRA	
Link ID	Level/Link Location	V/C	LOS	V/C	LOS	Change in V/C	Significant Impact?
IG	Terminal 2 inner curb, center west	0.042	A	0.039	A	0.00	No
IH	Terminal 2 inner curb, west	0.013	A	0.012	A	0.00	No
II	Terminal 3 inner curb, center	0.047	A	0.042	A	0.00	No
IJ	Terminal 3 inner curb, west	0.012	A	0.006	A	-0.01	No
IK	TBIT inner curb, center	0.214	A	0.189	A	-0.02	No
IL	TBIT inner curb, south	0.243	A	0.216	A	-0.03	No
IM	Inner curb between TBIT and Terminal 4	0.015	A	0.015	A	0.00	No
IN	Terminal 4 inner curb	0.187	A	0.178	A	-0.01	No
IO	Terminal 5 inner curb, west	0.018	A	0.018	A	0.00	No
IP	Terminal 5 inner curb, center	0.091	A	0.086	A	0.00	No
IQ	Terminal 6 inner curb, center	0.133	A	0.118	A	-0.02	No
IR	Terminal 6 inner curb, east	0.262	A	0.125	A	-0.14	No
IS	Terminal 7 inner curb, west	0.199	A	0.187	A	-0.01	No
IT	Terminal 7 inner curb, center	0.219	A	0.208	A	-0.01	No
IU	Terminal 8 inner curb	0.118	A	0.111	A	-0.01	No
IV	Connection to outer curb, east of Terminal 8	0.036	A	0.036	A	0.00	No
IW	Connection to outer curb, east of exit to parking	0.036	A	0.000	A	-0.04	No
IX	Connection to outer curb, east of entrance from service road	0.036	A	0.000	A	-0.04	No

Source: Ricondo & Associates, Inc., 2012.

Table SRA-2.3.12.1-4

Cumulative Analysis - Future (2025) Conditions - Peak Period Curbside Impact Analysis - LAWA Staff-Recommended Alternative

								SRA Impact Analysis			
				Baseline (2009)		Future Without Alternative		Future (2025) With SRA		Impact of SRA (Cumulative Contribution)	
Roadway Level	Location	Curbside	Zone[1]	Equiv. V/C	LOS	Equiv. V/C	LOS	Equiv. V/C	LOS	Change in V/C	Significant Impact/ Cumulatively Considerable
Departures	Terminal 1	-	Drop off	0.739	D	0.354	A	0.267	A	-0.087	No
	Terminal 2	-	Drop off	0.397	A	0.337	A	0.240	A	-0.096	No
	Terminal 3	-	Drop off	0.670	D	0.550	B	0.400	A	-0.150	No
	TBIT	-	Drop off	0.828	D	0.437	A	0.367	A	-0.070	No
	Terminal 4	-	Drop off	0.713	D	0.385	A	0.297	A	-0.087	No
	Terminal 5	-	Drop off	0.698	D	0.510	B	0.360	A	-0.150	No
	Terminal 6	-	Drop off	0.724	D	0.479	B	0.349	A	-0.130	No
	Terminal 7	-	Drop off	0.452	B	0.309	A	0.218	A	-0.091	No
	Central Processor	-	Drop off	-	-	0.479	B	0.396	A	-0.083	No
Arrivals	Terminal 1	Inner	Passenger Cars/Limo	0.261	A	0.148	A	0.222	A	0.074	No
	Terminal 1		Overall Average	0.868	D	0.563	B	0.218	A	-0.346	No
		Outer	Green Zone (FlyAway, Buses, Long Distance Vans)	0.790	D	0.527	A	0.263	A	-0.263	No
		Outer	Blue Zone (LAX Shuttle, Airline Connections)	0.553	B	0.313	A	0.000	A	-0.313	No
		Outer	Red Zone (Hotel/Courtesy)	1.374	F	0.824	D	0.824	D	0.000	No
		Outer	Purple Zone (RAC Shuttles)	0.754	C	0.754	C	0.000	A	-0.754	No
		Inner	Orange Zone (Shared Ride Vans)	0.796	D	0.398	A	0.000	A	-0.398	No
	Terminal 2	Inner	Passenger Cars/Limo	0.121	A	0.182	A	0.243	A	0.061	No
	Terminal 2		Overall Average	0.873	D	0.462	A	0.193	A	-0.269	No
		Outer	Green Zone (FlyAway, Buses, Long Distance Vans)	0.645	B	0.389	A	0.194	A	-0.194	No
		Outer	Blue Zone (LAX Shuttle, Airline Connections)	0.523	A	0.262	A	0.000	A	-0.262	No
		Outer	Red Zone (Hotel/Courtesy)	1.399	F	0.769	C	0.769	C	0.000	No
		Outer	Purple Zone (RAC Shuttles)	0.874	D	0.430	A	0.000	A	-0.430	No

Table SRA-2.3.12.1-4

Cumulative Analysis - Future (2025) Conditions - Peak Period Curbside Impact Analysis - LAWA Staff-Recommended Alternative

Roadway Level	Location	Curbside	Zone[1]	Baseline (2009)		Future Without Alternative		SRA Impact Analysis			
								Future (2025) With SRA		Impact of SRA (Cumulative Contribution)	
				Equiv. V/C	LOS	Equiv. V/C	LOS	Equiv. V/C	LOS	Change in V/C	Significant Impact/ Cumulatively Considerable
		Outer	Orange Zone (Shared Ride Vans)	0.923	E	0.462	A	0.000	A	-0.462	No
	Terminal 3	Inner	Passenger Cars/Limo	0.080	A	0.164	A	0.197	A	0.033	No
	Terminal 3		Overall Average	1.311	F	0.614	B	0.216	A	-0.398	No
		Outer	Green Zone (FlyAway, Buses, Long Distance Vans)	0.888	E	0.888	E	0.296	A	-0.592	No
		Outer	Blue Zone (LAX Shuttle, Airline Connections)	0.583	B	0.291	A	0.000	A	-0.291	No
		Outer	Red Zone (Hotel/Courtesy)	3.419	F	0.782	D	0.782	D	0.000	No
		Outer	Purple Zone (RAC Shuttles)	0.641	B	0.596	B	0.000	A	-0.596	No
		Outer	Orange Zone (Shared Ride Vans)	1.026	F	0.513	A	0.000	A	-0.513	No
	TBIT	Inner	Passenger Cars/Limo	0.325	A	0.422	A	0.584	C	0.162	**Yes**
	TBIT		Overall Average	0.753	C	0.484	A	0.172	A	-0.313	No
		Outer	Green Zone (FlyAway, Buses, Long Distance Vans)	0.641	B	0.427	A	0.214	A	-0.214	No
		Outer	Blue Zone (LAX Shuttle, Airline Connections)	0.542	B	0.291	A	0.000	A	-0.291	No
		Outer	Red Zone (Hotel/Courtesy)	1.061	F	0.646	B	0.646	B	0.000	No
		Outer	Purple Zone (RAC Shuttles)	0.596	B	0.596	B	0.000	A	-0.596	No
		Outer	Orange Zone (Shared Ride Vans)	0.923	E	0.462	A	0.000	A	-0.462	No
	Terminal 4	Inner	Passenger Cars/Limo	0.167	A	0.177	A	0.207	A	0.030	No
	Terminal 4		Overall Average	1.137	F	0.550	B	0.226	A	-0.324	No
		Outer	Green Zone (FlyAway, Buses, Long Distance Vans)	0.848	D	0.340	A	0.207	A	-0.134	No
		Outer	Blue Zone (LAX Shuttle, Airline Connections)	0.938	E	0.469	A	0.000	A	-0.469	No
		Outer	Red Zone (Hotel/Courtesy)	2.262	F	0.923	E	0.923	E	0.000	No
		Outer	Purple Zone (RAC Shuttles)	0.712	C	0.557	B	0.000	A	-0.557	No
		Outer	Orange Zone (Shared Ride Vans)	0.923	E	0.462	A	0.000	A	-0.462	No
	Terminal 5	Inner	Passenger Cars/Limo	0.306	A	0.306	A	0.368	A	0.061	No
	Terminal 5		Overall Average	1.244	F	0.587	B	0.234	A	-0.353	No
		Outer	Green Zone (FlyAway, Buses, Long Distance Vans)	1.282	F	0.496	A	0.248	A	-0.248	No
		Outer	Blue Zone (LAX Shuttle, Airline Connections)	1.040	F	0.385	A	0.000	A	-0.385	No
		Outer	Red Zone (Hotel/Courtesy)	2.442	F	0.923	E	0.923	E	0.000	No
		Outer	Purple Zone (RAC Shuttles)	0.534	A	0.669	C	0.000	A	-0.669	No
		Outer	Orange Zone (Shared Ride Vans)	0.923	E	0.462	A	0.000	A	-0.462	No
	Terminal 6	Inner	Passenger Cars/Limo	0.259	A	0.148	A	0.185	A	0.037	No
	Terminal 6		Overall Average	1.120	F	0.498	A	0.182	A	-0.316	No
		Outer	Green Zone (FlyAway, Buses, Long Distance Vans)	1.625	F	0.472	A	0.236	A	-0.236	No
		Outer	Blue Zone (LAX Shuttle, Airline Connections)	0.769	C	0.385	A	0.000	A	-0.385	No
		Outer	Red Zone (Hotel/Courtesy)	1.672	F	0.674	C	0.674	C	0.000	No
		Outer	Purple Zone (RAC Shuttles)	0.611	B	0.496	A	0.000	A	-0.496	No
		Outer	Orange Zone (Shared Ride Vans)	0.923	E	0.462	A	0.000	A	-0.462	No
	Terminal 7	Inner	Passenger Cars/Limo	0.276	A	0.184	A	0.276	A	0.092	No
	Terminal 7		Overall Average	0.914	E	0.560	B	0.221	A	-0.339	No
		Outer	Green Zone (FlyAway, Buses, Long Distance Vans)	0.801	D	0.469	A	0.235	A	-0.235	No
		Outer	Blue Zone (LAX Shuttle, Airline Connections)	0.793	D	0.397	A	0.000	A	-0.397	No
		Outer	Red Zone (Hotel/Courtesy)	1.451	F	0.871	D	0.871	D	0.000	No
		Outer	Purple Zone (RAC Shuttles)	0.601	B	0.601	B	0.000	A	-0.601	No
		Outer	Orange Zone (Shared Ride Vans)	0.923	E	0.462	A	0.000	A	-0.462	No
	Central Processor	Inner	Passenger Cars/Limo	-	-	0.150	A	0.150	A	0.000	No
	Central Processor		Overall Average	-	-	0.600	B	0.200	A	-0.400	No
		Outer	Green Zone (FlyAway, Buses, Long Distance Vans)	-	-	0.769	C	0.385	A	-0.385	No
		Outer	Blue Zone (LAX Shuttle, Airline Connections)	-	-	0.385	A	0.000	A	-0.385	No
		Outer	Red Zone (Hotel/Courtesy)	-	-	0.615	B	0.615	B	0.000	No

Table SRA-2.3.12.1-4

Cumulative Analysis - Future (2025) Conditions - Peak Period Curbside Impact Analysis - LAWA Staff-Recommended Alternative

								SRA Impact Analysis			
				Baseline (2009)		Future Without Alternative		Future (2025) With SRA		Impact of SRA (Cumulative Contribution)	
Roadway Level	Location	Curbside	Zone[1]	Equiv. V/C	LOS	Equiv. V/C	LOS	Equiv. V/C	LOS	Change in V/C	Significant Impact/ Cumulatively Considerable
		Outer	Purple Zone (RAC Shuttles)	-	-	0.769	C	0.000	A	-0.769	No
		Outer	Orange Zone (Shared Ride Vans)	-	-	0.462	A	0.000	A	-0.462	No

[1] Weighted Average of Drop off only Common Zone and Drop off and Pick Up Allocated Zone.

Source: Ricondo & Associates, Inc., 2012.

Table SRA-2.3.12.1-5

Cumulative Analysis - Future (2025) Conditions - Peak Period Signalized Intersection Impacts - LAWA Staff-Recommended Alternative

						SRA Impact Analysis			
	Baseline (2009)		Future Without Alternative		Future (2025) With SRA		Impact of SRA (Cumulative Contribution)	
Intersection	V/C	LOS	V/C	LOS	V/C	LOS	Change in V/C	Significant Impact/ Cumulatively Considerable
1. World Way North and Sky Way (Upper Level)	0.530	A	0.528	A	0.591	A	0.06	No
2. World Way South and Central Processor Curbside Road(Upper Level)	0.589	A	0.573	A	0.643	B	0.07	No
3. World Way South and East Way (Upper Level)	0.134	A	0.115	A	0.151	A	0.04	No
4. World Way North and Sky Way (Lower Level)	0.517	A	0.495	A	0.464	A	-0.03	No
5. World Way North and Sky Way (Lower Level) Relocated Intersection	-	-	-	-	0.623	B	-	No
6. East Way and World Way South (Lower Level)	0.192	A	0.194	A	0.282	A	0.09	No
7. Central Processor Private Vehicle Curbside Road and World Way South (Lower Level)	-	-	0.42	A	0.538	A	0.12	No
8. Central Processor Commercial Vehicle Curbside Road and World Way South (Lower Level)	-	-	0.468	A	0.416	A	-0.05	No
9. World Way South and Center Way (Exit) (Lower Level)[4]	0.650	B	0.66	B	0.79	C	0.13	**Yes**

Source: Ricondo & Associates, Inc., using TRAFFIX and Synchro, January 2012.

Table SRA-2.3.12.1-6

Cumulative Analysis - Future (2025) Conditions - Peak Period Roadway Link Impacts - LAWA Staff-Recommended Alternative

						SRA Impact Analysis			
		Baseline (2009)		Future Without Alternative		Future (2025) With SRA		Impact of SRA (Cumulative Contribution)	
		V/C	LOS	V/C	LOS	V/C	LOS	Change in V/C	Significant Impact/ Cumulatively Considerable
	Departures								
UA	WB World Way N, east of East Way (upper level roadway entrance)	0.708	C	0.474	A	0.555	A	0.08	No
UB	SB East Way, exiting from World Way	0.125	A	0.129	A	0.161	A	0.03	No
UC	SB East Way, south of EP1	0.114	A	0.115	A	0.140	A	0.02	No
UD	SB East Way, south of EP7	0.103	A	0.103	A	0.125	A	0.02	No
UE	WB World Way N, west of East Way intersection	0.616	B	0.543	A	0.614	B	0.07	No
NA	New Central Processor Road	-	-	0.293	A	0.355	A	0.06	No
UF	SB West Way, exiting from World Way	0.348	A	0.000	A	0.000	A	0.00	No
UG	SB West Way, south of EP2	0.343	A	0.000	A	0.000	A	0.00	No
UH	WB Exit ramp from West Way to Center Way	0.025	A	0.000	A	0.000	A	0.00	No
UI	EB Entrance ramp from Center Way to West Way	0.089	A	0.000	A	0.000	A	0.00	No
UJ	SB West Way, south of Center Way ramp	0.375	A	0.000	A	0.000	A	0.00	No

Table SRA-2.3.12.1-6

Cumulative Analysis - Future (2025) Conditions - Peak Period Roadway Link Impacts - LAWA Staff-Recommended Alternative

		Baseline (2009)		Future Without Alternative		SRA Impact Analysis			
						Future (2025) With SRA		Impact of SRA (Cumulative Contribution)	
		V/C	LOS	V/C	LOS	V/C	LOS	Change in V/C	Significant Impact/ Cumulatively Considerable
UK	SB West Way, south of EP5 - entering World Way S	0.364	A	0.000	A	0.000	A	0.00	No
UL	WB World Way, west of SB West Way exit	0.562	A	0.431	A	0.478	A	0.05	No
UM	SB World Way, south of EP3	0.639	B	0.383	A	0.441	A	0.06	No
UN	SB World Way, south of EP4	0.564	A	0.360	A	0.399	A	0.04	No
UO	EB World Way S, east of West Way	0.780	C	0.576	A	0.647	B	0.07	No
UP	NB East Way - exit from World Way S, entrance to World Way N	0.071	A	0.045	A	0.070	A	0.02	No
UQ	EB World Way S, east of East Way	0.691	B	0.535	A	0.624	B	0.09	No
UR	Upper level Exit (south and east)	0.357	A	0.348	A	0.420	A	0.07	No
US	Upper level recirculation/exit (north)	0.341	A	0.294	A	0.321	A	0.03	No
UT	Transfer to lower level & exit (north)	0.594	A	0.285	A	0.308	A	0.02	No
UU	Upper level recirculation	0.028	A	0.018	A	0.026	A	0.01	No
UV	Upper level recirculation & entrance	0.316	A	0.309	A	0.513	A	0.20	No
UW	Entrance from Sky Way	0.185	A	0.172	A	0.210	A	0.04	No
UX	Entrance from east/south	0.433	A	0.304	A	0.489	A	0.18	No
	Arrivals								
CA	Entrance from lower level north	0.068	A	0.000	A	0.000	A	0.00	No
CE	Center Way North, east of P4 exit	0.161	A	0.000	A	0.000	A	0.00	No
CF	Center Way South, east of P6 exit	0.140	A	0.000	A	0.000	A	0.00	No
CG	Northbound West Way, south of Center Way	0.073	A	0.000	A	0.000	A	0.00	No
CH	Northbound West Way, north of Center Way	0.073	A	0.000	A	0.000	A	0.00	No
CI	Southbound West Way, south of lower level roadway	0.401	A	0.000	A	0.000	A	0.00	No
CJ	Southbound West Way, south of P4 exit	0.201	A	0.000	A	0.000	A	0.00	No
CK	Southbound West Way, south of Center Way	0.170	A	0.000	A	0.000	A	0.00	No
CL	Southbound West Way, south of P16 exit	0.261	A	0.000	A	0.000	A	0.00	No
CM	Center Way North, east of West Way intersection	0.192	A	0.000	A	0.000	A	0.00	No
CN	Center Way South, east of West Way intersection	0.140	A	0.000	A	0.000	A	0.00	No
CO	Center Way North, east of P3 exit	0.235	A	0.225	A	0.327	A	0.10	No
CQ	Center Way North, east of P2 exit	0.235	A	0.225	A	0.327	A	0.10	No
CU	Center Way North, east of Theme Way intersection	0.249	A	0.239	A	0.347	A	0.11	No
CW	East Way northbound, north of Center Way	0.072	A	0.105	A	0.153	A	0.05	No
CX	East Way northbound, south of Center Way	0.072	A	0.105	A	0.153	A	0.05	No
CY	East Way southbound, north of Center Way	0.109	A	0.052	A	0.073	A	0.02	No
CZ	East Way southbound, south of Center Way	0.109	A	0.052	A	0.073	A	0.02	No
CAA	East Way southbound, south of P19 exit	0.109	A	0.052	A	0.073	A	0.02	No
CAB	Center Way, east of East Way intersection	0.233	A	0.225	A	0.328	A	0.10	No
CAC	Center Way, east of P1 exit	0.268	A	0.260	A	0.379	A	0.12	No
CAD	Center Way, east of P10 exit	0.268	A	0.260	A	0.379	A	0.12	No
CAE	Return/exit roadway, north of Center Way	0.008	A	0.007	A	0.000	A	-0.01	No
CAF	Center Way, east of exit to return/exit	0.346	A	0.338	A	0.506	A	0.17	No
CAG	Center Way, east of P11 exit	0.393	A	0.385	A	0.574	A	0.19	No
CAH	Center Way, east surface public parking lot P22 exit	0.393	A	0.385	A	0.574	A	0.19	No
CAI	Center Way, east of upper level ramp	0.368	A	0.362	A	0.504	A	0.14	No
CAJ	Center Way, east P12 exit	0.368	A	0.362	A	0.504	A	0.14	No
CAK	Return/exit roadway, north of Center Way	0.234	A	0.225	A	0.334	A	0.11	No
CAL	Return/exit roadway, west of Century Boulevard entrance/exit	0.153	A	0.109	A	0.000	A	-0.11	No
CAM	Upper level ramp to eastbound Center Way	0.294	A	0.294	A	0.294	A	0.00	No
CAN	Upper level ramp to return/exit	0.423	A	0.424	A	0.187	A	-0.24	No
CAO	Return/exit roadway, south of lower level roadway	0.165	A	0.154	A	0.062	A	-0.09	No
CAP	Exit to Sky Way	0.185	A	0.146	A	0.000	A	-0.15	No
LA	Lower level roadway entrance	0.375	A	0.355	A	0.567	A	0.21	No
LB	Terminal 1 outer curb, west of P8 exit	0.452	A	0.439	A	0.567	A	0.13	No
LC	Terminal 1 outer curb, after inner curb exit 1	0.521	A	0.388	A	0.442	A	0.05	No
LD	Terminal 1 outer curb, west of P9 exit and inner curb exit 2	0.578	A	0.412	A	0.479	A	0.07	No
LE	Terminal 1 outer curb, west of East Way intersection	0.538	A	0.478	A	0.461	A	-0.02	No

Table SRA-2.3.12.1-6

Cumulative Analysis - Future (2025) Conditions - Peak Period Roadway Link Impacts - LAWA Staff-Recommended Alternative

						SRA Impact Analysis			
		Baseline (2009)		Future Without Alternative		Future (2025) With SRA		Impact of SRA (Cumulative Contribution)	
		V/C	LOS	V/C	LOS	V/C	LOS	Change in V/C	Significant Impact/ Cumulatively Considerable
LF	Outer curb, west of inner curb entrance from Terminal 1	0.888	D	0.538	A	0.702	C	0.16	**Yes**
LG	Terminal 2 outer curb, west of exit to inner curb	0.531	A	0.399	A	0.474	A	0.08	No
LH	Terminal 2 outer curb, west of Theme Way	0.912	E	0.509	A	0.661	B	0.15	No
LI	Terminal 2 outer curb, west of P10 exit	0.903	E	0.502	A	0.650	B	0.15	No
LJ	Terminal 2 outer curb, west of P10 exit	0.640	B	0.419	A	0.466	A	0.05	No
LK	Terminal 2 outer curb, west of exit to inner curb	0.713	C	0.501	A	0.589	A	0.09	No
LL	Terminal 2 outer curb, west of P11 exit	0.699	B	0.501	A	0.589	A	0.09	No
LM	Terminal 2 outer curb, west of inner curb entrance from Terminal 2	0.686	B	0.426	A	0.501	A	0.07	No
LO	Terminal 2 outer curb, west of West Way intersection	0.601	B	0.426	A	0.501	A	0.07	No
LP	Terminal 2 outer curb, west of exit to inner curb	6.409	F	0.520	A	0.664	B	0.14	No
LQ	Terminal 3 outer curb, west of P12 exit	0.688	B	0.492	A	0.493	A	0.00	No
LR	Terminal 3 outer curb, west of P13 exit	0.879	D	0.474	A	0.500	A	0.03	No
LS	Terminal 3 outer curb, west of entrance from inner curb	0.871	D	0.447	A	0.546	A	0.10	No
LT	TBIT outer curb, south of exit to inner curb	0.735	C	0.394	A	0.412	A	0.02	No
LU	TBIT outer curb, south of Center Way intersection	0.707	C	0.394	A	0.412	A	0.02	No
LV	TBIT outer curb, south of exit to inner curb	0.721	C	0.353	A	0.420	A	0.07	No
LW	TBIT outer curb, south of entrance from inner curb	1.146	F	0.524	A	0.700	B	0.18	No
LX	Terminal 4 outer curb, east of exit to inner curb	0.874	D	0.408	A	0.507	A	0.10	No
LY	Terminal 4 outer curb, east of P14 exit	0.691	B	0.395	A	0.411	A	0.02	No
LAA	Terminal 4 outer curb, east of P15 exit	0.691	B	0.448	A	0.439	A	-0.01	No
LAB	Terminal 4 outer curb, after entrance from inner curb	4.061	F	0.520	A	0.638	B	0.12	No
LAC	Outer curb, east of West Way intersection	0.632	B	0.391	A	0.409	A	0.02	No
LAD	Terminal 5 outer curb, after exit to inner curb	0.472	A	0.507	A	0.483	A	-0.02	No
LAE	Terminal 5 outer curb, east of P17 exit	0.739	C	0.334	A	0.373	A	0.04	No
LAF	Terminal 5 outer curb, east of inner curb entrance/exit	0.483	A	0.369	A	0.397	A	0.03	No
LAG	Terminal 6 outer curb, east of P18 exit	0.859	D	0.411	A	0.516	A	0.11	No
LAH	Terminal 6 outer curb, east of P9 exit	0.427	A	0.382	A	0.397	A	0.01	No
LAI	Terminal 6 outer curb, east of exit to inner curb	0.767	C	0.338	A	0.375	A	0.04	No
LAJ	Outer curb, east of East Way intersection	0.495	A	0.346	A	0.367	A	0.02	No
LAK	Terminal 7 outer curb, east of inner curb entrance/exit	0.471	A	0.330	A	0.348	A	0.02	No
LAL	Terminal 7 outer curb, east of P20 exit	0.696	B	0.410	A	0.505	A	0.09	No
LAM	Terminal 7 outer curb, east of exit to inner curb	0.399	A	0.279	A	0.343	A	0.06	No
LAN	Terminal 7 outer curb, after P21 exit	0.431	A	0.331	A	0.366	A	0.04	No
LAO	Terminal 7 outer curb, after entrance from inner curb	0.299	A	0.340	A	0.409	A	0.07	No
LAP	Terminal 7 outer curb, after P13 exit	0.363	A	0.379	A	0.464	A	0.08	No
LAQ	Terminal 8 outer curb, east of inner curb entrance/exit	0.363	A	0.379	A	0.464	A	0.08	No
LAR	Terminal 8 outer curb, after inner curb entrance	0.370	A	0.383	A	0.470	A	0.09	No
LAS	Lower level exit 1 (south)	0.527	A	0.378	A	0.486	A	0.11	No
LAT	Lower level exit 2 (east)	0.601	B	0.442	A	0.556	A	0.11	No
LAU	Entrance from Sky Way	0.196	A	0.133	A	0.000	A	-0.13	No
IA	Terminal 1 inner curb, east	0.063	A	0.045	A	0.048	A	0.00	No
IB	Terminal 1 inner curb, center	0.203	A	0.134	A	0.182	A	0.05	No
IC	Terminal 1 inner curb, west	0.274	A	0.155	A	0.152	A	0.00	No
ID	Inner curb between Terminal 1 and Terminal 2	0.000	A	0.020	A	0.000	A	-0.02	No
IE	Terminal 2 inner curb, east	0.044	A	0.104	A	0.127	A	0.02	No
IF	Terminal 2 inner curb, center	0.034	A	0.099	A	0.115	A	0.02	No
IG	Terminal 2 inner curb, center west	0.042	A	0.108	A	0.127	A	0.02	No
IH	Terminal 2 inner curb, west	0.013	A	0.045	A	0.038	A	-0.01	No
II	Terminal 3 inner curb, center	0.047	A	0.115	A	0.136	A	0.02	No
IJ	Terminal 3 inner curb, west	0.012	A	0.030	A	0.010	A	-0.02	No
IK	TBIT inner curb, center	0.214	A	0.354	A	0.525	A	0.17	No
IL	TBIT inner curb, south	0.243	A	0.392	A	0.589	A	0.20	No
IM	Inner curb between TBIT and Terminal 4	0.015	A	0.029	A	0.027	A	0.00	No
IN	Terminal 4 inner curb	0.187	A	0.159	A	0.212	A	0.05	No
IO	Terminal 5 inner curb, west	0.018	A	0.242	A	0.329	A	0.09	No

Table SRA-2.3.12.1-6

Cumulative Analysis - Future (2025) Conditions - Peak Period Roadway Link Impacts - LAWA Staff-Recommended Alternative

						SRA Impact Analysis			
		Baseline (2009)		Future Without Alternative		Future (2025) With SRA		Impact of SRA (Cumulative Contribution)	
		V/C	LOS	V/C	LOS	V/C	LOS	Change in V/C	Significant Impact/ Cumulatively Considerable
IP	Terminal 5 inner curb, center	0.091	A	0.242	A	0.329	A	0.09	No
IQ	Terminal 6 inner curb, center	0.133	A	0.079	A	0.091	A	0.01	No
IR	Terminal 6 inner curb, east	0.262	A	0.104	A	0.090	A	-0.01	No
IS	Terminal 7 inner curb, west	0.199	A	0.138	A	0.177	A	0.04	No
IT	Terminal 7 inner curb, center	0.219	A	0.149	A	0.194	A	0.05	No
IU	Terminal 8 inner curb	0.118	A	0.072	A	0.102	A	0.03	No
IV	Connection to outer curb, east of Terminal 8	0.036	A	0.019	A	0.028	A	0.01	No
IW	Connection to outer curb, east of exit to parking	0.036	A	0.000	A	0.028	A	0.03	No
IX	Connection to outer curb, east of entrance from service road	0.036	A	0.000	A	0.028	A	0.03	No
NC	Central Processor Curbside East Side	-	-	0.225	A	0.316	A	0.09	No
ND	Central Processor Curbside West Side (Commercial Curbside)	-	-	0.135	A	0.067	A	-0.07	No
NE	Central Processor Curbside West Side South of Center Way	-	-	0.079	A	0.110	A	0.03	No
NLAU	Realigned Sky Way	-	-	0.133	A	0.179	A	0.05	No
NCAP	Realigned Sky Way Northbound	-	-	0.052	A	0.106	A	0.05	No
NF	World North Inner Roadway West of Realigned Sky Way	-	-	0.045	A	0.048	A	0.00	No
NI	World North Outer Roadway West of Realigned Sky Way East of Recirc Ramp	-	-	0.355	A	0.535	A	0.18	No
NH	World North Outer Roadway West of Realigned Sky Way East of Return Road	-	-	0.261	A	0.474	A	0.21	No

Source: Ricondo & Associates, Inc., 2012.

Table SRA-2.3.12.1-7

Public Parking Demand - Capacity - LAWA Staff-Recommended Alternative

		Baseline (2009) Spaces			Future (2025) Spaces		Future (2025) Airport Parking Space Supply
Airport Public Parking Lot	Facility	Supply	Demand	Requirements	Demand	Requirements	LAWA Staff-Recommended Alternative
Airport (CTA)[1,2]	Parking Structures P-1 to P-7	8,577	5,268	6,184	5,268	6,184	7,41
	Percent Occupied (CTA Spaces)						87.8%
Airport (Remote)[3]							
	Park One						
	Lot C						7,300
	Manchester Square						4,200
	ITF						4,900
	ITC						
	Sub-Total	**10,028**	**10,251**	**11,390**	**10,251**	**11,390**	**16,400**
	Percent Occupied (Remote Spaces)						69.5%
All Airport Parking Facilities	**TOTAL**	**18,605**	**15,519**	**17,574**	**15,519**	**17,574**	**23,441**
	Percent Occupied (Total Spaces)						75.0%

1 On-airport parking demand is assumed to be 85 percent of the parking requirements.
2 Assumes 2% of on-airport parkers are long-term.
3 Off-airport parking demand is assumed to be 90 percent of the parking requirements.

Source: LAWA, 2011.

Similar to projects currently under construction within the CTA, such as the replacement of the CUP, any LAWA Staff-Recommended Alternative-related project that affects the normal operation of ground transportation in the CTA would be required, pursuant to LAX Master Plan Commitment ST-18, to submit a Construction Traffic Management Plan (CTMP) for review and approval by LAWA staff prior to starting work. Depending on the extent and duration of construction, the CTMP may be in multiple phases. To maintain appropriate traffic flow at all times within the CTA, project construction may be limited by LAWA to certain hours of the day, days of the week, and/or times of year. CTMPs may include but not be limited to changeable message signs, arrow boards, temporary striping, detours, signal timing and phasing changes, pedestrian re-routing, temporary relocation of commercial curb zones and construction, and regulatory and wayfinding signs. In addition, LAWA would alert passengers of more extensive construction activity on its website and through other social media. Other LAX Master Plan commitments and mitigation measures described in Section 4.12.1.5 of the SPAS Draft EIR would also serve to avoid or reduce construction-related impacts to the on-airport transportation system. In the current absence of specific construction plans, schedules, and approaches for the LAWA Staff-Recommended Alternative, which would be determined during more detailed planning and design stages in the future, it is not possible to conclude whether the on-airport transportation system construction impacts would be fully mitigated by the aforementioned measures. As such, construction impacts to the on-airport transportation system are considered at this time to be significant.

2.3.12.1.1.4.2 Cumulative Impacts

Construction activities associated with past, present, and reasonably foreseeable future projects within the CTA, along with the improvements proposed under the LAWA Staff-Recommended Alternative, pose the potential for cumulative impacts to the on-airport transportation system.

Projects, in conjunction with the improvements associated with the LAWA Staff-Recommended Alternative, that pose the potential for cumulative on-airport transportation system impacts include the Bradley West Project, the Midfield Satellite Concourse new passenger processor, the North Terminals Improvements, the South Terminals Improvements, Miscellaneous Terminal Improvements, the Central Utility Plant Replacement Project, the "New Face" of the Central Terminal Area Improvements/Enhancements, Replacement of Elevators and Escalators, the CTA Second Level Roadway Expansion Joint and Deck Repairs, the LAX Sign District, and, depending upon the alternative selected, the Airport Metro Connector Project. To the extent that construction activities within the CTA overlap between these projects, both in terms of timing and location, significant impacts related to traffic congestion and delays within the CTA roadway system could occur. All of these projects would require the preparation of traffic control plans and implementation of other measures to reduce construction traffic impacts, as described in Section 4.12.1.5 of the SPAS Draft EIR. In the current absence of detailed construction plans for most of these projects, many of which are still in the conceptual stages of planning such as the LAWA Staff-Recommended Alternative, it is not possible to conclude that cumulative construction-related impacts to the on-airport surface transportation system would be reduced to a level that is less than significant with implementation of such measures. Therefore, cumulative impacts to the on-airport transportation system associated with construction would be significant. Based on the anticipated schedules for the above projects, implementation of the improvements associated with the LAWA Staff-Recommended Alternative would result in a cumulatively considerable contribution to those impacts.

2.3.12.1.2 Mitigation Measures

2.3.12.1.2.1 Mitigation Measures for Project Impacts (2009)

As indicated above, no significant impacts to curbside operations, intersections, or roadway links would occur under the LAWA Staff-Recommended Alternative relative to the Baseline (2009) versus Baseline (2009) With Alternative analyses; therefore, no mitigation is required.

Relative to construction-related traffic impacts, implementation of the LAX Master Plan commitments and mitigation measures described in Section 4.12.1.5 of the SPAS Draft EIR would reduce such impacts;

however, in the absence of specific project construction details at this conceptual level of planning, it cannot be concluded whether those commitments and measures would fully mitigate the impacts under the LAWA Staff-Recommended Alternative or whether additional project-specific construction traffic mitigation measures are needed to reduce impacts to the on-airport transportation system a level that is less than significant. It would be speculative at this level of planning to formulate additional mitigation measures for improvement-specific construction traffic impacts.

2.3.12.1.2.2 Mitigation Measures for Cumulative Impacts (2025)

As described above in Section 2.3.12.1.1, the contribution of the LAWA Staff-Recommended Alternative to significant cumulative impacts at certain curbside locations, intersections, and roadway links would be cumulatively considerable under the future (2025) conditions. In developing the proposed mitigation program for the LAWA Staff-Recommended Alternative, LAWA evaluated possible improvements that could be made at the significantly impacted curbside sections, as well as the roadway segments and intersection that would be impacted under future (2025) conditions. The discussion below presents both those improvements that were considered but determined to be infeasible, as well as those improvements that would be feasible and are thereby included in the recommended mitigation program for SPAS.

Improvements Considered but Determined to be Infeasible

CTA Signalized Intersection Impacts

- **World Way South and Center Way - Intersection #9** - Under future (2025) conditions, this intersection would experience a cumulatively considerable contribution from the LAWA Staff-Recommended Alternative that exceeds the threshold of significance. To mitigate the anticipated impacts, one additional through lane would be required on the eastbound approach to the intersection. In addition, the east leg of the intersection would need to be widened to allow for the additional eastbound through lane. The separation distance between the existing support columns for the departures level recirculation roadway is insufficient to allow for an additional eastbound through lane without demolishing and reconstructing the departures level recirculation roadway. If an additional lane were to be added to the airport's exit roadway, the bridge spanning Sepulveda Boulevard would also require widening to accommodate an additional lane so that an exclusive acceleration/deceleration lane for the ramps connecting to Sepulveda Boulevard can be maintained. Further, the addition of a fifth eastbound lane on the bridge spanning Sepulveda Boulevard would require, at a minimum, a partial reconstruction of the ramps to and from Sepulveda Boulevard to accommodate a reduced turning radius for each ramp. To implement this proposed mitigation measure, at least one of the two existing support columns for the departures level recirculation roadway would need to be relocated. This would require an extended closure of the departures level recirculation roadway for the demolition and reconstruction of the affected upper level span. This extended closure would impact upper level vehicles recirculating to either the departures level or vehicles such as commercial vehicles traveling to the arrivals level curbsides or exiting the CTA northbound on Sky Way. Based on existing physical constraints, implementation of improvements necessary to mitigate the impact at this intersection is not feasible and, therefore, is not recommended.

Improvements Determined to be Feasible

CTA Curbside Impacts

- **TBIT Arrivals Level Inner Curbside** - Under future (2025) conditions, this curbside would experience a cumulatively considerable contribution to a cumulatively significant impact from the LAWA Staff-Recommended Alternative that exceeds the threshold of significance. To mitigate the anticipated impacts, additional curbside parking may be provided by moving the taxi staging zone further downstream to the vacant area between TBIT and Terminal 4.

CTA Roadway Link Impacts

- **Roadway Link "LF"** - Under the cumulative future (2025) conditions, this roadway link would experience a cumulatively considerable contribution to a cumulatively significant impact from the LAWA Staff-Recommended Alternative that exceeds the threshold of significance.

To mitigate the anticipated impacts defined above, various operational changes that would involve allowing some commercial modes to change from a dual level (dual loop) operation to a single level (single loop) operation, where customers would be picked up and dropped off on the same curbside, may be considered. For example, one such alternative considered for this analysis would allow the hotel shuttles to single loop on the departures level, rental car shuttles to single loop on the arrivals level, and remove the assigned employee shuttle zones on the departures level allowing employee shuttles to drop off on the upper level and pick up on the lower level. The resultant decrease in traffic volumes along the subject roadway link on the departures level would reduce the impact to a level that is less than significant. The proposed change in operations for the hotel, rental car, and employee shuttles is presented as an illustration of the possible operational changes which may be implemented by LAWA to mitigate the impacts presented above. LAWA will determine at the time of implementation which commercial mode(s) should be relocated to mitigate the impacts from the LAWA Staff-Recommended Alternative that exceed the threshold of significance.

Recommended Mitigation Program

Based on the information provided above, the following mitigation measures are proposed to address on-airport transportation impacts associated with the LAWA Staff-Recommended Alternative:

- **MM-ST(OA) (SPAS)-1. Relocate Existing Taxi Loading Zone at TBIT (the LAWA Staff-Recommended Alternative).**

  LAWA will relocate the existing taxi loading zone at TBIT to the curve located between TBIT and Terminal 4. This change would provide a larger passenger loading area for the private vehicles along the TBIT inner curbside.

- **MM-ST(OA) (SPAS)-2. Change Departures and Arrivals Level Commercial Vehicle Curbside Operations (the LAWA Staff-Recommended Alternative).**

  LAWA will implement operational changes to commercial modes such that LAWA Staff-Recommended Alternative-related impacts to roadway links would not exceed the threshold of significance. LAWA will determine at the time of implementation which commercial mode(s) should be relocated. LAWA will consider options such as changing hotel and rental car shuttle operations from their current dual loop operation to a single loop operation on the departures and arrivals level curbsides respectively, while the employee shuttle operation could be changed from its existing single level operation on the departures level to a dual loop operation.

2.3.12.1.3 Level of Significance After Mitigation

2.3.12.1.3.1 Project Impacts (2009)

For the reasons described above, construction-related impacts to on-airport transportation cannot be concluded as being fully mitigated; therefore, for the purposes of this EIR, significant construction-related impacts to the on-airport transportation system would occur with implementation of the LAWA Staff-Recommended Alternative.

2.3.12.1.3.2 Cumulative Impacts (2025)

Table SRA-2.3.12.1-8 shows the results of the analysis for the proposed mitigation on the TBIT arrivals level inner curbsides while **Table SRA-2.3.12.1-9** provides the results for the proposed mitigation of the CTA roadways. As indicated in **Table SRA-2.3.12.1-8**, implementation of Mitigation Measure MM-ST(OA) (SPAS)-1, Relocate Existing Taxi Loading Zone at TBIT, would reduce impacts to curbsides

associated with the LAWA Staff-Recommended Alternative to a level that is less than significant. As indicated in **Table SRA-2.3.12.1-9**, implementation of Mitigation Measure MM-ST(OA) (SPAS)-2, Change Departures and Arrivals Level Commercial Vehicle Curbside Operations, would reduce impacts to all departures and arrivals level roadways under the LAWA Staff-Recommended Alternative in the future (2025) condition to a level that is less than significant. The results of the analysis are presented in Appendix K1, *On-Airport Transportation*, of the SPAS Draft EIR.

Table SRA-2.3.12.1-8

Curbside Impact Mitigation - LAWA Staff-Recommended Alternative

	Before Mitigation		After Mitigation		Impact	
TBIT Curbside	V/C	LOS	V/C	LOS	Mitigated Change in V/C	Significant Impact/ Cumulatively Considerable
Future Without Alternative	0.422	A	0.422	A	-	
Future (2025) SRA	0.584	C	0.464	B	0.042	No

Source: Ricondo & Associates, Inc., 2012.

As discussed above, the physical constraints at the intersection of World Way South and Center Way (Intersection #9) would render the improvements identified in Section 2.3.12.1.2 infeasible. As a result, impacts to this intersection under the LAWA Staff-Recommended Alternative could not be feasibly reduced to a level that is less than significant. Therefore, the cumulative impact at World Way South and Center Way (Intersection #9) would be significant and unavoidable, and the contribution of the LAWA Staff-Recommended Alternative to this impact would be cumulatively considerable and unavoidable. However, Mitigation Measure MM-ST(OA) (SPAS)-2, while developed to address impacts to roadway links, would improve the level of service at this intersection from LOS D to LOS C. Although the volume to capacity level at this intersection would continue to exceed the thresholds of significance under cumulative conditions associated with the LAWA Staff-Recommended Alternative, LOS C is considered to be a generally good level of service.

For the reasons described above, it cannot be concluded that cumulative construction-related impacts to on-airport transportation would be fully mitigated. Therefore, for the purposes of this EIR, cumulative construction impacts would be significant and unavoidable, and the contribution of the LAWA Staff-Recommended Alternative to this impact would be cumulatively considerable and unavoidable.

Table SRA-2.3.12.1-9

Roadway Link Impact Mitigation - LAWA Staff-Recommended Alternative

Roadway Links		Future Without Alternative Volume to Capacity Before Mitigation	Future Without Alternative Volume to Capacity After Mitigation	Future (2025) SRA Volume to Capacity Before Mitigation	Future (2025) SRA Volume to Capacity After Mitigation	Future (2025) SRA Mitigated LOS	Future (2025) SRA Mitigated Difference	Significant Impact/ Cumulatively Considerable
LF	Outer curb, west of inner curb entrance from Terminal 1	0.538	0.355	0.702	0.357	A	0.002	No

Note:

Following the implementation of the proposed mitigation measures, the volume to capacity ratios for all roadway links in the LAWA Staff-Recommended Alternative will improve or remain the same as those prior to mitigation.

Source: Ricondo & Associates, Inc., 2012.

2.3.12.2 Off-Airport Transportation

2.3.12.2.1 Impact Analysis

As noted in Section 2.3, impacts of the LAWA Staff-Recommended Alternative related to off-airport transportation are only associated with the ground access components of Alternative 9, as evaluated in Section 4.12.2.6 of the SPAS Draft EIR.

As described in Section 4.12.2.2 of the SPAS Draft EIR, off-airport traffic-related impacts pertaining to operation of the LAWA Staff-Recommended Alternative were assessed in two ways; one by comparing Baseline (2010) With Alternative scenarios against Baseline (2010) Without Alternative scenarios, and the other by comparing the Future (2025) With Alternative scenarios against the Future (2025) Without Alternative scenarios. The comparison of Future (2025) scenarios involves holding the airport-related trip generation at current levels and evaluates it against the LAWA Staff-Recommended Alternative with the airport at 2025 trip generation levels. This growth in trip generation is expected to occur with or without the SPAS and therefore yields a conservative analysis.

The subject comparisons, particularly the comparison to Baseline (2010) Without Alternative conditions, help account for the fact that the physical improvements proposed under the LAWA Staff-Recommended Alternative play a large role in influencing the travel patterns of localized airport-related trips (passengers, employees, rental cars, cargo, etc.) and the timing of those trips. The shifts in trips that occur for these new facilities have an effect on the non-airport related vehicular traffic. The change in airport trip patterns can influence existing and future background trip patterns, resulting in drivers choosing alternate routes and modifying their travel patterns.

2.3.12.2.1.1 Impacts Relative to Baseline (2010) Without Alternative Conditions

The impact comparison for the LAWA Staff-Recommended Alternative is depicted in **Table SRA-2.3.12.2-1**. The associated LOS worksheets used to calculate those impacts is provided in Appendix K2-6.[61] The traffic volume estimates for the Baseline (2010) Without Alternative scenario and the Baseline (2010) With Alternative scenario are provided in Appendix K2-5. Also described below are impacts related to CMP facilities. Detailed worksheets and resultant calculation tables are provided in Appendix K2-7.

Based on the aforementioned comparison calculations, all of the alternatives would result in significant impacts relative to Baseline (2010) Without Alternative conditions. The following summarizes the impacts associated with each alternative.

[61] The analysis of the LAWA Staff-Recommended Alternative in Appendix K2 is provided under the designation "Alternative 9."

Table SRA-2.3.12.2-1

Baseline (2010) Alternative Impact Analysis Summary - LAWA Staff-Recommended Alternative

		SRA		
Int. #	**Intersection**	**AM**	**MD**	**PM**
7	Airport Boulevard & Century Boulevard	-	-	-
9	Airport Boulevard & Manchester Avenue	-	Yes	-
13	La Cienega Boulevard & Arbor Vitae Street	-	-	-
14	Aviation Boulevard & Century Boulevard	-	-	-
17	Aviation Boulevard/Florence Avenue & Manchester Avenue	-	-	-
26	La Cienega Boulevard & Centinela Avenue	-	-	-
36	La Cienega Boulevard & Century Boulevard	Yes	-	-
52	Inglewood Avenue & El Segundo Boulevard	-	-	-
53	La Cienega Boulevard & El Segundo Boulevard	-	-	-
58	La Cienega Boulevard & Florence Avenue	-	-	-
62	Hawthorne Boulevard & Imperial Avenue	-	-	-
66	Inglewood Avenue & Imperial Highway	-	-	-
71	Sepulveda Boulevard & Imperial Highway	-	-	Yes
74	I-105 Ramps (e/o Aviation Boulevard) & Imperial Highway	-	-	-
76	Inglewood Avenue & Lennox Boulevard	-	-	-
85	La Brea Avenue & Manchester Boulevard	-	Yes	-
90	La Cienega Boulevard & Manchester Boulevard	-	-	-
96	La Cienega Boulevard & I-405 Southbound Ramps (n/o Century Boulevard)	-	-	Yes
125	Sepulveda Boulevard & Rosecrans Avenue	-	-	-
135	Sepulveda Boulevard & Westchester Parkway	-	-	-
	Number of Significant Impacts	1	2	2
	Number of Significantly Impacted Intersections		5	

Source: Fehr & Peers, 2012.

Intersections

Table SRA-2.3.12.2-2 delineates the intersection impacts of the LAWA Staff-Recommended Alternative by comparing the Baseline (2010) With Alternative scenario and the Baseline (2010) Without Alternative scenario. As indicated in **Table SRA-2.3.12.2-2**, five of the 200 intersections would be significantly impacted in one or more peak hours.

CMP Facilities

Table 5 in Appendix K2-7 delineates the impacts of the LAWA Staff-Recommended Alternative to the 15 arterial monitoring stations by comparing the Baseline (2010) With Alternative scenario and the Baseline (2010) Without Alternative scenario. For this alternative, no CMP arterial monitoring stations would be significantly impacted.

Table 14 in Appendix K2-7 delineates the impacts of the LAWA Staff-Recommended Alternative to the 30 CMP freeway monitoring stations by comparing the Baseline (2010) With Alternative scenario and the Baseline (2010) Without Alternative scenario. As indicated in Table 14, no CMP freeway monitoring stations would be significantly impacted.

With regard to CMP transit analysis, transit demand is not expected to increase when comparing the Baseline (2010) With Alternative scenario and the Baseline (2010) Without Alternative scenario; therefore, no impact is identified.

2.3.12.2.1.2 Impacts Relative to Future (2025) Conditions

The impact comparison for the LAWA Staff-Recommended Alternative is depicted in **Table SRA-2.3.12.2-3**. This comparison provides the LAWA Staff-Recommended Alternative's contribution to cumulative impacts and determines whether the LAWA Staff-Recommended Alternative's contribution would be significant (cumulatively considerable). The associated LOS worksheets used to calculate those impacts are provided in Appendix K2-6. The traffic volume estimates for the Future (2025) Without Alternative scenarios and the Future (2025) With Alternative scenarios are provided in Appendix K2-5. Also described below are impacts related to CMP facilities. Detailed worksheets and resultant calculation tables are provided in Appendix K2-7.

Based on the aforementioned comparison calculations, the LAWA Staff-Recommended Alternative would result in significant impacts relative to Future (2025) conditions. The following summarizes the impacts associated with the LAWA Staff-Recommended Alternative.

Table SRA-2.3.12.2-2

Baseline (2010) With the LAWA Staff-Recommended Alternative Level of Service Analysis

					Baseline (2010)						Baseline (2010) With SRA								
					AM		MD		PM		AM		MD		PM		Significant impact?		
Int. #	Intersection	Jurisdiction	ATSAC	ATCS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	AM	MD	PM
1	Admiralty Way & Bali Way	LA County	X	X	0.566	A	0.530	A	0.696	B	0.566	A	0.535	A	0.696	B	-	-	-
2	Admiralty Way & Fiji Way	LA County	X	X	0.297	A	0.276	A	0.443	A	0.306	A	0.279	A	0.445	A	-	-	-
3	Admiralty Way & Mindanao Way	LA County	X	X	0.549	A	0.537	A	0.623	B	0.549	A	0.534	A	0.621	B	-	-	-
4	Palawan Way & Admiralty Way	LA County	X		0.518	A	0.424	A	0.599	A	0.522	A	0.441	A	0.599	A	-	-	-
5	Via Marina & Admiralty Way	LA County	X	X	0.414	A	0.440	A	0.641	B	0.415	A	0.440	A	0.642	B	-	-	-
6	Airport Boulevard & Arbor Vitae Street/Westchester Parkway	City of LA	X	X	0.299	A	0.485	A	0.579	A	0.247	A	0.430	A	0.544	A	-	-	-
7	Airport Boulevard & Century Boulevard	City of LA	X	X	0.516	A	0.552	A	0.517	A	0.561	A	0.611	B	0.640	B	-	-	-
8	La Tijera Boulevard & Airport Boulevard	City of LA	X	X	0.377	A	0.323	A	0.363	A	0.435	A	0.361	A	0.372	A	-	-	-
9	Airport Boulevard & Manchester Avenue	Caltrans/City of LA	X	X	0.563	A	0.681	B	0.786	C	0.591	A	0.735	C	0.804	D	-	Yes	-
10	Aviation Boulevard & Arbor Vitae Street	Inglewood/City of LA	X	X	0.427	A	0.420	A	0.551	A	0.339	A	0.320	A	0.475	A	-	-	-
11	Inglewood Avenue & Arbor Vitae Street	Inglewood			0.423	A	0.495	A	0.689	B	0.450	A	0.542	A	0.728	C	-	-	-
12	La Brea Avenue & Arbor Vitae Street	Inglewood			0.392	A	0.480	A	0.669	B	0.392	A	0.487	A	0.676	B	-	-	-
13	La Cienega Boulevard & Arbor Vitae Street	Inglewood/City of LA	X	X	0.354	A	0.397	A	0.491	A	0.422	A	0.430	A	0.613	B	-	-	-
14	Aviation Boulevard & Century Boulevard	City of LA	X	X	0.738	C	0.664	B	0.892	D	0.755	C	0.667	B	0.892	D	-	-	-
15	Aviation Boulevard & El Segundo Boulevard	El Segundo			0.851	D	0.584	A	0.746	C	0.851	D	0.586	A	0.751	C	-	-	-
16	Aviation Boulevard & Imperial Highway	City of LA	X	X	0.630	B	0.370	A	0.595	A	0.562	A	0.351	A	0.589	A	-	-	-
17	Aviation Boulevard/Florence Avenue & Manchester Avenue	Caltrans/Inglewood	X	X	0.589	A	0.591	A	0.653	B	0.654	B	0.649	B	0.683	B	-	-	-
18	Aviation Boulevard & Rosecrans Avenue	El Segundo/Hawthorne/Manhattan Beach			0.684	B	0.760	C	0.827	D	0.687	B	0.762	C	0.827	D	-	-	-
19	Aviation Boulevard & 111th Street	City of LA	X	X	0.520	A	0.402	A	0.477	A	0.516	A	0.353	A	0.453	A	-	-	-
20	Aviation Boulevard & West 120th Street	El Segundo/LA County			0.592	A	0.365	A	0.516	A	0.580	A	0.362	A	0.505	A	-	-	-
21	Lincoln Boulevard & Bali Way	Caltrans/City of LA/LA County	X	X	0.449	A	0.497	A	0.696	B	0.457	A	0.497	A	0.696	B	-	-	-
22	Lincoln Boulevard & Bluff Creek Drive	Caltrans/City of LA	X	X	0.351	A	0.211	A	0.334	A	0.352	A	0.213	A	0.341	A	-	-	-
23	Centinela Avenue & Jefferson Boulevard	City of LA/LA County	X	X	0.459	A	0.420	A	0.600	A	0.461	A	0.420	A	0.607	B	-	-	-
24	Centinela Avenue & Culver Boulevard	City of LA	X	X	0.669	B	0.451	A	0.698	B	0.669	B	0.449	A	0.693	B	-	-	-
25	La Brea Avenue & Centinela Avenue	Inglewood			0.778	C	0.706	C	0.874	D	0.780	C	0.712	C	0.875	D	-	-	-
26	La Cienega Boulevard & Centinela Avenue	Inglewood/City of LA	X	X	0.933	E	0.590	A	0.973	E	0.934	E	0.598	A	0.974	E	-	-	-
27	La Tijera Boulevard & Centinela Avenue	City of LA/LA County	X	X	0.538	A	0.475	A	0.690	B	0.539	A	0.475	A	0.696	B	-	-	-
28	Sepulveda Boulevard & Centinela Avenue	Culver City	X		0.710	C	0.561	A	0.736	C	0.712	C	0.567	A	0.736	C	-	-	-
29	Centinela Avenue & Venice Boulevard	Caltrans/City of LA	X	X	0.955	E	0.800	C	0.893	D	0.955	E	0.805	D	0.901	E	-	-	-
30	Centinela Avenue & Washington Boulevard	Culver City	X		0.733	C	0.626	B	0.849	D	0.734	C	0.626	B	0.848	D	-	-	-
31	Centinela Avenue & Washington Place	Culver City/City of LA	X		0.721	C	0.589	A	0.754	C	0.720	C	0.590	A	0.755	C	-	-	-
32	Centinela Avenue & SR 90 Eastbound On-/Off-Ramps	Caltrans/City of LA	X	X	0.291	A	0.216	A	0.409	A	0.293	A	0.219	A	0.409	A	-	-	-
33	Centinela Avenue & Sandford/SR 90 Westbound Ramps	Caltrans/City of LA	X	X	0.351	A	0.216	A	0.454	A	0.355	A	0.216	A	0.454	A	-	-	-
34	La Brea Avenue/Hawthorne Boulevard & Century Boulevard	Inglewood			0.574	A	0.605	B	0.746	C	0.578	A	0.614	B	0.764	C	-	-	-
35	Inglewood Avenue & Century Boulevard	Inglewood			0.558	A	0.562	A	0.800	C	0.570	A	0.565	A	0.802	D	-	-	-
36	La Cienega Boulevard & Century Boulevard	Inglewood/City of LA/LA County	X	X	0.515	A	0.582	A	0.682	B	0.763	C	0.677	B	0.669	B	Yes	-	-
37	Prairie Avenue & Century Boulevard	Inglewood			0.583	A	0.681	B	0.783	C	0.587	A	0.681	B	0.783	C	-	-	-
38	Sepulveda Boulevard & Century Boulevard	Caltrans/City of LA	X	X	0.546	A	0.473	A	0.620	B	0.570	A	0.498	A	0.653	B	-	-	-
39	I-405 Northbound Ramps & Century Boulevard	Caltrans/Inglewood			0.643	B	0.544	A	0.641	B	0.664	B	0.588	A	0.642	B	-	-	-
40	Duquesne Avenue & Culver Boulevard	Culver City	X		0.539	A	0.358	A	0.592	A	0.546	A	0.366	A	0.595	A	-	-	-
41	Culver Boulevard & Jefferson Boulevard	City of LA	X	X	0.687	B	0.299	A	0.652	B	0.684	B	0.293	A	0.649	B	-	-	-
42	Nicholson Street & Culver Boulevard	City of LA	X	X	0.541	A	0.337	A	0.737	C	0.530	A	0.329	A	0.734	C	-	-	-
43	Overland Avenue & Culver Boulevard	Culver City	X		1.070	F	0.574	A	0.849	D	1.069	F	0.574	A	0.845	D	-	-	-
44	Sawtelle Boulevard & Culver Boulevard	Culver City	X		0.601	B	0.417	A	0.787	C	0.593	A	0.407	A	0.782	C	-	-	-
45	Sepulveda Boulevard & Culver Boulevard	Culver City	X		0.677	B	0.477	A	0.642	B	0.679	B	0.477	A	0.645	B	-	-	-
46	Douglas Street & El Segundo Boulevard	El Segundo			0.657	B	0.511	A	0.864	D	0.654	B	0.504	A	0.856	D	-	-	-
47	Douglas Street & Imperial Highway	El Segundo/City of LA	X	X	0.292	A	0.230	A	0.387	A	0.319	A	0.257	A	0.415	A	-	-	-
48	Douglas Street & Mariposa Avenue	El Segundo			0.324	A	0.365	A	0.514	A	0.319	A	0.360	A	0.506	A	-	-	-
49	Douglas Street & Rosecrans Avenue	El Segundo/Manhattan Beach			0.587	A	0.638	B	0.662	B	0.580	A	0.632	B	0.662	B	-	-	-
50	Duquesne Avenue & Jefferson Boulevard	Culver City	X		0.514	A	0.475	A	0.625	B	0.516	A	0.478	A	0.625	B	-	-	-
51	Hawthorne Boulevard & El Segundo Boulevard	Hawthorne			0.597	A	0.654	B	1.157	F	0.597	A	0.651	B	1.147	F	-	-	-
52	Inglewood Avenue & El Segundo Boulevard	Hawthorne/LA County			0.582	A	0.632	B	0.961	E	0.589	A	0.632	B	0.970	E	-	-	-
53	La Cienega Boulevard & El Segundo Boulevard	Hawthorne/LA County			0.620	B	0.508	A	0.917	E	0.615	B	0.500	A	0.909	E	-	-	-
54	Nash Street & El Segundo Boulevard	El Segundo			0.524	A	0.402	A	0.634	B	0.515	A	0.394	A	0.629	B	-	-	-

Table SRA-2.3.12.2-2

Baseline (2010) With the LAWA Staff-Recommended Alternative Level of Service Analysis

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Int. #	Intersection	Jurisdiction	ATSAC	ATCS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	AM	MD	PM
55	Sepulveda Boulevard & El Segundo Boulevard	Caltrans/El Segundo			0.754	C	0.732	C	0.947	E	0.755	C	0.734	C	0.949	E	-	-	-
56	Lincoln Boulevard & Fiji Way	Caltrans/City of LA/LA County	X	X	0.550	A	0.544	A	0.752	C	0.550	A	0.544	A	0.756	C	-	-	-
57	La Brea Avenue & Florence Avenue	Inglewood			0.670	B	0.638	B	0.844	D	0.658	B	0.611	B	0.826	D	-	-	-
58	La Cienega Boulevard & Florence Avenue	Inglewood			0.667	B	0.658	B	0.895	D	0.670	B	0.689	B	0.897	D	-	-	-
59	Nash Street & Grand Avenue	El Segundo			0.422	A	0.324	A	0.426	A	0.405	A	0.322	A	0.413	A	-	-	-
60	Sepulveda Boulevard & Grand Avenue	Caltrans/El Segundo			0.753	C	0.695	B	0.828	D	0.764	C	0.703	C	0.828	D	-	-	-
61	Vista del Mar & Grand Avenue	City of LA	X	X	0.495	A	0.226	A	0.326	A	0.490	A	0.225	A	0.324	A	-	-	-
62	Hawthorne Boulevard & Imperial Avenue	Hawthorne			0.551	A	0.549	A	0.839	D	0.561	A	0.551	A	0.843	D	-	-	-
63	Hawthorne Boulevard & Lennox Boulevard	LA County			0.397	A	0.544	A	0.724	C	0.423	A	0.557	A	0.754	C	-	-	-
64	Highland Avenue/Vista del Mar & Rosecrans Avenue	Manhattan Beach			0.770	C	0.523	A	0.685	B	0.763	C	0.523	A	0.685	B	-	-	-
65	Sepulveda Boulevard & Howard Hughes Parkway	City of LA	X	X	0.388	A	0.365	A	0.540	A	0.388	A	0.365	A	0.543	A	-	-	-
66	Inglewood Avenue & Imperial Highway	Hawthorne			0.614	B	0.647	B	1.153	F	0.627	B	0.653	B	1.154	F	-	-	-
67	La Cienega Boulevard & Imperial Highway	City of LA/LA County	X	X	0.397	A	0.246	A	0.540	A	0.361	A	0.220	A	0.529	A	-	-	-
68	Main Street & Imperial Highway	El Segundo/City of LA	X	X	0.683	B	0.440	A	0.547	A	0.699	B	0.445	A	0.537	A	-	-	-
69	Pershing Drive & Imperial Highway	City of LA	X	X	0.515	A	0.368	A	0.354	A	0.499	A	0.341	A	0.349	A	-	-	-
70	Prairie Avenue & Imperial Highway	Hawthorne/Inglewood			0.611	B	0.581	A	0.820	D	0.602	B	0.579	A	0.816	D	-	-	-
71	Sepulveda Boulevard & Imperial Highway	Caltrans/El Segundo/City of LA	X	X	0.650	B	0.674	B	1.013	F	0.677	B	0.683	B	1.024	F	-	-	Yes
72	Vista del Mar & Imperial Highway	City of LA	X	X	0.403	A	0.205	A	0.363	A	0.396	A	0.191	A	0.359	A	-	-	-
73	Nash Street/I-105 Westbound Ramps & Imperial Highway	Caltrans/El Segundo/City of LA	X	X	0.575	A	0.279	A	0.332	A	0.589	A	0.279	A	0.336	A	-	-	-
74	I-105 Ramps (e/o Aviation Boulevard) & Imperial Highway	Caltrans/City of LA	X	X	0.544	A	0.308	A	0.534	A	0.515	A	0.308	A	0.530	A	-	-	-
75	I-405 Northbound Ramps (e/o La Cienega Boulevard) & Imperial Highway	Caltrans/Hawthorne/LA County			0.440	A	0.309	A	0.614	B	0.440	A	0.302	A	0.610	B	-	-	-
76	Inglewood Avenue & Lennox Boulevard	LA County			0.424	A	0.490	A	0.703	C	0.425	A	0.503	A	0.715	C	-	-	-
77	Inglewood Avenue & Manchester Boulevard	Caltrans/Inglewood			0.529	A	0.489	A	0.645	B	0.525	A	0.486	A	0.635	B	-	-	-
78	Lincoln Boulevard & Jefferson Boulevard	Caltrans/City of LA	X	X	0.610	B	0.487	A	0.624	B	0.627	B	0.492	A	0.630	B	-	-	-
79	Overland Avenue & Jefferson Boulevard	Culver City	X		0.630	B	0.468	A	0.687	B	0.628	B	0.466	A	0.685	B	-	-	-
80	Sepulveda Boulevard & Jefferson Boulevard	Culver City	X		0.384	A	0.336	A	0.406	A	0.389	A	0.349	A	0.407	A	-	-	-
81	Sepulveda Boulevard & Jefferson Boulevard & Playa Street	Culver City	X		0.666	B	0.601	B	0.785	C	0.674	B	0.608	B	0.793	C	-	-	-
82	Slauson Avenue & Jefferson Boulevard	Culver City	X		0.278	A	0.401	A	0.416	A	0.284	A	0.401	A	0.419	A	-	-	-
83	I-405 Northbound Ramps & Jefferson Boulevard	Caltrans/Culver City/City of LA	X	X	0.382	A	0.366	A	0.678	B	0.348	A	0.351	A	0.652	B	-	-	-
84	I-405 Southbound Ramps & Jefferson Boulevard	Caltrans/Culver City/City of LA	X	X	0.275	A	0.322	A	0.365	A	0.274	A	0.315	A	0.364	A	-	-	-
85	La Brea Avenue & Manchester Boulevard	Caltrans/Inglewood			0.678	B	0.670	B	0.714	C	0.705	C	0.716	C	0.745	C	-	Yes	-
86	La Brea Avenue/Overhill Drive & Stocker Street	LA County			0.694	B	0.611	B	1.071	F	0.694	B	0.619	B	1.072	F	-	-	-
87	La Brea Avenue & Slauson Avenue	LA County			0.753	C	0.629	B	0.917	E	0.751	C	0.625	B	0.914	E	-	-	-
88	La Cienega Boulevard & La Tijera Boulevard	Inglewood/City of LA	X	X	0.780	C	0.689	B	0.871	D	0.760	C	0.667	B	0.868	D	-	-	-
89	La Cienega Boulevard & Lennox Boulevard	City of LA/LA County	X	X	0.346	A	0.280	A	0.371	A	0.356	A	0.291	A	0.379	A	-	-	-
90	La Cienega Boulevard & Manchester Boulevard	Caltrans/Inglewood			0.605	B	0.666	B	0.765	C	0.606	B	0.688	B	0.766	C	-	-	-
91	La Cienega Boulevard Northbound Ramps & Slauson Avenue	LA County			0.664	B	0.525	A	0.648	B	0.660	B	0.525	A	0.639	B	-	-	-
92	La Cienega Boulevard Southbound Ramps & Slauson Avenue	LA County			0.672	B	0.616	B	0.787	C	0.706	C	0.616	B	0.788	C	-	-	-
93	La Cienega Boulevard & Stocker Street	LA County			1.212	F	0.786	C	1.127	F	1.207	F	0.786	C	1.127	F	-	-	-
94	La Cienega Boulevard & 111th Street	City of LA/LA County	X	X	0.290	A	0.277	A	0.413	A	0.291	A	0.277	A	0.348	A	-	-	-
95	La Cienega Boulevard & West 120th Street	LA County			0.358	A	0.282	A	0.696	B	0.354	A	0.281	A	0.695	B	-	-	-
96	La Cienega Boulevard & I-405 Southbound Ramps (n/o Century Boulevard)	Caltrans/Inglewood/City of LA	X	X	0.627	B	0.571	A	0.589	A	0.659	B	0.695	B	0.803	D	-	-	Yes
97	La Cienega Boulevard & I-405 Southbound Ramps (s/o Century Boulevard)	Caltrans/City of LA/LA County	X	X	0.352	A	0.418	A	0.471	A	0.352	A	0.393	A	0.459	A	-	-	-
98	La Cienega Boulevard & I-405 Southbound Ramps (n/o Imperial Highway)	Caltrans/City of LA/LA County	X	X	0.400	A	0.290	A	0.285	A	0.384	A	0.286	A	0.243	A	-	-	-
99	Lincoln Boulevard & La Tijera Boulevard	Caltrans/City of LA	X	X	0.339	A	0.228	A	0.366	A	0.364	A	0.230	A	0.371	A	-	-	-
100	La Tijera Boulevard & Manchester Avenue	Caltrans/City of LA	X	X	0.445	A	0.460	A	0.507	A	0.416	A	0.436	A	0.491	A	-	-	-
101	Sepulveda Boulevard & La Tijera Boulevard	City of LA	X	X	0.501	A	0.573	A	0.629	B	0.465	A	0.478	A	0.586	A	-	-	-
102	I-405 Northbound Ramps & La Tijera Boulevard	Caltrans/City of LA	X	X	0.534	A	0.631	B	0.536	A	0.534	A	0.688	B	0.536	A	-	-	-
103	I-405 Southbound Ramps & La Tijera Boulevard	Caltrans/City of LA	X	X	0.432	A	0.515	A	0.552	A	0.433	A	0.524	A	0.568	A	-	-	-
104	Lincoln Boulevard & Loyola Marymount University Drive	Caltrans/City of LA	X	X	0.427	A	0.320	A	0.525	A	0.438	A	0.335	A	0.560	A	-	-	-
105	Lincoln Boulevard & Manchester Avenue	Caltrans/City of LA	X	X	0.597	A	0.475	A	0.618	B	0.593	A	0.475	A	0.613	B	-	-	-
106	Lincoln Boulevard & Maxella Avenue	Caltrans/City of LA	X	X	0.554	A	0.550	A	0.592	A	0.552	A	0.548	A	0.591	A	-	-	-

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Int. #	Intersection	Jurisdiction	ATSAC	ATCS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	AM	MD	PM
107	Lincoln Boulevard & Mindanao Way	Caltrans/City of LA/LA County	X	X	0.624	B	0.697	B	0.771	C	0.631	B	0.720	C	0.777	C	-	-	-
108	Sepulveda Boulevard & Lincoln Boulevard	Caltrans/City of LA	X	X	0.621	B	0.510	A	0.769	C	0.609	B	0.467	A	0.756	C	-	-	-
109	Lincoln Boulevard & Venice Boulevard	Caltrans/City of LA	X	X	0.814	D	0.811	D	0.895	D	0.817	D	0.813	D	0.896	D	-	-	-
110	Lincoln Boulevard & Washington Boulevard	Caltrans/City of LA	X	X	0.746	C	0.816	D	0.936	E	0.746	C	0.817	D	0.936	E	-	-	-
111	Lincoln Boulevard & 83rd Street	Caltrans/City of LA	X	X	0.544	A	0.379	A	0.547	A	0.544	A	0.381	A	0.547	A	-	-	-
112	Lincoln Boulevard & SR 90 Ramps	Caltrans/City of LA	X	X	0.595	A	0.594	A	0.701	C	0.597	A	0.605	B	0.703	C	-	-	-
113	Pershing Drive & Manchester Avenue	Caltrans/City of LA	X	X	0.454	A	0.295	A	0.375	A	0.451	A	0.288	A	0.374	A	-	-	-
114	Sepulveda Boulevard & Manchester Avenue	Caltrans/City of LA	X	X	0.630	B	0.611	B	0.773	C	0.631	B	0.619	B	0.774	C	-	-	-
115	Ash Avenue & Manchester Avenue	Caltrans/Inglewood			0.699	B	0.622	B	0.780	C	0.696	B	0.612	B	0.780	C	-	-	-
116	Nash Street & Mariposa Avenue	El Segundo			0.574	A	0.324	A	0.434	A	0.571	A	0.322	A	0.434	A	-	-	-
117	Sepulveda Boulevard & Mariposa Avenue	Caltrans/El Segundo			0.708	C	0.641	B	0.757	C	0.711	C	0.642	B	0.759	C	-	-	-
118	Sawtelle Boulevard & Matteson Street/I-405 Southbound Ramps	Caltrans/Culver City	X		0.760	C	0.523	A	0.778	C	0.739	C	0.507	A	0.764	C	-	-	-
119	Ocean Avenue/Via Marina & Washington Boulevard	City of LA/LA County	X	X	0.531	A	0.476	A	0.694	B	0.531	A	0.480	A	0.698	B	-	-	-
120	Overhill Drive & Slauson Avenue	LA County			0.639	B	0.533	A	0.986	E	0.633	B	0.532	A	0.976	E	-	-	-
121	Overland Avenue & Venice Boulevard	Caltrans/Culver City/City of LA	X		0.819	D	0.657	B	0.873	D	0.820	D	0.656	B	0.879	D	-	-	-
122	Palawan Way & Washington Boulevard	City of LA/LA County			13.4	B	12.1	B	12.8	B	13.4	B	12.2	B	12.8	B	-	-	-
123	Pershing Drive & Westchester Parkway	City of LA	X	X	0.211	A	0.115	A	0.187	A	0.208	A	0.108	A	0.184	A	-	-	-
124	Prairie Avenue & West 112th Street/I-105 Off-Ramp	Caltrans/Inglewood			0.457	A	0.583	A	0.646	B	0.447	A	0.583	A	0.638	B	-	-	-
125	Sepulveda Boulevard & Rosecrans Avenue	Caltrans/El Segundo/Manhattan Beach			0.840	D	0.766	C	1.058	F	0.835	D	0.760	C	1.058	F	-	-	-
126	Sepulveda Boulevard & Sawtelle Boulevard	Culver City	X		0.421	A	0.526	A	0.595	A	0.424	A	0.528	A	0.598	A	-	-	-
127	Sawtelle Boulevard & Venice Boulevard	Caltrans/Culver City/City of LA	X		0.899	D	0.739	C	0.881	D	0.895	D	0.732	C	0.880	D	-	-	-
128	Sawtelle Boulevard & Washington Boulevard	Culver City	X		0.476	A	0.414	A	0.599	A	0.476	A	0.413	A	0.554	A	-	-	-
129	Sawtelle Boulevard & Washington Place	Culver City	X		0.427	A	0.325	A	0.515	A	0.419	A	0.321	A	0.514	A	-	-	-
130	Sepulveda Boulevard & Slauson Avenue	Culver City	X		0.487	A	0.526	A	0.703	C	0.491	A	0.529	A	0.708	C	-	-	-
131	Sepulveda Boulevard & Venice Boulevard	Caltrans/Culver City/City of LA	X	X	0.758	C	0.649	B	0.951	E	0.767	C	0.657	B	0.956	E	-	-	-
132	Sepulveda Boulevard & Washington Boulevard	Culver City	X		0.567	A	0.510	A	0.620	B	0.579	A	0.516	A	0.632	B	-	-	-
133	Sepulveda Boulevard & Washington Place	Culver City	X		0.588	A	0.487	A	0.577	A	0.594	A	0.493	A	0.582	A	-	-	-
134	Sepulveda Boulevard & I-405 Northbound On-/Off-Ramps	Caltrans/Culver City	X		0.824	D	0.565	A	0.762	C	0.784	C	0.535	A	0.733	C	-	-	-
135	Sepulveda Boulevard & Westchester Parkway	City of LA	X	X	0.447	A	0.528	A	0.683	B	0.427	A	0.468	A	0.638	B	-	-	-
136	Sepulveda Boulevard & 76th Street	City of LA	X	X	0.663	B	0.422	A	0.628	B	0.658	B	0.398	A	0.624	B	-	-	-
137	Sepulveda Boulevard & 79th Street	City of LA	X	X	0.445	A	0.351	A	0.507	A	0.430	A	0.325	A	0.504	A	-	-	-
138	Sepulveda Boulevard & 83rd Street	City of LA	X	X	0.390	A	0.312	A	0.456	A	0.381	A	0.290	A	0.453	A	-	-	-
139	Sepulveda Boulevard & I-105 Westbound Ramps (n/o Imperial Highway)	Caltrans/City of LA	X	X	0.839	D	0.805	D	0.872	D	0.825	D	0.787	C	0.851	D	-	-	-
140	SR 90 Westbound Ramps & Slauson Avenue	Caltrans/Culver City/LA County	X		0.505	A	0.393	A	0.671	B	0.504	A	0.391	A	0.642	B	-	-	-
141	Airport Boulevard & 96th Street	City of LA	X	X	0.175	A	0.288	A	0.360	A	0.227	A	0.320	A	0.437	A	-	-	-
142	Jenny Avenue & 96th Street	City of LA	X	X	0.129	A	0.154	A	0.115	A	0.169	A	0.193	A	0.159	A	-	-	-
143	Vicksburg Avenue & 96th Street	City of LA	X	X	0.180	A	0.292	A	0.219	A	0.322	A	0.325	A	0.420	A	-	-	-
144	Airport Boulevard & 98th Street	City of LA	X	X	0.292	A	0.381	A	0.439	A	0.325	A	0.463	A	0.534	A	-	-	-
145	Jenny Avenue & Westchester Parkway	City of LA	X	X	0.060	A	0.151	A	0.143	A	0.060	A	0.175	A	0.146	A	-	-	-
146	Sepulveda Eastway & Westchester Parkway	City of LA	X	X	0.221	A	0.340	A	0.423	A	0.219	A	0.330	A	0.421	A	-	-	-
147	Crenshaw Boulevard & Century Boulevard	Inglewood			0.563	A	0.674	B	0.781	C	0.567	A	0.679	B	0.785	C	-	-	-
148	La Cienega Boulevard & Fairview Boulevard	Inglewood/City of LA	X	X	0.834	D	0.603	B	0.851	D	0.834	D	0.595	A	0.838	D	-	-	-
149	Crenshaw Boulevard & Imperial Highway	Inglewood			0.566	A	0.620	B	0.818	D	0.570	A	0.625	B	0.834	D	-	-	-
150	Sepulveda Boulevard & Braddock Drive	Culver City			0.505	A	0.446	A	0.566	A	0.506	A	0.453	A	0.568	A	-	-	-
151	Buckingham Parkway & Slauson Avenue	Culver City			0.646	B	0.451	A	0.778	C	0.644	B	0.450	A	0.777	C	-	-	-
152	Duquesne Avenue & Washington Boulevard	Culver City			0.493	A	0.435	A	0.607	B	0.496	A	0.439	A	0.609	B	-	-	-
153	Overland Avenue & Kelmore Street/Ranch Road	Culver City			21.6	C	13.7	B	28.5	D	21.8	C	13.7	B	28.5	D	-	-	-
154	Overland Avenue & Sawtelle Boulevard	Culver City			20.3	C	15.1	C	27.2	D	20.3	C	15.1	C	27.2	D	-	-	-
155	Overland Avenue & Washington Boulevard	Culver City/City of LA			0.764	C	0.663	B	0.980	E	0.764	C	0.666	B	0.984	E	-	-	-
156	Walgrove Avenue & Washington Boulevard	Culver City			17.1	C	37.0	E	68.1	F	18.7	C	40.9	E	68.1	F	-	-	-
157	La Cienega Boulevard & 104th Street	City of LA/LA County	X	X	0.297	A	0.241	A	0.301	A	0.256	A	0.236	A	0.278	A	-	-	-
158	Vista del Mar & Waterview Street	City of LA	X	X	0.305	A	0.056	A	0.237	A	0.299	A	0.053	A	0.233	A	-	-	-
159	Hindry Avenue & Manchester Boulevard	Caltrans/Inglewood			0.387	A	0.550	A	0.542	A	0.388	A	0.599	A	0.542	A	-	-	-
160	Lincoln Boulevard & Rose Avenue	Caltrans/City of LA	X	X	0.873	D	0.775	C	0.797	C	0.872	D	0.775	C	0.793	C	-	-	-
161	Western Avenue & Century Boulevard	City of LA	X	X	0.440	A	0.509	A	0.637	B	0.440	A	0.519	A	0.640	B	-	-	-
162	Sepulveda Boulevard & Manhattan Beach Boulevard	Caltrans/Manhattan Beach			0.849	D	0.914	E	1.100	F	0.849	D	0.917	E	1.104	F	-	-	-
163	La Cienega Boulevard & Jefferson Boulevard	City of LA	X		0.898	D	0.679	B	1.014	F	0.891	D	0.673	B	1.006	F	-	-	-

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164	Crenshaw Boulevard & Manchester Avenue	Caltrans/Inglewood			0.686	B	0.714	C	0.860	D	0.686	B	0.710	C	0.857	D	-	-	-
165	La Cienega Boulevard & Rodeo Road	City of LA	X		0.942	E	0.654	B	0.951	E	0.938	E	0.654	B	0.948	E	-	-	-
166	La Brea Avenue & Rodeo Road	City of LA	X		0.969	E	0.651	B	0.851	D	0.969	E	0.653	B	0.854	D	-	-	-
167	La Brea Avenue & Jefferson Boulevard	City of LA	X		0.980	E	0.578	A	0.866	D	0.984	E	0.578	A	0.876	D	-	-	-
168	Crenshaw Boulevard & Florence Avenue	City of LA	X	X	0.670	B	0.501	A	0.741	C	0.676	B	0.514	A	0.746	C	-	-	-
169	Prairie Avenue & Manchester Boulevard	Inglewood			0.942	E	0.646	B	0.785	C	0.943	E	0.652	B	0.786	C	-	-	-
170	I-110 Northbound Ramps & Manchester Avenue	Caltrans/City of LA	X	X	0.561	A	0.434	A	0.476	A	0.556	A	0.431	A	0.470	A	-	-	-
171	Western Avenue & Florence Avenue	City of LA	X	X	0.736	C	0.438	A	0.718	C	0.751	C	0.458	A	0.736	C	-	-	-
172	Western Avenue & Manchester Avenue	Caltrans/City of LA	X	X	0.648	B	0.493	A	0.748	C	0.651	B	0.500	A	0.759	C	-	-	-
173	Western Avenue & Imperial Highway	LA County	X	X	0.639	B	0.477	A	0.765	C	0.641	B	0.481	A	0.794	C	-	-	-
174	Vermont Avenue & Florence Avenue	City of LA	X	X	0.619	B	0.426	A	0.599	A	0.629	B	0.453	A	0.605	B	-	-	-
175	Vermont Avenue & Manchester Avenue	Caltrans/LA County/City of LA	X	X	0.661	B	0.471	A	0.611	B	0.667	B	0.475	A	0.621	B	-	-	-
176	Vermont Avenue & Century Boulevard	LA County/City of LA	X	X	0.605	B	0.399	A	0.563	A	0.605	B	0.402	A	0.565	A	-	-	-
177	Vermont Avenue & Imperial Highway	LA County/City of LA	X	X	0.728	C	0.458	A	0.758	C	0.729	C	0.461	A	0.777	C	-	-	-
178	Figueroa Street & Florence Avenue	City of LA	X	X	0.693	B	0.412	A	0.610	B	0.693	B	0.428	A	0.621	B	-	-	-
179	Figueroa Street & Manchester Avenue	Caltrans/City of LA	X	X	0.776	C	0.549	A	0.796	C	0.768	C	0.549	A	0.781	C	-	-	-
180	Figueroa Street & Century Boulevard	City of LA	X	X	0.840	D	0.411	A	0.658	B	0.853	D	0.411	A	0.663	B	-	-	-
181	Figueroa Street & Imperial Highway	City of LA	X	X	0.757	C	0.323	A	0.651	B	0.779	C	0.325	A	0.677	B	-	-	-
182	Inglewood Avenue & Rosecrans Avenue	Hawthorne			0.694	B	0.608	B	0.840	D	0.699	B	0.615	B	0.843	D	-	-	-
183	Hawthorne Boulevard & Rosecrans Avenue	Hawthorne			0.709	C	0.621	B	0.770	C	0.709	C	0.625	B	0.770	C	-	-	-
184	Prairie Avenue & Rosecrans Avenue	Hawthorne/Lawndale			0.776	C	0.673	B	0.856	D	0.779	C	0.674	B	0.859	D	-	-	-
185	Crenshaw Boulevard & Rosecrans Avenue	Gardena/Hawthorne/LA County			0.729	C	0.644	B	0.800	C	0.739	C	0.648	B	0.800	C	-	-	-
186	Western Avenue & Rosecrans Avenue	Gardena			0.737	C	0.603	B	0.838	D	0.738	C	0.608	B	0.839	D	-	-	-
187	Vermont Avenue & Rosecrans Avenue	Gardena/City of LA	X		0.702	C	0.553	A	0.747	C	0.702	C	0.554	B	0.747	C	-	-	-
188	Prairie Avenue & El Segundo Boulevard	Hawthorne			0.883	D	0.627	B	0.889	D	0.881	D	0.618	B	0.889	D	-	-	-
189	Crenshaw Boulevard & El Segundo Boulevard	Hawthorne/Gardena			0.882	D	0.654	B	0.774	C	0.898	D	0.656	B	0.782	C	-	-	-
190	Western Avenue & El Segundo Boulevard	Gardena/LA County			0.798	C	0.518	A	0.759	C	0.798	C	0.521	A	0.759	C	-	-	-
191	Vermont Avenue & El Segundo Boulevard	Gardena/LA County/City of LA	X		0.634	B	0.330	A	0.550	A	0.620	B	0.329	A	0.535	A	-	-	-
192	Aviation Boulevard & Artesia Boulevard	Redondo Beach/Manhattan Beach			1.062	F	0.734	C	1.053	F	1.067	F	0.737	C	1.054	F	-	-	-
193	Aviation Boulevard & Manhattan Beach Boulevard	Redondo Beach/Manhattan Beach			0.895	D	0.724	C	0.979	E	0.899	D	0.724	C	0.981	E	-	-	-
194	Sepulveda Boulevard & Palms Boulevard	City of LA	X		0.766	C	0.552	A	0.929	E	0.775	C	0.559	A	0.929	E	-	-	-
195	Sawtelle Boulevard & Palms Boulevard	City of LA	X		0.769	C	0.401	A	0.757	C	0.757	C	0.394	A	0.730	C	-	-	-
196	Prairie Avenue & Florence Avenue	Inglewood			0.915	E	0.571	A	0.781	C	0.915	E	0.571	A	0.781	C	-	-	-
197	Prairie Avenue & Lennox Boulevard	Inglewood			0.538	A	0.468	A	0.606	B	0.541	A	0.470	A	0.606	B	-	-	-
198	Flower Street (near I-110 Southbound Ramps) & Florence Avenue	Caltrans/City of LA	X	X	0.443	A	0.418	A	0.458	A	0.445	A	0.433	A	0.478	A	-	-	-
199	Grand Avenue (near I-110 Northbound Ramps) & Florence Avenue	Caltrans/City of LA	X	X	0.540	A	0.503	A	0.561	A	0.541	A	0.521	A	0.566	A	-	-	-
200	I-110 Southbound Ramps & Manchester Avenue	Caltrans/City of LA	X	X	0.474	A	0.402	A	0.477	A	0.473	A	0.402	A	0.473	A	-	-	-

Source: Fehr & Peers, 2012.

Table SRA-2.3.12.2-3

Future (2025) With Alternative Impact Analysis Summary - LAWA Staff-Recommended Alternative

		SRA		
Int. #	Intersection	AM	MD	PM
6	Airport Boulevard & Arbor Vitae Street/Westchester Parkway	-	-	Yes
7	Airport Boulevard & Century Boulevard	Yes	Yes	Yes
9	Airport Boulevard & Manchester Avenue	Yes	Yes	Yes
10	Aviation Boulevard & Arbor Vitae Street	-	-	Yes
11	Inglewood Avenue & Arbor Vitae Street	-	-	Yes
12	La Brea Avenue & Arbor Vitae Street	-	-	Yes
13	La Cienega Boulevard & Arbor Vitae Street	-	-	-
14	Aviation Boulevard & Century Boulevard	Yes	Yes	Yes
15	Aviation Boulevard & El Segundo Boulevard	-	-	-
16	Aviation Boulevard & Imperial Highway	-	-	-
17	Aviation Boulevard/Florence Avenue & Manchester Avenue	Yes	-	Yes
25	La Brea Avenue & Centinela Avenue	Yes	Yes	-
26	La Cienega Boulevard & Centinela Avenue	Yes	Yes	-
27	La Tijera Boulevard & Centinela Avenue	-	-	Yes
28	Sepulveda Boulevard & Centinela Avenue	-	-	-
34	La Brea Avenue/Hawthorne Boulevard & Century Boulevard	Yes	Yes	Yes
35	Inglewood Avenue & Century Boulevard	Yes	Yes	-
36	La Cienega Boulevard & Century Boulevard	Yes	Yes	Yes
37	Prairie Avenue & Century Boulevard	Yes	Yes	Yes
38	Sepulveda Boulevard & Century Boulevard	-	-	Yes
46	Douglas Street & El Segundo Boulevard	-	-	Yes
51	Hawthorne Boulevard & El Segundo Boulevard	-	-	Yes
52	Inglewood Avenue & El Segundo Boulevard	-	-	-
53	La Cienega Boulevard & El Segundo Boulevard	-	-	-
57	La Brea Avenue & Florence Avenue	Yes	Yes	Yes
58	La Cienega Boulevard & Florence Avenue	Yes	Yes	Yes
60	Sepulveda Boulevard & Grand Avenue	-	-	Yes
62	Hawthorne Boulevard & Imperial Avenue	-	-	Yes
63	Hawthorne Boulevard & Lennox Boulevard	-	-	Yes
64	Highland Avenue/Vista del Mar & Rosecrans Avenue	Yes	-	-
66	Inglewood Avenue & Imperial Highway	Yes	Yes	Yes
69	Pershing Drive & Imperial Highway	-	-	-
70	Prairie Avenue & Imperial Highway	-	-	-
71	Sepulveda Boulevard & Imperial Highway	Yes	Yes	Yes
74	I-105 Ramps (e/o Aviation Boulevard) & Imperial Highway	-	-	-
76	Inglewood Avenue & Lennox Boulevard	-	-	Yes
77	Inglewood Avenue & Manchester Boulevard	-	-	Yes
85	La Brea Avenue & Manchester Boulevard	-	-	Yes
86	La Brea Avenue/Overhill Drive & Stocker Street	Yes	-	Yes
87	La Brea Avenue & Slauson Avenue	Yes	Yes	Yes
88	La Cienega Boulevard & La Tijera Boulevard	-	Yes	Yes
90	La Cienega Boulevard & Manchester Boulevard	Yes	Yes	Yes
93	La Cienega Boulevard & Stocker Street	Yes	Yes	Yes
95	La Cienega Boulevard & West 120th Street	-	-	Yes
96	La Cienega Boulevard & I-405 Southbound Ramps (n/o Century Boulevard)	-	Yes	Yes
101	Sepulveda Boulevard & La Tijera Boulevard	-	-	-
102	I-405 Northbound Ramps & La Tijera Boulevard	Yes	Yes	-
105	Lincoln Boulevard & Manchester Avenue	-	-	-
109	Lincoln Boulevard & Venice Boulevard	-	Yes	-
110	Lincoln Boulevard & Washington Boulevard	-	Yes	-
115	Ash Avenue & Manchester Avenue	-	Yes	Yes
119	Ocean Avenue/Via Marina & Washington Boulevard	Yes	Yes	Yes
125	Sepulveda Boulevard & Rosecrans Avenue	-	Yes	-
135	Sepulveda Boulevard & Westchester Parkway	-	-	-
139	Sepulveda Boulevard & I-105 Westbound Ramps (n/o Imperial Highway)	-	Yes	Yes
143	Vicksburg Avenue & 96th Street	-	-	Yes
146	Sepulveda Eastway & Westchester Parkway	-	-	-

Table SRA-2.3.12.2-3

Future (2025) With Alternative Impact Analysis Summary - LAWA Staff-Recommended Alternative

		SRA		
Int. #	Intersection	AM	MD	PM
147	Crenshaw Boulevard & Century Boulevard	-	Yes	Yes
148	La Cienega Boulevard & Fairview Boulevard	-	-	-
149	Crenshaw Boulevard & Imperial Highway	-	Yes	Yes
153	Overland Avenue & Kelmore Street/Ranch Road	-	-	-
154	Overland Avenue & Sawtelle Boulevard	-	-	Yes
156	Walgrove Avenue & Washington Boulevard	-	Yes	Yes
159	Hindry Avenue & Manchester Boulevard	-	Yes	-
162	Sepulveda Boulevard & Manhattan Beach Boulevard	-	Yes	-
164	Crenshaw Boulevard & Manchester Avenue	Yes	Yes	Yes
165	La Cienega Boulevard & Rodeo Road	Yes	-	-
166	La Brea Avenue & Rodeo Road	-	-	-
169	Prairie Avenue & Manchester Boulevard	Yes	-	Yes
172	Western Avenue & Manchester Avenue	-	-	Yes
173	Western Avenue & Imperial Highway	-	-	Yes
188	Prairie Avenue & El Segundo Boulevard	Yes	-	-
197	Prairie Avenue & Lennox Boulevard	-	-	Yes
	Number of Significant Impacts	26	31	45
	Number of Significantly Impacted Intersections		57	

Source: Fehr & Peers, 2012.

Intersections

Table SRA-2.3.12.2-4 delineates the intersection impacts of the LAWA Staff-Recommended Alternative by comparing the Future (2025) With Alternative scenario and the Future (2025) Without Alternative scenario. As indicated in **Table SRA-2.3.12.2-4**, 58 of the 200 intersections would be significantly impacted in one or more peak hours.

CMP Facilities

Table 10 in Appendix K2-7 delineates the impacts of the LAWA Staff-Recommended Alternative to the 14 arterial monitoring stations by comparing the Future (2025) With Alternative scenario and the Future (2025) Without Alternative scenario. For this alternative, the following CMP arterial monitoring station would be significantly impacted:

- 164. Manchester Avenue and Crenshaw Boulevard (CMP ID #24)

Table 18 in Appendix K2-7 delineates the impacts of the LAWA Staff-Recommended Alternative to the 30 CMP freeway monitoring stations by comparing the Future (2025) With Alternative scenario and the Future (2025) Without Alternative scenario. As indicated in Table 18, the following three CMP freeway monitoring stations would be significantly impacted (without LAX Master Plan Commitment ST-24, Fair Share Contribution to CMP Improvements):

- Route 405, at postmile 0.40, north of Route 22
- Route 405, at postmile 8.02, Santa Fe Avenue
- Route 405, at postmile 11.90, south of Route 110

Table SRA-2.3.12.2-4

Future (2025) With the LAWA Staff-Recommended Alternative Level of Service Analysis

					Future (2025) Without Alternative						Future (2025) With SRA						Significant impact?		
					AM		MD		PM		AM		MD		PM				
Int. #	Intersection	Jurisdiction	ATSAC	ATCS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	AM	MD	PM
1	Admiralty Way & Bali Way	LA County	X	X	0.647	B	0.607	B	0.817	D	0.657	B	0.617	B	0.823	D	-	-	-
2	Admiralty Way & Fiji Way	LA County	X	X	0.447	A	0.360	A	0.595	A	0.451	A	0.372	A	0.595	A	-	-	-
3	Admiralty Way & Mindanao Way	LA County	X	X	0.481	A	0.522	A	0.671	B	0.505	A	0.531	A	0.675	B	-	-	-
4	Palawan Way & Admiralty Way	LA County	X		0.625	B	0.436	A	0.657	B	0.631	B	0.474	A	0.668	B	-	-	-
5	Via Marina & Admiralty Way	LA County	X	X	0.598	A	0.576	A	0.833	D	0.604	B	0.595	A	0.839	D	-	-	-
6	Airport Boulevard & Arbor Vitae Street/Westchester Parkway	City of LA	X	X	0.471	A	0.573	A	0.747	C	0.500	A	0.685	B	0.925	E	-	-	Yes
7	Airport Boulevard & Century Boulevard	City of LA	X	X	0.651	B	0.648	B	0.619	B	0.736	C	0.979	E	0.861	D	Yes	Yes	Yes
8	La Tijera Boulevard & Airport Boulevard	City of LA	X	X	0.520	A	0.441	A	0.580	A	0.634	B	0.611	B	0.665	B	-	-	-
9	Airport Boulevard & Manchester Avenue	Caltrans/City of LA	X	X	0.740	C	0.849	D	0.951	E	0.871	D	1.056	F	1.060	F	Yes	Yes	Yes
10	Aviation Boulevard & Arbor Vitae Street	Inglewood/City of LA	X	X	0.550	A	0.525	A	0.791	C	0.582	A	0.569	A	0.864	D	-	-	Yes
11	Inglewood Avenue & Arbor Vitae Street	Inglewood			0.508	A	0.575	A	0.798	C	0.553	A	0.606	B	0.848	D	-	-	Yes
12	La Brea Avenue & Arbor Vitae Street	Inglewood			0.440	A	0.547	A	0.759	C	0.473	A	0.553	A	0.802	D	-	-	Yes
13	La Cienega Boulevard & Arbor Vitae Street	Inglewood/City of LA	X	X	0.542	A	0.501	A	0.701	C	0.595	A	0.503	A	0.736	C	-	-	-
14	Aviation Boulevard & Century Boulevard	City of LA	X	X	0.943	E	0.827	D	1.097	F	1.180	F	1.069	F	1.208	F	Yes	Yes	Yes
15	Aviation Boulevard & El Segundo Boulevard	El Segundo			0.922	E	0.638	B	0.823	D	0.928	E	0.677	B	0.854	D	-	-	-
16	Aviation Boulevard & Imperial Highway	City of LA	X	X	0.675	B	0.455	A	0.691	B	0.680	B	0.557	A	0.707	C	-	-	-
17	Aviation Boulevard/Florence Avenue & Manchester Avenue	Caltrans/Inglewood	X	X	0.854	D	0.903	E	0.894	D	0.885	D	0.909	E	0.984	E	Yes	-	Yes
18	Aviation Boulevard & Rosecrans Avenue	El Segundo/Hawthorne/Manhattan Beach			0.743	C	0.819	D	0.926	E	0.752	C	0.833	D	0.932	E	-	-	-
19	Aviation Boulevard & 111th Street	City of LA	X	X	0.573	A	0.478	A	0.555	A	0.609	B	0.522	A	0.642	B	-	-	-
20	Aviation Boulevard & West 120th Street	El Segundo/LA County			0.659	B	0.413	A	0.557	A	0.700	B	0.501	A	0.650	B	-	-	-
21	Lincoln Boulevard & Bali Way	Caltrans/City of LA/LA County	X	X	0.570	A	0.574	A	0.836	D	0.579	A	0.587	A	0.840	D	-	-	-
22	Lincoln Boulevard & Bluff Creek Drive	Caltrans/City of LA	X	X	0.553	A	0.333	A	0.567	A	0.553	A	0.347	A	0.570	A	-	-	-
23	Centinela Avenue & Jefferson Boulevard	City of LA/LA County	X	X	0.643	B	0.504	A	0.840	D	0.664	B	0.510	A	0.845	D	-	-	-
24	Centinela Avenue & Culver Boulevard	City of LA	X	X	0.777	C	0.577	A	0.907	E	0.788	C	0.581	A	0.911	E	-	-	-
25	La Brea Avenue & Centinela Avenue	Inglewood			0.913	E	0.794	C	0.991	E	0.931	E	0.816	D	0.991	E	Yes	Yes	-
26	La Cienega Boulevard & Centinela Avenue	Inglewood/City of LA	X	X	0.896	D	0.681	B	1.134	F	0.938	E	0.741	C	1.134	F	Yes	Yes	-
27	La Tijera Boulevard & Centinela Avenue	City of LA/LA County	X	X	0.643	B	0.502	A	0.840	D	0.681	B	0.537	A	0.862	D	-	-	Yes
28	Sepulveda Boulevard & Centinela Avenue	Culver City	X		0.884	D	0.711	C	0.879	D	0.891	D	0.724	C	0.885	D	-	-	-
29	Centinela Avenue & Venice Boulevard	Caltrans/City of LA	X	X	1.048	F	0.898	D	1.064	F	1.051	F	0.899	D	1.069	F	-	-	-
30	Centinela Avenue & Washington Boulevard	Culver City	X		0.853	D	0.707	C	1.003	F	0.857	D	0.723	C	1.020	F	-	-	-
31	Centinela Avenue & Washington Place	Culver City/City of LA	X		0.770	C	0.657	B	0.880	D	0.777	C	0.660	B	0.883	D	-	-	-
32	Centinela Avenue & SR 90 Eastbound On-/Off-Ramps	Caltrans/City of LA	X	X	0.391	A	0.282	A	0.525	A	0.409	A	0.300	A	0.532	A	-	-	-
33	Centinela Avenue & Sandford/SR 90 Westbound Ramps	Caltrans/City of LA	X	X	0.440	A	0.267	A	0.556	A	0.454	A	0.286	A	0.560	A	-	-	-
34	La Brea Avenue/Hawthorne Boulevard & Century Boulevard	Inglewood			0.735	C	0.771	C	0.983	E	0.796	C	0.959	E	1.089	F	Yes	Yes	Yes
35	Inglewood Avenue & Century Boulevard	Inglewood			0.705	C	0.657	B	0.926	E	0.754	C	0.754	C	0.929	E	Yes	Yes	-
36	La Cienega Boulevard & Century Boulevard	Inglewood/City of LA/LA County	X	X	0.730	C	0.661	B	0.827	D	0.929	E	0.861	D	0.984	E	Yes	Yes	Yes
37	Prairie Avenue & Century Boulevard	Inglewood			0.678	B	0.754	C	0.927	E	0.725	C	0.794	C	0.979	E	Yes	Yes	Yes
38	Sepulveda Boulevard & Century Boulevard	Caltrans/City of LA	X	X	0.579	A	0.497	A	0.655	B	0.659	B	0.613	B	0.749	C	-	-	Yes
39	I-405 Northbound Ramps & Century Boulevard	Caltrans/Inglewood			0.743	C	0.586	A	0.714	C	0.762	C	0.627	B	0.714	C	-	-	-
40	Duquesne Avenue & Culver Boulevard	Culver City	X		0.585	A	0.432	A	0.661	B	0.588	A	0.432	A	0.661	B	-	-	-
41	Culver Boulevard & Jefferson Boulevard	City of LA	X	X	0.733	C	0.342	A	0.738	C	0.741	C	0.359	A	0.752	C	-	-	-
42	Nicholson Street & Culver Boulevard	City of LA	X	X	0.675	B	0.412	A	0.816	D	0.679	B	0.430	A	0.833	D	-	-	-
43	Overland Avenue & Culver Boulevard	Culver City	X		1.182	F	0.660	B	0.935	E	1.182	F	0.671	B	0.946	E	-	-	-
44	Sawtelle Boulevard & Culver Boulevard	Culver City	X		0.686	B	0.479	A	0.888	D	0.689	B	0.503	A	0.891	D	-	-	-
45	Sepulveda Boulevard & Culver Boulevard	Culver City	X		0.730	C	0.557	A	0.733	C	0.741	C	0.564	A	0.738	C	-	-	-
46	Douglas Street & El Segundo Boulevard	El Segundo			0.773	C	0.594	A	0.976	E	0.782	C	0.628	B	1.006	F	-	-	Yes
47	Douglas Street & Imperial Highway	El Segundo/City of LA	X	X	0.371	A	0.256	A	0.456	A	0.414	A	0.302	A	0.515	A	-	-	-
48	Douglas Street & Mariposa Avenue	El Segundo			0.400	A	0.444	A	0.592	A	0.431	A	0.477	A	0.604	B	-	-	-
49	Douglas Street & Rosecrans Avenue	El Segundo/Manhattan Beach			0.666	B	0.717	C	0.789	C	0.678	B	0.728	C	0.807	D	-	-	-
50	Duquesne Avenue & Jefferson Boulevard	Culver City	X		0.614	B	0.569	A	0.741	C	0.621	B	0.579	A	0.769	C	-	-	-
51	Hawthorne Boulevard & El Segundo Boulevard	Hawthorne			0.675	B	0.697	B	1.230	F	0.679	B	0.730	C	1.242	F	-	-	Yes
52	Inglewood Avenue & El Segundo Boulevard	Hawthorne/LA County			0.670	B	0.697	B	1.078	F	0.690	B	0.710	C	1.080	F	-	-	-
53	La Cienega Boulevard & El Segundo Boulevard	Hawthorne/LA County			0.710	C	0.562	A	1.015	F	0.735	C	0.579	A	1.023	F	-	-	-
54	Nash Street & El Segundo Boulevard	El Segundo			0.593	A	0.456	A	0.708	C	0.599	A	0.468	A	0.711	C	-	-	-

Table SRA-2.3.12.2-4

Future (2025) With the LAWA Staff-Recommended Alternative Level of Service Analysis

					Future (2025) Without Alternative						Future (2025) With SRA						Significant impact?		
					AM		MD		PM		AM		MD		PM				
Int. #	Intersection	Jurisdiction	ATSAC	ATCS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	AM	MD	PM
55	Sepulveda Boulevard & El Segundo Boulevard	Caltrans/El Segundo			0.821	D	0.843	D	1.013	F	0.821	D	0.860	D	1.014	F	-	-	-
56	Lincoln Boulevard & Fiji Way	Caltrans/City of LA/LA County	X	X	0.620	B	0.613	B	0.860	D	0.629	B	0.650	B	0.867	D	-	-	-
57	La Brea Avenue & Florence Avenue	Inglewood			0.791	C	0.763	C	1.054	F	0.838	D	0.849	D	1.144	F	Yes	Yes	Yes
58	La Cienega Boulevard & Florence Avenue	Inglewood			0.896	D	0.896	D	1.165	F	0.938	E	1.047	F	1.177	F	Yes	Yes	Yes
59	Nash Street & Grand Avenue	El Segundo			0.545	A	0.416	A	0.510	A	0.557	A	0.417	A	0.516	A	-	-	-
60	Sepulveda Boulevard & Grand Avenue	Caltrans/El Segundo			0.810	D	0.755	C	0.934	E	0.810	D	0.756	C	0.960	E	-	-	Yes
61	Vista del Mar & Grand Avenue	City of LA	X	X	0.549	A	0.265	A	0.388	A	0.588	A	0.279	A	0.409	A	-	-	-
62	Hawthorne Boulevard & Imperial Avenue	Hawthorne			0.664	B	0.602	B	0.959	E	0.675	B	0.638	B	1.026	F	-	-	Yes
63	Hawthorne Boulevard & Lennox Boulevard	LA County			0.508	A	0.607	B	0.810	D	0.518	A	0.652	B	0.863	D	-	-	Yes
64	Highland Avenue/Vista del Mar & Rosecrans Avenue	Manhattan Beach			0.823	D	0.563	A	0.737	C	0.857	D	0.569	A	0.744	C	Yes	-	-
65	Sepulveda Boulevard & Howard Hughes Parkway	City of LA	X	X	0.418	A	0.400	A	0.598	A	0.434	A	0.416	A	0.609	B	-	-	-
66	Inglewood Avenue & Imperial Highway	Hawthorne			0.765	C	0.695	B	1.286	F	0.810	D	0.739	C	1.324	F	Yes	Yes	Yes
67	La Cienega Boulevard & Imperial Highway	City of LA/LA County	X	X	0.536	A	0.276	A	0.698	B	0.537	A	0.315	A	0.701	C	-	-	-
68	Main Street & Imperial Highway	El Segundo/City of LA	X	X	0.763	C	0.526	A	0.639	B	0.766	C	0.548	A	0.652	B	-	-	-
69	Pershing Drive & Imperial Highway	City of LA	X	X	0.382	A	0.304	A	0.433	A	0.412	A	0.319	A	0.448	A	-	-	-
70	Prairie Avenue & Imperial Highway	Hawthorne/Inglewood			0.690	B	0.628	B	0.881	D	0.713	C	0.646	B	0.882	D	-	-	-
71	Sepulveda Boulevard & Imperial Highway	Caltrans/El Segundo/City of LA	X	X	0.805	D	0.807	D	1.223	F	0.851	D	0.864	D	1.245	F	Yes	Yes	Yes
72	Vista del Mar & Imperial Highway	City of LA	X	X	0.416	A	0.224	A	0.409	A	0.427	A	0.235	A	0.420	A	-	-	-
73	Nash Street/I-105 Westbound Ramps & Imperial Highway	Caltrans/El Segundo/City of LA	X	X	0.642	B	0.237	A	0.416	A	0.710	C	0.404	A	0.480	A	-	-	-
74	I-105 Ramps (e/o Aviation Boulevard) & Imperial Highway	Caltrans/City of LA	X	X	0.647	B	0.340	A	0.609	B	0.662	B	0.365	A	0.655	B	-	-	-
75	I-405 Northbound Ramps (e/o La Cienega Boulevard) & Imperial Highway	Caltrans/Hawthorne/LA County			0.500	A	0.353	A	0.703	C	0.516	A	0.375	A	0.703	C	-	-	-
76	Inglewood Avenue & Lennox Boulevard	LA County			0.468	A	0.557	A	0.819	D	0.525	A	0.558	A	0.870	D	-	-	Yes
77	Inglewood Avenue & Manchester Boulevard	Caltrans/Inglewood			0.651	B	0.565	A	0.773	C	0.675	B	0.597	A	0.803	D	-	-	Yes
78	Lincoln Boulevard & Jefferson Boulevard	Caltrans/City of LA	X	X	0.688	B	0.560	A	0.741	C	0.691	B	0.575	A	0.743	C	-	-	-
79	Overland Avenue & Jefferson Boulevard	Culver City	X		0.678	B	0.542	A	0.777	C	0.686	B	0.546	A	0.793	C	-	-	-
80	Sepulveda Boulevard & Jefferson Boulevard	Culver City	X		0.475	A	0.419	A	0.503	A	0.479	A	0.421	A	0.505	A	-	-	-
81	Sepulveda Boulevard & Jefferson Boulevard & Playa Street	Culver City	X		0.819	D	0.712	C	1.019	F	0.830	D	0.720	C	1.021	F	-	-	-
82	Slauson Avenue & Jefferson Boulevard	Culver City	X		0.388	A	0.528	A	0.505	A	0.394	A	0.536	A	0.506	A	-	-	-
83	I-405 Northbound Ramps & Jefferson Boulevard	Caltrans/Culver City/City of LA	X	X	0.506	A	0.424	A	0.782	C	0.512	A	0.428	A	0.786	C	-	-	-
84	I-405 Southbound Ramps & Jefferson Boulevard	Caltrans/Culver City/City of LA	X	X	0.329	A	0.349	A	0.446	A	0.361	A	0.360	A	0.480	A	-	-	-
85	La Brea Avenue & Manchester Boulevard	Caltrans/Inglewood			0.847	D	0.744	C	0.945	E	0.860	D	0.757	C	0.961	E	-	-	Yes
86	La Brea Avenue/Overhill Drive & Stocker Street	City of LA/LA County			0.820	D	0.724	C	1.193	F	0.863	D	0.760	C	1.233	F	Yes	-	Yes
87	La Brea Avenue & Slauson Avenue	LA County			0.905	E	0.747	C	1.007	F	0.972	E	0.815	D	1.035	F	Yes	Yes	Yes
88	La Cienega Boulevard & La Tijera Boulevard	Inglewood/City of LA	X	X	0.794	C	0.738	C	1.005	F	0.788	C	0.782	C	1.131	F	-	Yes	Yes
89	La Cienega Boulevard & Lennox Boulevard	City of LA/LA County	X	X	0.419	A	0.354	A	0.497	A	0.466	A	0.441	A	0.551	A	-	-	-
90	La Cienega Boulevard & Manchester Boulevard	Caltrans/Inglewood			0.736	C	0.741	C	0.907	E	0.796	C	0.843	D	0.969	E	Yes	Yes	Yes
91	La Cienega Boulevard Northbound Ramps & Slauson Avenue	LA County			0.693	B	0.589	A	0.834	D	0.722	C	0.640	B	0.850	D	-	-	-
92	La Cienega Boulevard Southbound Ramps & Slauson Avenue	LA County			1.002	F	0.829	D	1.010	F	1.004	F	0.833	D	1.018	F	-	-	-
93	La Cienega Boulevard & Stocker Street	LA County			1.270	F	0.838	D	1.210	F	1.287	F	0.863	D	1.223	F	Yes	Yes	Yes
94	La Cienega Boulevard & 111th Street	City of LA/LA County	X	X	0.438	A	0.294	A	0.453	A	0.439	A	0.400	A	0.478	A	-	-	-
95	La Cienega Boulevard & West 120th Street	LA County			0.449	A	0.313	A	0.817	D	0.479	A	0.367	A	0.894	D	-	-	Yes
96	La Cienega Boulevard & I-405 Southbound Ramps (n/o Century Boulevard)	Caltrans/Inglewood/City of LA	X	X	0.669	B	0.695	B	0.694	B	0.674	B	0.864	D	0.810	D	-	Yes	Yes
97	La Cienega Boulevard & I-405 Southbound Ramps (s/o Century Boulevard)	Caltrans/City of LA/LA County	X	X	0.415	A	0.462	A	0.540	A	0.501	A	0.518	A	0.615	B	-	-	-
98	La Cienega Boulevard & I-405 Southbound Ramps (n/o Imperial Highway)	Caltrans/City of LA/LA County	X	X	0.478	A	0.341	A	0.369	A	0.509	A	0.431	A	0.381	A	-	-	-
99	Lincoln Boulevard & La Tijera Boulevard	Caltrans/City of LA	X	X	0.520	A	0.320	A	0.625	B	0.523	A	0.335	A	0.637	B	-	-	-
100	La Tijera Boulevard & Manchester Avenue	Caltrans/City of LA	X	X	0.570	A	0.549	A	0.679	B	0.570	A	0.542	A	0.679	B	-	-	-
101	Sepulveda Boulevard & La Tijera Boulevard	City of LA	X	X	0.602	B	0.729	C	0.851	D	0.600	A	0.589	A	0.784	C	-	-	-
102	I-405 Northbound Ramps & La Tijera Boulevard	Caltrans/City of LA	X	X	0.619	B	0.693	B	0.609	B	0.746	C	0.842	D	0.664	B	Yes	Yes	-
103	I-405 Southbound Ramps & La Tijera Boulevard	Caltrans/City of LA	X	X	0.467	A	0.563	A	0.681	B	0.516	A	0.612	B	0.713	C	-	-	-
104	Lincoln Boulevard & Loyola Marymount University Drive	Caltrans/City of LA	X	X	0.569	A	0.441	A	0.698	B	0.570	A	0.470	A	0.724	C	-	-	-
105	Lincoln Boulevard & Manchester Avenue	Caltrans/City of LA	X	X	0.800	C	0.547	A	0.871	D	0.802	D	0.549	A	0.878	D	-	-	-
106	Lincoln Boulevard & Maxella Avenue	Caltrans/City of LA	X	X	0.599	A	0.624	B	0.683	B	0.601	B	0.632	B	0.688	B	-	-	-
107	Lincoln Boulevard & Mindanao Way	Caltrans/City of LA/LA County	X	X	0.739	C	0.872	D	0.947	E	0.749	C	0.883	D	0.947	E	-	-	-
108	Sepulveda Boulevard & Lincoln Boulevard	Caltrans/City of LA	X	X	0.684	B	0.571	A	0.938	E	0.665	B	0.563	A	0.925	E	-	-	-
109	Lincoln Boulevard & Venice Boulevard	Caltrans/City of LA	X	X	0.892	D	0.915	E	1.036	F	0.899	D	0.925	E	1.043	F	-	Yes	-
110	Lincoln Boulevard & Washington Boulevard	Caltrans/City of LA	X	X	0.841	D	0.904	E	1.053	F	0.845	D	0.919	E	1.054	F	-	Yes	-

Table SRA-2.3.12.2-4

Future (2025) With the LAWA Staff-Recommended Alternative Level of Service Analysis

					Future (2025) Without Alternative						Future (2025) With SRA								
					AM		MD		PM		AM		MD		PM		Significant impact?		
Int. #	Intersection	Jurisdiction	ATSAC	ATCS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	AM	MD	PM
111	Lincoln Boulevard & 83rd Street	Caltrans/City of LA	X	X	0.609	B	0.435	A	0.700	B	0.618	B	0.448	A	0.704	C	-	-	-
112	Lincoln Boulevard & SR 90 Ramps	Caltrans/City of LA	X	X	0.629	B	0.639	B	0.802	D	0.638	B	0.650	B	0.813	D	-	-	-
113	Pershing Drive & Manchester Avenue	Caltrans/City of LA	X	X	0.464	A	0.329	A	0.475	A	0.478	A	0.340	A	0.482	A	-	-	-
114	Sepulveda Boulevard & Manchester Avenue	Caltrans/City of LA	X	X	0.684	B	0.709	C	0.962	E	0.717	C	0.723	C	0.958	E	-	-	-
115	Ash Avenue & Manchester Avenue	Caltrans/Inglewood			0.786	C	0.711	C	0.945	E	0.805	D	0.767	C	0.979	E	-	Yes	Yes
116	Nash Street & Mariposa Avenue	El Segundo			0.650	B	0.385	A	0.538	A	0.669	B	0.413	A	0.557	A	-	-	-
117	Sepulveda Boulevard & Mariposa Avenue	Caltrans/El Segundo			0.783	C	0.759	C	0.839	D	0.816	D	0.767	C	0.842	D	-	-	-
118	Sawtelle Boulevard & Matteson Street/I-405 Southbound Ramps	Caltrans/Culver City	X		0.926	E	0.611	B	1.081	F	0.926	E	0.625	B	1.081	F	-	-	-
119	Ocean Avenue/Via Marina & Washington Boulevard	City of LA/LA County	X	X	1.181	F	0.956	E	1.514	F	1.216	F	1.005	F	1.539	F	Yes	Yes	Yes
120	Overhill Drive & Slauson Avenue	LA County			0.736	C	0.620	B	1.147	F	0.760	C	0.698	B	1.155	F	-	-	-
121	Overland Avenue & Venice Boulevard	Caltrans/Culver City/City of LA	X	X	0.879	D	0.709	C	0.991	E	0.884	D	0.713	C	0.994	E	-	-	-
122	Palawan Way & Washington Boulevard	City of LA/LA County			16.5	C	14.5	B	16.5	C	16.6	C	14.7	B	17.0	C	-	-	-
123	Pershing Drive & Westchester Parkway	City of LA	X	X	0.244	A	0.166	A	0.311	A	0.286	A	0.187	A	0.329	A	-	-	-
124	Prairie Avenue & West 112th Street/I-105 Off-Ramp	Caltrans/Inglewood			0.553	A	0.623	B	0.759	C	0.555	A	0.630	B	0.774	C	-	-	-
125	Sepulveda Boulevard & Rosecrans Avenue	Caltrans/El Segundo/Manhattan Beach			0.918	E	0.836	D	1.158	F	0.923	E	0.862	D	1.160	F	-	Yes	-
126	Sepulveda Boulevard & Sawtelle Boulevard	Culver City	X		0.516	A	0.614	B	0.742	C	0.523	A	0.621	B	0.756	C	-	-	-
127	Sawtelle Boulevard & Venice Boulevard	Caltrans/Culver City/City of LA	X	X	1.077	F	0.843	D	0.956	E	1.084	F	0.848	D	0.958	E	-	-	-
128	Sawtelle Boulevard & Washington Boulevard	Culver City	X		0.660	B	0.517	A	0.787	C	0.660	B	0.533	A	0.797	C	-	-	-
129	Sawtelle Boulevard & Washington Place	Culver City	X		0.487	A	0.373	A	0.667	B	0.497	A	0.380	A	0.673	B	-	-	-
130	Sepulveda Boulevard & Slauson Avenue	Culver City	X		0.598	A	0.688	B	0.894	D	0.615	B	0.719	C	0.904	E	-	-	-
131	Sepulveda Boulevard & Venice Boulevard	Caltrans/Culver City/City of LA	X	X	0.893	D	0.734	C	1.115	F	0.893	D	0.746	C	1.117	F	-	-	-
132	Sepulveda Boulevard & Washington Boulevard	Culver City	X		0.610	B	0.597	A	0.727	C	0.620	B	0.610	B	0.727	C	-	-	-
133	Sepulveda Boulevard & Washington Place	Culver City	X		0.660	B	0.583	A	0.707	C	0.660	B	0.587	A	0.710	C	-	-	-
134	Sepulveda Boulevard & I-405 Northbound On-/Off-Ramps	Caltrans/Culver City	X		0.885	D	0.610	B	0.812	D	0.886	D	0.618	B	0.812	D	-	-	-
135	Sepulveda Boulevard & Westchester Parkway	City of LA	X	X	0.658	B	0.643	B	1.109	F	0.680	B	0.644	B	1.113	F	-	-	-
136	Sepulveda Boulevard & 76th Street	City of LA	X	X	0.691	B	0.484	A	0.700	B	0.699	B	0.496	A	0.740	C	-	-	-
137	Sepulveda Boulevard & 79th Street	City of LA	X	X	0.507	A	0.411	A	0.573	A	0.507	A	0.411	A	0.609	B	-	-	-
138	Sepulveda Boulevard & 83rd Street	City of LA	X	X	0.449	A	0.398	A	0.549	A	0.462	A	0.398	A	0.589	A	-	-	-
139	Sepulveda Boulevard & I-105 Westbound Ramps (n/o Imperial Highway)	Caltrans/City of LA	X	X	0.877	D	0.840	D	0.923	E	0.896	D	0.891	D	0.956	E	-	Yes	Yes
140	SR 90 Westbound Ramps & Slauson Avenue	Caltrans/Culver City/LA County	X		0.534	A	0.426	A	0.682	B	0.552	A	0.436	A	0.683	B	-	-	-
141	Airport Boulevard & 96th Street	City of LA	X	X	0.234	A	0.348	A	0.456	A	0.354	A	0.490	A	0.523	A	-	-	-
142	Jenny Avenue & 96th Street	City of LA	X	X	0.183	A	0.203	A	0.153	A	0.243	A	0.290	A	0.340	A	-	-	-
143	Vicksburg Avenue & 96th Street	City of LA	X	X	0.279	A	0.363	A	0.335	A	0.405	A	0.686	B	0.840	D	-	-	Yes
144	Airport Boulevard & 98th Street	City of LA	X	X	0.357	A	0.447	A	0.500	A	0.467	A	0.627	B	0.630	B	-	-	-
145	Jenny Avenue & Westchester Parkway	City of LA	X	X	0.153	A	0.220	A	0.243	A	0.157	A	0.253	A	0.263	A	-	-	-
146	Sepulveda Eastway & Westchester Parkway	City of LA	X	X	0.427	A	0.543	A	0.693	B	0.427	A	0.583	A	0.693	B	-	-	-
147	Crenshaw Boulevard & Century Boulevard	Inglewood			0.708	C	0.773	C	0.928	E	0.729	C	0.807	D	0.979	E	-	Yes	Yes
148	La Cienega Boulevard & Fairview Boulevard	Inglewood/City of LA	X	X	0.881	D	0.657	B	0.952	E	0.893	D	0.688	B	0.954	E	-	-	-
149	Crenshaw Boulevard & Imperial Highway	Inglewood			0.680	B	0.705	C	1.001	F	0.715	C	0.748	C	1.030	F	-	Yes	Yes
150	Sepulveda Boulevard & Braddock Drive	Culver City			0.580	A	0.527	A	0.677	B	0.580	A	0.537	A	0.683	B	-	-	-
151	Buckingham Parkway & Slauson Avenue	Culver City			0.716	C	0.544	A	0.888	D	0.724	C	0.551	A	0.888	D	-	-	-
152	Duquesne Avenue & Washington Boulevard	Culver City/City of LA			0.573	A	0.507	A	0.657	B	0.580	A	0.517	A	0.663	B	-	-	-
153	Overland Avenue & Kelmore Street/Ranch Road	Culver City			32.1	D	15.3	C	46.2	E	32.6	D	15.7	C	49.9	E	-	-	-
154	Overland Avenue & Sawtelle Boulevard	Culver City			31.4	D	17.6	C	45.9	E	33.1	D	18.6	C	50.6	F	-	-	Yes
155	Overland Avenue & Washington Boulevard	Culver City/City of LA			0.840	D	0.756	C	1.069	F	0.847	D	0.771	C	1.069	F	-	-	-
156	Walgrove Avenue & Washington Boulevard	Culver City			68.8	F	>100	F	>100	F	68.8	F	355.8	F	952.7	F	-	Yes	Yes
157	La Cienega Boulevard & 104th Street	City of LA/LA County	X	X	0.340	A	0.301	A	0.370	A	0.417	A	0.379	A	0.417	A	-	-	-
158	Vista del Mar & Waterview Street	City of LA	X	X	0.327	A	0.073	A	0.267	A	0.343	A	0.077	A	0.283	A	-	-	-
159	Hindry Avenue & Manchester Boulevard	Caltrans/Inglewood			0.513	A	0.638	B	0.597	A	0.516	A	0.756	C	0.691	B	-	Yes	-
160	Lincoln Boulevard & Rose Avenue	Caltrans/City of LA	X	X	0.920	E	0.847	D	0.843	D	0.927	E	0.857	D	0.850	D	-	-	-
161	Western Avenue & Century Boulevard	City of LA	X	X	0.576	A	0.629	B	0.824	D	0.598	A	0.662	B	0.827	D	-	-	-
162	Sepulveda Boulevard & Manhattan Beach Boulevard	Caltrans/Manhattan Beach			0.950	E	0.987	E	1.193	F	0.957	E	0.997	E	1.199	F	-	Yes	-
163	La Cienega Boulevard & Jefferson Boulevard	City of LA	X	X	0.986	E	0.700	B	0.955	E	0.988	E	0.714	C	0.964	E	-	-	-
164	Crenshaw Boulevard & Manchester Avenue	Caltrans/Inglewood			0.816	D	0.843	D	1.025	F	0.857	D	0.873	D	1.066	F	Yes	Yes	Yes
165	La Cienega Boulevard & Rodeo Road	City of LA	X	X	1.025	F	0.719	C	1.037	F	1.035	F	0.734	C	1.038	F	Yes	-	-
166	La Brea Avenue & Rodeo Road	City of LA	X	X	0.989	E	0.756	C	0.972	E	0.996	E	0.775	C	0.981	E	-	-	-
167	La Brea Avenue & Jefferson Boulevard	City of LA	X	X	1.035	F	0.659	B	1.063	F	1.042	F	0.687	B	1.067	F	-	-	-

Table SRA-2.3.12.2-4

Future (2025) With the LAWA Staff-Recommended Alternative Level of Service Analysis

					Future (2025) Without Alternative						Future (2025) With SRA						Significant impact?		
					AM		MD		PM		AM		MD		PM				
Int. #	Intersection	Jurisdiction	ATSAC	ATCS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	AM	MD	PM
168	Crenshaw Boulevard & Florence Avenue	City of LA	X	X	0.754	C	0.579	A	0.896	D	0.782	C	0.624	B	0.904	E	-	-	-
169	Prairie Avenue & Manchester Boulevard	Inglewood			1.042	F	0.701	C	0.922	E	1.079	F	0.732	C	0.941	E	Yes	-	Yes
170	I-110 Northbound Ramps & Manchester Avenue	Caltrans/City of LA	X	X	0.593	A	0.460	A	0.537	A	0.598	A	0.467	A	0.549	A	-	-	-
171	Western Avenue & Florence Avenue	City of LA	X	X	0.860	D	0.600	A	0.902	E	0.876	D	0.602	B	0.911	E	-	-	-
172	Western Avenue & Manchester Avenue	Caltrans/City of LA	X	X	0.727	C	0.560	A	0.887	D	0.733	C	0.571	A	0.906	E	-	-	Yes
173	Western Avenue & Imperial Highway	LA County	X	X	0.743	C	0.575	A	0.912	E	0.764	C	0.596	A	0.941	E	-	-	Yes
174	Vermont Avenue & Florence Avenue	City of LA	X	X	0.700	B	0.540	A	0.734	C	0.717	C	0.567	A	0.749	C	-	-	-
175	Vermont Avenue & Manchester Avenue	Caltrans/LA County/City of LA	X	X	0.722	C	0.542	A	0.760	C	0.755	C	0.553	A	0.784	C	-	-	-
176	Vermont Avenue & Century Boulevard	LA County/City of LA	X	X	0.700	B	0.556	A	0.726	C	0.718	C	0.607	B	0.764	C	-	-	-
177	Vermont Avenue & Imperial Highway	LA County/City of LA	X	X	0.823	D	0.545	A	0.992	E	0.834	D	0.547	A	0.995	E	-	-	-
178	Figueroa Street & Florence Avenue	City of LA	X	X	0.741	C	0.506	A	0.733	C	0.771	C	0.533	A	0.765	C	-	-	-
179	Figueroa Street & Manchester Avenue	Caltrans/City of LA	X	X	0.886	D	0.618	B	0.913	E	0.887	D	0.644	B	0.920	E	-	-	-
180	Figueroa Street & Century Boulevard	City of LA	X	X	0.893	D	0.500	A	0.784	C	0.899	D	0.539	A	0.800	C	-	-	-
181	Figueroa Street & Imperial Highway	City of LA	X	X	0.837	D	0.378	A	0.818	D	0.851	D	0.391	A	0.835	D	-	-	-
182	Inglewood Avenue & Rosecrans Avenue	Hawthorne			0.798	C	0.663	B	0.952	E	0.807	D	0.698	B	0.960	E	-	-	-
183	Hawthorne Boulevard & Rosecrans Avenue	Hawthorne			0.802	D	0.700	B	0.943	E	0.814	D	0.720	C	0.944	E	-	-	-
184	Prairie Avenue & Rosecrans Avenue	Hawthorne/Lawndale			0.872	D	0.736	C	0.969	E	0.890	D	0.769	C	0.977	E	-	-	-
185	Crenshaw Boulevard & Rosecrans Avenue	Gardena/Hawthorne/LA County			0.796	C	0.727	C	0.916	E	0.816	D	0.748	C	0.923	E	-	-	-
186	Western Avenue & Rosecrans Avenue	Gardena			0.810	D	0.672	B	0.927	E	0.828	D	0.675	B	0.934	E	-	-	-
187	Vermont Avenue & Rosecrans Avenue	Gardena/City of LA	X		0.757	C	0.604	B	0.857	D	0.757	C	0.610	B	0.862	D	-	-	-
188	Prairie Avenue & El Segundo Boulevard	Hawthorne			1.001	F	0.684	B	1.006	F	1.027	F	0.704	C	1.008	F	Yes	-	-
189	Crenshaw Boulevard & El Segundo Boulevard	Hawthorne/Gardena			0.969	E	0.722	C	0.890	D	0.975	E	0.742	C	0.896	D	-	-	-
190	Western Avenue & El Segundo Boulevard	Gardena/LA County			0.846	D	0.594	A	0.860	D	0.852	D	0.614	B	0.872	D	-	-	-
191	Vermont Avenue & El Segundo Boulevard	Gardena/LA County/City of LA	X		0.682	B	0.422	A	0.676	B	0.703	C	0.436	A	0.708	C	-	-	-
192	Aviation Boulevard & Artesia Boulevard	Redondo Beach/Manhattan Beach			1.132	F	0.769	C	1.078	F	1.138	F	0.769	C	1.084	F	-	-	-
193	Aviation Boulevard & Manhattan Beach Boulevard	Redondo Beach/Manhattan Beach			0.976	E	0.769	C	1.083	F	0.979	E	0.776	C	1.089	F	-	-	-
194	Sepulveda Boulevard & Palms Boulevard	City of LA	X	X	0.770	C	0.590	A	0.980	E	0.780	C	0.597	A	0.987	E	-	-	-
195	Sawtelle Boulevard & Palms Boulevard	City of LA	X	X	0.787	C	0.407	A	0.850	D	0.793	C	0.410	A	0.853	D	-	-	-
196	Prairie Avenue & Florence Avenue	Inglewood			0.965	E	0.647	B	0.851	D	0.969	E	0.672	B	0.868	D	-	-	-
197	Prairie Avenue & Lennox Boulevard	Inglewood			0.670	B	0.557	A	0.704	C	0.684	B	0.603	B	0.782	C	-	-	Yes
198	Flower Street (near I-110 Southbound Ramps) & Florence Avenue	Caltrans/City of LA	X	X	0.527	A	0.513	A	0.535	A	0.538	A	0.545	A	0.564	A	-	-	-
199	Grand Avenue (near I-110 Northbound Ramps) & Florence Avenue	Caltrans/City of LA	X	X	0.617	B	0.602	B	0.675	B	0.633	B	0.632	B	0.689	B	-	-	-
200	I-110 Southbound Ramps & Manchester Avenue	Caltrans/City of LA	X	X	0.487	A	0.436	A	0.531	A	0.489	A	0.449	A	0.540	A	-	-	-

Source: Fehr & Peers, 2012.

Table SRA-2.3.12.2-5

CMP Transit Analysis Future (2025) With the LAWA Staff-Recommended Alternative

	AM Peak Hour			PM Peak Hour		
SRA	**Capacity**	**Change in Demand**	**Change in D/C**	**Capacity**	**Change in Demand**	**Change in D/C**
North/South Corridor	13,145	--	--	13,210	--	--
East/West Corridor	6,440	--	--	6,595	--	--
Total	**19,585**	**240**	**1.23%**	**19,805**	**261**	**1.32%**

Source: Fehr & Peers, 2012.

Table 4.12.2-6 of the SPAS Draft EIR shows the total incremental estimated transit demand due to airport-related growth under each alternative, including the LAWA Staff-Recommended Alternative,[62] and **Table SRA-2.3.12.2-5** indicates the resulting impact on the utilization of the major north/south and east/west CMP transit corridors in the LAX vicinity. As indicated in **Table SRA-2.3.12.2-5**, implementation of the LAWA Staff-Recommended Alternative would increase transit system utilization by approximately 1.23 percent in the a.m. peak hour and 1.32 percent in the p.m. peak hour, which would not represent a substantial increase in transit demand. At this level of increase, impacts to the regional transit system would be considered less than significant.

2.3.12.2.1.3 Construction Impacts

The LAWA Staff-Recommended Alternative is only at a conceptual level of planning. No construction plans, programs, or schedules have been formulated for the LAWA Staff-Recommended Alternative. As such, it would be speculative to estimate construction-related vehicle trip generation and distribution onto the local roadway network in order to evaluate traffic impacts on specific streets and intersections during peak and non-peak traffic periods. The following provides a qualitative evaluation of the key factors that would influence construction traffic generation under the LAWA Staff-Recommended Alternative, how such traffic generation would relate, in general, to the roadway system around LAX, and which existing provisions of the LAX Master Plan would serve to reduce or avoid construction traffic impacts. Applicable LAX Master Plan commitments and mitigation measures cited below are discussed fully in Section 4.12.2.5 of the SPAS Draft EIR.

For the LAWA Staff-Recommended Alternative, construction activities at LAX would extend over the course of several years. As individual projects are underway, traffic impacts would likely be experienced in the immediate area around the active development site(s). Three key considerations that would influence potential traffic impacts of these construction activities are:

- Deliveries of various construction materials
- Provision of labor to the construction sites
- Maintenance of traffic in the immediate construction zones

Section 2.3.1.12 of the SPAS Draft EIR identifies seven potential construction staging areas that could be utilized in some combination during development of the LAWA Staff-Recommended Alternative. Four of the potential construction staging areas are located within the LAX Northside planning area, which is planned for future development independent from SPAS. Depending on the nature and timing of such future development, use of those construction staging areas for SPAS-related construction staging may be limited.

[62] The LAWA Staff-Recommended Alternative in Table 4.12.2-6 of the SPAS Draft EIR is designated as "Alternative 9."

Regional access for construction-related vehicles would occur via the I-405 and I-105 freeways. Pursuant to LAX Master Plan Commitment ST-22, Designated Truck Routes, designated truck routes for construction would include Pershing Drive (Westchester Parkway to Imperial Highway); Florence Avenue (Aviation Boulevard to I-405); Manchester Boulevard (Aviation Boulevard to I-405); Aviation Boulevard (Manchester Avenue to Imperial Highway); Westchester Parkway/Arbor Vitae Street (Pershing Drive to I-405); Century Boulevard (Sepulveda Boulevard to I-405); Imperial Highway (Pershing Drive to I-405); La Cienega Boulevard (north of Imperial Highway); Airport Boulevard (Arbor Vitae Street to Century Boulevard); Sepulveda Boulevard (Westchester Parkway to Imperial Highway); I-405; and I-105. LAX Master Plan Commitment ST-17, Maintenance of Haul Routes, provides for the maintenance of haul routes.

It is anticipated that implementation of the LAWA Staff-Recommended Alternative would, from time to time, require substantial deliveries of equipment, materials, and personnel to the construction site and the hauling and return of equipment, materials (i.e., excavated soils), and personnel from the site. Potential traffic impacts associated with such deliveries, haul trips, and construction worker trips would be reduced through the use of designated truck/haul routes, as described above, and by LAX Master Plan Commitment ST-12, Designated Truck Delivery Hours, which requires such activities be scheduled to avoid peak traffic hours (i.e., avoid 7:00 a.m. to 9:00 a.m. and 4:30 p.m. to 6:30 p.m.). Additionally, LAX Master Plan Commitment ST-18, Construction Traffic Management Plan, and LAX Master Plan Mitigation Measure MM-ST-14, Ground Transportation/Construction Coordination Office Outreach Program, require each construction project to have a construction traffic management plan and coordinate with the LAX Ground Transportation/Construction Coordination Office for specific means to manage and reduce both worker-related traffic impacts and delivery/haul-related traffic impacts.

The LAWA Staff-Recommended Alternative includes major construction projects that would be substantial generators of construction traffic, including substantial numbers of truck trips for materials delivery, removal of spoil materials, and other construction functions, as well as employee trips. A large construction work force would be required, which would also generate traffic. Potential traffic impacts associated with worker trips would be reduced through several LAX Master Plan commitments and an LAX Master Plan mitigation measure. LAX Master Plan Commitment ST-14, Construction Employee Shift Hours, requires that construction worker shift hours do not coincide with the heaviest commuter traffic periods (7:00 a.m. to 9:00 a.m., 4:30 p.m. to 6:30 p.m.). LAX Master Plan Commitment ST-21, Construction Employee Parking Locations, provides that during construction of improvements at or near the eastern portion of the airport, employee parking locations be selected as close to I-405 and I-105 as possible and be accessible by employee vehicles with minimal disruption to adjacent streets. Similarly, LAX Master Plan Commitment ST-20, Stockpile Locations, provides for situating stockpile locations as close to the I-405 and I-105 as possible.[63] LAX Master Plan Commitment ST-18, Construction Traffic Management Plan, and LAX Master Plan Mitigation Measure MM-ST-14, Ground Transportation/Construction Coordination Office Outreach Program, described in Section 4.12.2.5 of the SPAS Draft EIR, provide additional mechanisms to manage and reduce worker-related traffic impacts.

In addition to potential disruption of local traffic conditions due to the addition of construction-related vehicle trips, there is the potential for additional disruption in the event a project-related improvement requires temporary closure of at least one lane adjacent to its site. Closures of key roadways and intersections could cause delays, except if done for short durations during periods of very low vehicular volumes. In addition to potential traffic disruption impacts, such closures could affect pedestrian access and/or bicycle lanes due to the need to temporarily close sidewalks, and transit service may be affected

[63] The intended construction traffic mitigation benefits of LAX Master Plan Commitments ST-20 and ST-21 would be best achieved relative to Alternative 3 based on the size, nature, and location of improvements proposed at the east end of the airport under that alternative; however, those benefits would not be realized relative to the other alternatives given the comparatively smaller and fewer improvements at the east end of the airport under those alternatives. The need for, and potential traffic implications of, placing construction employee parking and construction stockpile areas at the east end of the airport would be further assessed in conjunction with the preparation of the construction traffic management plan required under LAX Master Plan Commitment ST-18 as required for all alternatives, including the LAWA Staff-Recommended Alternative.

due to the need to temporarily relocate bus stops. The potential for, and impacts associated with, such lane closures are addressed by LAX Master Plan Commitment ST-9, Construction Deliveries, requiring that construction deliveries involving lane closures must receive prior approval from the LAX Ground Transportation/Construction Coordination Office and notification of deliveries shall be made with sufficient time to allow for any modifications to approved traffic detour plans. Additionally, LAX Master Plan Commitment ST-19, Closure Restrictions of Existing Roadways, requires that, other than short time periods during nighttime construction, existing roadways remain open until they are no longer needed for regular traffic or construction traffic, unless a temporary detour route is available to serve the same function. The related requirements associated with LAX Master Plan Commitment ST-18, Construction Traffic Management Plan, and LAX Master Plan Mitigation Measure MM-ST-14, Ground Transportation/Construction Coordination Office Outreach Program, described above, would also help reduce potential impacts associated with construction-related lane closures.

In summary, implementation of the LAWA Staff-Recommended Alternative would result in temporary construction-related traffic impacts. Although there are a number of Master Plan commitments and a mitigation measure specifically designed to reduce such impacts, it cannot be concluded at this time that all construction-related traffic impacts would be reduced to a level that is less than significant. As such, in addition to the intersection impacts described above, construction-related traffic could, at times, result in temporary significant and unavoidable impacts on the streets surrounding LAX.

2.3.12.2.2 Mitigation Measures

Potential intersection improvements were identified and evaluated for all intersections identified in **Table SRA-2.3.12.2-1** and **Table SRA-2.3.12.2-3** as being significantly impacted. Such improvements include the addition of, or improvements to, travel lanes and turn lanes, traffic signal enhancements, and intersection restriping. Locations where additional right-of-way may be required are noted. The proposed and/or adopted pedestrian and bike plans[64] from the local jurisdictions in the SPAS off-airport transportation study area were evaluated to ensure the feasibility of the proposed mitigation measures such that these mitigation measures would not affect nor conflict with the proposed pedestrian or bike facilities as shown in the adopted plans. In some cases, it was determined that the improvements would not be feasible and that the impact would be significant and unavoidable. In other cases, it would be feasible to implement the mitigation under consideration. For all locations where jurisdiction is shared with agencies other than the City of Los Angeles, or which lie wholly outside of the City of Los Angeles, review and approval by the responsible agencies would be required. The discussion below in Section 2.3.12.2.2.1 presents both those improvements that were considered but determined to be infeasible, as well as those improvements that would be feasible and are thereby included in the recommended mitigation program for the LAWA Staff-Recommended Alternative, which is presented in Section 2.3.12.2.2.2.

2.3.12.2.2.1 Identification and Evaluation of Mitigation Measures

The following discussion proposes mitigation measures, where feasible, for significant impacts identified in the impact analysis above.

[64] The adopted and proposed bike plans in the SPAS off-airport transportation study area include the following documents: Draft Culver City Bicycle & Pedestrian Master Plan, October 2010, Available: http://ccwalkbike.org/documents/; City of Los Angeles, Department of City Planning, 2010 Bicycle Plan, adopted March 1, 2011, Available: http://cityplanning.lacity.org/cwd/gnlpln/transelt/NewBikePlan/Txt/LA%20CITY%20BICYCLE%20PLAN.pdf; County of Los Angeles Bicycle Master Plan, Final Plan, March 2012, Available: http://dpw.lacounty.gov/pdd/bikepath/bikeplan/; and South Bay Bicycle Coalition, South Bay Bicycle Master Plan, August 2011, Available: http://www.southbaybicyclecoalition.org/pass-the-plan-action-plan/south-bay-bicycle-master-plan-review-copy/.

Baseline (2010) with Alternatives

Intersection Improvements

- **9. Airport Boulevard and Manchester Avenue.**

  The potential improvement that would fully mitigate the project impact at this location would be to restripe the eastbound approach to provide one left-turn lane, two through lanes, and a shared through/right-turn lane. Implementation of this improvement would entail removal of three parking spaces on the south side of Manchester Avenue west of Belford Avenue, and two parking spaces on the south side of Manchester Avenue east of Belford Avenue would need to be restricted during the p.m. peak period. However, the proposed restriping of the eastbound approach would conflict with the City of Los Angeles's vision for future bicycle lanes on this segment of Manchester Avenue, and therefore is considered infeasible. No other feasible improvements were identified. This impact would be significant and unavoidable under the LAWA Staff-Recommended Alternative.

- **36. La Cienega Boulevard and Century Boulevard.**

  The potential improvements evaluated at this location for the LAWA Staff-Recommended Alternative involves modifying each of the alternatives' assumptions for lane configuration to the following: the northbound and southbound lane configurations from one left-turn lane, two through lanes, and two right-turn lanes to two left-turn lanes, two through lanes, one shared through/right-turn lane, and one right-turn lane; the eastbound lane configuration from one left-turn lane, three through lanes, and one right-turn lane to two left-turn lanes, three through lanes, and two right-turn lanes; and the westbound lane configuration from one left-turn lane, three through lanes, and one shared through/right-turn lane to two left-turn lanes, four through lanes, and two right-turn lanes with a westbound right-turn overlap phase.

  The proposed physical improvements for the LAWA Staff-Recommended Alternative cannot be accommodated within the existing right-of-way. They would require removal of existing business (economic and policy infeasibility) and create additional environmental impacts associated with demolition and construction, such as noise, air quality, etc., and therefore are considered infeasible.

  The impact at this location could be reduced through increased service levels of the airport employee TDM/Vanpool program. This program would improve intersection operations; however, it would only partially mitigate the significant impact at this location. Therefore, this impact would remain significant and unavoidable under the LAWA Staff-Recommended Alternative.

- **71. Sepulveda Boulevard and Imperial Highway.**

  Potential improvements evaluated at this location are to modify the traffic signal to include a northbound right-turn overlap phase and to restripe the northbound approach on Sepulveda Boulevard to provide one left-turn lane, three through lanes, and two right-turn lanes. Implementation of these improvements would fully mitigate the impact at this location under the LAWA Staff-Recommended Alternative.

- **85. La Brea Avenue and Manchester Boulevard.**

  The potential improvement evaluated at this location is to restripe the northbound approach to provide a separate right-turn lane, resulting in one left-turn lane, two through lanes, and one right-turn lane. This improvement would require removal of up to approximately six metered parking spaces. This improvement would fully mitigate the impact under the LAWA Staff-Recommended Alternative.

- **96. La Cienega Boulevard and Southbound I-405 Ramps (North of Century Boulevard).**

  The potential mitigation evaluated at this location under the LAWA Staff-Recommended Alternative involves widening the I-405 Freeway southbound off-ramp (the westbound approach) to provide one left-turn lane, one shared left-turn/through lane, one shared through/right-turn lane and widening the northbound approach to provide two left-turn lanes, one through lane, one shared through/right-turn lane, and one right-turn lane. The proposed physical improvements would not be sufficient to

mitigate the identified impact under the LAWA Staff-Recommended Alternative. No other feasible improvement is available to fully mitigate the project impact under Baseline (2010) with the LAWA Staff-Recommended Alternative scenario.

Future (2025) with Alternatives

Intersection Improvements

- **6. Airport Boulevard and Arbor Vitae Street/Westchester Parkway.**

  The potential improvement for this location is to restripe the northbound approach and departure to provide a third through lane so that the resulting northbound lane configuration would be one left-turn lane, two through lanes, and one shared through/right-turn lane. Implementation of this improvement alone would partially mitigate the significant impact identified at this location under the LAWA Staff-Recommended Alternative.

  To provide full mitigation for the LAWA Staff-Recommended Alternative impacts, the improvement evaluated is to reconfigure the northbound approach and departure to provide a third through lane, and widen the eastbound and westbound approaches to add a third through lane in each direction. The proposed improvements for the north approach could be accommodated within the existing right-of-way; however, widening of the east and west legs could not be accommodated within the existing right-of-way and would require removal of existing business (economic and policy infeasibility) and create additional environmental impacts associated with demolition and construction, such as noise, air quality, etc. The Westchester Community Plan, an element of the City's General Plan, includes policies to improve Airport Boulevard between La Tijera Boulevard and Century Boulevard to six through lanes and to improve Arbor Vitae Street between Airport Boulevard and Aviation Boulevard to six through lanes. Given the uncertainty of the implementation plan for the Westchester Community Plan, the widening of the eastbound and westbound approaches may not be feasible.

  Therefore, the LAWA Staff-Recommended Alternative can only be partially mitigated with the proposed improvements for the northbound approach and departure (which is to provide a third through lane so that the resulting northbound lane configuration would be one left-turn lane, two through lanes, and one shared through/right-turn lane). No other feasible improvements are available to fully mitigate the project impact under the LAWA Staff-Recommended Alternative. Therefore, this impact would remain significant and unavoidable under the LAWA Staff-Recommended Alternative.

- **7. Airport Boulevard and Century Boulevard.**

  Potential improvements evaluated at this location are to reconfigure the traffic signal to add a southbound right-turn overlapping phase, and reconfigure the northbound approach to provide additional left-turn capacity. The resulting northbound approach would provide one left-turn lane, one shared through/left-turn lane, one through lane, and one right-turn lane. The impact at this location could be reduced through increased service levels of the airport employee TDM/Vanpool program. This program would improve intersection operations; however, it would only partially mitigate the significant impact at this location. The combined effect of the physical improvement and the employee vanpool program would only partially mitigate the identified impact. No other feasible improvements have been identified to fully mitigate the project impact at this location. Therefore, this impact would remain significant and unavoidable under the LAWA Staff-Recommended Alternative.

- **9. Airport Boulevard and Manchester Avenue.**

  The potential improvements evaluated at this location are to restripe the eastbound and westbound approach to provide one left-turn lane, two through lanes, and a shared through/right-turn lane. These improvements would partially mitigate the identified impact under the LAWA Staff-Recommended Alternative.

  Implementation of this improvement would entail removal of three parking spaces on the south side of Manchester Avenue west of Belford Avenue, and two parking spaces on the south side of Manchester Avenue east of Belford Avenue would need to be restricted during the p.m. peak period.

However, the proposed restriping of the eastbound approach would conflict with the City of Los Angeles's vision for future bicycle lanes on this segment of Manchester Avenue; therefore, this improvement is considered infeasible. No other feasible improvements were identified. This impact would be significant and unavoidable.

- **10. Arbor Vitae Street and Aviation Boulevard.**

  The mitigation measure at this location is to widen the eastbound approach to the intersection of Arbor Vitae Street and Aviation Boulevard to provide a separate right-turn lane, resulting in one left-turn lane, two through lanes and one right-turn lane. Implementation of this improvement can be accomplished within the existing right of way and would fully mitigate the significant impacts under the LAWA Staff-Recommended Alternative.

- **11. Arbor Vitae Street and Inglewood Avenue.**

  The mitigation measure for this location under the LAX Master Plan is to restripe the southbound approach to provide a separate right-turn lane, which would require removal of two parking stalls on the west side of Inglewood Avenue north of Arbor Vitae Street. Implementation of this improvement would fully mitigate the significant impact identified at this location under the LAWA Staff-Recommended Alternative.

- **12. La Brea Avenue and Arbor Vitae Street.**

  The impact at this location could be mitigated through fair share contribution to the City of Inglewood's ITS improvement program. The contribution to the system would be equivalent to a 0.10 reduction in volume/capacity. This would fully mitigate the impacts under the LAWA Staff-Recommended Alternative.

- **14. Aviation Boulevard and Century Boulevard.**

  The potential improvement evaluated at this location is to widen the northbound, southbound, and westbound approaches, resulting in northbound two left-turn lanes, three through lanes, and one right-turn lane; southbound two left-turn lanes, two through lanes, and one shared through/right-turn lane; and westbound two left-turn lanes, four through lanes, and one right-turn lane. Implementation of these improvements would improve the intersection operations; however, they would only partially mitigate the significant impact at this location and the proposed physical improvement conflicts with the City of Los Angeles' vision for a planned bike lanes on Aviation Boulevard, which may result in policy infeasibility and impacts to alternative modes of transportation. Therefore, the proposed improvements are considered infeasible. The impact at this location could be reduced through increased service levels of the airport employee TDM/Vanpool program. This program would improve intersection operations; however, it would only partially mitigate the significant impact at this location. No other feasible improvements have been identified to fully mitigate the project impact. Therefore, this impact would remain significant and unavoidable under the LAWA Staff-Recommended Alternative.

- **17. Aviation Boulevard/Florence Avenue and Manchester Avenue.**

  The potential improvement evaluated at this location involves restriping both the eastbound and westbound lane configurations from one left-turn lane, two through lanes, and one right-turn lane to one left-turn lane, two through lanes, and one shared through/right-turn lane. This improvement would require the elimination of parking on the south side of Manchester Boulevard east of Aviation Boulevard and on the north side of Manchester Boulevard west of Aviation Boulevard in order to provide appropriate merging distances. This improvement would fully mitigate the identified project impact under the LAWA Staff-Recommended Alternative.

- **25. La Brea Avenue and Centinela Avenue.**

  The potential improvement evaluated at this location is to restripe the northbound and southbound approaches to provide separate right-turn lanes. The resulting lane configuration would be

northbound one left-turn lane, two through lanes, and one right-turn lane; and southbound one left-turn lane, two through lanes, and one right-turn lane. Implementation of this improvement would fully mitigate the identified project impact at this location.

- **26. La Cienega Boulevard and Centinela Avenue.**

  The potential improvement evaluated at this location is to modify the southbound approach to provide dual left-turn lanes. This improvement would require modification of the raised median on La Cienega Boulevard north of Centinela Avenue. The resulting configuration would be two left-turn lanes, two through lanes, and one shared through/right-turn lane. Implementation of this improvement would fully mitigate the significant impact at this location under the LAWA Staff-Recommended Alternative.

- **27. La Tijera Boulevard and Centinela Avenue.**

  The addition of a second southbound left-turn lane would fully mitigate the project impact at this location. However, this improvement could not be accommodated within the existing right-of-way and would require narrowing of existing sidewalks on La Tijera Boulevard, which would result in policy infeasibility and impacts to alternative modes of transportation. No other feasible improvements have been identified to fully mitigate the project impact. Therefore, this impact would remain significant and unavoidable.

  It is noted that a recent study conducted for SCAG developed grade separation concept designs for the adjacent intersection of La Cienega Boulevard at Centinela Avenue, La Tijera Boulevard, and Fairview Boulevard. If this grade separation concept becomes feasible, LAWA can provide fair share contribution, subject to FAA approval, to this improvement to fully mitigate the project impact at the adjacent intersection of La Cienega Boulevard at Centinela Avenue. This would then reduce the project traffic passing through the intersection of La Tijera Boulevard and Centinela Avenue and reduce the project impact at this location. In addition, if permitted by the FAA, LAWA will also make a monetary contribution to upgrading the County's ITS system at this intersection to partially mitigate the alternative's contribution to the cumulative impacts. Because the County does not have a method to quantify the benefits of this improvement, no quantitative V/C reduction has been taken for this location.

- **34. La Brea Avenue/Hawthorne Boulevard and Century Boulevard.**

  To fully mitigate the project impact at this location under the LAWA Staff-Recommended Alternative would require the fair share contribution to Inglewood's ITS improvement program (the contribution to the system would be equivalent to a 0.10 reduction in volume/capacity), increased service levels of the airport employee TDM/Vanpool program, and physical roadway improvements such as additional through lanes on the northbound, southbound, eastbound, and westbound approaches. However, these physical improvements could not be accommodated within the existing right-of-way and would require removal of existing business on Hawthorne Boulevard and narrowing of existing sidewalks on Century Boulevard, which may result in impacts to alternative modes of transportation. Therefore, the physical improvements are considered infeasible. No feasible improvements have been identified to fully mitigate the project impact at this location under the LAWA Staff-Recommended Alternative. This impact could be partially mitigated through contribution to the ITS program and the TDM/Vanpool program at the airport. Therefore, the impact at this location would remain significant and unavoidable under the LAWA Staff-Recommended Alternative.

- **35. Inglewood Avenue and Century Boulevard.**

  The impact at this location could be mitigated through fair share contribution to the City of Inglewood's ITS improvement program. The contribution to the system would be equivalent to a 0.10 reduction in volume/capacity. This would fully mitigate the impacts under the LAWA Staff-Recommended Alternative.

- **36. La Cienega Boulevard and Century Boulevard.**

  The potential improvements evaluated at this location for the LAWA Staff-Recommended Alternative involves modifying the LAWA Staff-Recommended Alternative assumptions for lane configuration to the following: the northbound and southbound lane configurations from one left-turn lane, two through lanes, and two right-turn lanes to two left-turn lanes, two through lanes, one shared through/right-turn lane, and one right-turn lane; the eastbound lane configuration from one left-turn lane, three through lanes, and one right-turn lane to two left-turn lanes, three through lanes, and two right-turn lanes; and the westbound lane configuration from one left-turn lane, three through lanes, and one shared through/right-turn lane to two left-turn lanes, four through lanes, and two right-turn lanes with a westbound right-turn overlap phase.

  The physical improvements proposed above for the LAWA Staff-Recommended Alternative could not be accommodated within the existing right-of-way. They would require removal of existing business and therefore are considered infeasible.

  The impact at this location could be reduced through increased service levels of the airport employee TDM/Vanpool program. This program would improve intersection operations; however, it would only partially mitigate the significant impact at this location. In addition, if permitted by the FAA, LAWA will also make a monetary contribution to upgrading the County's ITS system at this intersection to partially mitigate the alternative's contribution to the cumulative impacts. Because the County does not have a method to quantify the benefits of this improvement, no quantitative V/C reduction has been taken for this location. No other feasible improvements have been identified to fully mitigate the project impact under the LAWA Staff-Recommended Alternative. Therefore, the impact at this location would remain significant and unavoidable under the LAWA Staff-Recommended Alternative.

- **37. Prairie Avenue and Century Boulevard.**

  The impact at this location could be mitigated through fair share contribution to the City of Inglewood's ITS improvement program. The contribution to the system would be equivalent to a 0.10 reduction in volume/capacity. This would fully mitigate the impacts under the LAWA Staff-Recommended Alternative.

- **38. Sepulveda Boulevard and Century Boulevard.**

  The potential improvement evaluated at this location is to restripe the westbound approach to allow triple left turns from Century Boulevard westbound to southbound Sepulveda Boulevard. The westbound configuration would be two left turns, one shared left-turn/through/right-turn lane, and one right-turn lane. This would require removal of the raised median island on the westbound departure, which is considered physically feasible. Implementation of this physical improvement would fully mitigate the impacts for the LAWA Staff-Recommended Alternative.

- **46. Douglas Street and El Segundo Boulevard.**

  The potential improvements that would fully mitigate the project impact at this location would involve widening of the northbound approach to provide two left-turn lanes, two through lanes, and one shared through/right-turn lane; and widening of the eastbound approach to provide an additional eastbound through lane. Both improvements could not be accommodated within the existing right-of-way and would require removal of off-street surface parking spaces of existing businesses, and are therefore considered infeasible. Therefore, this impact would be significant and unavoidable under the LAWA Staff-Recommended Alternative.

- **51. Hawthorne Boulevard and El Segundo Boulevard.**

  To fully mitigate the project impact at this location, the southbound configuration would need to provide one right-turn lane, four through lanes, and two left-turn lanes. However, this improvement is not feasible due to physical constraints such as removal of recently constructed streetscape improvements and on-street parking on the southbound departure. No feasible improvements have

been identified. Therefore, this impact would remain significant and unavoidable under the LAWA Staff-Recommended Alternative.

- **57. La Brea Avenue and Florence Avenue.**

  The potential improvement evaluated at this location is to restripe the northbound approach to provide a separate right-turn lane, resulting in one left-turn lane, two through lanes, and one right-turn lane. This improvement would fully mitigate the identified impact under the LAWA Staff-Recommended Alternative.

- **58. La Cienega Boulevard and Florence Avenue.**

  Potential improvements evaluated at this location are to modify the north/south split phasing to Protected-Variable and to restripe the southbound approach to provide two left-turn lanes, one through lane, and one shared through/right-turn lane. Implementation of these improvements would partially mitigate the identified project impact under the LAWA Staff-Recommended Alternative. To fully mitigate the intersection would require the following configuration: northbound one left-turn lane, three through lanes, and one right-turn lane; southbound two left-turn lanes, three through lanes, and two right-turn lanes; eastbound two left-turn lanes, one through lane, and one shared through/right-turn lane; and westbound two left-turn lanes, one through lane, and one shared through/right-turn lane. These improvements would require obtaining right-of-way from the adjoining freeway and would conflict with the planned Metro LAX/Crenshaw light rail line, resulting in policy infeasibility and impacts to alternative modes of transportation. Therefore, this impact would remain significant and unavoidable under the LAWA Staff-Recommended Alternative.

- **60. Sepulveda Boulevard and Grand Avenue.**

  The potential improvement evaluated at this location is to restripe the eastbound approach to provide additional right-turn capacity. The resulting eastbound lane configuration would be one left-turn lane, one shared left-turn/through/right-turn lane, and one right-turn lane. Implementation of this improvement would fully mitigate the project impact.

- **62. Hawthorne Boulevard and Imperial Avenue.**

  The potential improvement evaluated at this location is to restripe the southbound approach to provide a separate right-turn lane, resulting in one left-turn lane, three through lanes, and one right-turn lane. Implementation of this improvement would only partially mitigate the identified impact under the LAWA Staff-Recommended Alternative. To fully mitigate the impact at this location under the LAWA Staff-Recommended Alternative would require the provision of additional eastbound and westbound through lanes. This physical improvement could not be accommodated within the existing right-of-way and would require removal of existing businesses (economic and policy infeasibility) and create additional environmental impacts associated with demolition and construction, such as noise, air quality, etc., and therefore is considered infeasible. No other feasible improvements are available to fully mitigate the project impact under the LAWA Staff-Recommended Alternative. Therefore, this impact would remain significant and unavoidable under the LAWA Staff-Recommended Alternative.

- **63. Hawthorne Boulevard and Lennox Boulevard.**

  The potential improvement evaluated at this location is to restripe the southbound approach to provide an additional left-turn lane and one additional through lane, which would require removal of the raised center median on Hawthorne Boulevard. The resulting southbound configuration would be two left-turn lanes, three through lanes, and one shared through/right-turn lane. This improvement would fully mitigate the identified impact; however, it could not be accommodated within the existing right-of-way and would require removal of existing business on Hawthorne Boulevard (economic and policy infeasibility) and create additional environmental impacts associated with demolition and construction, such as noise, air quality, etc. Therefore, this improvement is considered infeasible. If permitted by the FAA, LAWA will make a monetary contribution to upgrading the County's ITS system at this intersection to partially mitigate the alternative's contribution to the cumulative impacts.

Because the County does not have a method to quantify the benefits of this improvement, no quantitative V/C reduction has been taken for this location. No other feasible improvements have been identified to fully mitigate the project impact. Therefore, this impact would remain significant and unavoidable under the LAWA Staff-Recommended Alternative.

- **64. Highland Avenue/Vista del Mar and Rosecrans Avenue.**

  The addition of a second westbound right-turn lane or a free westbound right-turn lane would fully mitigate the project impact at this location; however, it would require removal of off-street parking space and disrupt the existing business at the northeast corner of the intersection. Therefore, due to the existing right-of-way constraints on Highland Avenue, the proposed mitigation is infeasible. No other feasible improvements have been identified to fully mitigate the project impact. Therefore, this impact would remain significant and unavoidable under the LAWA Staff-Recommended Alternative.

- **66. Inglewood Avenue and Imperial Highway.**

  The potential improvement evaluated at this location is to restripe the southbound approach to provide additional through capacity, resulting in one left-turn lane, one through lane, and one shared through/right-turn lane. This improvement would partially mitigate the identified impact under the LAWA Staff-Recommended Alternative. No other feasible improvements have been identified to fully mitigate the project impact under the LAWA Staff-Recommended Alternative. Therefore, this impact would remain significant and unavoidable under the LAWA Staff-Recommended Alternative.

- **71. Sepulveda Boulevard and Imperial Highway.**

  Potential improvements evaluated at this location are to modify the traffic signal to include a northbound right-turn overlap phase, restripe the westbound approach to provide a second right-turn lane, and restripe the northbound approach on Sepulveda Boulevard to provide one left-turn lane, three through lanes, and two right-turn lanes. The improvement to the westbound approach can be accommodated within the existing right-of-way, but would require relocation of the existing bike lane to south of the dual right-turn lanes. Implementation of these improvements would fully mitigate the impact at this location under the LAWA Staff-Recommended Alternative.

- **76. Inglewood Avenue and Lennox Boulevard.**

  The addition of a second through lane on both the northbound and southbound approaches would fully mitigate the project impact at this location, however this widening of the northbound and southbound approaches would require narrowing of existing sidewalk on Inglewood Avenue, resulting in policy infeasibility and impacts to alternative modes of transportation. If permitted by the FAA, LAWA will make a monetary contribution to upgrading the County's ITS system at this intersection to partially mitigate the alternative's contribution to the cumulative impacts. Because the County does not have a method to quantify the benefits of this improvement, no quantitative V/C reduction can be taken for this location. No other feasible improvements have been identified. Therefore, this impact would remain significant and unavoidable under the LAWA Staff-Recommended Alternative.

- **77. Inglewood Avenue and Manchester Boulevard.**

  The addition of a third eastbound through lane would fully mitigate the project impact at this location; however, it would require removing of existing mature landscaped raised median and removal of off-street surface parking spaces on existing business properties, and therefore is considered infeasible. No other feasible improvements have been identified to fully mitigate the project impact. Therefore, this impact would remain significant and unavoidable under the LAWA Staff-Recommended Alternative.

- **85. La Brea Avenue and Manchester Boulevard.**

  The impact at this location could be mitigated through fair share contribution to the City of Inglewood's ITS improvement program. The contribution to the system would be equivalent to a 0.10 reduction in

volume/capacity. This would fully mitigate the impacts under the LAWA Staff-Recommended Alternative.

- **86. La Brea Avenue/Overhill Avenue and Stocker Street.**

  The potential improvement evaluated at this location would modify the southbound approach to provide additional through capacity by converting the southbound free right-turn lane to a shared through/right-turn lane, resulting in two left-turn lanes, two through lanes, and one shared through/right-turn lane. Implementation of this improvement could be accomplished within the existing right-of-way, but would remove the raised island on the northwest corner of the intersection. Because this improvement would only partially mitigate the project impact in certain peak hours but would worsen conditions in others, it is not recommended. To fully mitigate the impact at this location would require the provision of a southbound through lane, which is not feasible within the existing right-of-way and would require narrowing sidewalks on La Brea Avenue, which would result in policy infeasibility and impacts to alternative modes of transportation. If permitted by the FAA, LAWA will make a monetary contribution to upgrading the County's ITS system at this intersection to partially mitigate the alternative's contribution to the cumulative impacts. Because the County does not have a method to quantify the benefits of this improvement, no quantitative V/C reduction has been taken for this location. No other feasible improvements have been identified to fully mitigate the project impact. Therefore, this impact would remain significant and unavoidable under the LAWA Staff-Recommended Alternative.

- **87. La Brea Avenue and Slauson Avenue.**

  The potential improvement evaluated at this location is to restripe the southbound approach to provide one left-turn lane, two through lanes, and one shared through/right-turn lane and to eliminate the existing southbound right-turn overlap phase. Implementation of this improvement would partially mitigate the project impact at this location. If permitted by the FAA, LAWA will also make a monetary contribution to upgrading the County's ITS system at this intersection to partially mitigate the alternative's contribution to the cumulative impacts. Because the County does not have a method to quantify the benefits of this improvement, no quantitative V/C reduction has been taken for this location. No other feasible improvements have been identified to fully mitigate the project impact. Therefore, this impact would remain significant and unavoidable under the LAWA Staff-Recommended Alternative.

- **88. La Cienega Boulevard and La Tijera Boulevard.**

  Due to right-of-way and physical constraints at this intersection, no feasible improvements have been identified. It is noted that a recent study conducted for SCAG developed grade separation concept designs for La Cienega Boulevard at Centinela Avenue, La Tijera Boulevard, and Fairview Boulevard. Pending further study of these concepts to determine their feasibility, however, this impact would remain significant and unavoidable. If this grade separation concept becomes feasible, LAWA can provide fair share contribution, subject to FAA approval, to this improvement to fully mitigate the project impact at this location.

- **90. La Cienega Boulevard and Manchester Boulevard.**

  The improvement for this location included in the LAX Master Plan involves changing the north/south split phasing from split to protected and restriping La Cienega Boulevard from north of Florence Avenue to south of Olive Street in order to reconfigure the southbound approach to provide two left-turn lanes, one through lane, and one shared through/right-turn lane. Implementation of this improvement would only partially mitigate the identified project impact under the LAWA Staff-Recommended Alternative. To fully mitigate the impact at this location for the LAWA Staff-Recommended Alternative would require the provision of a second eastbound left-turn lane, a second westbound left-turn lane, and an additional northbound through lane. These additional improvements would require removal of an existing retaining wall on the eastside of La Cienega Boulevard and would require widening of the Manchester Boulevard Bridge over the I-405 Freeway. These additional improvements would require further engineering study and Caltrans review and approval,

and therefore may not be feasible. No feasible improvements have been identified to fully mitigate the project impact at the LAWA Staff-Recommended Alternative.

Although the partial mitigation of changing the north/south split phasing from split to protected and restriping the southbound approach to provide two left-turn lanes, one through lane, and one shared through/right-turn lane is physically feasible; therefore, the project impact at this location would remain significant and unavoidable under the LAWA Staff-Recommended Alternative.

- **93. La Cienega Boulevard and Stocker Street.**

  Due to right-of-way and physical constraints at this intersection, no feasible improvements have been identified. It is noted that a recent study conducted for SCAG developed a grade separation concept design for La Cienega Boulevard at Stocker Street. Pending further study of these concepts to determine their feasibility, however, this impact would remain significant and unavoidable under the LAWA Staff-Recommended Alternative. If this grade separation concept becomes feasible, LAWA can provide fair share contribution to this improvement, subject to FAA approval, to fully mitigate the project impact at this location. If permitted by the FAA, LAWA will also make a monetary contribution to upgrading the County's ITS system at this intersection to partially mitigate the alternative's contribution to the cumulative impacts. Because the County does not have a method to quantify the benefits of this improvement, no quantitative V/C reduction can be taken for this location and the impact is considered to be significant and unavoidable.

- **95. La Cienega Boulevard and 120th Street.**

  The addition of a second southbound left-turn lane would fully mitigate the project impact at this location. However, this improvement could not be accommodated within the existing right-of-way, but would require removal of existing business on the east side La Cienega Boulevard (economic and policy infeasibility) and create additional environmental impacts associated with demolition and construction, such as noise, air quality, etc. Therefore, this improvement is considered infeasible. If permitted by the FAA, LAWA will make a monetary contribution to upgrading the County's ITS system at this intersection to partially mitigate the alternative's contribution to the cumulative impacts. Because the County does not have a method to quantify the benefits of this improvement, no quantitative V/C reduction can be taken for this location. No feasible improvements have been identified that would fully mitigate the identified impact. Therefore, this impact would remain significant and unavoidable.

- **96. La Cienega Boulevard and Southbound I-405 Ramps (north of Century Boulevard).**

  The potential improvement evaluated at this location involves widening of the I-405 Freeway southbound off-ramp (the westbound approach) to provide one left-turn lane, one shared left-turn/through lane, and one shared through/right-turn lane. This proposed improvement would only partially mitigate the impact under the LAWA Staff-Recommended Alternative. Full mitigation of the impacts under the LAWA Staff-Recommended Alternative would also require widening the northbound approach to provide two left-turn lanes, one through lane, one shared through/right-turn lane, and one right-turn lane. The proposed physical improvements are considered feasible and would fully mitigate the project impacts at this location under Future (2025) with the LAWA Staff-Recommended Alternative scenario.

- **102. Northbound I-405 Ramps and La Tijera Boulevard.**

  A potential improvement that would fully mitigate the project impact at this location is the addition of a second eastbound left-turn lane from La Tijera Boulevard onto the I-405 northbound on-ramp and the widening of the westbound approach of La Tijera Boulevard from four to five through lanes plus a westbound right-turn lane. This improvement is identified as a potential improvement in the Coastal Corridor Specific Plan, but is subject to additional feasibility analysis and is not considered feasible at this time.

  The impact at this location could be reduced through increased service levels of the airport employee TDM/Vanpool program. This program would improve intersection operations; however, it would only

partially mitigate the significant impact at this location. No other feasible improvements have been identified to fully mitigate the project impact under the LAWA Staff-Recommended Alternative.

If the widening of the La Tijera Boulevard Bridge becomes feasible, LAWA can provide fair share contribution to this improvement, subject to FAA approval, to fully mitigate the project impact at this location.

- **109. Lincoln Boulevard and Venice Boulevard.**

  The addition of one northbound through lane would fully mitigate the project impact at this location. However, this improvement could not be accommodated within the existing right-of-way and would require narrowing sidewalks on Lincoln Boulevard, which would result in policy infeasibility and impacts to alternative modes of transportation.

  The impact at this location could be reduced through increased service levels of the airport employee TDM/Vanpool program. This program would improve intersection operations; however, it would only partially mitigate the significant impact at this location. No other feasible improvements have been identified to fully mitigate the project impact under the LAWA Staff-Recommended Alternative. Therefore, this impact would remain significant and unavoidable under the LAWA Staff-Recommended Alternative.

- **110. Lincoln Boulevard and Washington Boulevard.**

  The addition of a southbound through lane would fully mitigate the project impact at this location. However, adding a southbound through lane would require widening of the southbound approach and departure, which would require removal of existing business on the west side of Lincoln Boulevard (economic and policy infeasibility) and create additional environmental impacts associated with demolition and construction, such as noise, air quality, etc., and therefore is considered infeasible. The impact at this location could be reduced through increased service levels of the airport employee TDM/Vanpool program. This program would improve intersection operations; however, it would only partially mitigate the significant impact at this location. No other feasible improvements have been identified to fully mitigate the project impact under the LAWA Staff-Recommended Alternative. Therefore, this impact would remain significant and unavoidable under the LAWA Staff-Recommended Alternative.

- **115. Ash Avenue and Manchester Avenue.**

  The potential improvement evaluated at this location is to restripe the northbound approach to provide additional left-turn capacity, resulting in two left-turn lanes and one shared through/right-turn lane. Implementation of this improvement would partially mitigate the impact at this location under the LAWA Staff-Recommended Alternative. No other feasible improvements have been identified to fully mitigate the project impact under the LAWA Staff-Recommended Alternative. Therefore, this impact would remain significant and unavoidable under the LAWA Staff-Recommended Alternative.

- **119. Ocean Avenue/Via Marina and Washington Boulevard.**

  The potential improvement for this location would be restriping the westbound approach to provide a separate right-turn lane. Because it would not fully mitigate the project impact and because it would entail removal of approximately six on-street parking spaces, this improvement is not considered feasible. To fully mitigate the project impact at this location would require the provision of additional eastbound and westbound through lanes.

  However, these improvements would require widening of the eastbound and westbound approaches and departures, which would require removal of existing business on Washington Boulevard (economic and policy infeasibility) and create additional environmental impacts associated with demolition and construction, such as noise, air quality, etc., and therefore are considered infeasible. If permitted by the FAA, LAWA will make a monetary contribution to upgrading the County's ITS system at this intersection to partially mitigate the alternative's contribution to the cumulative impacts. Because the County does not have a method to quantify the benefits of this improvement, no

quantitative V/C reduction can be taken for this location. No feasible improvements have been identified to fully mitigate the project impact. Therefore, this impact would remain significant and unavoidable under the LAWA Staff-Recommended Alternative.

- **125. Sepulveda Boulevard and Rosecrans Avenue.**

  Addressing the significant impact at this location would require widening of the northbound approach to provide two left-turn lanes, five through lanes, and one right-turn lane. This physical improvement could not be accommodated within the existing right-of-way and would require removal of existing business (economic and policy infeasibility) on Sepulveda Boulevard and create additional environmental impacts associated with demolition and construction, such as noise, air quality, etc., and therefore is considered infeasible.

  The impact at this location could be reduced through increased service levels of the airport employee TDM/Vanpool program. This program would improve intersection operations; however, it would only partially mitigate the significant impact at this location. No other feasible improvements have been identified to fully mitigate the project impact under the LAWA Staff-Recommended Alternative. Therefore, this impact would remain significant and unavoidable under the LAWA Staff-Recommended Alternative.

- **139. Sepulveda Boulevard and I-105 Westbound Ramps (North of Imperial Avenue).**

  The addition of a fourth northbound through lane would fully mitigate the project impact at this location. However, the proposed improvement could not be accommodated within the existing right-of-way and would require relocation of existing supporting structures of the I-105 Freeway and modification to the I-105 westbound off-ramp at Sepulveda Boulevard, which would require further engineering study and may not be acceptable to Caltrans. In addition, the merge from four lanes to the existing three lanes in the Sepulveda Tunnel north of this intersection could not be achieved using Caltrans standards.

  The impact at this location could be reduced through increased service levels of the airport employee TDM/Vanpool program. This program would improve intersection operations; however, it would only partially mitigate the significant impact at this location. No other feasible improvements have been identified to fully mitigate the project impact under the LAWA Staff-Recommended Alternative. Therefore, this impact would remain significant and unavoidable under the LAWA Staff-Recommended Alternative.

- **143. Vicksburg Avenue and 96th Street.**

  The potential improvement evaluated at this location is to widen the westbound approach to provide dual right-turn movements from Vicksburg Avenue to 96th Street Bridge, resulting in the following westbound configuration: one left-turn lane, one through lane, and two right-turn lanes. Implementation of this improvement would fully mitigate the project impact under the LAWA Staff-Recommended Alternative.

- **147. Crenshaw Boulevard and Century Boulevard.**

  The addition of a fourth southbound through lane would fully mitigate the project impact at this location. However, the proposed improvements could not be accommodated within the existing right-of-way and would require removal of existing business on the west side of Crenshaw Boulevard, which would result in economic and policy infeasibility, and therefore is considered infeasible. The impact at this location could be reduced through increased service levels of the airport employee TDM/Vanpool program. This program would improve intersection operations; however, it would only partially mitigate the significant impact at this location. No other feasible improvements have been identified to fully mitigate the project impact under the LAWA Staff-Recommended Alternative. Therefore, this impact would remain significant and unavoidable under the LAWA Staff-Recommended Alternative.

- **149. Crenshaw Boulevard and Imperial Highway.**

  The addition of one through lane in both the eastbound and westbound directions would fully mitigate the project impact at this location. However, the proposed improvement could not be accommodated within existing right-of-way and would require removal of existing business on Imperial Highway, which would result in economic and policy infeasibility, and therefore is considered infeasible. No feasible improvements have been identified to fully mitigate the project impact. This impact would remain significant and unavoidable under the LAWA Staff-Recommended Alternative.

- **154. Overland Avenue and Sawtelle Boulevard.**

  This stop-controlled intersection meets the standard traffic signal warrants[65] recommended in the Federal Highway Administration Manual on Uniform Traffic Control Devices and associated State guidelines and the criteria for installation of a traffic signal under existing conditions. Installation of a signal would improve the traffic operations at this location and could fully mitigate the project impact. However, installation of a traffic signal at this location would be the responsibility of Culver City. No other feasible improvements have been identified to fully mitigate the project impact. Therefore, the impact at this location would remain significant and unavoidable under the LAWA Staff-Recommended Alternative. If installation of the signal becomes feasible, LAWA would provide a fair share contribution, subject to FAA approval, to this improvement, which would fully mitigate the project impact at this location.

- **156. Walgrove Avenue and Washington Boulevard.**

  This stop-controlled intersection meets the standard traffic signal warrants[66] recommended in the Federal Highway Administration Manual on Uniform Traffic Control Devices and associated State guidelines and the criteria for installation of a traffic signal under existing conditions. Installation of a signal would improve the traffic operations at this location and could fully mitigate the project impact. However, installation of a traffic signal at this location would be the responsibility of Culver City and, given the close proximity to upstream/downstream signals, may not be acceptable to Culver City. No other feasible improvements have been identified to fully mitigate the project impact. Therefore, the impact at this location would be significant and unavoidable under the LAWA Staff-Recommended Alternative. If installation of a signal becomes feasible at this location, LAWA would provide a fair share contribution, subject to FAA approval, to this improvement, which would fully mitigate the project impact at this location.

- **159. Hindry Avenue and Manchester Boulevard.**

  The potential improvement evaluated at this location is to reconfigure the eastbound approach to provide a separate right-turn lane, resulting in one left-turn lane, two through lanes, and one right-turn lane. Implementation of this improvement would require removal of approximately seven metered

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65 This analysis is intended to examine the general correlation between the planned level of future development and the need to install new traffic signals. It estimates future development-generated traffic compared against a sub-set of the standard traffic signal warrants recommended in the Federal Highway Administration Manual on Uniform Traffic Control Devices and associated State guidelines. This analysis should not serve as the only basis for deciding whether and when to install a signal. To reach such a decision, the full set of warrants should be investigated based on field-measured, rather than forecast, traffic data and a thorough study of traffic and roadway conditions by an experienced engineer. Furthermore, the decision to install a signal should not be based solely upon the warrants, since the installation of signals can lead to certain types of collisions. The responsible local agency should undertake regular monitoring of actual traffic conditions and accident data, and timely re-evaluation of the full set of warrants in order to prioritize and program intersections for signalization.

66 This analysis is intended to examine the general correlation between the planned level of future development and the need to install new traffic signals. It estimates future development-generated traffic compared against a sub-set of the standard traffic signal warrants recommended in the Federal Highway Administration Manual on Uniform Traffic Control Devices and associated State guidelines. This analysis should not serve as the only basis for deciding whether and when to install a signal. To reach such a decision, the full set of warrants should be investigated based on field-measured, rather than forecast, traffic data and a thorough study of traffic and roadway conditions by an experienced engineer. Furthermore, the decision to install a signal should not be based solely upon the warrants, since the installation of signals can lead to certain types of collisions. The responsible local agency should undertake regular monitoring of actual traffic conditions and accident data, and timely re-evaluation of the full set of warrants in order to prioritize and program intersections for signalization.

parking spaces. This improvement would fully mitigate the project impact under Alternative 4 and partially mitigate the project impact under the LAWA Staff-Recommended Alternative. No feasible improvements have been identified to fully mitigate the project impact for the LAWA Staff-Recommended Alternative. Therefore, the impact at this location would remain significant and unavoidable under the LAWA Staff-Recommended Alternative.

- **162. Sepulveda Boulevard and Manhattan Beach Boulevard.**

  The addition of a second northbound left-turn lane would fully mitigate the project impact at this location. Implementation of this improvement would require removal of the raised median on Sepulveda Boulevard and would require narrowing of existing sidewalk on the east side of Sepulveda Boulevard, which would result in policy infeasibility and impacts to alternative modes of transportation. Therefore, this improvement is considered infeasible due to right-of-way and physical constraints. The impact at this location could be reduced through increased service levels of the airport employee TDM/Vanpool program. This program would improve intersection operations; however, it would only partially mitigate the significant impact at this location. No other feasible improvements have been identified to fully mitigate the project impact under the LAWA Staff-Recommended Alternative. Therefore, this impact would remain significant and unavoidable under the LAWA Staff-Recommended Alternative.

- **164. Manchester Avenue and Crenshaw Boulevard.**

  The addition of one through lane in the eastbound and westbound directions would fully mitigate the project impact at this location. Implementation of this improvement would require additional right-of-way and would require removal of the raised median and on-street parking on Manchester Boulevard, and therefore is considered infeasible. No other feasible improvements have been identified to fully mitigate the impact at this location. Therefore, this impact would remain significant and unavoidable under the LAWA Staff-Recommended Alternative.

- **165. La Cienega Boulevard and Rodeo Road.**

  The project impact at this location would be fully mitigated with the addition of a separate southbound right-turn lane to serve the channelized free right-turn lane that exists at the intersection. Extending the southbound right-turn lane would require additional right-of-way and would significantly disrupt the existing business on the northwest corner of the intersection, which would result in economic and policy infeasibility; and is therefore determined to be infeasible. Therefore, this impact would remain significant and unavoidable under the LAWA Staff-Recommended Alternative.

  In addition, it is noted that a recent study conducted for SCAG developed a grade separation concept designs for La Cienega Boulevard at Rodeo Road. Pending further study of this concept to determine its feasibility, this impact, however, would remain significant and unavoidable. If this grade separation concept becomes feasible, LAWA can provide fair share contribution, subject to FAA approval, to this improvement to fully mitigate the project impact at this location.

- **169. Prairie Avenue and Manchester Boulevard.**

  The potential improvement evaluated at this location is to reconfigure the eastbound approach to provide dual left-turn lanes. This improvement would require removing the raised center median and restriping the westbound departure lanes northward in the existing right-of-way. The resulting eastbound approach would provide two left-turn lanes, two through lanes, and one shared through/right-turn lane. This improvement would only partially mitigate the project impact under the LAWA Staff-Recommended Alternative. No other feasible improvements have been identified to fully mitigate the project impacts under the LAWA Staff-Recommended Alternative. Therefore, this impact would remain significant and unavoidable under the LAWA Staff-Recommended Alternative.

- **172. Western Avenue and Manchester Avenue.**

  The project impact at this location would be fully mitigated with the addition of westbound dual left-turn lanes. However, this improvement would require additional right-of-way acquisition from private

properties on the west side of Western Avenue and would significantly disrupt those existing business due to loss of off-street parking spaces, which would result in economic and policy infeasibility; and is therefore determined to be infeasible. No feasible improvements are available to fully mitigate the project impact. Therefore, this impact would remain significant and unavoidable under the LAWA Staff-Recommended Alternative.

- **173. Western Avenue and Imperial Highway.**

  The addition of a separate eastbound right-turn lane would fully mitigate the project impact at this location. However, this improvement would require additional right-of-way acquisition from private property on the southwest corner of this intersection, and would significantly disrupt that existing business due to loss of off-street parking spaces, which would result in economic and policy infeasibility. Therefore, this improvement is determined to be infeasible. If permitted by the FAA, LAWA will make a monetary contribution to upgrading the County's ITS system at this intersection to partially mitigate the alternative's contribution to the cumulative impacts. Because the County does not have a method to quantify the benefits of this improvement, no quantitative V/C reduction can be taken for this location. No feasible improvements are available to fully mitigate the project impact. Therefore, this impact would remain significant and unavoidable under the LAWA Staff-Recommended Alternative.

- **188. Prairie Avenue and El Segundo Boulevard.**

  The project impact at this location would be fully mitigated with the addition of separate eastbound and westbound right-turn lanes. However, these improvements would require additional right-of-way acquisition from the private property on the southwest corner of this intersection and public space from Hawthorne Memorial Park, which would result in economic and policy infeasibility. No other feasible improvements have been identified to fully mitigate the project impact at this location. Therefore, this impact would remain significant and unavoidable under the LAWA Staff-Recommended Alternative.

- **197. Prairie Avenue and Lennox Boulevard.**

  The potential improvement evaluated at this location is to restripe the eastbound approach to provide one left-turn lane, one shared through/left-turn lane, and one right-turn lane. This improvement would only partially mitigate the project impact under the LAWA Staff-Recommended Alternative. No other feasible improvements have been identified to fully mitigate the project impact under the LAWA Staff-Recommended Alternative. Therefore, this impact would remain significant and unavoidable for the LAWA Staff-Recommended Alternative.

Freeway Segment Improvements

No feasible improvements have been identified for the three freeway segments that could be significantly impacted under the LAWA Staff-Recommended Alternative:

- Route 405, at postmile 0.40, north of Route 22
- Route 405, at postmile 8.02, Santa Fe Avenue
- Route 405, at postmile 11.90, south of Route 110

To fully mitigate the project impact at these locations would require the construction of an additional northbound travel lane at each location and an additional southbound travel lane on I-405 south of Route 110. Due to right-of-way and physical constraints, such as existing bridge structures and auxiliary lane and ramp configurations, the addition of travel lanes at these locations is not feasible. Therefore, impacts would remain significant and unavoidable.

2.3.12.2.2.2 Recommended Mitigation Program

Implementation of LAX Master Plan Commitments ST-9, ST-12, ST-14, ST-17, ST-18, ST-19, ST-20, ST-21,[67] and ST-22 and LAX Master Plan Mitigation Measure MM-ST-14 would reduce construction-related off-airport transportation impacts associated with the LAWA Staff-Recommended Alternative. No additional measures are available to address construction-related off-airport transportation impacts at this stage of planning.

There would be significant impacts to some CMP arterial monitoring intersections and freeway monitoring stations under the LAWA Staff-Recommended Alternative. Physical mitigation is available for Intersection 26 (La Cienega Boulevard and Centinela Avenue) as shown below under MM-ST (SPAS)-10. No additional measures are feasible and available to address the impacts to other impacted arterial and freeway facilities.

Based on the information provided in Section 2.3.12.2.2.1, the following mitigation measures are proposed to address off-airport transportation impacts associated with the LAWA Staff-Recommended Alternative:

Intersection Mitigation Measures

- **MM-ST (SPAS)-1. Transportation Demand Management Program.**

  To reduce the impacts associated with the LAWA Staff-Recommended Alternative, LAWA will provide additional vanpool services to airport employees. This would reduce vehicular trips on the major roadways that provide direct access to and from the airport facilities (e.g., Sepulveda Boulevard, Lincoln Boulevard, Century Boulevard, La Tijera Boulevard, Aviation Boulevard, and La Cienega Boulevard). The upgrades to the existing vanpool program would entail providing sufficient vehicles to accommodate up to 500 employees that would shift from driving to the airport to the program.

  The increased vanpool service will result in removal of approximately 740 daily vehicular trips to and from the airport parking facilities on a typical weekday. The net effect of this program would result in partial mitigation of project impacts at multiple locations associated with the LAWA Staff-Recommended Alternative.

- **MM-ST (SPAS)-2. Modify the Intersection of Airport Boulevard and Arbor Vitae Street/ Westchester Parkway (Intersection 6).**

  The mitigation measure for this location is to restripe the northbound approach and departure to provide a third through lane so that the resulting northbound lane configuration would be one left-turn lane, two through lanes, and one shared through/right-turn lane. This would be a partial mitigation for the Future (2025) With the LAWA Staff-Recommended Alternative scenario.

- **MM-ST (SPAS)-3. Modify the Intersection of Airport Boulevard and Century Boulevard (Intersection 7).**

  The mitigation measure for this location is to reconfigure the traffic signal to add a southbound right-turn overlapping phase, and reconfigure the northbound approach to provide additional left-turn capacity. The resulting northbound approach would provide one left-turn lane, one shared through/left-turn lane, one through lane, and one right-turn lane. The impact at this location could be reduced through increased service levels of the airport employee TDM/Vanpool program. This program would improve intersection operations; however, the combined effect of the physical

[67] As discussed in Section 4.12.2.6.3, the construction traffic mitigation benefits of LAX Master Plan Commitments ST-20 and ST-21, which involve locating construction worker parking and construction stockpiles at the east end of the airport, would best be realized under Alternative 3, given the size, location, and nature of improvements proposed in that area; however, the mitigation benefits and traffic implications of those measures relative to other alternatives, including the LAWA Staff-Recommended Alternative, would need to be further assessed in conjunction with development of construction traffic control plans required under ST-18.

improvement and the employee vanpool program would partially mitigate the identified impact under the Future (2025) With the LAWA Staff-Recommended Alternative scenario.

- **MM-ST (SPAS)-4. Modify the Intersection of Arbor Vitae Street and Inglewood Avenue (Intersection 11).**

  The mitigation measure for this location is to restripe the southbound approach to provide a separate right-turn lane. This improvement would be a full mitigation for the Future (2025) With the LAWA Staff-Recommended Alternative scenario.

- **MM-ST (SPAS)-5. La Brea Avenue and Arbor Vitae Street (Intersection 12).**

  The mitigation involves Fair share contribution to the City of Inglewood's ITS improvement program for this intersection. Implementation of the ITS improvement would be full mitigation for the project impact under the Future (2025) With the LAWA Staff-Recommended Alternative scenario.

- **MM-ST (SPAS)-8. Modify the Intersection of Aviation Boulevard/Florence Avenue and Manchester Avenue (Intersection 17).**

  The mitigation measure for this location is to restripe both the eastbound and westbound lane configurations from one left-turn lane, two through lanes, and one right-turn lane to one left-turn lane, two through lanes, and one shared through/right-turn lane. This would be a full mitigation for the project impacts under the Future (2025) With the LAWA Staff-Recommended Alternative scenario.

- **MM-ST (SPAS)-9. Modify the Intersection of La Brea Avenue and Centinela Avenue (Intersection 25).**

  The mitigation measure for this location is to restripe the northbound and southbound approaches to provide separate right-turn lanes. The resulting lane configuration would be northbound one left-turn lane, two through lanes, and one right-turn lane; and southbound one left-turn lane, two through lanes, and one right-turn lane. This would be a full mitigation for the project impacts under the Future (2025) With the LAWA Staff-Recommended Alternative scenario.

- **MM-ST (SPAS)-10. Modify the Intersection of La Cienega Boulevard and Centinela Avenue (Intersection 26).**

  The mitigation measure for this location is to modify the southbound approach to provide dual left-turn lanes. This improvement would require modification to the raised median on La Cienega Boulevard north of Centinela Avenue. The resulting configuration would be two left-turn lanes, two through lanes, and one shared through/right-turn lane. This improvement would be a full mitigation for project impacts identified at this location under the Future (2025) With the LAWA Staff-Recommended Alternative scenario. This would also be the mitigation for this impacted CMP arterial intersection.

- **MM-ST (SPAS)-12. La Brea Avenue/Hawthorne Boulevard and Century Boulevard (Intersection 34).**

  The mitigation involves fair share contribution to the City of Inglewood's ITS improvement program for this intersection. Implementation of the ITS improvement would be partial mitigation for the project impact under the Future (2025) With the LAWA Staff-Recommended Alternative scenario.

- **MM-ST (SPAS)-13. Inglewood Avenue and Century Boulevard (Intersection 35).**

  The mitigation involves fair share contribution to the City of Inglewood's ITS improvement program for this intersection. Implementation of the ITS improvement would be provide full mitigation for the project impact under the Future (2025) With the LAWA Staff-Recommended Alternative scenario.

- **MM-ST (SPAS)-14. Prairie Avenue and Century Boulevard (Intersection 37).**

  The mitigation involves fair share contribution to the City of Inglewood's ITS improvement program for this intersection. Implementation of the ITS improvement would provide full mitigation for the project impact under the Future (2025) With the LAWA Staff-Recommended Alternative scenario.

- **MM-ST (SPAS)-15. Modify the Intersection of Sepulveda Boulevard and Century Boulevard (Intersection 38).**

  The mitigation measure for this location is to restripe the westbound approach to provide two left-turn lanes, one shared left-turn/through/right-turn lane, and one right-turn lane. This improvement would be a full mitigation for the Future (2025) With the LAWA Staff-Recommended Alternative scenario.

- **MM-ST (SPAS)-17. Modify the Intersection of La Brea Avenue and Florence Avenue (Intersection 57).**

  The mitigation measure for this location is to restripe the northbound approach to provide a separate right-turn lane, resulting in one left-turn lane, two through lanes, and one right-turn lane. This improvement would be a full mitigation for project impacts identified at this location under the Future (2025) With the LAWA Staff-Recommended Alternative scenario.

- **MM-ST (SPAS)-18. Modify the Intersection of La Cienega Boulevard and Florence Avenue (Intersection 58).**

  The mitigation measure for this location is to modify the north/south split phasing to Protected-Variable and restripe the southbound approach to provide two left-turn lanes, one through lane, and one shared through/right-turn lane. This improvement would be a partial mitigation for the project impacts under the Future (2025) With the LAWA Staff-Recommended Alternative scenario.

- **MM-ST (SPAS)-19. Modify the Intersection of Sepulveda Boulevard and Grand Avenue (Intersection 60).**

  The mitigation measure for this location is to restripe the westbound approach to provide additional left-turn capacity by restriping a through lane to a shared through/left-turn lane. Minor changes to the lane assignment signage would also be necessary. The resulting westbound lane configuration would be two left-turn lanes, one shared through/left-turn lane, one through lane and one right-turn lane. This improvement would be a full mitigation for project impacts under the Future (2025) With Alternatives 1-2, 8, and 9 scenarios.

- **MM-ST (SPAS)-20. Modify the Intersection of Hawthorne Boulevard and Imperial Avenue (Intersection 62).**

  The mitigation measure for this location is to restripe the southbound approach to provide a separate right-turn lane, resulting in one left-turn lane, three through lanes, and one right-turn lane. This improvement would be a partial mitigation for project impacts under the Future (2025) With the LAWA Staff-Recommended Alternative scenario.

- **MM-ST (SPAS)-21. Modify the Intersection of Inglewood Avenue and Imperial Highway (Intersection 66).**

  The mitigation measure for this location is to restripe the southbound approach to provide additional through capacity, resulting in one left-turn lane, one through lane, and one shared through/right-turn lane. This improvement would be a partial mitigation for impacts under the Future (2025) With the LAWA Staff-Recommended Alternative scenario.

- **MM-ST (SPAS)-23. Modify the Intersection of Sepulveda Boulevard and Imperial Highway (Intersection 71).**

  The mitigation measure for this location is to modify the traffic signal to include a northbound right-turn overlap phase, restripe the westbound approach to provide a second right-turn lane, and restripe the northbound approach on Sepulveda Boulevard to provide one left-turn lane, three through lanes, and two right-turn lanes. These would be a full mitigation for the project impacts under the Baseline (2010) with the LAWA Staff-Recommended Alternative scenario and also those impacts under the Future (2025) With the LAWA Staff-Recommended Alternative scenario.

- **MM-ST (SPAS)-25. Modify the Intersection of La Brea Avenue and Manchester Boulevard (Intersection 85).**

  The mitigation involves fair share contribution to the City of Inglewood's ITS improvement program for this intersection. Implementation of the ITS improvement would provide full mitigation for the project impact found Baseline (2010) With the LAWA Staff-Recommended Alternative and under the Future (2025) With the LAWA Staff-Recommended Alternative.

- **MM-ST (SPAS)-26. Modify the Intersection of La Brea Avenue and Slauson Avenue (Intersection 87).**

  The mitigation measure for this location is to restripe the southbound approach to provide one left-turn lane, two through lanes, and one shared through/right-turn lane and to eliminate the existing southbound right-turn overlap phase. This would be a partial mitigation for the Future (2025) With the LAWA Staff-Recommended Alternative scenario.

- **MM-ST (SPAS)-27. Modify the Intersection of La Cienega Boulevard and Manchester Boulevard (Intersection 90).**

  The mitigation measure for this location is to change the north/south split phasing from split to protected and restripe La Cienega Boulevard from north of Florence Avenue to south of Olive Street in order to reconfigure the southbound approach to provide two left-turn lanes, one through lane, and one shared through/right-turn lane. This would be a partial mitigation for project impacts under the Future (2025) With the LAWA Staff-Recommended Alternative scenario.

- **MM-ST (SPAS)-28. Modify the intersection of La Cienega Boulevard and Southbound I-405 Ramps (north of Century Boulevard) (Intersection 96).**

  The mitigation measure for this location is to widen the I-405 Freeway southbound off-ramp (the westbound approach) to provide one left-turn lane, one shared left-turn/through lane, and one shared through/right-turn lane.

  Full mitigation of the impacts under Future (2025) with the LAWA Staff-Recommended Alternative would also require widening the northbound approach to provide two left-turn lanes, one through lane, one shared through/right-turn lane, and one right-turn lane.

- **MM-ST (SPAS)-31. Modify the Intersection of Ash Avenue and Manchester Avenue (Intersection 115).**

  The mitigation measure for this location is to restripe the northbound approach to provide additional left-turn capacity, resulting in two left-turn lanes and one shared through/right-turn lane. This would be a partial mitigation for the Future (2025) With the LAWA Staff-Recommended Alternative scenario.

- **MM-ST (SPAS)-32. Vicksburg Avenue and 96th Street (Intersection 143).**

  The mitigation measure for this location is to widen the westbound approach to provide dual right-turn movements from Vicksburg Avenue to 96th Street Bridge, resulting in the following westbound configuration: one left-turn lane, one through lane, and two right-turn lanes. This would be a full mitigation for the Future (2025) With the LAWA Staff-Recommended Alternative scenario.

- **MM-ST (SPAS)-34. Modify the Intersection of Hindry Avenue and Manchester Boulevard (Intersection 159).**

  The mitigation measure for this location is to reconfigure the eastbound approach to provide a separate right-turn lane, resulting in one left-turn lane, two through lanes, and one right-turn lane. This would partially mitigate the impacts under the Future (2025) With the LAWA Staff-Recommended Alternative scenario.

- **MM-ST (SPAS)-35. Modify the Intersection of Prairie Avenue and Manchester Boulevard (Intersection 169).**

  The mitigation measure for this location is to reconfigure the eastbound approach to provide dual left-turn lanes. This improvement would require removing the raised center median and restriping the westbound departure lanes northward in the existing right-of-way. The resulting eastbound approach would provide two left-turn lanes, two through lanes, and one shared through/right-turn lane. This would partially mitigate the impacts under the Future (2025) With the LAWA Staff-Recommended Alternative scenario.

- **MM-ST (SPAS)-36. Modify the Intersection of Prairie Avenue and Lennox Boulevard (Intersection 197).**

  The mitigation measure for this location is to restripe the eastbound approach to provide one left-turn lane, one shared through/left-turn lane, and one right-turn lane. This improvement would partially mitigate the project impact under the Future (2025) With the LAWA Staff-Recommended Alternative scenario.

- **MM-ST (SPAS)-37. Modify the Intersection of Arbor Vitae Street and Aviation Boulevard (Intersection 10).**

  The mitigation measure for this location is to widen the eastbound approach to provide a separate right-turn lane, resulting in one left-turn lane, two through lanes, and one right-turn lane. This improvement would fully mitigate the project impact under the Future (2025) With the LAWA Staff-Recommended Alternative.

- **MM-ST (SPAS)-38. Modify the Intersection of La Tijera Boulevard and Centinela Avenue (Intersection 27).**

  The mitigation measure for this location is to provide a fair share contribution to the improvement of this intersection as part of a grade separation project that would also affect the adjacent section of La Cienega Boulevard, subject to FAA approval and should the grade separation project be found to be feasible and implementation pursued by the affected local agencies. In addition, if permitted by the FAA, LAWA will make a monetary contribution to upgrading the County's ITS system at this intersection to partially mitigate the alternative's contribution to the cumulative impacts. Because the County does not have a method to quantify the benefits of this improvement, no quantitative V/C reduction has been taken for this location. Because the grade separation project is in the early design and conceptual planning stages, however, it is not fully defined nor adopted at this time and the impact at this location would remain significant and unavoidable.

- **MM-ST (SPAS)-40. Fair Share Contribution to a Traffic Signal at the Intersection of Overland Avenue and Sawtelle Boulevard (Intersection 154).**

  The mitigation measure for this location is to provide a fair share contribution to the installation of a traffic signal, subject to FAA approval and should it be implemented by the City of Culver City. Because it is uncertain that it will be implemented, however, the impact at this location would remain significant and unavoidable.

- **MM-ST (SPAS)-41. Fair Share Contribution to a Traffic Signal at the Intersection of Walgrove Avenue and Washington Boulevard (Intersection 156).**

  The mitigation measure for this location is to provide a fair share contribution to the installation of a traffic signal, subject to FAA approval and should it be implemented by the City of Culver City. Because it is uncertain that it will be implemented, however, the impact at this location would remain significant and unavoidable.

- **MM-ST (SPAS)-42. Contribute to ITS (Intelligent Transportation Systems) Improvements at 11 Study Intersections within the Jurisdiction of Los Angeles County (Intersections 27, 36, 52, 63, 76, 86, 87, 93, 95, 119, and 173.**

  Los Angeles County Department of Public Works staff determined that improvements to the County's intelligent transportation systems (ITS) equipment would improve traffic operations where no feasible physical mitigation measures have been identified. As partial mitigation for the identified cumulative impacts, LAWA will make a monetary contribution to upgrading the County's ITS system at these intersections, if permitted by the FAA. Because the contribution to Los Angeles County is conditional pending approval by FAA and because the County does not have a method to quantify the benefits of this improvement, no quantitative V/C reduction has been taken for this location and these impacts would remain significant and unavoidable.

As described, several types of improvements to the off-airport transportation system are recommended to mitigate the impacts associated with the LAWA Staff-Recommended Alternative. Such improvements include the addition of, or improvements to, travel and turn lanes, and traffic signal phasing modifications, fair share contribution to improve the computer-controlled traffic signal control systems in the City of Inglewood, and provision of additional vanpool services to LAWA, airport and cargo employees to and from the airport.

The potential environmental impacts associated with the proposed improvements to the off-airport transportation system would depend on the specific nature, location, and extent of such improvements. For example, the addition or improvement of travel and/or turn lanes that is accomplished by restriping of lanes within existing roadway segments would, in general, have a low potential for significant environmental effects other than improvement in traffic flows. The addition of lanes accomplished by the removal or modification of existing raised medians would have some level of environmental impacts such as construction-related noise, air quality impacts, temporary lane closures, and visual impacts if the removed median is currently landscaped. The addition of lanes accomplished with elimination of on-street parking could impact nearby off-street parking areas and/or remaining on-street parking areas to the extent that the affected parking redistributes to such areas. The addition of lanes accomplished by the physical widening of roadway segments could result in the types of potential environmental impacts described above relative to the removal or modification of raised medians, and could also result in the reduction of the widths of sidewalks or parkways, possibly impacting trees, utilities, or other existing improvements, if any, located within the needed rights-of-way.

2.3.12.2.3 Level of Significance After Mitigation

This section evaluates the level of significance after implementing the recommended mitigation measures identified above in Section 2.3.12.2.2.2. A summary of the effectiveness of the proposed intersection mitigation measures under Baseline (2010) with Alternative conditions is presented in **Table SRA-2.3.12.2-6** and a detailed listing of these intersections is shown above in **Table SRA-2.3.12.2-1**. As shown in **Tables SRA-2.3.12.2-6** and **SRA-2.3.12.2-7**, under Baseline (2010) with Alternative, there are three fully mitigated intersections and two intersections for which there are no feasible physical mitigation measures, for a total of two intersections with significant and unavoidable impacts under the LAWA Staff-Recommended Alternative.

A summary of the effectiveness of the proposed intersection mitigation measures under Future (2025) with Alternative conditions is presented in **Table SRA-2.3.12.2-8**, and a detailed listing for the impacted peak hours of these intersections is shown above in **Table SRA-2.3.12.2-3**. As shown in **Tables SRA-2.3.12.2-8** and **SRA-2.3.12.2-9**, under Future (2025) with Alternative, there are 15 fully mitigated intersections, 17 partially mitigated intersections, and 25 intersections for which there are no feasible mitigation measures for a total of 42 intersections with significant and unavoidable residual impacts under the LAWA Staff-Recommended Alternative. Under the LAWA Staff-Recommended Alternative, impacts at one CMP arterial monitoring intersection and three CMP freeway monitoring stations would be significant and unavoidable. Under the LAWA Staff-Recommended Alternative, transit impacts would be less than significant.

LAX Master Plan commitments and an LAX Master Plan mitigation measure would help reduce construction-related impacts to the off-airport transportation system under the LAWA Staff-Recommended Alternative. However, no additional measures are available at this stage of planning to address these construction-related impacts. As such, construction-related off-airport traffic could, at times, result in temporary significant and unavoidable impacts on the streets surrounding LAX.

Table SRA-2.3.12.2-6

Baseline (2010) With Alternative With Mitigation Impact Summary - LAWA Staff-Recommended Alternative

		SRA		
Int. #	**Intersection**	**AM**	**MD**	**PM**
7	Airport Boulevard & Century Boulevard	-	-	-
9	Airport Boulevard & Manchester Avenue	-	N.F.M.	-
13	La Cienega Boulevard & Arbor Vitae Street	-	-	-
14	Aviation Boulevard & Century Boulevard	-	-	-
17	Aviation Boulevard/Florence Avenue & Manchester Avenue	-	-	-
26	La Cienega Boulevard & Centinela Avenue	-	-	-
36	La Cienega Boulevard & Century Boulevard	N.F.M.	-	-
52	Inglewood Avenue & El Segundo Boulevard	-	-	-
53	La Cienega Boulevard & El Segundo Boulevard	-	-	-
58	La Cienega Boulevard & Florence Avenue	-	-	-
62	Hawthorne Boulevard & Imperial Avenue	-	-	-
66	Inglewood Avenue & Imperial Highway	-	-	-
71	Sepulveda Boulevard & Imperial Highway	-	-	Full
74	I-105 Ramps (e/o Aviation Boulevard) & Imperial Highway	-	-	-
76	Inglewood Avenue & Lennox Boulevard	-	-	-
85	La Brea Avenue & Manchester Boulevard	-	Full	-
90	La Cienega Boulevard & Manchester Boulevard	-	-	-
96	La Cienega Boulevard & I-405 Southbound Ramps (n/o Century Boulevard)	-	-	Full
125	Sepulveda Boulevard & Rosecrans Avenue	-	-	-
135	Sepulveda Boulevard & Westchester Parkway	-	-	-
	Number of Intersections with Full Mitigation	0	1	2
	Number of Intersections with Partial Mitigation	0	0	0
	Number of Intersections with No Feasible Mitigation	1	1	0
	Number of Significantly Impacted Intersections after Mitigation		2	

Notes:

Full - Intersections that can be fully mitigated to a level less than significant with recommended mitigation measures.
N.F.M. - No Feasible Physical Mitigation measures are available. Project impacts remain significant and unavoidable.

Source: Fehr & Peers, 2012.

Table SRA-2.3.12.2-7

Baseline (2010) With the LAWA Staff-Recommended Alternative Plus Mitigation Level of Service Analysis

			Baseline (2010) Without Alternative						Baseline (2010) With SRA Plus Mitigation								
			AM		MD		PM		AM		MD		PM		Mitigation Effectiveness		
Int. #	Intersection	Jurisdiction	V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	AM	MD	PM
9	Airport Boulevard & Manchester Avenue	Caltrans/City of LA	0.563	A	0.681	B	0.786	C	0.591	A	0.735	C	0.804	D	-	N.F.M.	-
36	La Cienega Boulevard & Century Boulevard	Inglewood/City of LA/LA County	0.515	A	0.582	A	0.682	B	0.763	C	0.677	B	0.669	B	N.F.M.	-	-
71	Sepulveda Boulevard & Imperial Highway	Caltrans/El Segundo/City of LA	0.650	B	0.674	B	1.013	F	0.651	B	0.572	A	0.796	C	-	-	Full
85	La Brea Avenue & Manchester Boulevard	Caltrans/Inglewood	0.678	B	0.670	B	0.714	C	0.699	B	0.710	C	0.745	C	-	Full	-
96	La Cienega Boulevard & I-405 Southbound Ramps (n/o Century Boulevard)	Caltrans/Inglewood/City of LA	0.627	B	0.571	A	0.589	A	0.626	B	0.671	B	0.803	D	-	-	Partial

Notes:

Full - Intersections that can be fully mitigated to a level less than significant with recommended mitigation measures.
Partial - Intersection operating conditions would be improved with recommended mitigation measures, however; would not be fully mitigated and would remain significant and unavoidable.
N.F.M. - No Feasible Physical Mitigation measures are available. Project impacts remain significant and unavoidable.

Source: Fehr & Peers, 2012.

Table SRA-2.3.12.2-8

Future (2025) With Alternative With Mitigation Impact Summary - LAWA Staff Recommended Alternative

Int. #	Intersection	SRA AM	SRA MD	SRA PM
6	Airport Boulevard & Arbor Vitae Street/Westchester Parkway	-	-	Partial
7	Airport Boulevard & Century Boulevard	Full	Partial	Partial
9	Airport Boulevard & Manchester Avenue	N.F.M.	N.F.M.	N.F.M.
10	Aviation Boulevard & Arbor Vitae Street	-	-	Full
11	Inglewood Avenue & Arbor Vitae Street	-	-	Full
12	La Brea Avenue & Arbor Vitae Street	-	-	Full
13	La Cienega Boulevard & Arbor Vitae Street	-	-	-
14	Aviation Boulevard & Century Boulevard	Partial	Partial	N.F.M.
15	Aviation Boulevard & El Segundo Boulevard	-	-	-
16	Aviation Boulevard & Imperial Highway	-	-	-
17	Aviation Boulevard/Florence Avenue & Manchester Avenue	Full	-	Full
25	La Brea Avenue & Centinela Avenue	Full	Full	-
26	La Cienega Boulevard & Centinela Avenue	Full	Full	-
27	La Tijera Boulevard & Centinela Avenue	-	-	N.F.M.
28	Sepulveda Boulevard & Centinela Avenue	-	-	-
34	La Brea Avenue/Hawthorne Boulevard & Century Boulevard	Full	Partial	Full
35	Inglewood Avenue & Century Boulevard	Full	Full	-
36	La Cienega Boulevard & Century Boulevard	N.F.M.	N.F.M.	N.F.M.
37	Prairie Avenue & Century Boulevard	Full	Full	Full
38	Sepulveda Boulevard & Century Boulevard	-	-	Full
46	Douglas Street & El Segundo Boulevard	-	-	N.F.M.
51	Hawthorne Boulevard & El Segundo Boulevard	-	-	N.F.M.
52	Inglewood Avenue & El Segundo Boulevard	-	-	-
53	La Cienega Boulevard & El Segundo Boulevard	-	-	-
57	La Brea Avenue & Florence Avenue	Full	Full	Full
58	La Cienega Boulevard & Florence Avenue	Partial	Partial	Full
60	Sepulveda Boulevard & Grand Avenue	-	-	Full
62	Hawthorne Boulevard & Imperial Avenue	-	-	Partial
63	Hawthorne Boulevard & Lennox Boulevard	-	-	N.F.M.
64	Highland Avenue/Vista del Mar & Rosecrans Avenue	N.F.M.	-	-
66	Inglewood Avenue & Imperial Highway	Full	N.F.M.	Full
70	Prairie Avenue & Imperial Highway	-	-	-
71	Sepulveda Boulevard & Imperial Highway	Full	-	Full
74	I-105 Ramps (e/o Aviation Boulevard) & Imperial Highway	-	-	-
76	Inglewood Avenue & Lennox Boulevard	-	-	N.F.M.
77	Inglewood Avenue & Manchester Boulevard	-	-	N.F.M.
85	La Brea Avenue & Manchester Boulevard	-	-	Full
86	La Brea Avenue/Overhill Drive & Stocker Street	N.F.M.	-	N.F.M.
87	La Brea Avenue & Slauson Avenue	Partial	N.F.M.	Full
88	La Cienega Boulevard & La Tijera Boulevard	-	N.F.M.	N.F.M.
90	La Cienega Boulevard & Manchester Boulevard	Full	Partial	N.F.M.
93	La Cienega Boulevard & Stocker Street	N.F.M.	N.F.M.	N.F.M.
95	La Cienega Boulevard & West 120th Street	-	-	N.F.M.
96	La Cienega Boulevard & I-405 Southbound Ramps (n/o Century Boulevard)	-	Full	Full
101	Sepulveda Boulevard & La Tijera Boulevard	-	-	-
102	I-405 Northbound Ramps & La Tijera Boulevard	N.F.M.	N.F.M.	-
105	Lincoln Boulevard & Manchester Avenue	-	-	-
109	Lincoln Boulevard & Venice Boulevard	-	N.F.M.	-
110	Lincoln Boulevard & Washington Boulevard	-	Partial	-
115	Ash Avenue & Manchester Avenue	-	Full	N.F.M.
119	Ocean Avenue/Via Marina & Washington Boulevard	N.F.M.	N.F.M.	N.F.M.
125	Sepulveda Boulevard & Rosecrans Avenue	-	Partial	-
135	Sepulveda Boulevard & Westchester Parkway	-	-	-
139	Sepulveda Boulevard & I-105 Westbound Ramps (n/o Imperial Highway)	-	Partial	Partial
143	Vicksburg Avenue & 96th Street	-	-	Full
146	Sepulveda Eastway & Westchester Parkway	-	-	-

Table SRA-2.3.12.2-8

Future (2025) With Alternative With Mitigation Impact Summary - LAWA Staff Recommended Alternative

		SRA		
Int. #	**Intersection**	**AM**	**MD**	**PM**
147	Crenshaw Boulevard & Century Boulevard	-	Partial	Partial
148	La Cienega Boulevard & Fairview Boulevard	-	-	-
149	Crenshaw Boulevard & Imperial Highway	-	N.F.M.	N.F.M.
153	Overland Avenue & Kelmore Street/Ranch Road	-	-	-
154	Overland Avenue & Sawtelle Boulevard	-	-	N.F.M.
156	Walgrove Avenue & Washington Boulevard	-	N.F.M.	N.F.M.
159	Hindry Avenue & Manchester Boulevard	-	Partial	-
162	Sepulveda Boulevard & Manhattan Beach Boulevard	-	N.F.M.	-
164	Crenshaw Boulevard & Manchester Avenue	N.F.M.	N.F.M.	N.F.M.
165	La Cienega Boulevard & Rodeo Road	N.F.M.	-	-
166	La Brea Avenue & Rodeo Road	-	-	-
169	Prairie Avenue & Manchester Boulevard	Full	-	N.F.M.
172	Western Avenue & Manchester Avenue	-	-	N.F.M.
173	Western Avenue & Imperial Highway	-	-	N.F.M.
188	Prairie Avenue & El Segundo Boulevard	N.F.M.	-	-
197	Prairie Avenue & Lennox Boulevard	-	-	Partial
	Number of Intersections with Full Mitigation	12	7	16
	Number of Intersections with Partial Mitigation	3	10	6
	Number of Intersections with No Feasible Mitigation	11	13	23
	Number of Significantly Impacted Intersections after Mitigation		42	

Notes:

Full - Intersections that can be fully mitigated to a level less than significant with recommended mitigation measures.
Partial - Intersection operating conditions would be improved with recommended mitigation measures, however; would not be fully mitigated and would remain significant and unavoidable.
N.F.M. - No Feasible Physical Mitigation measures are available. Project impacts remain significant and unavoidable.

Source: Fehr & Peers, 2012.

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Table SRA-2.3.12.2-9

Future (2025) With the LAWA Staff-Recommended Alternative Plus Mitigation Level of Service Analysis

			Future (2025) Without Alternative						Future (2025) With SRA Plus Mitigation						Mitigation Effectiveness		
			AM		MD		PM		AM		MD		PM				
Int. #	Intersection	Jurisdiction	V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	AM	MD	PM
6	Airport Boulevard & Arbor Vitae Street/Westchester Parkway	City of LA	0.471	A	0.573	A	0.747	C	0.444	A	0.595	A	0.787	C	-	-	Partial
7	Airport Boulevard & Century Boulevard	City of LA	0.651	B	0.648	B	0.619	B	0.686	B	0.869	D	0.858	D	Full	Partial	Partial
9	Airport Boulevard & Manchester Avenue	Caltrans/City of LA	0.740	C	0.849	D	0.951	E	0.871	D	1.056	F	1.060	F	N.F.M.	N.F.M.	N.F.M.
10	Aviation Boulevard & Arbor Vitae Street	Inglewood/City of LA	0.550	A	0.525	A	0.791	C	0.582	A	0.525	A	0.795	C	-	-	Full
11	Inglewood Avenue & Arbor Vitae Street	Inglewood	0.508	A	0.575	A	0.798	C	0.522	A	0.563	A	0.810	D	-	-	Full
12	La Brea Avenue & Arbor Vitae Street	Inglewood	0.440	A	0.547	A	0.759	C	0.373	A	0.453	A	0.702	C	-	-	Full
14	Aviation Boulevard & Century Boulevard	City of LA	0.943	E	0.827	D	1.097	F	1.162	F	1.064	F	1.208	F	Partial	Partial	N.F.M.
17	Aviation Boulevard/Florence Avenue & Manchester Avenue	Caltrans/Inglewood	0.854	D	0.903	E	0.894	D	0.788	C	0.810	D	0.902	E	Full	-	Full
25	La Brea Avenue & Centinela Avenue	Inglewood	0.913	E	0.794	C	0.991	E	0.878	D	0.763	C	0.975	E	Full	Full	-
26	La Cienega Boulevard & Centinela Avenue	Inglewood/City of LA	0.896	D	0.681	B	1.134	F	0.885	D	0.685	B	1.023	F	Full	Full	-
27	La Tijera Boulevard & Centinela Avenue[2]	City of LA/LA County	0.643	B	0.502	A	0.840	D	0.681	B	0.537	A	0.862	D	-	-	N.F.M.
34	La Brea Avenue/Hawthorne Boulevard & Century Boulevard	Inglewood	0.735	C	0.771	C	0.983	E	0.690	B	0.859	D	0.983	E	Full	Partial	Full
35	Inglewood Avenue & Century Boulevard	Inglewood	0.705	C	0.657	B	0.926	E	0.654	B	0.654	B	0.829	D	Full	Full	-
36	La Cienega Boulevard & Century Boulevard[2]	Inglewood/City of LA/LA County	0.730	C	0.661	B	0.827	D	0.929	E	0.861	D	0.984	E	N.F.M.	N.F.M.	N.F.M.
37	Prairie Avenue & Century Boulevard	Inglewood	0.678	B	0.754	C	0.927	E	0.625	B	0.694	B	0.879	D	Full	Full	Full
38	Sepulveda Boulevard & Century Boulevard	Caltrans/City of LA	0.579	A	0.497	A	0.655	B	0.663	B	0.577	A	0.685	B	-	-	Full
46	Douglas Street & El Segundo Boulevard	El Segundo	0.773	C	0.594	A	0.976	E	0.782	C	0.628	B	1.006	F	-	-	N.F.M.
51	Hawthorne Boulevard & El Segundo Boulevard	Hawthorne	0.675	B	0.697	B	1.230	F	0.679	B	0.730	C	1.242	F	-	-	N.F.M.
57	La Brea Avenue & Florence Avenue	Inglewood	0.791	C	0.763	C	1.054	F	0.788	C	0.799	C	1.041	F	Full	Full	Full
58	La Cienega Boulevard & Florence Avenue	Inglewood	0.896	D	0.896	D	1.165	F	0.920	E	0.994	E	1.047	F	Partial	Partial	Full
60	Sepulveda Boulevard & Grand Avenue	Caltrans/El Segundo	0.810	D	0.755	C	0.934	E	0.807	D	0.756	C	0.913	E	-	-	Full
62	Hawthorne Boulevard & Imperial Avenue	Hawthorne	0.664	B	0.602	B	0.959	E	0.636	B	0.638	B	0.993	E	-	-	Partial
63	Hawthorne Boulevard & Lennox Boulevard[2]	LA County	0.508	A	0.607	B	0.810	D	0.518	A	0.652	B	0.863	D	-	-	N.F.M.
64	Highland Avenue/Vista del Mar & Rosecrans Avenue	Manhattan Beach	0.823	D	0.563	A	0.737	C	0.857	D	0.569	A	0.744	C	N.F.M.	-	-
66	Inglewood Avenue & Imperial Highway	Hawthorne	0.765	C	0.695	B	1.286	F	0.763	C	0.739	C	1.061	F	Full	N.F.M.	Full
71	Sepulveda Boulevard & Imperial Highway	Caltrans/El Segundo/City of LA	0.805	D	0.807	D	1.223	F	0.784	C	0.606	B	0.857	D	Full	-	Full
76	Inglewood Avenue & Lennox Boulevard[2]	LA County	0.468	A	0.557	A	0.819	D	0.525	A	0.558	A	0.870	D	-	-	N.F.M.
77	Inglewood Avenue & Manchester Boulevard	Caltrans/Inglewood	0.651	B	0.565	A	0.773	C	0.675	B	0.597	A	0.803	D	-	-	N.F.M.
85	La Brea Avenue & Manchester Boulevard	Caltrans/Inglewood	0.847	D	0.744	C	0.945	E	0.760	C	0.657	B	0.861	D	-	-	Full
86	La Brea Avenue/Overhill Drive & Stocker Street[2]	LA County	0.820	D	0.724	C	1.193	F	0.863	D	0.760	C	1.233	F	N.F.M.	-	N.F.M.
87	La Brea Avenue & Slauson Avenue[2]	LA County	0.905	E	0.747	C	1.007	F	0.955	E	0.871	D	0.996	E	Partial	N.F.M.	Full
88	La Cienega Boulevard & La Tijera Boulevard	Inglewood/City of LA	0.794	C	0.738	C	1.005	F	0.788	C	0.782	C	1.131	F	-	N.F.M.	N.F.M.
90	La Cienega Boulevard & Manchester Boulevard	Caltrans/Inglewood	0.736	C	0.741	C	0.907	E	0.742	C	0.787	C	0.969	E	Full	Partial	N.F.M.
93	La Cienega Boulevard & Stocker Street[2]	LA County	1.270	F	0.838	D	1.210	F	1.287	F	0.863	D	1.223	F	N.F.M.	N.F.M.	N.F.M.
95	La Cienega Boulevard & West 120th Street[2]	LA County	0.449	A	0.313	A	0.817	D	0.479	A	0.367	A	0.894	D	-	-	N.F.M.
96	La Cienega Boulevard & I-405 Southbound Ramps (n/o Century Boulevard)	Caltrans/Inglewood/City of LA	0.669	B	0.695	B	0.694	B	0.605	B	0.614	B	0.592	A	-	Full	Full
102	I-405 Northbound Ramps & La Tijera Boulevard	Caltrans/City of LA	0.619	B	0.693	B	0.609	B	0.746	C	0.842	D	0.617	B	N.F.M.	N.F.M.	-
109	Lincoln Boulevard & Venice Boulevard	Caltrans/City of LA	0.892	D	0.915	E	1.036	F	0.899	D	0.925	E	1.019	F	-	N.F.M.	-
110	Lincoln Boulevard & Washington Boulevard	Caltrans/City of LA	0.841	D	0.904	E	1.053	F	0.829	D	0.915	E	1.054	F	-	Partial	-
115	Ash Avenue & Manchester Avenue	Caltrans/Inglewood	0.786	C	0.711	C	0.945	E	0.735	C	0.744	C	1.070	F	-	Full	N.F.M.
119	Ocean Avenue/Via Marina & Washington Boulevard[2]	City of LA/LA County	1.181	F	0.956	E	1.514	F	1.216	F	1.005	F	1.539	F	N.F.M.	N.F.M.	N.F.M.
125	Sepulveda Boulevard & Rosecrans Avenue	Caltrans/El Segundo/Manhattan Beach	0.918	E	0.836	D	1.158	F	0.918	E	0.860	D	1.153	F	-	Partial	-
139	Sepulveda Boulevard & I-105 Westbound Ramps (n/o Imperial Highway)	Caltrans/City of LA	0.877	D	0.840	D	0.923	E	0.880	D	0.887	D	0.941	E	-	Partial	Partial
143	Vicksburg Avenue & 96th Street	City of LA	0.279	A	0.363	A	0.335	A	0.257	A	0.506	A	0.623	B	-	-	Full
147	Crenshaw Boulevard & Century Boulevard	Inglewood	0.708	C	0.773	C	0.928	E	0.723	C	0.805	D	0.973	E	-	Partial	Partial
149	Crenshaw Boulevard & Imperial Highway	Inglewood	0.680	B	0.705	C	1.001	F	0.715	C	0.748	C	1.030	F	-	N.F.M.	N.F.M.
154	Overland Avenue & Sawtelle Boulevard	Culver City	31.4	D	17.6	C	45.9	E	33.1	D	18.6	C	50.6	F	-	-	N.F.M.
156	Walgrove Avenue & Washington Boulevard	Culver City	68.8	F	>100	F	>100	F	68.8	F	>100	F	>100	F	-	N.F.M.[1]	N.F.M.[1]
159	Hindry Avenue & Manchester Boulevard	Caltrans/Inglewood	0.513	A	0.638	B	0.597	A	0.503	A	0.725	C	0.673	B	-	Partial	-
162	Sepulveda Boulevard & Manhattan Beach Boulevard	Caltrans/Manhattan Beach	0.950	E	0.987	E	1.193	F	0.950	E	0.997	E	1.193	F	-	N.F.M.	-
164	Crenshaw Boulevard & Manchester Avenue	Caltrans/Inglewood	0.816	D	0.843	D	1.025	F	0.857	D	0.873	D	1.066	F	N.F.M.	N.F.M.	N.F.M.
165	La Cienega Boulevard & Rodeo Road	City of LA	1.025	F	0.719	C	1.037	F	1.035	F	0.734	C	1.038	F	N.F.M.	-	-
169	Prairie Avenue & Manchester Boulevard	Inglewood	1.042	F	0.701	C	0.922	E	1.048	F	0.732	C	0.941	E	Full	-	N.F.M.
172	Western Avenue & Manchester Avenue	Caltrans/City of LA	0.727	C	0.560	A	0.887	D	0.733	C	0.571	A	0.906	E	-	-	N.F.M.
173	Western Avenue & Imperial Highway[2]	LA County	0.743	C	0.575	A	0.912	E	0.764	C	0.596	A	0.941	E	-	-	N.F.M.
188	Prairie Avenue & El Segundo Boulevard	Hawthorne	1.001	F	0.684	B	1.006	F	1.027	F	0.704	C	1.008	F	N.F.M.	-	-

Table SRA-2.3.12.2-9

Future (2025) With the LAWA Staff-Recommended Alternative Plus Mitigation Level of Service Analysis

			Future (2025) Without Alternative						Future (2025) With SRA Plus Mitigation						Mitigation Effectiveness		
			AM		MD		PM		AM		MD		PM				
Int. #	Intersection	Jurisdiction	V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	AM	MD	PM
197	Prairie Avenue & Lennox Boulevard	Inglewood	0.670	B	0.557	A	0.704	C	0.655	B	0.562	A	0.763	C	-	-	Partial

Notes:

Full - Intersections that can be fully mitigated to a level less than significant with recommended mitigation measures.
Partial - Intersection operating conditions would be improved with recommended mitigation measures, however; would not be fully mitigated and would remain significant and unavoidable.
N.F.M. - No Feasible Physical Mitigation measures are available. Project impacts remain significant and unavoidable.

[1] This stop-controlled intersection is expected to operate at oversaturated condition, based on the vehicle delay reported for the worst-case approach. This intersection was also evaluated using the ICU methodology and the resulting project-related incremental increase in V/C ratio is greater than the City of Culver City adopted significance criteria.

[2] The impact at this intersection would be partially mitigated by a monetary contribution by LAWA, pending FAA approval, to the County's ITS system. Because the County does not have a method for quantifying the benefits of this type of improvement, however, no quantitative V/C reduction has been taken.

Source: Fehr & Peers, 2012.

2.3.13 Utilities

2.3.13.1 Energy

2.3.13.1.1 Impacts Analysis

This section describes the impacts related to energy consumption for the LAWA Staff-Recommended Alternative. For the LAWA Staff-Recommended Alternative, the effects are discussed as they relate to projected energy consumption. As indicated in Section 2.3, impacts of the LAWA Staff-Recommended Alternative related to energy consumption are associated with the airfield/terminal components of Alternative 1 and the ground access components of Alternative 9, as identified in Tables 4.13.1-1, 4.13.1-2 and 4.13.1-3 of the SPAS Draft EIR. **Tables SRA-2.3.13.1-1** and **SRA-2.3.13.1-2** identify building-related electricity and natural gas consumption, respectively, associated with the LAWA Staff-Recommended Alternative as well as under 2010 baseline conditions. **Table SRA-2.3.13.1-3** shows total energy consumption.

Table SRA-2.3.13.1-1

Baseline and Projected Building-Related Electricity Consumption - LAWA Staff-Recommended Alternative

Building Components	Baseline Conditions	SRA		
		Airfield/ Terminals	Ground Access	Total SRA
Terminals				
Terminal 0	NA	330,000	NA	330,000
Terminal 1 Concourse	138,000	114,000	NA	114,000
Terminal 2 Concourse	306,000	306,000	NA	306,000
Terminal 3 Concourse	279,000	223,000	NA	223,000
New Linear Concourse	NA	NA	NA	NA
New Passenger Processing Terminals	NA	NA	NA	NA
Bradley West North Concourse Extension	NA	113,800	NA	113,800
MSC North Concourse Extension	NA	249,400	NA	249,400
Subtotal Terminal Components	**723,000**	**1,336,200**	**0**	**1,336,200**
Ground Access Components				
Ground Transportation Center	NA	NA	NA	NA
Intermodal Transportation Center	NA	NA	NA	NA
Intermodal Transportation Facility	NA	NA	75,000	75,000
CONRAC	NA	NA	85,000	85,000
Subtotal Ground Access Components	**0**	**0**	**160,000**	**160,000**
Total Building Area (sf)	**723,000**	**1,336,200**	**160,000**	**1,496,200**
Total Electricity (MWh/yr[1])	**13,773**	**25,455**	**3,048**	**28,503**

[1] MWh/yr = megawatt-hours per year

Source: CDM Smith, 2012.

Table SRA-2.3.13.1-2

Baseline and Projected Building-Related Natural Gas Consumption - LAWA Staff-Recommended Alternative

Building Components	Baseline Conditions	SRA		
		Airfield/ Terminals	Ground Access	Total SRA
Terminals				
Terminal 0	NA	330,000	NA	330,000
Terminal 1 Concourse	138,000	114,000	NA	114,000
Terminal 2 Concourse	306,000	306,000	NA	306,000
Terminal 3 Concourse	279,000	223,000	NA	223,000
New Linear Concourse	NA	NA	NA	NA
New Passenger Processing Terminals	NA	NA	NA	NA
Bradley West North Concourse Extension	NA	113,800	NA	113,800
MSC North Concourse Extension	NA	249,400	NA	249,400
Subtotal Terminal Components	**723,000**	**1,336,200**	**0**	**1,336,200**
Ground Access Components				
Ground Transportation Center	NA	NA	NA	NA
Intermodal Transportation Center	NA	NA	NA	NA
Intermodal Transportation Facility	NA	NA	75,000	75,000
CONRAC	NA	NA	85,000	85,000
Subtotal Ground Access Components	**0**	**0**	**160,000**	**160,000**
Total Building Area (sf)	**723,000**	**1,336,200**	**160,000**	**1,496,200**
Total Natural Gasoline (Mcf/yr[1])	**10,975**	**20,284**	**2,429**	**22,713**

[1] Mcf/yr = thousand cubic feet per year

Source: CDM Smith, 2012.

Table SRA-2.3.13.1-3

Baseline and Projected Total Energy Consumption - LAWA Staff-Recommended Alternative

Energy Form	Baseline Conditions	SRA		
		Airfield/ Terminals	Ground Access	Total SRA
Electricity (MWh/yr[1])				
Building	13,773	25,455	3,048	28,503
Water Supply	235	433	52	485
Wastewater Generation	40	75	9	84
APM Electricity	NA	NA	12,494	12,494
Subtotal	**14,048**	25,963	15,603	**41,566**
Natural Gas (Mcf/yr[2])	**10,975**	20,284	2,429	**22,713**
Transportation-Related Fuels				
Jet A (Million Gallons/yr)	**63.0**	93.9	NA	**93.9**
Gasoline (Million Gallons/yr)				
On-Airport Vehicles	4.0	NA	3.3	3.3
Off-Airport Vehicles	118.3	NA	119.8	119.8
GSE	2.5	3.2	NA	3.2
Subtotal	**124.8**	3.2	123.2	**126.3**
Diesel (Million Gallons/yr)				
On-Airport Vehicles	1.2	NA	1.3	1.3
Off-Airport Vehicles	27.1	NA	33.0	33.0
GSE	2.6	3.4	NA	3.4
Construction	NA			37.1[3]
Subtotal	**30.8**	3.4	34.3	**74.8**
LPG (Million Gallons/yr)				
GSE	**2.0**	2.6	NA	**2.6**

Note:

Numbers may not add due to rounding.

1 MWh/yr = megawatt-hours per year

2 Mcf/yr = thousand cubic feet per year

3 Construction-related energy consumption for the LAWA Staff-Recommended Alternative was derived from construction-related emissions developed for the analysis of greenhouse gas emissions, which combined the emissions associated with construction of the airfield and terminal components of Alternative 1 with those associated with the ground access components of Alternative 9.

Source: CDM Smith, 2012; Lea + Elliot, Inc. (Alternative 3 APM electricity).

Under the LAWA Staff-Recommended Alternative, aircraft operations, GSE, and vehicle miles traveled (VMT) by on-and off-airport vehicles would increase compared to baseline conditions. In addition, square footage associated with terminals and other passenger-related facilities would increase.

Electricity and Natural Gas

Under the LAWA Staff-Recommended Alternative, the passenger-related building area would increase compared to baseline conditions. Although concourse areas associated with Terminals 1 and 3 would decrease, there would be new concourse areas associated with Terminal 0 and the northerly extensions

of Bradley West and the Midfield Satellite Concourse (MSC). In addition, this alternative would include a passenger service area at the ITF. As shown in **Table SRA-2.3.13.1-1**, under the LAWA Staff-Recommended Alternative, total electricity use for passenger-related facilities in 2025 would be 28,503 MWh/yr in 2025. As shown in **Table SRA-2.3.13.1-3**, under the LAWA Staff-Recommended Alternative, total electricity consumption associated with water supply and wastewater generation would be 569 MWh/yr in 2025. In addition, the LAWA Staff-Recommended Alternative would include an APM system, which would likely be electric powered, using an estimated 12,494 MWh/yr in 2015. **Table SRA-2.3.13.1-2** shows that, under the LAWA Staff-Recommended Alternative, total natural gas use associated with passenger-related facilities would be 22,713 Mcf/yr, or 22.7 MMcf/yr, in 2025. The projected consumption of electricity and natural gas under the LAWA Staff-Recommended Alternative would represent 0.11 percent of the projected electrical energy demand within LADWP's service area in 2025 and 0.0025 percent of the projected Southern California regional natural gas demand.

In order to reduce electricity and natural gas consumption under the LAWA Staff-Recommended Alternative, LAWA would implement LAX Master Plan Commitment E-1, Energy Conservation and Efficiency Program, to maximize the energy efficiency of new facilities. This program would be consistent with federal policies and state requirements pertaining to energy efficiency and resource conservation. In addition, LAWA would apply sustainable design concepts to new facilities in accordance with its *Sustainability Plan*, and would pursue LEED® certification, both of which would increase energy efficiency in the new facilities and building areas.

Under the LAWA Staff-Recommended Alternative, a sufficient supply of electricity and natural gas is expected to be available based on the LADWP *Power IRP* and the *California Gas Report*.[68,69] Therefore, impacts with respect to electricity and natural gas consumption would be less than significant. Moreover, with implementation of the existing LAX Master Plan mitigation measures, the LAWA Staff-Recommended Alternative would not result in a wasteful, inefficient, or unnecessary consumption of electricity or natural gas.

Transportation-Related Fuel

As indicated in Section 4.13.1.3 of the SPAS Draft EIR, transportation-related fuels used at LAX include Jet A fuel for aircraft, and gasoline, diesel, and alternative fuels (LPG, LNG, and CNG, all of which are represented by LPG in this analysis) for vehicles and/or GSE. **Table SRA-2.3.13.1-3** shows all projected transportation-related fuel consumption resulting from the LAWA Staff-Recommended Alternative.

Jet A

Under the LAWA Staff-Recommended Alternative, Jet A fuel consumption by aircraft in the LTO cycle is estimated to be 93.9 million gallons in 2025. This represents an increase in Jet A fuel consumption over baseline conditions (63 million gallons). For the most part, this increase would result from increased flight operations at the horizon year (i.e., 2025) activity level of 78.9 MAP, which would occur in the future with or without the LAWA Staff-Recommended Alternative, although changes in airfield design and taxi-idle times would also affect Jet A fuel consumption.

The number of ADG VI aircraft would increase in 2025 compared to baseline conditions. As noted in Section 4.13.1.3 of the SPAS Draft EIR, ADG VI aircraft are more fuel efficient than other aircraft. Airfield improvements associated with the LAWA Staff-Recommended Alternative would also increase the efficiency of ADG VI operations on the airfield. These improvements include the northerly relocation of Runway 6L/24R, addition of a centerfield taxiway, the easterly extension of Runway 6R/24L and Taxiway E, increased separation between Taxiway E and Taxilane D, and the westerly extension of Taxilane D.

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68 City of Los Angeles, Department of Water and Power, Power Integrated Resource Plan, December 11, 2011, Available: http://www.lapowerplan.org/.

69 The California Gas and Electric Utilities, 2010 California Gas Report, 2010, Available: http://www.socalgas.com/regulatory/cgr.shtml.

As indicated in Section 4.13.1.3 of the SPAS Draft EIR, petroleum product supplies, including Jet A fuel, are anticipated to be adequate well beyond 2025. Therefore, since a sufficient supply of Jet A fuel is expected to be available, the impact associated with an increase in Jet A fuel consumption under the LAWA Staff-Recommended Alternative would be less than significant. Moreover, with implementation of the design features noted above, the LAWA Staff-Recommended Alternative would not result in a wasteful, inefficient, or unnecessary consumption of Jet A fuel.

Gasoline and Diesel

Under the LAWA Staff-Recommended Alternative, total gasoline and diesel fuel consumption would be approximately 126.3 million gallons and 74.8 million gallons, respectively, in 2025. Gasoline and diesel consumption would both increase compared to baseline conditions. A substantial portion of these increases would result from greater flight operations and passenger activity in 2025, which would occur in the future with or without the LAWA Staff-Recommended Alternative.

Several design features associated with the LAWA Staff-Recommended Alternative would partially offset increases in fuel consumption due to increased vehicle trips. Development of the ITF, parking, and the CONRAC would encourage passengers to park or be dropped off outside the CTA, and enter the CTA on the proposed APM system. The APM would include a stop at the future Metro Crenshaw/LAX Transit Station, which would facilitate increased transit ridership to the airport. These features would reduce total VMT to and from the airport, and would reduce transportation-related fuel consumption compared to conditions in 2025 without implementation of the LAWA Staff-Recommended Alternative.

As discussed previously, petroleum products, including gasoline and diesel, are market-driven commodities for which the Energy Information Administration indicates adequate supplies are anticipated well beyond 2025. Since sufficient supplies of gasoline and diesel are expected to be available, the impact associated with an increase in gasoline and diesel consumption under the LAWA Staff-Recommended Alternative would be less than significant. Moreover, with implementation of the design features noted above, the LAWA Staff-Recommended Alternative would not result in a wasteful, inefficient, or unnecessary consumption of gasoline or diesel.

Liquefied Petroleum Gas

Under the LAWA Staff-Recommended Alternative, the total consumption of alternative fuels, as represented by LPG, would be 2.6 million gallons in 2025, an increase over baseline conditions. The increase would result from increased GSE associated with greater flight operations at the horizon year (i.e., 2025) activity level of 78.9 MAP, which would occur in the future with or without the LAWA Staff-Recommended Alternative. As indicated in Section 4.13.1.3 of the SPAS Draft EIR, petroleum product supplies, including LPG, are anticipated to be adequate well beyond 2025. Therefore, since a sufficient supply of LPG is expected to be available, the impact associated with an increase in LPG consumption under the LAWA Staff-Recommended Alternative would be less than significant.

2.3.13.1.2 Mitigation Measures

Implementation of LAX Master Plan Commitment E-1, Energy Conservation and Efficiency Program, would reduce energy consumption associated with the SPAS improvements and ensure that impacts related to energy use associated with the LAWA Staff-Recommended Alternative would be less than significant. Therefore, no mitigation measures specific to SPAS are required.

2.3.13.2 Solid Waste

2.3.13.2.1 Impacts Analysis

This section describes the impacts related to solid waste for the LAWA Staff-Recommended Alternative. As noted in Section 2.3, impacts of the LAWA Staff-Recommended Alternative related to solid waste would result from passenger activity associated with the airfield/terminal components of Alternative 1 and the ground access components of Alternative 9, as evaluated in Section 4.13.2.6 of the SPAS Draft EIR.

For the LAWA Staff-Recommended Alternative, the effects are discussed as they relate to overall solid waste generation and compliance with AB 939 diversion requirements. The analysis focuses on passenger-related solid waste generation. **Table SRA-2.3.13.2-1** identifies projected passenger-related municipal solid waste generation for the LAWA Staff-Recommended Alternative as well as under 2010 baseline conditions.

Passenger activity levels at LAX are forecasted to be 78.9 MAP by 2025 as a result of projected natural growth. This increase in passenger activity is expected with or without implementation of the LAWA Staff-Recommended Alternative. As noted in Section 4.13.2.2 of the SPAS Draft EIR, the municipal solid waste generation factor used for this analysis is 0.784 pounds per passenger, which accounts for a future diversion rate of 70 percent. Using this methodology, passenger-related activity would generate a total of 84.7 tpd (30,928 tpy) of passenger-related solid waste in 2025 (see **Table SRA-2.3.13.2-1**). This would be an increase of 15 tpd compared to baseline conditions (a 22 percent increase). Sunshine Canyon Landfill, which handles all solid waste from LAX, is permitted to accept 12,100 tpd of solid waste, but only averages 7,845 tpd. Therefore, Sunshine Canyon Landfill has enough capacity to accommodate the increase in solid waste associated with the LAWA Staff-Recommended Alternative without using any other regional landfills. As noted in Section 4.13.2.3 of the SPAS Draft EIR, Sunshine Canyon Landfill is estimated to close in 2031, which is well beyond the 2025 SPAS planning horizon. The solid waste generated by passenger activity in 2025 is projected to be within the capacity of Sunshine Canyon Landfill, an existing/permitted regional landfill; therefore, impacts to solid waste disposal capacity would be less than significant.

Under the LAWA Staff-Recommended Alternative, LAWA would continue to implement existing programs aimed at complying with LAX Master Plan Commitment SW-1, Implement an Enhanced Recycling Program, reducing overall waste generation and disposal, and meeting the 70 percent diversion rate. LAWA has adopted the LAWA *Sustainable Airport Planning, Design and Construction Guidelines* for implementation on all airport projects. These Guidelines provide goals and performance standards for recycling of materials during both construction and operation of airport facilities in accordance with the provisions of LAX Master Plan Commitment SW-1. LAWA has also implemented an enhanced recycling program at LAX as outlined in the *LAX Recycling Plan*, which provides updated guidelines for recycling operations at LAX, and is developing new programs to increase diversion rates at LAX. With the implementation and continued enhancement of existing recycling programs in accordance with LAX Master Plan Commitment SW-1, and compliance with future diversion requirements, the LAWA Staff-Recommended Alternative would not conflict with solid waste policies and objectives intended to help achieve the requirements of AB 939 and impacts to such policies and objectives would be less than significant.

Table SRA-2.3.13.2-1

Passenger-Related Solid Waste Generation at LAX - LAWA Staff Recommended Alternative

Year	Solid Waste Factor (Per Year)	Units	Total Generation (tons per day)[1]	Total Generation (tons per year)[1]
Baseline Conditions (2010)	431 tons/MAP	59.1 MAP	69.7	25,472
Future Conditions (2025)	392 tons/MAP	78.9 MAP	84.7	30,928

[1] Approximate calculations; numbers are rounded.

Source: CDM Smith, 2012.

2.3.13.2.2 Mitigation Measures

Implementation of LAX Master Plan Commitment SW-1, Implement an Enhanced Recycling Program, would ensure that impacts related to solid waste disposal associated with the LAWA Staff-Recommended Alternative would be less than significant. Therefore, no mitigation measures specific to the LAWA Staff-Recommended Alternative are required.

2.3.13.3 Wastewater Generation

2.3.13.3.1 Impacts Analysis

This section describes the impacts related to wastewater for the LAWA Staff-Recommended Alternative. As noted in Section 2.3, impacts of the LAWA Staff-Recommended Alternative related to wastewater generation are associated with the airfield/terminal components of Alternative 1 and the ground access components of Alternative 9, as evaluated in Section 4.13.3.6 of the SPAS Draft EIR. For the LAWA Staff-Recommended Alternative, the effects are discussed as they relate to projected wastewater generation. The analysis focuses on wastewater generation associated with passenger-related facilities. **Table SRA-2.3.13.3-1** identifies wastewater generation associated with passenger-related facilities for the LAWA Staff-Recommended Alternative as well as under 2010 baseline conditions.

Under the LAWA Staff-Recommended Alternative, the passenger-related building area would increase compared to baseline conditions. Although concourse areas associated with Terminals 1 and 3 would decrease, there would be new concourse areas associated with Terminal 0 and the northerly extensions of Bradley West and the Midfield Satellite Concourse (MSC). In addition, this alternative would include a passenger service area at the ITF and the CONRAC customer service area. As shown in **Table SRA-2.3.13.3-1**, under the LAWA Staff-Recommended Alternative, wastewater generation from passenger-related facilities would be 119,696 gpd (0.12 mgd) in 2025. As noted in Section 4.13.3.3 of the SPAS Draft EIR, Hyperion Treatment Plant (HTP) had baseline wastewater flows of 299 mgd in 2010, and currently has a design capacity of 450 mgd. Therefore, the increased wastewater generation from the LAWA Staff-Recommended Alternative could be accommodated by the existing wastewater treatment facilities at HTP. Moreover, as shown in Figure 4.13.3-1 of the SPAS Draft EIR, if the SCAG and HSA flow trendlines are extended beyond the City's 2020 planning horizon for wastewater facilities, the HSA would have sufficient capacity to handle projected wastewater flows in 2025, including flows associated with the LAWA Staff-Recommended Alternative. In addition, LAWA would implement LAX Master Plan Commitment W-2, Enhance Existing Water Conservation Program, and would comply with its Sustainability Plan and LSAG, all of which would reduce wastewater flows associated with the LAWA Staff-Recommended Alternative. For these reasons, wastewater generation related to the LAWA Staff-Recommended Alternative would not exceed the existing or future capacity of regional wastewater treatment facilities. Therefore, impacts from increased wastewater generation under this alternative would be less than significant.

Table SRA-2.3.13.3-1

Baseline (2010) and Projected (2025) Wastewater Generation - LAWA Staff-Recommended Alternative

Building Components	Baseline Conditions	SRA Airfield/ Terminals	SRA Ground Access	SRA Total SRA
Terminals				
Terminal 0	NA	330,000	NA	330,000
Terminal 1 Concourse	138,000	114,000	NA	114,000
Terminal 2 Concourse	306,000	306,000	NA	306,000
Terminal 3 Concourse	279,000	223,000	NA	223,000
New Linear Concourse	NA	NA	NA	NA
New Passenger Processing Terminals	NA	NA	NA	NA
Bradley West North Concourse Extension	NA	113,800	NA	113,800
MSC North Concourse Extension	NA	249,400	NA	249,400
Subtotal Terminal Components	**723,000**	**1,336,200**	**0**	**1,336,200**
Ground Access Components				
Ground Transportation Center	NA	NA	NA	0
Intermodal Transportation Center	NA	NA	NA	0
Intermodal Transportation Facility	NA	NA	75,000	75,000
CONRAC	NA	NA	85,000	85,000
Subtotal Ground Access Components	**0**	**0**	**160,000**	**160,000**
Total Building Area (sf)	**723,000**	**1,336,200**	**160,000**	**1,496,200**
Total Wastewater Generation (gpd)	**57,840**	**106,896**	**12,800**	**119,696**
% of Hyperion Treatment Plant Capacity	**0.01%**	**0.02%**	**0.003%**	**0.023%**

Note:

Totals may not add due to rounding.

Source: CDM Smith, 2012.

2.3.13.3.2 Mitigation Measures

Implementation of LAX Master Plan Commitment W-2, Enhance Existing Water Conservation Program, would ensure that impacts relative to wastewater generation would be less than significant. Therefore, no mitigation measures specific to the LAWA Staff-Recommended Alternative are required.

2.3.13.4 Water Supply

2.3.13.4.1 Impacts Analysis

This section describes the impacts related to water supply for the LAWA Staff-Recommended Alternative. As noted in Section 2.3, impacts of the LAWA Staff-Recommended Alternative related to water supply are associated with the airfield/terminal components of Alternative 1 and the ground access components of Alternative 9, as evaluated in Section 4.13.4.6 of the SPAS Draft EIR. For the LAWA Staff-Recommended Alternative, the effects are discussed as they relate to projected water demand. This analysis focuses on water use associated with passenger-related facilities. **Table SRA-2.3.13.4-1** identifies water demand associated with passenger-related facilities for the LAWA Staff-Recommended Alternative as well as under 2010 baseline conditions.

Table SRA-2.3.13.4-1

Baseline (2010) and Projected (2025) Water Use (AF/yr) - LAWA Staff-Recommended Alternative

Building Components	Baseline Conditions	SRA		
		Airfield/ Terminals	Ground Access	Total SRA
Terminals				
Terminal 0	NA	330,000	NA	330,000
Terminal 1 Concourse	138,000	114,000	NA	114,000
Terminal 2 Concourse	306,000	306,000	NA	306,000
Terminal 3 Concourse	279,000	223,000	NA	223,000
New Linear Concourse	NA	NA	NA	NA
New Passenger Processing Terminals	NA	NA	NA	NA
Bradley West North Concourse Extension	NA	113,800	NA	113,800
MSC North Concourse Extension	NA	249,400	NA	249,400
Subtotal Terminal Components	**723,000**	**1,336,200**	**0**	**1,336,200**
Ground Access Components				
Ground Transportation Center	NA	NA	NA	NA
Intermodal Transportation Center	NA	NA	NA	NA
Intermodal Transportation Facility	NA	NA	75,000	75,000
CONRAC	NA	NA	85,000	85,000
Subtotal Ground Access Components	**0**	**0**	**160,000**	**160,000**
Total Building Area (sf)	**723,000**	**1,336,200**	**160,000**	**1,496,200**
Total Water Consumption (AF/yr)	**64.78**	**119.72**	**14.34**	**134.06**
% of LADWP Demand	**0.0117%**	**0.0177%**	**0.0021%**	**0.0198%**

Source: CDM Smith, 2012.

Under the LAWA Staff-Recommended Alternative, the passenger-related building area would increase compared to baseline conditions. Although concourse areas associated with Terminals 1 and 3 would decrease, there would be new concourse areas associated with Terminal 0 and the northerly extensions of Bradley West and the Midfield Satellite Concourse (MSC). In addition, this alternative would include a passenger service area at the ITF and the CONRAC customer service area. As shown in **Table SRA-2.3.13.4-1**, under the LAWA Staff-Recommended Alternative, water demand from passenger-related facilities would be 134.06 AF/yr in 2025. This would represent less than 0.02 percent of anticipated LADWP water demand in 2025, for which LADWP forecasts sufficient water supplies, as explained below. This increase in demand would not be significant compared to the total future regional water supply.

LADWP's 2010 UWMP projects that there will be adequate water supply to meet City demands through 2035.[70] As indicated in Section 4.13.4.3 of the SPAS Draft EIR, the LADWP projections are based on the 2008 RTP, which, in turn, includes a passenger activity level of 78.9 MAP for LAX.[71] Therefore, LADWP's UWMP projections account for future passenger activity at LAX of 78.9 MAP, the same level associated with the LAWA Staff-Recommended Alternative.

The WSA prepared by LADWP for the LAX Master Plan indicates that "adequate water supplies will be available to meet the water demands of the project." As noted in Section 4.13.4.3 of the SPAS Draft EIR,

[70] City of Los Angeles, Department of Water and Power, Urban Water Management Plan, 2010.

[71] SCAG recently adopted the 2012-2035 RTP/SCS. However, the current UWMP is based on the 2008 RTP. It should be noted that the 2012-2035 RTP/SCS also includes a future (2035) passenger activity level of 78.9 MAP for LAX.

the WSA for the LAX Master Plan is based on the 2001 UWMP, which projected water demand to 2020. The WSA was based on a projected activity level at LAX of 78.9 MAP. Therefore, even though the WSA was based on a UWMP with a 2020 timeframe, as LAX passenger activities in 2025 would be the same as assumed in the WSA, the WSA findings remain valid. Furthermore, terminal and ground access passenger-related facilities under the LAWA Staff-Recommended Alternative would be substantially smaller than the analogous facilities under the LAX Master Plan (1,496,200 square feet under the LAWA Staff-Recommended Alternative compared to 5,125,000 square feet under the LAX Master Plan (i.e., Alternative 3)). Therefore, the WSA finding that adequate water supplies would be available to meet the water demand of the project would remain unchanged under the LAWA Staff-Recommended Alternative. This was confirmed by LADWP, which stated that a new WSA is not needed for the LAX SPAS EIR.[72]

Under the LAWA Staff-Recommended Alternative, LAWA would implement LAX Master Plan Commitments W-1, Maximize Use of Reclaimed Water, and W-2, Enhance Existing Water Conservation Program, to reduce water use associated with the LAWA Staff-Recommended Alternative. As a result, water demand related to the LAWA Staff-Recommended Alternative would not exceed regional water supply, and impacts related to water use would be less than significant.

2.3.13.4.2 Mitigation Measures

Implementation of LAX Master Plan Commitments W-1, Maximize Use of Reclaimed Water, and W-2, Enhance Existing Water Conservation Program, would ensure that impacts related to water use associated with the LAWA Staff-Recommended Alternative would be less than significant. Therefore, no mitigation measures specific to the LAWA Staff-Recommended Alternative are required.

2.4 Cumulative Impacts of the LAWA Staff-Recommended Alternative

Introduction

This section presents the cumulative environmental impacts of the LAWA Staff-Recommended Alternative described in Section 2.2, *LAWA Staff-Recommended Alternative Description*, as derived from the analysis presented in the SPAS Draft EIR. The cumulative impacts analyses in this section are based upon the same methodology and specific projects at and near LAX as described in Sections 5.1 through 5.4 in Chapter 5, *Cumulative Impacts*, of the SPAS Draft EIR.

As described in Section 2.1 of this chapter, the LAWA Staff-Recommended Alternative couples the airfield and terminal improvements associated with Alternative 1 with the ground access components associated with Alternative 9. Thus, the impacts analysis in this section for the LAWA Staff-Recommended Alternative is representative of the impacts analysis of Alternatives 1 and 9 in Chapter 5 of the SPAS Draft EIR. For some topics, such as aircraft noise, impacts from the LAWA Staff-Recommended Alternative would only result from airfield improvements; the impacts for these topics are equivalent to the impacts associated with Alternative 1 as presented in the SPAS Draft EIR. For other sections, such as on- and off-airport transportation, impacts from the LAWA Staff-Recommended Alternative would only result from the ground access improvements; the impacts for these sections are identical to the impacts associated with Alternative 9 in the SPAS Draft EIR. For some topics, such as aesthetics, impacts from the LAWA Staff-Recommended Alternative would result from both the airfield/terminal and the ground access improvements; in these cases, the impacts associated with the LAWA Staff-Recommended Alternative represent a combination of the impacts associated with Alternative 1 and Alternative 9 of the SPAS Draft EIR. As noted in Section 2.3, calculations of air pollutant concentrations and human health risks conducted for the LAWA Staff-Recommended Alternative are provided in Attachment 1 of Part II of this Final EIR

[72] Kwan, Delon, City of Los Angeles, Department of Water and Power, Personal Communication, June 13, 2012.

2.4.1 Aesthetics

Cumulative projects that are located at or adjacent to LAX that might have an impact on views or would introduce new features or the loss of existing aesthetic elements that would alter, decrease, or contrast with the existing valued visual character of LAX or surrounding areas were considered in the analysis of cumulative aesthetics impacts. Because LAX and the surrounding area are highly urbanized, impacts to views generated by individual projects tend to be geographically isolated, and are not always visible from adjacent areas. The projects listed below, which are at or adjacent to LAX, involve visible, above ground physical improvements that due to proximity have the potential, in conjunction with SPAS airfield, terminal, and ground access improvements, to result in combined adverse effects associated with degradation of visual quality or diminishment of important views.

Projects within and in the vicinity of LAX would also result in an increase in ambient nighttime light levels and potentially generate glare. However, this increase would occur in the context of infill development within a lit and glare-generating urban environment. Compliance with regulatory requirements and applicable design plans, including Los Angeles Municipal Code (LAMC) Sec. 93.0117, which prohibits light spillover and requires that light sources be shielded and directed downward, and LAX Master Plan commitments would ensure that cumulative projects would not result in either a change in lighting/lighting intensity that would spill off and adversely affect light-sensitive uses or a substantial new source of glare that would adversely affect nighttime views in adjacent areas sensitive to glare. Therefore, cumulative impacts related to increases in ambient light levels on sensitive receptors would be less than significant.

The following cumulative projects were considered in conjunction with the LAWA Staff-Recommended Alternative in the analysis of cumulative impacts to aesthetics and visual resources:

- Within the Century Corridor/eastern boundary area, the Metro Crenshaw/LAX Transit Corridor and Station, Airport Metro Connector Project (depending upon the selected alternative), Airfield Operating Area (AOA) Perimeter Fence Enhancements, and Central Utility Plant (CUP) Replacement Project off-site water treatment plant;
- Within the Central Terminal Area (CTA), the Bradley West Project, North Terminals Improvements, CUP Replacement Project, central processor component of the Midfield Satellite Concourse (MSC) Program, LAX Sign District, New Face of the CTA Improvements/Enhancements, and, depending upon the selected alternative, the Airport Metro Connector Project (depending upon the selected alternative);
- Within the southern boundary area, the South Airfield Improvement Project (SAIP), Runway 7L/25R East End Reconstruction and West End Runway Safety Area (RSA) Improvements, AOA Perimeter Fence Enhancements, West Aircraft Maintenance Area, MSC, Relocatable Aircraft Maintenance Hangar, Bradley West Project, and Metro Crenshaw/LAX Transit Corridor;
- Within the western boundary area, the MSC, West Aircraft Maintenance Facility, Coastal Dunes Improvement Project, Stormwater Infiltration and Treatment Facility, and LAX Northside; and
- Within the northern boundary area, the Coastal Dunes Improvement Project, Stormwater Infiltration and Treatment Facility, LAX Northside,[73] Westchester Golf Course Three-Hole Restoration Project, MSC, Bradley West Project, and North Terminals Improvements.

Century Corridor/Eastern Boundary

Cumulative projects within the Century Corridor/eastern boundary area, listed above, in combination with ground access improvements, such as the APM, Intermodal Transportation Facility (ITF), and new parking facility and CONRAC in Manchester Square occurring under the LAWA Staff-Recommended Alternative, would contribute to cumulative impacts to aesthetic resources, views, and light and glare. Construction of the ITF, parking facilities, CONRAC, and APM under the LAWA Staff-Recommended

[73] The LAX Northside Plan Update is a probable future project for purposes of a cumulative impact analysis (Pub. Resources Code Section 21083(b)(2)). The cumulative analysis herein considers both the currently-approved LAX Northside project as well as the LAX Northside Plan Update project.

Alternative would occur within an area of poor visual quality that does not include any notable views, and the affected area already includes existing light sources, including street lights, parking lot lighting, security lighting, and lighting from building and parking structure interiors, typical of a highly urbanized environment. These new ground access improvements would be subject to airport design guidelines for screening, buffers, landscaping, setbacks, pedestrian amenities, and high architectural standards, including those set forth in the *LAX Street Frontage and Landscape Development Plan Update*, as well as LAX Master Plan Commitments DA-1, Provide and Maintain Airport Buffer Areas, and LU-4, Neighborhood Compatibility Program, to promote visual compatibility. Provisions addressing light and glare would also apply, including LAX Master Plan Commitment LI-2, Use of Non-Glare Generating Building Materials; LAX Master Plan Commitment LI-3, Lighting Controls; and LAMC Section 93.0117 (see Section 4.1.3 of the SPAS Draft EIR for a complete discussion of the applicable regulatory context). As a result, aesthetic and light and glare impacts associated with the LAWA Staff-Recommended Alternative would be less than significant.

The Metro Crenshaw/LAX Transit Corridor Project would not be located in areas of high visual quality, are not expected to degrade the character or visual quality of the potentially affected areas, and are located in areas with existing light sources (e.g., street lights, parking lot lighting, security lighting, and lighting from building and parking structure interiors) typical of a highly urbanized environment. In addition, mitigation measures for the project require incorporating features consistent with the recommendations and principles and community input. These measures would be implemented as part of the Metro Crenshaw/LAX Transit Corridor Project to ensure visual compatibility and reduce visual conflicts between the proposed transit system and surrounding community. These urban design principles and project features include incorporation of art, landscaping, pedestrian amenities, awnings, street furniture, and other visual treatments into the design of the station and alignment.[74] Finally, light and glare impacts from the Metro Crenshaw/LAX Transit Corridor Project were not identified as significant impacts because project features would be located in or adjacent to existing roadway or railroad rights of way which currently produce transport-related light and glare, in addition, some sections of the project alignment would be below grade.[75] Given the location of the Metro Crenshaw/LAX Transit Corridor Project and the urban design principles and mitigation measure identified above, the Metro Crenshaw/LAX Transit Corridor Project would not be expected to obstruct valued views within the Century Corridor/eastern boundary area or result in significant light and glare impacts.

As part of the Airport Metro Connector Project, Metro is examining ways to connect the transit system to LAX.[76] Modes under consideration including Light Rail Transit and an Automated People Mover (APM), and Bus Rapid Transit along a number of different alignments, including an underground option. Depending on the outcome, elevated elements of the Airport Metro Connector Project would contribute to cumulative impacts to views and aesthetic and visual resources within the Century Corridor area with potential routes along Century Boulevard and 98th Street. As discussed previously, similar to the Metro Crenshaw/LAX Transit Corridor and Station, this analysis assumes that a number of urban design principles and features would be implemented as part of the Airport Metro Connector Project per Metro's Rail Design Criteria to ensure visual compatibility and reduce visual and light and glare conflicts between the proposed transit system and the surrounding area. In addition, Federal Transit Administration (FTA) Circular 9400.1A, Design and Art in Transit Projects, encourages the use of design and artist

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74 U.S. Department of Transportation, Federal Transit Administration and Los Angeles County Metropolitan Transportation Authority (Metro), Crenshaw/LAX Transit Corridor Project Final Environmental Impact Report/Environmental Impact Statement, August 2011.

75 U.S. Department of Transportation, Federal Transit Administration and Los Angeles County Metropolitan Transportation Authority (Metro), Crenshaw/LAX Transit Corridor Project Final Environmental Impact Report/Environmental Impact Statement, August 2011.

76 Los Angeles County Metropolitan Transportation Authority (Metro), Metro Green Line to LAX, Project Overview Fact Sheet, Available: http://www.metro.net/projects_studies/green_line_lax/images/Green_Line_LAX_Overview.pdf, accessed June 21, 2012.

considerations in transit projects.[77] Furthermore, this project is not located in an area that is valued for or of high visual quality and it is not expected to obstruct valued views.[78]

The CUP Replacement Project would include development of an off-site water treatment plant near Jenny Avenue and West 96th Street. The proposed water treatment plant would occupy an approximately 14,000-square-foot site that is currently developed with a surface parking lot. The site is surrounded by surface parking lots to the north, west, and east, and commercial and industrial uses to the south. As such, the off-site water treatment plant would not be located in an area that has a high level of visual quality or contains notable views.

Improvements to the AOA perimeter fencing have been underway in phases for several years as a component of security improvements to the airport. Phase 4 of the AOA Perimeter Fence Enhancements Project, which is to be completed over the next several years, is the last phase of the security fencing program and will include improvements along Imperial Highway, Aviation Boulevard, and Century Boulevard. Improvements to existing fencing to incorporate new security features would not affect notable views or valued visual resources or introduce new light sources.

In light of applicable design guidelines, including the *LAX Street Frontage and Landscape Plan Update* and requirements incorporated into Metro environmental documents, LAX Master Plan commitments, and existing visual quality, improvements under the LAWA Staff-Recommended Alternative in combination with cumulative projects would not degrade an area valued for its aesthetic character, or involve the removal of features that contribute to the aesthetic image of the area. Moreover, cumulative projects in combination with the LAWA Staff-Recommended Alternative improvements would not affect views from a designated scenic highway, corridor, or parkway or obstruct/diminish other valued focal or panoramic views. Similarly, cumulative development would not result in a change in lighting or lighting intensity such that light would spill off and adversely affect light-sensitive areas, and would not result in a substantial new source of glare that would adversely affect nighttime views in adjacent areas sensitive to glare. Therefore, cumulative impacts to aesthetic resources and views, and cumulative impacts related to light and glare, within the Century Corridor/eastern boundary area under the LAWA Staff-Recommended Alternative would be less than significant.

Central Terminal Area

Cumulative projects within the CTA, listed above, in combination with terminal improvements occurring under the LAWA Staff-Recommended Alternative, would contribute to cumulative impacts to aesthetic resources, views, and light and glare. However, cumulative projects would generally enhance existing visual and aesthetic quality because they would involve improvements and modernization of the existing structures, creation of new visual treatments, and would reflect a high level of attention to design due to imposition of LAWA design guidelines and associated reviews.

Terminal improvements under the LAWA Staff-Recommended Alternative include the addition of new Terminal 0, loss or modifications to concourse areas and/or gates at Terminals 1 and 2, replacement of the Terminal 3 concourse, and the modification and northern extension of concourse areas and gates at Tom Bradley International Terminal (TBIT) and the future MSC. Ground access improvements within the CTA consist of the easterly relocation of Sky Way (the primary access road connecting the CTA to southbound Sepulveda Boulevard and 96th Street Bridge). These improvements would be located in a highly lit environment. Since the existing terminal buildings are aging, functional in nature, and generally do not include extensive architectural features and/or landscaping, they do not contribute meaningfully to the aesthetic quality of the CTA. As such, modification and improvements of terminal buildings would not constitute the loss of valued visual and aesthetic resources. Furthermore, the new Terminal 0, and

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77 U.S. Department of Transportation, Federal Transit Administration and Los Angeles County Metropolitan Transportation Authority (Metro), Crenshaw/LAX Transit Corridor Project Final Environmental Impact Report/Environmental Impact Statement, August 2011.

78 While the Airport Metro Connector Project has a horizon year 2035, the Airport Metro Connector Project is analyzed as part of the cumulative analysis of this EIR because it could contribute to long-term cumulative impacts in conjunction with the SPAS alternatives and other cumulative development.

reconstruction and modifications of the Terminal 3 concourse and gates would, pursuant to the LAX Plan and *LAX Street Frontage and Landscape Development Plan Update*, incorporate more modern design elements and greater architectural articulation than current conditions. In addition, the LAX Specific Plan requires the development of conceptual design guidelines for new central terminals. Thus, the new Terminal 0 and modified facilities are expected to represent an aesthetic improvement within the CTA that would promote the airport's image as a Gateway to the City of Los Angeles. Therefore, impacts to aesthetic and visual resources associated with terminal improvements within the CTA under the LAWA Staff-Recommended Alternative would be less than significant. Terminal and airfield improvements within/near the CTA under the LAWA Staff-Recommended Alternative would take place on the airfield and north of World Way. As addressed in Section 2.3.1, *Aesthetics*, of this chapter, within the CTA, the APM associated with the LAWA Staff-Recommended Alternative would affect views of the Theme Building. With incorporation of Mitigation Measure MM-HA Mitigation Measure MM-HA (SPAS)-2, Preservation of Historic Resources: Theme Building and Setting, this impact would be less than significant.

An additional CTA improvement proposed as part of the LAWA Staff-Recommended Alternative is the relocation of Sky Way eastward between the future Terminal 0 and Sepulveda Boulevard. These modifications involve the relocation of an existing roadway, which would not detract from, and would not constitute a loss of, a valued visual resource. Existing views of Sky Way are not notable, and notable views within the CTA would not be altered with the relocation of Sky Way.

Since development of terminal improvements under the LAWA Staff-Recommended Alternative would not degrade features that contribute to the valued aesthetic character of the area, impacts to aesthetic and visual resources would be less than significant. As development of the terminal improvements under the LAWA Staff-Recommended Alternative would not affect views from a designated scenic highway, corridor, or parkway or obstruct valued focal or panoramic views, impacts to views would also be less than significant.

As noted above, a number of cumulative projects are proposed within the CTA. In particular, the New Face of the CTA is geared toward upgrading visual quality in the most visually prominent areas within the CTA, including terminal building exterior finishes and other improvements along walkways and curbside waiting areas. With incorporation of Mitigation Measure MM-HA Mitigation Measure MM-HA (SPAS)-2, Preservation of Historic Resources: Theme Building and Setting, improvements under the LAWA Staff-Recommended Alternative would not obstruct or degrade views of the Theme Building within the CTA and there are no other notable views within the CTA that would be obstructed.

The LAX Sign District would codify specific regulations and standards regarding the location, type, and size of allowable signs associated with non-airport related advertising, and their placement within the CTA and on terminals and passenger boarding bridges visible from apron areas. Implementation of the LAX Sign District would enhance the ability for signage at the airport to be cohesive and fit within a unified design theme.

The Bradley West Project, currently under construction, will represent an aesthetic improvement within the CTA and will be complementary to existing aesthetically valued elements of the area. The project is part of an overall architectural design vision for the modernization of LAX.[79] The North Terminals Improvements and future central processor component of the MSC, neither of which has undergone preliminary design, would similarly be expected to represent an aesthetic improvement within the CTA, and would be designed to complement the other terminal improvements currently planned or underway. Together, these projects would result in beneficial impacts to aesthetics within the CTA.

The CUP Replacement Project would replace the existing, outdated CUP currently located west of the Airport Traffic Control Tower and the Theme Building with a new facility designed to current LAWA standards. While the replacement CUP would be located closer to the Theme Building and Airport Traffic Control Tower, notable visual features and views of the Airport Traffic Control Tower and Theme Building

[79] City of Los Angeles, Los Angeles World Airports, Final Environmental Impact Report for Los Angeles International Airport (LAX) Bradley West Project, September 2009.

would not be affected. Scenic views from vantage points outside of the CTA of the City and coastline would not be affected as the facility would be well below the line-of-sight from these vantages. Furthermore, the existing CUP does not contribute meaningfully to the aesthetic quality within the CTA. As such, the replacement of the CUP would not constitute the loss of a valued aesthetic or visual resource. Impacts to views related to the CUP Replacement Project would be less than significant.[80]

As discussed earlier, as part of the Airport Metro Connector Project, Metro is examining ways to connect the transit system to LAX. Modes under consideration include Light Rail Transit, APM, and Bus Rapid Transit along a number of different alignments, including an underground option. Depending on the outcome, elevated elements of the project have the potential to contribute to cumulative impacts to views, aesthetics, and visual resources in the CTA. Within the CTA, components of the APM, Light Rail Transit, and Bus Rapid Transit options could be developed in a configuration that would extend to the eastern area of the CTA. Depending on the specific location, elevation, and design of the Light Rail Transit or Bus Rapid Transit options, focal views of the Theme Building from various vantage points in the CTA could be diminished. Although it is too early in the project development process to identify a route or specific project features for the Airport Metro Connector Project, this analysis assumes that, similar to the Metro Crenshaw/LAX Transit Corridor and Station, a number of urban design principles and features would be implemented as part of the Airport Metro Connector Project to ensure visual compatibility and reduce visual conflicts between the proposed transit system and the surrounding area. However, depending on the selected alternative, if the Airport Metro Connector alignment and any station locations include elevated elements, it could affect views of the Theme Building, a valued focal view, within the CTA. In light of applicable airport design guidelines, including the *LAX Street Frontage and Landscape Plan Update*, LAX Master Plan commitments, and existing visual quality, improvements under the LAWA Staff-Recommended Alternative, in combination with cumulative projects, would not degrade an area valued for its aesthetic character, or involve the removal of features that contribute to the aesthetic image of the area. Similarly, cumulative development would not result in a change in lighting or lighting intensity such that light would spill off and adversely affect light-sensitive areas, and would not result in a substantial new source of glare that would adversely affect nighttime views in adjacent areas sensitive to glare.

With the exception of the Airport Metro Connector Project, the cumulative projects would not affect views from a designated scenic highway, corridor, or parkway or obstruct/diminish other valued focal or panoramic views. Elevated elements related to the Airport Metro Connector Project could affect views of the Theme Building within the CTA. Although the Airport Metro Connector Project may contribute to a cumulatively significant impact on views of the Theme Building, in light of proposed Mitigation Measure MM-HA (SPAS)-2, Preservation of Historic Resources: Theme Building and Setting, the contribution of the LAWA Staff-Recommended Alternative to cumulative impacts would not be cumulatively considerable.

Southern Boundary

Cumulative projects within the southern boundary area, listed above, in combination with airfield and terminal modifications occurring under the LAWA Staff-Recommended Alternative, would contribute to cumulative impacts to aesthetic resources, views, and light and glare. Various terminal and airfield modifications under the LAWA Staff-Recommended Alternative would not introduce a new land use that would materially alter the overall visual character of the airfield, CTA, or aircraft operations. Changes to the north airfield and terminal improvements in the northern portion of the CTA would not alter existing long-range views of the Santa Monica Mountains due to the distance of the improvements and the substantially higher vantage points to the south. Improvements under the LAWA Staff-Recommended Alternative would not alter valued views in El Segundo of airfield operations, such as arriving and departing aircraft, or introduce substantial new sources of light. Therefore, impacts to views or visual and

[80] City of Los Angeles, Los Angeles World Airports, Final Environmental Impact Report for Los Angeles International Airport (LAX) Central Utility Plant Replacement Project, Appendix A, October 2009.

aesthetic characteristics from the south of LAX under the LAWA Staff-Recommended Alternative would be less than significant.

The West Aircraft Maintenance Area would involve the development of a new maintenance hangar, along with aircraft Remain Overnight (RON) apron area, and a ground run-up enclosure. These facilities would be visible from some western vantage points. However, the West Aircraft Maintenance Area project site is located in a highly disturbed area, and is mostly surrounded by airport uses that have limited aesthetic value. While development of the West Aircraft Maintenance Area would occur above grade and would be visible from western vantage points along Pershing Drive, aesthetic impacts from vantage points along Pershing Drive and from more distant points north and south of the airport would not be significant since the area does not currently support a high level of visual quality or contain important aesthetic elements. Furthermore, the improvements would not obstruct scenic views as the facility would be sited below and out of the line-of-sight of scenic views of the City and coastline.

Airfield improvements, including the SAIP and other taxiway and runway improvements, would not alter existing aircraft operations or the aesthetic character of the airfield. These improvements consist of pavement improvements and would not add any new structures to the viewshed.

The proposed Relocatable Aircraft Maintenance Hangar would be located south of World Way West, west of Taxiway R. The design of the proposed project allows it to be relocatable (i.e., consists of pre-fabricated pieces that are assembled at a site and can later be unassembled and moved elsewhere). Construction of the proposed facility would include site preparation, erection of the hangar frame, placement of exterior cover, and interior finishing. The project site is located in a highly disturbed area, and is mostly surrounded by airport uses that have limited aesthetic value. While development of the Relocatable Aircraft Maintenance Hangar would occur above grade and would be visible from western vantage points along Pershing Drive and from more distant points north and south of the airport, the area does not currently support a high level of visual quality or contain important aesthetic elements. Furthermore, the Relocatable Aircraft Maintenance Hangar would be similar in height to other nearby structures, such as the Aircraft Fire Fighting and Rescue (AFRR) station, the American Airlines High Bay Hangar, and the Bradley West Project (currently under construction) and would not introduce a notable new visual element to the area or impact focal views.

Various airfield modifications and terminal improvements related to cumulative projects, listed above, would not introduce land uses that would adversely alter the overall visual character of the airfield, CTA, or aircraft operations. Furthermore, views of the existing airfield, while of public interest, and more distant views to the CTA, are not scenic. Moreover, projects such as the Bradley West Project and the MSC would enhance views of the airport. Changes to the south airfield, enhancements to AOA perimeter fencing, development of the West Aircraft Maintenance Area, various terminal improvements, and the Metro Crenshaw/LAX Transit Corridor Project would not alter existing long-range views of the Santa Monica Mountains due to the distance of the improvements and the substantially higher vantage points to the south. Improvements would also not alter valued views in El Segundo of airfield operations, such as arriving and departing aircraft.

In light of applicable design guidelines, including the *LAX Street Frontage and Landscape Plan Update*, LAX Master Plan commitments, and existing visual quality, improvements under the LAWA Staff-Recommended Alternative in combination with cumulative projects would not degrade an area valued for its aesthetic character, or involve the removal of features that contribute to the aesthetic image of the area. Moreover, cumulative projects in combination with the LAWA Staff-Recommended Alternative improvements would not affect views from a designated scenic highway, corridor, or parkway or obstruct/diminish other valued focal or panoramic views. Similarly, cumulative development would not result in a change in lighting or lighting intensity such that light would spill off and adversely affect light-sensitive areas, and would not result in a substantial new source of glare that would adversely affect nighttime views in adjacent areas sensitive to glare. Therefore, cumulative impacts to aesthetic resources and views, and cumulative impacts related to light and glare, within the southern boundary area under the LAWA Staff-Recommended Alternative would be less than significant.

Western Boundary

Cumulative projects within the western boundary area, listed above, in combination with airfield and terminal modifications occurring under the LAWA Staff-Recommended Alternative, would contribute to cumulative impacts to aesthetic resources, views, and light and glare. Development within the western boundary area would be somewhat limited under the LAWA Staff-Recommended Alternative. Runway 6L/24R would be extended to the west, and taxiways would be improved and extended near the western end of the site. These improvements would represent a continuation of existing airfield uses. Aesthetic and view impacts from vantage points along Pershing Drive and from more distant points north and south of the airport would not be significant since the area does not currently support a high level of visual quality or contain important aesthetic elements. The runway improvements would generally occur at grade level and would not block any valued focal or panoramic view. Additionally, with the exception of changes to existing navigational aids, no development would take place in the El Segundo Blue Butterfly Habitat Restoration Area (Habitat Restoration Area), and views of the Los Angeles/El Segundo Dunes (Dunes) and views along Vista del Mar, a City of Los Angeles-designated Scenic Highway, would not materially change.

In order to accommodate the relocation of Runway 6L/24R, and the adjustment to the Runway 6R/24L landing threshold, existing navigational aids under the LAWA Staff-Recommended Alternative would be removed and new facilities would be installed and modified to align with the runway configurations. No increase in navigational aids would occur. Similar to baseline conditions, new and modified navigational aids would be low in profile and would not comprise a noticeable portion of the overall viewshed. In addition, the relocated navigational aids would not introduce a new light source. Accordingly, with no increase in navigational aids, relocation or modification of these facilities would not change the character of the area or obstruct or degrade a scenic view.

As noted above, a number of cumulative projects are proposed within the western portion of the airfield and within the CTA. The impacts of several of these projects are discussed previously in this analysis. The Coastal Dunes Improvement Project involves restoration/improvement of coastal dune habitat west of Pershing Drive. This project would result in an improvement of coastal and biological habitat that would improve the visual character of the Dunes, would not impede views, and would not introduce a new light source. See Section 2.3.3, *Biological Resources*, of this chapter, for a discussion of measures in place to ensure restoration of the Dunes once construction of navigational aids related to the LAWA Staff-Recommended Alternative is completed.

The proposed Stormwater Infiltration and Treatment Facility to be located north of Westchester Parkway and east of Pershing Drive would treat urban runoff and would include stormwater flow diversion structures, debris removal and underground detention and infiltration facilities that would remove pollutants. These facilities would include underground and low-profile structures that would not be visually prominent, would not block valued views of visual resources such as the iconic Theme Building or a panoramic view, and would not introduce substantial new lighting to the area.

In light of applicable design guidelines, including the *LAX Street Frontage and Landscape Plan Update*, LAX Master Plan commitments, and existing visual quality, improvements under the LAWA Staff-Recommended Alternative in combination with cumulative projects would not degrade an area valued for its aesthetic character, or involve the removal of features that contribute to the aesthetic image of the area. Moreover, cumulative projects in combination with the LAWA Staff-Recommended Alternative improvements would not affect views from a designated scenic highway, corridor, or parkway or obstruct/diminish other valued focal or panoramic views. Similarly, cumulative development would not result in a change in lighting or lighting intensity such that light would spill off and adversely affect light-sensitive areas, and would not result in a substantial new source of glare that would adversely affect nighttime views in adjacent areas sensitive to glare. Therefore, cumulative impacts to aesthetic resources and views, and cumulative impacts related to light and glare, within the western boundary area under the LAWA Staff-Recommended Alternative would be less than significant.

Northern Boundary

Cumulative projects within the northern boundary area, listed above, in combination with airfield, terminal, and ground access improvements occurring under the LAWA Staff-Recommended Alternative, would contribute to cumulative impacts to aesthetic resources, views, and light and glare. Implementation of the LAWA Staff-Recommended Alternative would involve changes to the north airfield and terminal improvements that would be visible from northern vantage points. The ground access improvements associated with the LAWA Staff-Recommended Alternative, including the CONRAC, public parking, and APM, would be constructed in northern boundary areas with poor visual quality and no notable views, but with existing light sources typical of a highly urbanized environment. Because these improvements would be compatible with surrounding land uses, and would be subject to design guidelines, impacts to aesthetic resources would be less than significant.

Under the LAWA Staff-Recommended Alternative, Lincoln Boulevard would be realigned to the north, with approximately 540 linear feet below grade and/or covered. Since the site of the new alignment is currently vacant and lies between two existing roadways, the area is not currently valued for its aesthetic character, and the improvements would not be at a height or location that would obstruct scenic views, impacts to aesthetic resources would be less than significant.

As noted above, a number of cumulative projects are proposed within the northern boundary area. The impacts of several of these projects are discussed previously in this analysis. In particular, the LAX Northside area is currently entitled for development of a mix of retail uses, hotels, offices, airport support facilities, education and community facilities, and open space under the adopted LAX Northside Plan. The approved development plan provides entitlements for 4.5 million square feet of development, subject to a limitation on the total number of daily trips. Formulation of a new land use development concept for the area is currently in process. The proposed LAX Northside Plan Update calls for less dense development as well as additional open space and community facilities while providing a mix of retail, office space, research and development, and non-profit uses.[81] The development of a mix of new land uses within this vacant area, even at a less dense level than previously entitled, would represent a substantial change in visual character and has the potential to affect views from residential development to the north. In addition, the conversion of the largely vacant LAX Northside would result in a noticeable increase in ambient light and glare as seen from existing adjacent light-sensitive uses in the Westchester area. However, the LAX Northside area is subject to height restrictions, setback requirements, and lighting and landscape guidelines and requirements contained in the *LAX Northside Design Plan and Development Guidelines* and the LAX Specific Plan with the goal of avoiding land use conflicts, creating a visually open appearance, and promoting design sensitivity to the residential interface, enhancing privacy. In addition, light spillover and substantial glare associated with the relocation of Lincoln Boulevard and its associated street lighting northward, in combination with development under LAX Northside, would be avoided. This is because the Lincoln Boulevard relocation improvements would be subject to LAX Master Plan Commitments LI-3, Lighting Controls, and DA-1, Construction Fencing, while both the Lincoln Boulevard relocation improvements and development in LAX Northside would be subject to LAMC Section 93.0117 and *LAX Northside Design Plan and Development Guidelines* regulating light spillover in residential areas.

Implementation of these design provisions would create an aesthetically pleasing interface with the Westchester community to the north, and setbacks and height limits would reduce visual intrusion and the obscuring of distant views. Implementation of the LAX Northside Plan would create intervening development between residential uses and existing views of the airfield would be limited. Although views from certain high-rise apartment buildings on the west side of Lincoln Boulevard would change, existing views of LAX Northside and LAX are not considered scenic or of high aesthetic quality. More distant views of the Theme Building would also be limited by the new development; however, due to the distance

[81] City of Los Angeles, Los Angeles World Airports, LAX Northside Plan Update, Available: http://www.lawa.org/GDZ., accessed December 30, 2012.

of the Theme Building from northern vantage points, existing views of the Theme Building that might be obstructed are not considered scenic.

The Westchester Golf Course Three-Hole Restoration Project, completed in 2010, involved the replacement of three holes at the Westchester Golf Course that were eliminated many years ago with the construction of Westchester Parkway, thereby returning the overall playing area to 18 holes. Landscaping for the project was provided in accordance with the *LAX Street Frontage and Landscape Development Plan Update*. The golf course is separated from nearby residences by a 12-foot-high masonry wall atop an 8-foot-high landscaped berm, effectively shielding any views of the golf course from nearby residences and preventing any light spillover or substantial glare. As such, impacts to aesthetic resources associated with this project were less than significant. Similarly, because of the masonry wall and berm, and given the light and glare controls discussed above (e.g., LAX Master Plan Commitments LI-3 and DA-1, LAMC Section 93.0117, and *LAX Northside Design Plan and Development Guidelines*), any increase in light and glare resulting from the combination of light from the Lincoln Boulevard relocation and development in LAX Northside would result in less than significant light and glare impacts.

Various airfield modifications and terminal improvements related to cumulative projects, listed above, would not introduce land uses that would adversely alter the overall visual character of the airfield, CTA, or aircraft operations. Furthermore, views of the existing airfield, while of public interest, are at a considerable distance from residences in Westchester and Playa del Rey. More distant views to the CTA are not scenic. Projects such as the Bradley West Project, the MSC, and the North Terminals Improvements would enhance views of the airport. Changes to the north airfield, enhancements to AOA perimeter fencing, and various terminal improvements, would not alter views of airfield operations, such as arriving and departing aircraft.

In light of applicable design guidelines, including the *LAX Street Frontage and Landscape Plan Update* and the *LAX Northside Design Plan and Development Guidelines*, LAX Master Plan commitments, and existing visual quality, improvements under the LAWA Staff-Recommended Alternative in combination with cumulative projects would not degrade an area valued for its aesthetic character, or involve the removal of features that contribute to the aesthetic image of the area. Moreover, cumulative projects in combination with the LAWA Staff-Recommended Alternative improvements would not affect views from a designated scenic highway, corridor, or parkway or obstruct/diminish other valued focal or panoramic views. Similarly, cumulative development would not result in a change in lighting or lighting intensity such that light would spill off and adversely affect light-sensitive areas, and would not result in a substantial new source of glare that would adversely affect nighttime views in adjacent areas sensitive to glare. Therefore, cumulative impacts to aesthetic resources and views, and cumulative impacts related to light and glare, within the northern boundary area under the LAWA Staff-Recommended Alternative would be less than significant.

Construction

If construction of airfield, terminal, and ground access improvements associated with the LAWA Staff-Recommended Alternative were to occur at the same time as construction of other cumulative projects, the combined construction activity would generate cumulative impacts to aesthetics and light and glare that would be greater than would occur if these projects were not to overlap. Cumulative construction activities would cause some areas of the airport environs to have an incomplete, disrupted, and unattractive quality. In addition, construction activities would require temporary nighttime lighting of the construction sites and construction staging areas. Use of Construction Staging Areas A, B, C, and D may occur in conjunction with the construction of LAX Northside, the Stormwater Infiltration and Treatment Facility, and the Coastal Dunes Improvement Project. These construction activities would be visible from residential areas north of Westchester Parkway, the Westchester Golf Course, and elevated residential areas northwest of Pershing Drive. Although Construction Staging Areas A, B, C, and D and construction activities associated with other cumulative projects would be visible to some degree from off-site vantage points to the north, most of these construction staging areas already accommodate existing construction activities and associated construction lighting. Construction staging equipment, activities, and light and glare from cumulative construction activities would not contrast or be out of character with existing views,

which include existing construction staging activities, airfield runways, and auxiliary structures located to the south.

Use of Construction Staging Areas E and F in the mostly vacated Belford and Manchester Square areas may occur in conjunction with construction of cumulative projects, such as the Metro Crenshaw/LAX Transit Corridor and Station. These cumulative construction activities would be visible from surrounding commercial, industrial, and surface parking uses. Views of the Manchester Square area would also be visible from the limited number of multi-family homes to the north, some of which would have elevated views of the site from upper stories. Construction Staging Areas E and F would be also visible from surrounding roadways. While Construction Staging Areas E and F in conjunction with construction activities associated with other cumulative projects would be visible to surrounding uses and vantage points, most of these areas have some existing lighting and currently accommodate some construction activities. Moreover, cumulative construction activities would be located in a lit urban setting, the existing visual quality in these areas is low, and the areas do not support notable views.

Use of Construction Staging Area G (the Continental City site) may occur in conjunction with the construction of the Metro Crenshaw/LAX Transit Corridor, both of which would be visible along on Aviation Boulevard, 111th Street, and I-105. Residential areas south of I-105 have limited views of the Continental City site due to the presence of I-105 support pilings, a sound wall, and right-of-way fronting Imperial Highway. Construction Staging Area G and construction activities associated with cumulative projects, such as the Metro Crenshaw/LAX Transit Corridor, would not detract from an area with valued aesthetic quality. Currently, the Continental City site is vacant and does not contain valued aesthetic resources or notable views. Cumulative construction activities in this area would not alter existing long-range views of the Santa Monica Mountains due to the distance of the improvements and the substantially higher vantage points to the south, nor would these activities alter valued views in El Segundo of airfield operations, such as arriving and departing aircraft. Furthermore, the area is located within the highly lit and glare-generating Century, Sepulveda, and Aviation Boulevard corridors, which are dominated by street lights, surface parking lot lighting, and lighting from building and parking structure interiors, and any construction-related light and glare generate would represent a small incremental increase in existing light and glare in this area.

Impacts related to temporary construction activities on the airport property would be reduced by LAX Master Plan Mitigation Measure MM-DA-1, Construction Fencing. Specifically, MM-DA-1 would ensure construction fencing and pedestrian canopies would be installed by LAWA to the degree feasible and appropriate to ensure maximum screening of areas under construction along major public approach and perimeter roadways. Along Century Boulevard, Sepulveda Boulevard, and in other areas where the quality of public views are a high priority, treatment of the fencing to reduce temporary visual impacts would occur. Construction lighting associated with the LAWA Staff-Recommended Alternative and other LAX Master Plan projects would be oriented toward airport property and away from adjacent sensitive receptors in accordance with LAX Master Plan Commitment LI-3, Lighting Controls. Temporary construction impacts related to the Metro Crenshaw/LAX Transit Corridor and Station and Airport Metro Connector Project would be subject to screening measures enforced by Metro, such as the replacement of street trees and vegetation and siting of stockpile and staging areas in less visually-sensitive areas. Therefore, cumulative short-term aesthetic impacts related to temporary construction activities would be less than significant. Similarly, since construction activities associated with the cumulative projects, in combination with construction activities under the LAWA Staff-Recommended Alternative, would not result in a change in lighting or lighting intensity such that light would spill off and adversely affect light-sensitive areas, and would not result in a substantial new source of glare that would adversely affect nighttime views in adjacent areas sensitive to glare, cumulative construction-related light and glare impacts would also be less than significant.

2.4.2 Air Quality

2.4.2.1 Construction Impacts

Construction air quality impacts tend to be primarily local in nature (i.e., impacts such as fugitive dust and construction equipment emissions are mostly realized in the immediate area around a construction site), although construction-related air pollutant emissions also contribute incrementally to degradation of regional ambient air quality. Cumulative projects with the most notable potential to contribute to cumulative construction air quality impacts, adding to the construction-related impacts associated with the LAWA Staff-Recommended Alternative, would be those under construction at the same time and in the same general vicinity as the LAWA Staff-Recommended Alternative. As such, the geographic study area for evaluation of cumulative construction air quality impacts is focused primarily on projects at LAX and the immediate surroundings. It should be noted, however, that the basis used in this EIR for determining significant air quality impacts, whether project-specific or cumulative, are the thresholds established by the South Coast Air Quality Management District (SCAQMD). The SCAQMD is the regional air pollution control agency for the South Coast Air Basin, which includes all of Orange County and the urban portions of Los Angeles, Riverside and San Bernardino counties, and sets forth regulations, policies, and programs designed to address air quality on a regional (Basin-wide) basis.

As described in Section 5.3 of the SPAS Draft EIR, numerous past, present, and reasonably foreseeable development projects are located at and around LAX. Past and present projects involving substantial construction activities include the South Airfield Improvement Project, Taxiway R, the Bradley West Project including Taxiways S and T, and the Central Utility Plant (CUP) Replacement Project. Construction of these projects has been, or is anticipated to be, completed prior to start of construction of SPAS improvements in 2015. There are also several other smaller projects described in Section 5.3 of the SPAS Draft EIR that have been, or would be, completed prior to 2015 (see anticipated timeframes within the description of each project). Reasonably foreseeable projects involving substantial construction activities between 2015 and 2025, concurrent with construction of SPAS improvements, include the Midfield Satellite Concourse (MSC) and associated taxiways and passenger processor, LAX Northside, and the Metro Crenshaw/LAX Transit Corridor and Station. Additional smaller development projects anticipated to occur during this time period are described in Section 5.3 of the SPAS Draft EIR, as are several other projects for which construction schedules have not yet been determined but would nevertheless contribute to cumulative construction air quality impacts at some point.

According to the SCAQMD, if an individual project results in air emissions of criteria pollutants that exceed the SCAQMD's recommended daily thresholds for project-specific impacts, then the project would also result in a cumulatively considerable net increase of these criteria pollutants.[82] Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant.

Construction of the past, present, and reasonably foreseeable future projects described above, along with the improvements proposed under the LAWA Staff-Recommended Alternative, would collectively exceed the SCAQMD thresholds of significance; hence, there would be significant cumulative impacts to air quality. As indicated in Sections 2.3.2.1.1 and 2.3.2.1.2, estimated emissions from construction of the LAWA Staff-Recommended Alternative would exceed the SCAQMD thresholds of significance for CO, VOC, NO_x, PM10, and PM2.5, and concentrations of criteria pollutants from construction would exceed the SCAQMD thresholds of significance for NO_2 and PM10. The contribution of the LAWA Staff-Recommended Alternative to cumulative emissions and concentrations of these specific pollutants would, therefore, be cumulatively considerable.

Construction emission and concentration impacts of SO_2 and construction concentration impacts of CO and PM2.5 would not exceed the SCAQMD thresholds of significance under the LAWA Staff-

[82] South Coast Air Quality Management District, White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution, August 2003, Appendix D, Available: http://www.aqmd.gov/hb/2003/030929a.html, accessed June 15, 2012.

Recommended Alternative and, therefore, would not be cumulatively considerable relative to these specific pollutants.

Overall, based on the above, construction of the LAWA Staff-Recommended Alternative would result in a cumulatively considerable impact on air quality.

2.4.2.2 Operational Impacts

Operational emissions associated with past, present, and reasonably foreseeable future projects such as those described in Section 5.3 of the SPAS Draft EIR would contribute to cumulative criteria pollutant emissions in excess of SCAQMD thresholds of significance; therefore, significant cumulative impacts would occur. Such operational emissions would be both localized, occurring at each project site, and regional in nature relative to mobile source emissions associated with vehicle travel to and from each site. According to the SCAQMD, if an individual project results in air emissions of criteria pollutants that exceed the SCAQMD's recommended daily thresholds for project-specific impacts, then the project would also result in a cumulatively considerable net increase of these criteria pollutants.

Operational emissions and concentrations associated with past, present, and reasonably foreseeable future projects, along with the LAWA Staff-Recommended Alternative, would contribute to cumulative criteria pollutant emissions in excess of SCAQMD thresholds of significance; therefore, significant cumulative impacts would occur. As discussed in Section 2.3.2.1.3 of this chapter, operational emissions associated with the LAWA Staff-Recommended Alternative would exceed the SCAQMD's threshold for SO_2, PM10, and PM2.5. The SO_2 exceedance is primarily due to aircraft emissions during takeoff and to auxiliary power units (APUs). Although SO_2 emissions from other cumulative projects would be much more limited, given that the vast majority of non-aviation fuel types are subject to existing regulatory requirements that limit sulfur content to very low levels (i.e., no more than 15 parts per million), the impact of the LAWA Staff-Recommended Alternative relative to SO_2, which exceeds the SCAQMD threshold of significance, would be a cumulatively considerable contribution to a significant impact for that pollutant. Emissions of PM10 and PM2.5 would, under the LAWA Staff-Recommended Alternative, exceed the SCAQMD thresholds of significance due primarily to off-airport vehicle travel, which would also occur with many of the other cumulative projects. The contribution of the LAWA Staff-Recommended Alternative to cumulative impacts for those pollutants would be cumulatively considerable. As discussed in Section 2.3.2.1.4 of this chapter, concentrations of NO_2 would exceed the SCAQMD's threshold of significance, due primarily to pollutant emissions associated with aircraft takeoffs, and concentrations of PM10 would also exceed the SCAQMD thresholds of significance. The LAWA Staff-Recommended Alternative would, therefore, also have a cumulatively considerable impact relative to those pollutants. As discussed in Section 2.3.2.2 of this chapter, mitigation measures would be implemented to address operational impacts; however, no feasible mitigation measures are available to reduce those impacts to a level that is less than significant.

Operational emission impacts of CO, VOC, and NO_x, and operational concentration impacts of CO, PM2.5, and SO_2 would not be significant under the LAWA Staff-Recommended Alternative and, therefore, would not be cumulatively considerable relative to those pollutants.

Overall, based on the above, operation of the LAWA Staff-Recommended Alternative would result in a cumulatively considerable impact on air quality.

2.4.3 Biological Resources

The cumulative study area related to biological resources includes the SPAS project area and the immediate vicinity of LAX; however, the cumulative study area varies among affected resource types. For example, the cumulative study area for El Segundo blue butterfly is limited to the Los Angeles/El Segundo Dunes (including the Dockweiler Beach Habitat Restoration area which is also part of the Airport Dunes Recovery Unit for this species as set forth by the U.S. Fish and Wildlife Service[83]) and other nearby populations because of the narrow habitat requirements for this species, while the cumulative

[83] U.S. Fish and Wildlife Service, Recovery Plan for the El Segundo Blue Butterfly (*Euphilotes battoides allyni*), 1998.

study area for nesting migratory birds includes any suitable nesting sites in the immediate vicinity of LAX. The area surrounding LAX is, and has long been, largely urbanized and there are few undeveloped areas that support sensitive biological resources. The nearest undeveloped areas are the Ballona Wetlands, Ballona Creek, and open space areas associated with the Playa Vista Project. Most of the area associated with the originally proposed Playa Vista Project, specifically areas northeast, northwest, and southwest of where Lincoln Boulevard crosses over the Ballona Channel, have been transferred to the State of California and/or are proposed to remain as natural habitat and permanent open space. The remaining quadrant of the original Playa Vista Project, located southeast of the Lincoln Boulevard/Ballona Channel, was previously occupied by the former Hughes Aircraft Company and McDonnell Douglas Corporation industrial complexes and has been largely redeveloped with residential, commercial, employment, recreational, and open space uses, beginning in 2001 and continuing to date. As the Playa Vista Project was located in an area that was already disturbed, project impacts to biological resources were limited, and included impacts to degraded wetlands in various locations in the Playa Vista Planning Area for construction of a freshwater wetland system and mixed-use development, as well as a reduction in undeveloped area for nesting birds and migrant raptors. These impacts were mitigated to a level that is less than significant by an extensive habitat restoration program.

The majority of projects in the surrounding area would add or increase the intensity of development in already urbanized settings (see Table 5-2 of the SPAS Draft EIR). Projects in these urbanized settings, whether sited on currently empty lots or already developed lots, are not generally considered a factor in reducing sensitive habitat or special status species populations. The projects at LAX that would contribute to cumulative impacts to biological resources, when combined with the SPAS project, include the proposed LAX Northside Project; various proposed, ongoing, and completed airside improvement projects; and the ongoing residential acquisition in Manchester Square. The ongoing Coastal Dunes Improvement Project would result in beneficial impacts to biological resources in the Los Angeles/El Segundo Dunes. The Los Angeles/El Segundo Dunes is a remnant of a more extensive dune ecosystem that once covered 2,900 acres. Development has eliminated the majority of the original Los Angeles/El Segundo Dunes complex, with the only remaining dunes being the 302 acres at LAX, about 55 acres of degraded dunes east of the Hyperion Treatment Plant south of LAX, 1.6 acres at the Chevron El Segundo blue butterfly preserve south of the Hyperion Treatment Plant, and 4 acres at Sand Dunes Park in Manhattan Beach, which is open to public recreation and has been highly degraded.[84] Impacts to the Los Angeles/El Segundo Dunes throughout much of their original area have resulted in the loss of both the native habitats/vegetation associations that occur on the Dunes, as well as alteration of coastal dune landforms through extensive grading. As discussed below, although the SPAS project would result in the loss of a small amount of native habitat area, the Los Angeles/El Segundo Dunes would not be impacted by large-scale landform alteration.

Vegetation Associations/Habitats

As discussed in Section 2.3.3 of this chapter, under the LAWA Staff-Recommended Alternative, impacts on ruderal vegetation, Disturbed Southern Dune Scrub, and Encelia Scrub in the north airfield and Construction Staging Areas A, B, C, D, and G would be less than significant. Projects in the LAX vicinity that would contribute to cumulative impacts to ruderal vegetation include the LAX Northside Project and various ongoing airside improvement projects, which collectively would reduce ruderal areas within LAX. The LAX Northside Project area is coincident with Staging Areas A, B, C, and D, as well as areas of ruderal vegetation north of Westchester Parkway. The construction staging areas do not support any known sensitive biological resources and, under the LAWA Staff-Recommended Alternative, impacts to ruderal vegetation in these areas would be less than significant. Similarly, the areas of ruderal vegetation north of Westchester Parkway do not support any sensitive biological resources. These areas are, and have been for many years, actively managed to discourage wildlife use that would present an aviation hazard. Moreover, the various completed, ongoing, and proposed airside improvement projects are sited in areas of ruderal vegetation that either do not support sensitive biological resources, or support

[84] Environmental Science Associates, Sapphos Environmental, and Rudolf H.T. Mattoni, Long-Term Habitat Management Plan for Los Angeles Airport/El Segundo Dunes, June 23, 1994.

sensitive biological resources for which significant impacts have been/would be reduced to a level that is less than significant with implementation of mitigation measures identified in the LAX Master Plan Mitigation Monitoring and Reporting Program (MMRP). Therefore, cumulative impacts to ruderal vegetation resulting from the combination of the LAWA Staff-Recommended Alternative and other cumulative projects would be less than significant.

As discussed in Section 2.3.3 of this chapter, impacts from the LAWA Staff-Recommended Alternative on Disturbed Southern Dune Scrub would be less than significant with implementation of Mitigation Measure MM-BIO (SPAS)-14, Replacement of Habitat Units. The only other project in the LAX vicinity that would affect this habitat type is the ongoing Coastal Dunes Improvement Project, which will result in a beneficial impact on Disturbed Southern Dune Scrub habitat. As impacts from the LAWA Staff-Recommended Alternative on Disturbed Southern Dune Scrub would be less than significant, and the Coastal Dunes Improvement Project would result in beneficial impacts to Disturbed Southern Dune Scrub vegetation, cumulative impacts would be less than significant.

Impacts to Encelia Scrub from the LAWA Staff-Recommended Alternative would be less than significant. There are no other projects in the LAX vicinity that would result in impacts to Encelia Scrub. Therefore, no cumulative impacts would occur.

Under the LAWA Staff-Recommended Alternative, impacts on Sandbar Willow Thicket, California Bulrush Marsh, and ruderal vegetation within the Argo Drainage Channel would be less than significant, as none of these vegetation types is considered sensitive. There are no other reasonably foreseeable projects that would result in impacts to these vegetation associations within the Argo Drainage Channel, or these habitats/vegetation associations within the LAX vicinity. The area surrounding LAX is highly urbanized, and current and future projects in the study area generally consist of infill and redevelopment projects that would not impact riparian and wetland vegetation, as drainages in the LAX vicinity are generally either concrete box channels, or have been covered and converted to underground drains. Although the planned Runway 6L/24R East End Runway Safety Area (RSA) Improvements Project would also have impacts on these habitats, these runway improvements would only occur in the absence of the LAWA Staff-Recommended Alternative. As there are no other reasonably foreseeable projects in the vicinity of LAX, including projects in Table 5-2 of the SPAS Draft EIR, that would impact the vegetation associations found in the Argo Drainage Channel, and there are no other nearby drainages that contain riparian and wetland vegetation, no cumulative impacts to riparian and wetland vegetation would occur. Impacts related to jurisdictional issues associated with the Argo Drainage Channel are addressed below.

As discussed in Section 2.3.3 of this chapter, the LAWA Staff-Recommended Alternative would require new navigational aids and a related new service road within the north airfield and/or Los Angeles/El Segundo Dunes. Installation of navigational aids in the Dunes would have a significant impact on state-designated sensitive habitats in the Los Angeles/El Segundo Dunes, although these impacts would be reduced to a level that is less than significant with implementation of mitigation measures described in Section 2.3.3 of this chapter. The only project in the LAX vicinity that would contribute to cumulative impacts to state-designated sensitive habitats in the Dunes is the Coastal Dunes Improvement Project, which will result in beneficial impacts to biological resources in the Los Angeles/El Segundo Dunes, including state-designated sensitive habitats. There are no other reasonably foreseeable projects in the cumulative study area that would impact the vegetation associations found in the Los Angeles/El Segundo Dunes or the other remnants of the dune ecosystem at degraded dunes east of the Hyperion Treatment Plant south of LAX, the Chevron El Segundo blue butterfly preserve south of the Hyperion Treatment Plant, and the degraded Sand Dunes Park in Manhattan Beach. As impacts from the LAWA Staff-Recommended Alternative would be less than significant with implementation of mitigation measures, and the Coastal Dunes Improvement Project would result in beneficial impacts to the state-designated sensitive habitats in the Dunes, cumulative impacts would be less than significant.

Under the LAWA Staff-Recommended Alternative, operation of the proposed improvements would not have an impact on sensitive habitats and vegetation associations, as operation would not result in any additional physical disturbance leading to a substantial reduction in any federally-designated critical habitat, locally-designated natural communities including state-designated sensitive habitats,

Environmentally Sensitive Habitat Areas (ESHAs), and habitat preservation areas designated pursuant to local ordinances. Operation of the proposed improvements would also not conflict with any local policies or ordinances protecting biological resources. Therefore, no cumulative impacts from the operation of the improvements would occur.

Under both construction of and operation of the improvements associated with the LAWA Staff-Recommended Alternative, there would be no conflict with the provisions of an adopted Habitat Conservation Plan (HCP), Natural Communities Conservation Plan (NCCP), or other approved local, regional, or state habitat conservation plans, as no such plan covers any portion of the biological resources study area. Moreover, the LAWA Staff-Recommended Alternative would not cause a substantial reduction in a locally-designated natural habitat or plant community, as no locally-designated habitats or plant communities are associated with the biological resources study area. Therefore, no cumulative impacts would occur.

Sensitive Plants

As discussed in Section 2.3.3 of this chapter, impacts to sensitive plant species at the western end of the north airfield, in Construction Staging Areas B, C, and D, and in the Los Angeles/El Segundo Dunes under the LAWA Staff-Recommended Alternative would be significant. These impacts would be reduced to a level that is less than significant with implementation of mitigation measures described in Section 2.3.3 of this chapter. There are no other reasonably foreseeable projects proposed for the western end of the north airfield where Lewis' evening primrose has been documented to occur. The only other potentially suitable habitat for sensitive plants elsewhere in the project area east of Pershing Drive is within Construction Staging Areas B, C, and D, which are proposed for future development under the LAX Northside Project. If southern tarplant occurs within Construction Staging Areas B, C, and D, it would be impacted and mitigated prior to development of the LAX Northside Project. Therefore, cumulative impacts to sensitive plants east of Pershing Drive would be less than significant.

The project in the LAX vicinity that would contribute to cumulative impacts to sensitive plants within the Dunes is the Coastal Dunes Improvement Project. There are no other reasonably foreseeable projects within the geographical scope of this analysis that would impact suitable habitat, within the Dunes or elsewhere in the vicinity of LAX, for the sensitive plant species that occur or have potential to occur within the Dunes. Since impacts from the LAWA Staff-Recommended Alternative on sensitive plants within the Dunes would be less than significant with implementation of mitigation measures described in Section 2.3.3 of this chapter, and the Coastal Dunes Improvement Project will have beneficial impacts to sensitive plants in the Dunes, cumulative impacts would be less than significant.

Under the LAWA Staff-Recommended Alternative, there would not be a substantial loss of individuals or substantial reduction of existing habitat of a locally-designated species, as no locally-designated plant species are known to occur within the biological resources study area. Therefore, no cumulative impacts would occur.

Sensitive Wildlife

As discussed in Section 2.3.3 of this chapter, impacts to burrowing owl associated with the Argo Drainage Channel and other undeveloped areas where suitable habitat occurs under the LAWA Staff-Recommended Alternative would be significant. These impacts would be reduced to a level that is less than significant with implementation of the mitigation measure described in Section 2.3.3 of this chapter. The projects in the LAX vicinity that would contribute to cumulative impacts to burrowing owl include the LAX Northside Project and various ongoing airside improvement projects. It is possible that if ground squirrel activity changes in the future, potentially suitable burrows could occur in currently vacant portions of the LAX Northside Project not used as construction staging areas for SPAS, as well as areas that would be affected by various airside improvement projects. Impacts to burrowing owl associated with the LAWA Staff-Recommended Alternative would be reduced to a level that is less than significant with implementation of proposed mitigation. Many of the various ongoing airside improvement projects, as well as the LAX Northside Project, are subject to similar mitigation pursuant to the LAX Master Plan MMRP. Nevertheless, cumulative impacts to burrowing owl associated with the LAX Northside Project

and various airside improvement projects, in combination with the LAWA Staff-Recommended Alternative, would be significant. However, with implementation of mitigation described in Section 2.3.3 of this chapter, the contribution of the LAWA Staff-Recommended Alternative to this significant cumulative impact would not be cumulatively considerable.

As discussed in Section 2.3.3 of this chapter, the LAWA Staff-Recommended Alternative would result in significant impacts to sensitive wildlife species. These impacts would occur primarily within the Los Angeles/El Segundo Dunes, affecting sensitive arthropods, gastropods, and reptiles, loggerhead shrike, burrowing owl, and El Segundo blue butterfly. With implementation of LAX Master Plan mitigation measures, impacts to El Segundo blue butterfly under the LAWA Staff-Recommended Alternative would be less than significant. Potential impacts to the other sensitive wildlife species in the Los Angeles/El Segundo Dunes would be reduced to a level that is less than significant with implementation of mitigation measures described in Section 2.3.3 of this chapter. The project in the LAX vicinity that would contribute to cumulative impacts to sensitive wildlife associated with the Dunes is the Coastal Dunes Improvement Project. There are no other reasonably foreseeable projects that would impact El Segundo blue butterfly at its known population locations, including the Dockweiler Beach bluffs, the Chevron Preserve, Malaga Cove, scattered locations in the Palos Verdes bluffs, and recently colonized habitat restoration areas in Redondo Beach. Additionally, there are no reasonably foreseeable projects in the project vicinity that would impact, within the Dunes or elsewhere in the vicinity of LAX, the other sensitive wildlife that occur within the Dunes. Since impacts from the LAWA Staff-Recommended Alternative on sensitive wildlife within the Dunes would be less than significant with implementation of LAX Master Plan mitigation measures and mitigation measures described in Section 2.3.3 of this chapter, and the Coastal Dunes Improvement Project will have beneficial impacts on sensitive wildlife in the Dunes, cumulative impacts would be less than significant.

As discussed in Section 2.3.3 of this chapter, under the LAWA Staff-Recommended Alternative, any activity that would remove mature trees from the project area used for nesting by migratory birds or raptors, including the trees associated with the relocation of Lincoln Boulevard and the proposed use of Staging Areas B, C, D, and F, would have the potential to impact nesting birds/raptors protected under the Migratory Bird Treaty Act (MBTA) or Fish and Game Code Section 3503 or 3503.5, which would be a significant impact. Reasonably foreseeable projects in the LAX vicinity that would contribute to cumulative impacts to mature trees that could be utilized by nesting raptors include the LAX Northside Project and the residential acquisition in Manchester Square, since these two areas contain residential street trees have been or may be removed. As discussed in Section 2.3.3 of this chapter, none of the mature trees in the LAX Northside Project area or Manchester Square are known to support nesting raptors. Moreover, the removal of mature trees within LAX Northside is subject to mitigation pursuant to the LAX Master Plan MMRP. Nevertheless, the potential removal of mature trees used for nesting under the LAWA Staff-Recommended Alternative, in combination with the potential removal of such trees associated with the LAX Northside Project and residential acquisition in Manchester Square, would result in a significant cumulative impact on nesting raptors. However, with implementation of mitigation measures described in Section 2.3.3 of this chapter, the contribution of the LAWA Staff-Recommended Alternative to significant cumulative impacts would not be cumulatively considerable.

Any project within the vicinity of LAX that would remove vegetation that could be used by nesting migratory birds would result in significant impacts to nesting migratory birds. The Playa Vista Project resulted in significant impacts to nesting migratory birds due to loss of suitable nesting vegetation. Cumulative impacts to nesting migratory birds due to loss of suitable nesting vegetation associated with projects in the vicinity of LAX, including Playa Vista, in combination with the LAWA Staff-Recommended Alternative, would be significant. However, with implementation of mitigation measures described in Section 2.3.3 of this chapter, the contribution of the LAWA Staff-Recommended Alternative to this significant cumulative impact would not be cumulatively considerable.

Upon completion of construction, operation of the facilities associated with the LAWA Staff-Recommended Alternative would not result in significant impacts to sensitive wildlife species. Therefore, operation of the facilities associated with the LAWA Staff-Recommended Alternative would not contribute to cumulative impacts to sensitive wildlife species.

Under the LAWA Staff-Recommended Alternative, there would not be a substantial loss of individuals or substantial reduction of existing habitat of a locally-designated species, as no locally-designated wildlife species are known to occur within the biological resources study area. Moreover, there are no wildlife movement/migration corridors associated with any portion of the biological resources study area, including the Argo Drainage Channel. Therefore, no cumulative impacts would occur.

Jurisdictional Aquatic Features

As discussed in Section 2.3.3 of this chapter, the LAWA Staff-Recommended Alternative would affect all potential U.S. Army Corps of Engineers (USACOE) and California Department of Fish and Game (CDFG) jurisdictional areas associated with the Argo Drainage Channel. This impact would be reduced to a level that is less than significant with implementation of the proposed mitigation measure described in Section 2.3.3 of this chapter. As noted above, there are no other projects that would result in impacts within the Argo Drainage Channel, nor are there any reasonably foreseeable projects within the geographic scope of analysis that would impact jurisdictional aquatic features. Nevertheless, given the historical loss of jurisdictional aquatic features in the vicinity, including at Playa Vista, cumulative impacts to jurisdictional aquatic features are considered significant. With implementation of the mitigation measure described in Section 2.3.3 of this chapter, the contribution of the LAWA Staff-Recommended Alternative to this significant cumulative impact would not be cumulatively considerable.

2.4.4 Coastal Resources

Anticipated regional growth with the potential for cumulative impacts to coastal resources includes new development within or adjacent to the coastal zone. As shown in Figure 5-1 of the SPAS Draft EIR, there are a number of projects located northwest of LAX within or near the coastal zone. The projects are primarily mixed-use developments with residential and restaurant/retail uses. Generally, LAX is located in a highly urbanized area. Many of the cumulative projects would replace existing development, or be developed on vacant parcels in urbanized areas. Development within the coastal zone is strictly regulated by the California Coastal Commission. The most proximate cumulative project is the Coastal Dunes Improvement Project, located in the northernmost portion of the Los Angeles/El Segundo Dunes (Dunes), west of Pershing Drive. The Coastal Dunes Improvement Project consists of the restoration and improvement of coastal dune habitat through the removal of streetscape, retaining walls, sidewalks, light poles, and other abandoned structures; the removal of select invasive non-native plant species; the installation of native plant species in disturbed areas; the recontouring of, and installation of erosion control measures on, newly exposed sites; and the restoration of periphery curb and gutter to minimize direct discharges from runoff.

As discussed in Section 2.3.4, *Coastal Resources*, of this chapter, the LAWA Staff-Recommended Alternative would require installation of various navigational aids and a new service road within the Dunes associated with the reconfiguration of runways in the north airfield. Overall, the area of the Dunes to be occupied by navigational aids under the LAWA Staff-Recommended Alternative would be comparable to that under the existing conditions and would not conflict with the goals of the California Coastal Act (CCA); therefore, impacts would be less than significant. With implementation of existing LAX Master Plan and proposed SPAS mitigation measures described in Section 2.3.3, *Biological Resources*, of this chapter impacts on biological resources in the coastal zone as a result of the installation of navigational aids and an associated service road within the Dunes would be less than significant.

The Coastal Dunes Improvement Project would result in beneficial impacts to coastal resources. As such, there is no potential for the impacts of that project to combine with the impacts to coastal resources under the LAWA Staff-Recommended Alternative. Therefore, no significant cumulative impacts to coastal resources would occur.

2.4.5 Cultural Resources

Cumulative impacts to identified potentially eligible, eligible, and listed cultural resources would occur due to combined effects on such resources associated with the LAWA Staff-Recommended Alternative structural improvements and other projects at or adjacent to LAX involving improvements that could

materially impair the physical characteristics of the resources that justify their inclusion in, or eligibility for inclusion in, the National Register (NR), California Register (CR), or listing in the City of Los Angeles Historic-Cultural Monuments Register (LAHCM).

2.4.5.1 Cumulative Projects

Historical Resources

There are five eligible or listed historical resources within the SPAS cultural resources study area: Hangar One (NR listed), Theme Building and Setting (CR/LAHCM listed), World War II Munitions Storage Bunker (NR/CR/LAHCM eligible), Intermediate Terminal Complex (CR/LAHCM eligible), and the Union Savings and Loan Building (CR/LAHCM eligible), shown in Figure 4.5-1 in Section 4.5, *Cultural Resources*, of the SPAS Draft EIR. Of these historical resources, two have the potential to be affected by structural improvements proposed under the LAWA Staff-Recommended Alternative, the Theme Building and Setting, and the Union Savings and Loan Building. The LAWA Staff-Recommended Alternative would not have any impacts on Hangar One, the World War II Munitions Storage Bunker, or the Intermediate Terminal Complex due to the distance of these resources from SPAS-related improvements. Therefore, the LAWA Staff-Recommended Alternative would not contribute to cumulative impacts to these historical resources, and Hangar One, the World War II Munitions Storage Bunker, and the Intermediate Terminal Complex are not addressed further in this analysis.

The following cumulative projects at or adjacent to LAX involve visible, aboveground physical improvements that may directly or indirectly affect historical resources or their immediate surrounds, or the removal of features that may potentially contribute to the historic character or immediate surroundings of historical resources. Within the Central Terminal Area (CTA), these projects include the Bradley West Project, North Terminals Improvements, South Terminals Improvements, Central Utility Plant (CUP) Replacement Project, the new passenger processor component of the Midfield Satellite Concourse (MSC) Program, the LAX Sign District, the New Face of the CTA Improvements/Enhancements, and, the Airport Metro Connector Project, which, in conjunction with the LAWA Staff-Recommended Alternative improvements, such as the design and/or construction of terminals and the Automated People Mover (APM), have the potential for cumulative impacts to views/viewsheds associated with the NR-eligible Theme Building and Setting. The two cumulative project in proximity to the Union Savings and Loan Building are the Radisson Hotel project, which involves the construction of a new hotel and two parking structures on the site of an existing conference center and recreation building that lies adjacent to the Union Savings and Loan Building; and the Airport Metro Connector project, which has conceptual alignments near Sepulveda Boulevard in the vicinity of 96th Street, 98th Street, and Century Boulevard.

Archaeological Resources

Relative to archaeological resources, excavation associated with other development projects at or near LAX has the potential to encounter previously undiscovered archaeological resources, which could result in cumulative impacts. There are a number of cumulative projects with the potential to encounter archaeological resources, including the CUP Replacement Project, North Terminals Improvements, MSC Program including related taxiway improvements, new passenger processor component of the MSC Program, West Aircraft Maintenance Area Project, and Runway 7L/25R East End Reconstruction. Other projects at or adjacent to LAX with the potential for cumulative impacts on archaeological resources include LAX Northside, Coastal Dunes Improvement Project, Stormwater Infiltration and Treatment Facility, and Metro Crenshaw/LAX Transit Corridor and Airport Metro Connector projects. Excavation related to past and present projects at LAX, such as the South Airfield Improvement Project, Taxiway R, Bradley West Project and associated taxiway improvements, and Westchester Golf Course Three-Hole Restoration Project, did not reveal any undiscovered archaeological resources. Therefore, these projects would not contribute to cumulative impacts to archaeological resources.

2.4.5.2 Cumulative Impacts

Historical Resources

As indicated in Section 2.3.5, *Cultural Resources*, of this chapter, impacts to the Theme Building and Setting associated with the airfield and terminal improvements under the LAWA Staff-Recommended Alternative would be less than significant. The proposed the LAWA Staff-Recommended Alternative terminal improvements in the vicinity of the Theme Building and Setting include the addition of a new Terminal 0, loss/modifications to concourse areas and/or gates at Terminals 1, 2, and 3, and the modification and northern extension of concourse area and gates at the Tom Bradley International Terminal (TBIT) and the future MSC passenger processor. These improvements would be compatible in design, scale, proportion, and massing, and would be largely blocked from view from the Theme Building by the existing concourses. However, the LAWA Staff-Recommended Alternative includes an APM within the CTA, which would have potential indirect long-term visual impacts on the NR-eligible Theme Building and Setting. With implementation of Mitigation Measure MM-HA (SPAS)-2, Preservation of Historic Resources: Theme Building and Setting, significant impacts would be avoided because views of the north and south elevations of the Theme Building would not be impaired by the APM. For these reasons, and with compliance with LAX Master Plan Commitment HR-1, Preservation of Historic Resources, and MM-HA (SPAS)-2, Preservation of Historic Resources: Theme Building and Setting, impacts on the Theme Building and Setting under the LAWA Staff-Recommended Alternative would be less than significant. Potential indirect impacts to the Union Savings and Loan Building from the proposed LAWA Staff-Recommended Alternative ground access improvements, specifically, an elevated APM structure along 98th Street and extending over Sepulveda Boulevard, would be less than significant due to their proposed location within or north of the 98th Street right-of-way, their distance from the eligible Union Savings and Loan Building, and the incorporation of LAX Master Plan Commitment HR-1, Preservation of Historic Resources.

As noted above, related cumulative projects in proximity to the Theme Building and Setting include the Bradley West Project, North Terminals Improvements, South Terminals Improvements, the CUP Replacement Project, the new passenger processor component of the MSC Program, the LAX Sign District, the New Face of the CTA Improvements/Enhancements, and, depending upon the selected alternative, the Airport Metro Connector Project, which, in conjunction with the LAWA Staff-Recommended Alternative improvements, have the potential for cumulative impacts. The setting west of the new Airport Traffic Control Tower is altered and generally noncontributing to the Theme Building, as views from the Theme Building to the west are interrupted and obscured by the new Airport Traffic Control Tower. The CUP Replacement Project and the proposed new passenger processor component of the MSC Program are separated from the Theme Building by the Airport Traffic Control Tower and would not contribute to cumulative impacts to the Theme Building and Setting since these projects would not be visible from, or within view of, the Theme Building.

Although located west of the new Airport Traffic Control Tower, the Bradley West Project is visible from, and within view of, the Theme Building and Setting. The architectural design of the building areas is inspired by the adjacent Pacific Ocean and will include modern design elements, architectural articulation, and landscape amenities. The upgrades associated with the Bradley West Project are also designed to be complimentary of the regional airport theme of LAX and the iconic Theme Building and Airport Traffic Control Tower.[85] The North Terminals Improvements would occur in areas within and between the existing passenger processing facilities at Terminals 1, 2, and 3. The South Terminals Improvements include improvements and building system upgrades to Terminals 5 through 8. These improvements are largely to the building interiors and do not include substantive changes to the building footprints or exteriors. Collectively, these terminal improvements could have indirect long-term visual impacts on the setting of the Theme Building. These effects relate to the potential for the design, bulk, placement, and/or proximity of the new terminal buildings to alter the immediate surroundings and/or the setting that

[85] City of Los Angeles, Los Angeles World Airports, Final Environmental Impact Report for Los Angeles International Airport (LAX) Bradley West Project, September 2009.

contributes to the eligibility of the Theme Building in relation to the airport context. However, height limitations, design, and distance of the proposed terminal improvements, and the incorporation of LAX Master Plan Commitment HR-1, Preservation of Historic Resources, which requires careful review of design and development of projects adjacent to historical resources in a manner consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties, would address the effects related to these cumulative projects.

The LAX Sign District Project would place supergraphic and digital signs associated with non-airport-related advertising within approved areas at the airport, limited to areas within the CTA and on terminals and passenger boarding bridges visible from apron areas. Signs would not be visible from the surrounding community. The signs would be located along the faces of existing structures and columns, but would not extend above the height of the existing terminal buildings or parking garages. As a result, the signs would not interfere with scale, proportion, or massing of the Theme Building and Setting, and impacts on this resource would be less than significant.[86] The New Face of the CTA Improvements/Enhancements project will enhance and unify the aesthetic appearance of the CTA. The project includes enhancements to exterior lighting, signage, walkways, and curbside waiting areas. These improvements would be compatible in design, scale, proportion, and massing with the Theme Building, and would not interfere with views of the airport or airfield from the Theme Building.

As part of the Airport Metro Connector Project, Metro is examining ways to connect the transit system to LAX. Modes under consideration include Light Rail Transit, Automated People Mover (APM), and Bus Rapid Transit, along a number of different alignments, including an underground option. Depending upon the outcome, elevated elements of the project have the potential for cumulative impacts to historical resources within the Century Corridor area with potential routes along Century Boulevard and 98th Street. Similar to the Metro Crenshaw/LAX Transit Corridor and Station, a number of urban design principles and features would likely be implemented as part of the Airport Metro Connector Project per Metro's Rail Design Criteria to ensure architectural and visual compatibility between the proposed transit system and the surrounding area to reduce potential indirect impacts to historical resources. Project features would include incorporation of art, landscaping, pedestrian amenities, awnings, street furniture, and other visual treatments into the design of the station and alignment. The Federal Transit Administration (FTA) Circular 9400.1A, Design and Art in Transit Projects, encourages the use of design and artist considerations in transit projects. Within the CTA, components of the APM, Light Rail Transit, and Bus Rapid Transit options could be developed in a configuration that would extend to the eastern portion of the CTA. Depending on the project's specific location, design, and the elevation, implementation of the project could diminish focal views of the Theme Building from various vantage points in the CTA. Additionally, due to the close proximity of the project, construction of the Airport Metro Connector Project could alter or remove contributing features of the Theme Building and Setting.

With the exception of the Airport Metro Connector Project, the cumulative projects in the CTA would be compatible with the historic materials, features, size, scale and proportion, and massing of the Theme Building and Setting and would protect the integrity of the historical resource and its environment. Although implementation of the Airport Metro Connector Project may contribute to a cumulatively significant impact on the Theme Building and Setting depending on the alternative selected, with height limitations, design, and distance of the proposed the LAWA Staff-Recommended Alternative terminal improvements, and the incorporation of LAX Master Plan Commitment HR-1, Preservation of Historic Resources, the contribution of the LAWA Staff-Recommended Alternative would not be cumulatively considerable.

Cumulative projects located in proximity to the Union Savings and Loan Building are the Radisson Hotel project and a potential route of the Airport Metro Connector Project in the vicinity of Sepulveda Boulevard and 98th Street. As noted above, the Radisson Hotel project involves the construction of a new hotel and two parking structures. Options under consideration for the Airport Metro Connector Project include Light Rail Transit, Automated People Mover (APM), and Bus Rapid Transit, with potential routes along Century

[86] City of Los Angeles, Los Angeles World Airports, Notice of Preparation for the LAX Sign District Project, March 16, 2012.

Boulevard and 98th Street as well as an underground option. Depending upon the selected alternative, elevated elements of the project in the vicinity of Sepulveda Boulevard and 98th Street have the potential to result in cumulative impacts to the Union Savings and Loan Building. These cumulative projects, and the elevated APM structure along 98th Street associated with the LAWA Staff-Recommended Alternative, would be compatible with the features, size, scale and proportion, and massing of the Union Savings and Loan Building. Therefore, cumulative impacts to this resource would be less than significant.

Archaeological Resources

No known archaeological resources that are unique or eligible for federal, state, or local designation would be affected by the LAWA Staff-Recommended Alternative. However, the number of archaeological resources previously recorded within LAX and the surrounding area suggests that there is a possibility of discovering archaeological resources during construction. Impacts associated with the disturbance or destruction of undiscovered archaeological resources during construction of the LAWA Staff-Recommended Alternative improvements would be less than significant with implementation of Mitigation Measure MM-HA (SPAS)-4, Conformance with LAX Master Plan Archaeological Treatment Plan, discussed in Section 2.3.5.2.2 of this chapter.

This same potential for encountering undiscovered resources exists for other cumulative projects within LAX and nearby that would include construction excavations. These potential impacts, which would be less than significant at the project level, would be cumulatively significant when viewed in combination with the progressive cumulative loss of archaeological resources associated with other past, present, and reasonably anticipated future projects. Even though regulatory controls and project-level mitigation measures would reduce these effects, there would be a cumulatively significant impact to undiscovered archaeological resources associated with cumulative projects.

With the exception of the north airfield and the navigational aids in the Los Angeles/El Segundo Dunes, the improvements associated with the LAWA Staff-Recommended Alternative are located in disturbed areas. The north airfield improvements and navigational aids would not require deep excavations, and the area subject to excavation for the navigational aids would be small. The lack of deep excavations reduces the potential to encounter undiscovered archaeological resources because deep excavations may encounter previously undisturbed soils conducive to retaining undiscovered archaeological resources. Shallow excavations are likely to be conducted in previously disturbed soils that are likely not conducive to retaining undiscovered archaeological resources because resources in these soils may have been destroyed or displaced from prior disturbances (e.g., rough grading or trenching, road/airstrip construction). Since improvements associated with the north airfield and navigational aids would include shallow excavations in disturbed soils, the likelihood of encountering undiscovered significant archaeological resources during construction would be limited. In light of this circumstance, and compliance with Mitigation Measure MM-HA (SPAS)-4, Conformance with LAX Master Plan Archaeological Treatment Plan, the contribution of the LAWA Staff-Recommended Alternative to cumulative impacts would not be cumulatively considerable.

2.4.6 Greenhouse Gases

The analysis of greenhouse gases (GHG), by its nature, considers cumulative conditions in that it evaluates the contributions of the LAWA Staff-Recommended Alternative in the context of global changes in the concentrations of atmospheric pollutants and their cumulative impact on global climate change. Due to the global nature of GHG emissions and their potential effects, GHG emissions are typically addressed in a cumulative impacts analysis (see, e.g., EPA, Draft Endangerment Finding, 74 Fed. Reg. 18886, 18904 (April 24, 2009) [cumulative emissions are responsible for the cumulative change in the stock of concentrations in the atmosphere]; California Air Pollution Control Officers Association, CEQA and Climate Change: Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act (January 2008) (CAPCOA White Paper), at p. 35 [GHG impacts are exclusively cumulative impacts; there are no noncumulative GHG emission impacts from a climate change perspective].) The analysis below considers other projects that would contribute to cumulative

impacts related to GHG, as well as the contribution of the LAWA Staff-Recommended Alternative to those cumulative impacts.

As indicated in Section 2.3.6 of this chapter, construction and operation of the LAWA Staff-Recommended Alternative would result in a significant impact relative to GHG emissions, primarily related to construction activities, aircraft operations, ground support equipment (GSE), auxiliary power units (APU), and motor vehicle operations, when compared to baseline conditions. Cumulative development in the region, and at LAX specifically, would also result in increased GHG emissions as a result of construction and operational activity. As mentioned in Section 2.3.6 of this chapter, the LAWA Staff-Recommended Alternative would result in lower GHG emissions from aircraft operations, which is the primary source of GHG emission increases compared to baseline conditions, than would otherwise occur in 2025 without the project. The LAWA Staff-Recommended Alternative would comply with requirements of the City of Los Angeles Green Building Code, which includes a number of measures that serve to reduce GHG emissions. On a per capita (per passenger) basis, implementation of the LAWA Staff-Recommended Alternative would result in approximately 14.7 percent less GHG emissions that the per capita GHG emissions associated with baseline conditions. The California Assembly Bill (AB) 32 Scoping Plan indicates that at least a 16 percent reduction in GHG emissions is necessary to achieve the goal of reducing GHG emissions projected to occur in California by 2020 under "business as usual" down to levels that occurred in the state in 1990. Meeting this GHG reduction goal statewide is intended to address cumulative GHG emissions within the state. Given that the LAWA Staff-Recommended Alternative cannot achieve a 16 percent reduction in GHG emissions, on a per capita basis compared to baseline conditions, the resultant significant GHG emissions impact would be cumulatively considerable.

2.4.7 Hazards/Hazardous Materials

2.4.7.1 Human Health Risk Assessment

Unlike air quality, for which standards have been established that determine acceptable levels of pollutant concentrations, no federal standards exist that establish acceptable levels of human health risks or that identify a threshold of significance for cumulative health risk impacts. Therefore, the discussion below addresses cumulative health risk impacts, and SPAS-related contributions to those impacts; however, no determination is made regarding the significance of cumulative impacts. Since these results are not used for significance determination and cumulative results do not provide sufficient resolution to distinguish cumulative impacts separately for each alternative the general discussion of the cumulative impacts is applicable to all of the SPAS alternatives, including the LAWA Staff-Recommended Alternative. Based on information available from the South Coast Air Quality Management District (SCAQMD) and U.S. Environmental Protection Agency (USEPA), relative to regional cancer risk estimates and toxic air contaminant (TAC) predictions, the geographic areas considered in the cumulative health risk impacts analysis include the South Coast Air Basin for cancer risk and the LAX area for non-cancer health hazards, as further described below.

2.4.7.1.1 Cumulative Cancer Risks

The SCAQMD conducted an urban air toxics monitoring and evaluation study for the South Coast Air Basin from April 2004 through March 2006 called Multiple Air Toxics Exposure Study in the South Coast Air Basin (MATES-III).[87] MATES-III is a follow up to MATES-II[88] and provides an updated general evaluation of cancer risks associated with TAC from all sources within the South Coast Air Basin. According to MATES-III, cancer risks in the South Coast Air Basin range from 870 in one million to 1,400 in one million, with an average of 1,200 in one million. These cancer risk estimates are high and indicate that current impacts associated with ongoing releases of TAC (e.g., from vehicle exhaust) and from sources of TAC from past and present projects in the region are substantial. The MATES-III study is an

87 South Coast Air Quality Management District, Final Report, Multiple Air Toxics Exposure Study in the South Coast Air Basin (MATES-III), September 2008, Available: http://www.aqmd.gov/prdas/matesIII/matesIII.html, accessed June 21, 2012.

88 South Coast Air Quality Management District, Final Report, Multiple Air Toxics Exposure Study in the South Coast Air Basin (MATES-II), March 2000, Available: http://www.aqmd.gov/matesiidf/es.pdf, accessed June 21, 2012.

appropriate estimate of present cumulative impacts of TAC emissions in the South Coast Air Basin. It does not, however, have sufficient resolution to determine the fractional contribution of current LAX operations to TAC in the airshed. Only possible incremental contributions to cumulative impacts can be assessed.

Meaningful quantification of future cumulative health risk exposure in the entire South Coast Air Basin is not possible. Moreover, the threshold of significance used to determine cancer risk impacts associated with the LAWA Staff-Recommended Alternative is based on the cancer risks associated with individual projects; this threshold is not appropriately applied to conclusions regarding cumulative cancer risk in the South Coast Air Basin. However, based on the relatively high cancer risk level associated with current concentrations of TAC in air in the South Coast Air Basin, as represented by baseline (2009) conditions (i.e., an additional 1,200 cancer cases per million), the LAWA Staff-Recommended Alternative would not add incrementally to the already high cumulative cancer risk in the South Coast Air Basin. In fact, as discussed in Section 2.3.7.1 of this chapter, estimated incremental cancer risks for all receptors for the LAWA Staff-Recommended Alternative are negative. Negative values indicate that implementing the alternative would result in decreases of some TAC concentrations (most notably diesel particulate matter), which would then lead to decreases in cumulative cancer risk estimates when compared to 2009 baseline impacts (i.e., impacts may be beneficial).

The above comparisons do not account for possible positive changes in air quality in the South Coast Air Basin in the future. SCAQMD and other agencies are consistently working to reduce air pollution. In particular, reductions in emissions of diesel particulates are being considered and implemented. Since diesel particulate matter is the major contributor to estimated cancer risks, substantial reductions in diesel emissions would result in substantial reductions in cumulative cancer risks. These, and other such regulations intended to reduce TAC emissions within the South Coast Air Basin, would reduce cumulative impacts overall. While continued, if not increased, regulation by the SCAQMD of point sources as well as more stringent emission controls on mobile sources would reduce TAC emissions, whether such measures would alter incremental contributions of TAC releases to cumulative impacts under the LAWA Staff-Recommended Alternative cannot be ascertained.

2.4.7.1.2 Cumulative Chronic Non-Cancer Health Hazards

Acrolein is the TAC of concern that is responsible for the majority of all predicted chronic non-cancer health hazards associated with LAX operations. In 2011, USEPA published an independent study of possible annual average air concentrations within the South Coast Air Basin associated with a variety of TAC, including acrolein.[89] These estimates provide a means for assessing cumulative chronic non-cancer health hazard impacts of airport operations in much the same manner as cumulative cancer risks were assessed using the MATES-III results.

Within the Human Health Risk Assessment (HHRA) study area, USEPA predictions[90] for annual average acrolein concentrations yield a range of hazard indices from 0.3 to 15, with an average of 4. Maximum incremental hazard indices for the LAWA Staff-Recommended Alternative (discussed in Section 2.3.7.1 of this chapter) were estimated to range from 0.09 to 0.47, all less than the threshold of significance of one. Given the large uncertainty factor for the chronic toxicity value of acrolein (a factor of 1,000) and the relatively small hazard indices associated with airport emissions, the LAWA Staff-Recommended Alternative is not expected to add significantly to cumulative chronic non-cancer health hazards.

Because of the substantial uncertainties associated with the USEPA estimates,[91] the cumulative analysis for chronic non-cancer health hazard impacts is semi-quantitative and based on a range of possible contributions. This cumulative analysis does not address the issue of potential interactions among

89 U.S. Environmental Protection Agency, 2005 National-Scale Air Toxics Assessment, 2011, Available: www.epa.gov/ttn/atw/nata2005/tables.html.

90 U.S. Environmental Protection Agency, 2005 National-Scale Air Toxics Assessment, 2011, Available: www.epa.gov/ttn/atw/nata2005/tables.html.

91 U.S. Environmental Protection Agency, 2005 National-Scale Air Toxics Assessment, 2011, Available: www.epa.gov/ttn/atw/nata2005/tables.html.

acrolein and criteria pollutants. Such interactions cannot, at this time, be addressed in a quantitative fashion. A qualitative discussion of the issue is presented in the LAX Master Plan Final EIR[92] Technical Report S-9a, Section 7.

As discussed in the LAX Master Plan Final EIR[93] (Section 4.24.1.2), limited data are available for describing acrolein emissions. Therefore, estimates of chronic non-cancer health hazards are very uncertain. Chronic non-cancer health hazards associated with the LAWA Staff-Recommended Alternative should only be used to provide a relative comparison to basin-wide conditions. These hazards should not be viewed as absolute estimates of potential health impacts. Moreover, USEPA's estimates are based on data that are now several years old. Emissions from some important sources may have been reduced as a result of continuing efforts by SCAQMD and other agencies to improve air quality in the South Coast Air Basin. Finally, the estimates do not consider degradation of TAC in the atmosphere. Degradation may be very important for relatively reactive chemicals such as acrolein.

2.4.7.1.3 Cumulative Acute Non-Cancer Health Hazards

Predicted concentrations of TAC released from operational activities for the LAWA Staff-Recommended Alternative suggest that slight impacts to human health may occur associated with acute non-cancer health hazards. The assessment of cumulative acute non-cancer health hazards follows the methods used to evaluate cumulative acute non-cancer health hazards presented in the LAX Master Plan Final EIR[94] (Section 4.24.1.7 and Technical Report S-9a, Section 6.3), incorporating updated National-Scale Air Toxics Assessment (NATA) tables from 2005. USEPA-modeled emission estimates by census tract were used to estimate annual average ambient air concentrations. These census tract emission estimates are subject to high uncertainty, and USEPA warns against using them to predict local concentrations. Thus, for the analysis of cumulative acute non-cancer health hazards, estimates for each census tract within the HHRA study area were identified, and the range of concentrations was used as an estimate of the possible range of annual average concentrations in the general vicinity of the airport. This range of concentrations was used to estimate a range of acute non-cancer hazard indices using the same methods as described in the LAX Master Plan Final EIR[95] (Section 4.24.1.7 and Technical Report S-9a, Section 6.1). This range of hazard indices was then used as a basis for comparison with estimated maximum acute non-cancer health hazards for the LAWA Staff-Recommended Alternative. The relative magnitude of acute non-cancer health hazards calculated on the basis of the USEPA estimates and maximum hazards estimated for the LAWA Staff-Recommended Alternative were taken as a general measure of relative cumulative impacts. Emphasis must be placed on the relative nature of these estimates. Uncertainties in the analysis preclude estimation of absolute impacts; uncertainties in the methods are further discussed in Appendix G1, *Human Health Risk Assessment*, of the SPAS Draft EIR.

When USEPA annual average estimates are converted to possible 1-hour maximum concentrations, acute hazard indices associated with total acrolein concentrations are estimated to range from 0.03 to 1.5, with an average of 0.4, for locations within the HHRA study area. The predicted overall maximum incremental acute non-cancer health hazard associated with acrolein for the LAWA Staff-Recommended Alternative is 3.0. USEPA modeled acute hazard indices associated with formaldehyde exposure are estimated to range from 0.1 to 2.2, with an average of 1.0, for locations within the HHRA study area. The predicted maximum acute non-cancer health hazard associated with formaldehyde for the operation of the LAWA Staff-Recommended Alternative is 0.64. Results suggest that the LAWA Staff-Recommended Alternative would add to total 1-hour maximum acrolein concentrations at some locations in the HHRA study area and, therefore, to cumulative acute non-cancer health hazards associated with exposure to acrolein.

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92 City of Los Angeles, Final Environmental Impact Report for Los Angeles International Airport (LAX) Proposed Master Plan Improvements, April 2004.

93 City of Los Angeles, Final Environmental Impact Report for Los Angeles International Airport (LAX) Proposed Master Plan Improvements, April 2004.

94 City of Los Angeles, Final Environmental Impact Report for Los Angeles International Airport (LAX) Proposed Master Plan Improvements, April 2004.

95 City of Los Angeles, Final Environmental Impact Report for Los Angeles International Airport (LAX) Proposed Master Plan Improvements, April 2004.

2.4.7.1.4 Conclusions

Although no defined thresholds for cumulative health risk impacts are available, it is the policy of the SCAQMD to use the same significance thresholds for cumulative impacts as for the project-specific impacts analyzed in the EIR.[96] If cumulative health risks are evaluated following this SCAQMD policy, the project's contribution to the cumulative cancer risk would not be cumulatively considerable since the incremental cancer risk impacts of the LAWA Staff-Recommended Alternative are all negative (i.e., beneficial) and thus below the individual cancer risk significance thresholds of 10 in one million.

However, the SCAQMD policy does have different significance thresholds for project-specific and cumulative impacts for hazard indices for TAC emissions. A project-specific significance threshold is 1.0 while the cumulative threshold is 3.0. Based on this SCAQMD policy, the relatively small chronic non-cancer hazard indices associated with airport emissions under the LAWA Staff-Recommended Alternative would not be cumulatively considerable. Acute non-cancer hazard indices would be at the cumulative threshold of 3.0 for the LAWA Staff-Recommended Alternative, and, therefore, also would likely be cumulatively considerable if it assumed that other planned regional projects would contribute positively to the total regional acute hazards.

2.4.7.2 Safety

The cumulative impacts analysis for safety addresses whether and how related projects at or near LAX in combination with the LAWA Staff-Preferred Alternative may affect the potential for aviation incidents and accidents, including birdstrikes, at LAX. The geographic scope of analysis includes areas in proximity to the north airfield, particularly as related to FAA safety areas for airfield operations. This area of analysis was defined in light of the nature and locations of the SPAS improvements and the projects shown in Figure 5-2 of the SPAS Draft EIR.

Cumulative projects near the north airfield include the LAX Northside development, as well as projects located in or near the CTA, including the North Terminals Improvements, the Central Utility Plant (CUP) Replacement Project, the Bradley West Project and associated taxiways, Taxiway R, and the Midfield Satellite Concourse (MSC) and associated taxiway improvements and passenger processor. Such improvements are generally located away from the north airfield operations area and/or are designed and operated in accordance with FAA safety requirements. In some cases, such as the taxiway improvements associated with Bradley West, MSC, and Taxiway R, the improvements are intended and designed to improve the safety and efficiency of large aircraft (i.e., Aircraft Design Group (ADG) VI) operations.

Cumulative projects would not increase the potential for the occurrence of birdstrikes. The likelihood of birdstrikes mainly depends on the presence of bird attractants, such as undeveloped open space, on or very near the airfield. Cumulative projects nearby, such as the LAX Northside development, would reduce the amount of undeveloped open space in the airport vicinity. Additionally, no projects or other land uses that would attract birds, such as solid waste landfills, are planned in the area. Therefore, there would be no cumulative impacts related to birdstrikes.

None of the ongoing and reasonably foreseeable on-airport improvements identified in Section 5.3 of the SPAS Draft EIR would increase the potential for aviation incidents or accidents. Future development within LAX Northside would place new structures north of the north airfield complex. As described in Section 4.7.2.6.1 of the SPAS Draft EIR, the relocation of Runway 6L/24R 260 feet north and the 604-foot westerly shift of the displaced landing threshold for Runway 24L would shift the associated FAR Part 77 Airspace Surfaces accordingly, drawing them closer to LAX Northside. Depending on the location, design, height, and timing of future development in LAX Northside, there would be a potential cumulative impact on aviation safety due to structures penetrating the Part 77 Airspace Surfaces (i.e., the potential

[96] South Coast Air Quality Management District, White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution, August 2003, Appendix D, Available: http://www.aqmd.gov/hb/2003/030929a.html, accessed June 15, 2012.

for future development to penetrate existing Part 77 surfaces and, in combination with the shifting of the surfaces, increase the amount of penetration). As described in Section 4.7.2.3 of the SPAS Draft EIR, FAR Part 77 imaginary surfaces are primarily intended to serve as a means of identifying objects that require more detailed analyses specific to the types of airspace operations and related safety requirements that occur within those surfaces. A determination of whether such penetrations of a Part 77 surface pose an aviation safety hazard, and the identification of the appropriate measure(s) to address any such hazard, occur through the more detailed analysis, which is completed by, or in coordination with, the FAA. Options to address potential aviation safety hazards can range from doing nothing (i.e., for low-risk objects), to placing high-visibility markings and lighting on structures to make them highly visible to pilots and indicating such objects on avigation maps, to identifying the need for proposed structures to be lower in height or removed. The combination of moving a runway and associated safety surfaces, and developing new uses directly north of the airport, would normally be a significant cumulative impact, and the contribution of the LAWA Staff-Preferred Alternative to this impact would be cumulatively considerable. However, both the northward relocation of Runway 6L/24R and the future development within LAX Northside are directly controlled by LAWA and are subject to FAA approval. As such, both LAWA and the FAA will plan, evaluate, and closely regulate future development within LAX Northside to address potential safety concerns, understanding that the safe and efficient operation of aircraft is the first priority. Such review, coordination, and requirement of FAA approval relative to the runway relocation would automatically occur through the airport layout plan (ALP) amendment process. While it is anticipated that such Part 77 review and approval by FAA relative to development in LAX Northside would occur through the normal course of ongoing coordination between LAWA and the FAA, Mitigation Measure MM-SAF (SPAS)-1, FAR Part 77 Review, presented in Section 5.5.7.2.10 of the SPAS Draft EIR, is recommended to provide additional certainty that potential aviation safety hazards are addressed through the Part 77 review process for LAX Northside development. With implementation of this mitigation measure, no cumulative impacts to aviation safety would occur.

2.4.7.3 Hazardous Materials

Impacts associated with hazardous materials include the potential exposure of construction workers to contamination, interference with ongoing remediation efforts, the potential for SPAS-related activities to result in soil or groundwater contamination, and the potential for impairment to the implementation of emergency response activities.

The exposure of construction workers to contaminated substances is not subject to cumulative effects, as this impact is site-specific and limited to particular construction workers that are employed at a construction site where contaminated materials may be uncovered. With respect to interference with ongoing remediation efforts, as noted in Section 4.7.3, *Hazardous Materials*, of the SPAS Draft EIR, there are a number of sites within the hazardous materials study area that contain contaminated soil and/or groundwater and are undergoing remediation. The LAWA Staff-Recommended Alternative has a potential to interfere with the remediation activities at some or all of these sites. However, contamination and remediation at these sites is limited geographically, and there are no other cumulative projects that would affect these ongoing remediation activities. Therefore, there would be no cumulative impacts related to ongoing remediation efforts.

Cumulative increases in the use of hazardous materials can result in an increased potential for a spill or release that, in turn, may result in soil or groundwater contamination. The potential for cumulative impacts focuses on cumulative development at LAX, as releases at LAX have the potential to affect the same soil or groundwater media. Such cumulative development includes construction of other projects at LAX, as well as operation of LAX improvements such as the Central Utility Plant (CUP) Replacement Project, the West Maintenance Area, and LAX Northside. The potential for cumulative impacts associated with these projects is addressed below.

There is a potential for cumulative impacts relating to the impairment of the implementation of emergency response activities. Within the airport, there are several substantial cumulative projects within the Central Terminal Area (CTA), including the passenger processor component of the Midfield Satellite Concourse (MSC) Program, CUP Replacement Project, and North Terminals Improvements. As indicated in the

introduction to this chapter, there are also a number of cumulative projects within the local area that would result in increased traffic on local roadways. The potential for cumulative impacts associated with these projects is addressed below.

As described in Section 2.3.7.3, *Hazardous Materials*, of this chapter, hazardous materials use and storage would increase under the LAWA Staff-Recommended Alternative compared to baseline conditions, which could increase the chances of a spill or release of these substances. Compliance with existing regulations and operating procedures, such as LAWA's *Procedure for the Management of Contaminated Materials Encountered During Construction*, would reduce the potential for releases to occur and would minimize the impact of a release were one to occur. Therefore, this impact would be less than significant. Cumulative projects at LAX would be subject to the same regulations and operating procedures. Therefore, cumulative impacts would also be less than significant.

The analysis of on-airport traffic conditions in the CTA provided in Section 2.3.12.1, *On-Airport Transportation*, of this chapter, includes roadway modifications associated with the LAWA Staff-Recommended Alternative as well as changes from the North Terminals Improvements, the MSC passenger processor, and CUP Replacement Project. As indicated in Section 2.3.7.3, *Hazardous Materials*, of this chapter, with implementation of the LAWA Staff-Recommended Alternative and these cumulative projects, traffic within the CTA would operate at acceptable levels of service, and the implementation of emergency response activities would not be impaired. Similarly, the analysis of off-airport traffic in Section 2.3.12.2, *Off-Airport Transportation*, of this chapter, accounts for traffic associated with the LAWA Staff-Recommended Alternative as well as regional growth. Although traffic would increase on off-airport roadways, conditions would by typical of the region. Moreover, there are three fire stations located on the airfield that have direct access to the airport without using off-airport roadways. For those emergency response providers located off-airport, there are multiple alternative routes to reach the airport and the roadway system would continue to operate such that emergency access would continue to be available. Therefore, cumulative impacts associated with emergency response activities would be less than significant.

2.4.8 Hydrology/Water Quality

This section considers the cumulative impacts relative to hydrology/water quality from past, present, and reasonably foreseeable future development projects in combination with the LAWA Staff-Recommended Alternative. The analysis focuses on development projects located in the watersheds within which the SPAS improvements are located (i.e., those projects with the greatest potential to have impacts to hydrology and water quality that could combine with impacts of the LAWA Staff-Recommended Alternative). In particular, the two projects at LAX with the potential to contribute to significant cumulative hydrology impacts are LAX Northside and the West Aircraft Maintenance Area, both of which would convert existing largely vacant land to future urban/airport development. LAX Northside is proposed to include a mix of retail uses, hotels, offices, educational and community facilities, and open space. The development of LAX Northside would result in conversion of largely vacant property to other land uses, such as commercial uses and roads. The West Aircraft Maintenance Area is proposed to be located on a 60-acre site on the west end of the airport. Development of the site would result in a land use conversion from airport open space to airport operations. Other development projects at/adjacent to LAX, as delineated in Figure 5-2 of the SPAS Draft EIR, that occur within the same sub-basins as the SPAS improvements, generally involve smaller improvements on areas that are already developed (i.e., surfaces are already impervious with surface water quality typical of developed/urbanized areas and, therefore, unlikely to change existing hydrology and water quality).

The vast majority of the LAX Northside area is vacant. The future development of urban uses on the site would increase the volumes and velocity of surface runoff due to the addition of impervious surfaces and would change the water quality characteristics within the runoff due to urban activities (e.g., traffic, parking, landscape maintenance, washing of surfaces) and building surfaces (i.e., roof/siding materials). Additionally, construction activities associated with future development within this area would pose the potential for temporary increases in erosion and sedimentation. The hydrology and water quality impacts

from development of LAX Northside would occur within the Argo sub-basin, which drains to the Santa Monica Bay.

The site proposed for the West Aircraft Maintenance Area is generally undeveloped, although portions of the site are paved and used for construction trailers/offices related to various improvement projects at LAX. Development of the West Aircraft Maintenance Area would increase the volumes and velocity of surface runoff due to the addition of impervious surfaces and would change the water quality characteristics within runoff. The change in water quality would occur from the replacement of existing vacant/disturbed ground, which generates mostly sediments and suspended solids within runoff, to aircraft apron/ramp area where aircraft would be parked or taxiing, introducing a source of pollutants such as oils and grease, metals, and particulate matter (e.g., tire particles). The hydrology and water quality impacts associated with implementation of the West Aircraft Maintenance Area project would occur within the Pershing sub-basin which drains to the Santa Monica Bay.

As discussed in Section 2.3.8, *Hydrology/Water Quality*, of this chapter, and shown in Table SRA-2.3.8-1 of this chapter, implementation of the LAWA Staff-Recommended Alternative would result in an increase in impervious surface area and an increase in several types of water quality pollutants, although there would be reductions in total suspended solids, 5-day Biochemical Oxygen Demand (BOD_5), and fecal enterococcus bacteria. Implementation of the LAWA Staff-Recommended Alternative would also result in short-term construction-related water quality impacts such as erosion and sedimentation. The impacts of the LAWA Staff-Recommended Alternative would include both the Argo sub-basin and the Pershing sub-basin. As such, there would be cumulative drainage impacts within the Argo sub-basin area from the combination of LAX Northside development and the LAWA Staff-Recommended Alternative, and cumulative drainage impacts within the Pershing sub-basin area from the combination of the West Aircraft Maintenance Area project and the LAWA Staff-Recommended Alternative (the two sub-basins do not share a common storm drain system, consequently cumulative drainage impacts would only be from the combination of the LAWA Staff-Recommended Alternative and each of the other projects within their respective sub-basins). Cumulative water quality impacts would occur from the combination of all three of the projects given that both affected sub-basins drain to Santa Monica Bay. The combination of these projects would not result in cumulative hydrology or water quality impacts related to the Dominguez Channel because neither LAX Northside or the West Aircraft Maintenance Area project drain to the Dominguez Channel sub-basin.

The LAX Master Plan Final EIR includes LAX Master Plan Commitment HWQ-1, which required preparation of the LAX Conceptual Drainage Plan (CDP) to identify the drainage system improvements and Best Management Practices (BMPs) necessary to avoid significant hydrology and water quality impacts from LAX Master Plan projects. While implementation of the current CDP would serve to mitigate hydrology and water quality impacts from future development within the LAX Master Plan area, within which all three projects - LAX Northside, West Aircraft Maintenance Area, and the LAWA Staff-Recommended Alternative - are located, the overall development characteristics of the combined projects would not be the same as the LAX Master Plan assumed during preparation of the CDP. As such, the cumulative hydrology and water quality impacts of the combined projects are considered to only be partially mitigated through implementation of LAX Master Plan Commitment HWQ-1, Conceptual Drainage Plan, and the remaining impact would be significant without additional mitigation. The contribution of the LAWA Staff-Recommended Alternative to this cumulatively significant impact would be cumulatively considerable.

As discussed in Section 2.3.8.2 of this chapter, Mitigation Measure MM-HWQ (SPAS)-1, Conceptual Drainage Plan Revision and Update, is recommended to revise and update the current CDP to account for changes in the development assumptions of SPAS alternatives, as compared to those of the LAX Master Plan, as well as other existing or proposed improvement projects at LAX. That revision and update of the CDP would serve to achieve the same level of mitigation intended by LAX Master Plan Commitment HWQ-1, that is, to reduce hydrology and water quality impacts to a level that is less than significant. Given that LAX Northside, the West Aircraft Maintenance Area project, and the LAWA Staff-Recommended Alternative would be accounted for through implementation of Mitigation Measure MM-HWQ (SPAS)-1, the cumulative hydrology and water quality impacts of these projects would be less than

significant, and the LAWA Staff-Recommended Alternative would no longer have a cumulatively considerable contribution.

2.4.9 Land Use and Planning

The cumulative analysis for land use and planning incorporates the same significance thresholds presented in Section 4.9, *Land Use and Planning*, of the SPAS Draft EIR, and also considers aircraft noise impacts on future noise-sensitive uses that could be introduced through cumulative project development. Therefore, a significant land use impact would occur if the SPAS alternatives, including the LAWA Staff-Recommended Alternative, in combination with the relevant cumulative projects would: 1) conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect and/or 2) create physical incompatibility with existing and future land uses through increased aircraft noise exposure.

Cumulative projects that are located at or adjacent to LAX are shown in Figure 5-2 of the SPAS Draft EIR. The cumulative projects that are evaluated in this analysis are those that have the potential for combined effects associated with the LAWA Staff-Recommended Alternative where this alternative includes proposed amendments to plans that have the potential for adverse environmental impacts. The LAWA Staff-Recommended Alternative includes changes to the following on-airport and off-airport land use plans/areas: the LAX Plan, LAX Specific Plan, Los Angeles Airport/El Segundo Dunes Specific Plan, City of Los Angeles Transportation Element, and City of Los Angeles 2010 Bicycle Plan. Cumulative projects that are not expected to conflict with these plans or are not expected to have combined physical effects in association with the SPAS land use plan impacts are not evaluated in this analysis. The cumulative projects evaluated in this analysis include the Coastal Dunes Improvement Project, LAX Northside, Metro Crenshaw/LAX Transit Corridor and Station, Airport Metro Connector Project, and the Coastal Dunes Improvement Project.

As described in Section 2.3.9, *Land Use and Planning*, of this chapter, the LAWA Staff-Recommended Alternative is consistent with the Southern California Association of Governments (SCAG) 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), SCAG 2012-2012 RTP/SCS Aviation and Ground Access Appendix, and SCAG 2004 Compass Blueprint Growth Vision, in large part because no changes are proposed to the practical capacity of LAX of 78.9 million annual passengers (MAP) and the LAWA Staff-Recommended Alternative otherwise support regional transportation policies. Furthermore, changes proposed under the LAWA Staff-Recommended Alternative are primarily within the existing airport boundary and would not result in changes to land use and development patterns on a regional scale. Therefore, cumulative impacts associated with the LAWA Staff-Recommended Alternative and potential conflicts with SCAG plans are not evaluated further in this analysis.

In addition to evaluation of cumulative impacts associated with consistency with plans, cumulative land use impacts were considered where cumulative projects with noise-sensitive uses are proposed in areas subject to significant aircraft noise exposure due to the LAWA Staff-Recommended Alternative, where incompatible land use could result with development of proposed projects. Cumulative noise impacts on noise-sensitive receptors associated with aircraft noise, road traffic noise, construction traffic and equipment noise, and transit noise and vibration are analyzed in Section 2.3.10, *Noise*, of this chapter.

Plan Consistency

LAX Plan/LAX Specific Plan

As discussed in Section 2.3.9.1 of this chapter, the LAWA Staff-Recommended Alternative includes proposed amendments to the LAX Plan and LAX Specific Plan to ensure precise consistency with these plans. These amendments include the realignment of Lincoln Boulevard and related conversion of a small portion of LAX Northside (Areas 8 and 9) to Airport Airside rather than the areas' current commercial designation. However, the potential for commercial use on these areas is limited due to the close proximity to the LAX north airfield, and associated noise impacts, safety requirements, and height restrictions. Under the LAX Northside Plan Update, these areas are proposed for Airport Support. The

slight reduction of commercial or airport support uses could be accommodated within other areas of LAX Northside. Also under the LAWA Staff-Recommended Alternative, the relocation of Runway 6L/24R would require changes to navigational aids within the Dunes Specific Plan Area, which is designated as Open Space in the LAX Plan. Since the planned navigational aids would be similar in function and number to the existing facilities, and impacts to biological resources would be fully mitigated through restoration and enhancement of state-designated sensitive habitat (see Section 2.3.3, *Biological Resources*, of this chapter), this use would be consistent with the Open Space designation of the LAX Plan and physical impacts associated with the plan change would be less than significant. Therefore, no conflicts with land use designations would occur, with precise consistency supported through the amendments to the LAX Plan and LAX Specific Plan. As a result, impacts associated with the LAWA Staff-Recommended Alternative would be less than significant.

A cumulative project that would also affect development within the LAX Plan and LAX Specific Plan is LAX Northside. LAX Northside is an approved plan that includes future development of 4.5 million square feet of development consisting of a mix of employment, retail, restaurant, office, hotel, research and development, education, civic, airport support, recreation, and buffer uses that support the needs of surrounding communities and LAWA. Formulation of a new reduced land use development program for the subject area is currently in process as part of the LAX Northside Plan Update, which will be followed by completion of environmental review studies. The LAX Northside area serves as an airport buffer zone (comprised of compatible development and landscape) for the Westchester community and is subject to use restrictions, height restrictions, setback requirements, and landscape requirements to avoid or reduce land use conflicts. The LAX Northside Plan Update currently in process, would include landscaped buffer areas, updated Design Guidelines, and other measures to avoid or reduce land use conflicts. The LAX Northside Plan Update would not affect areas within the Dunes Specific Plan Area.

Improvements proposed under the LAWA Staff-Recommended Alternative would generally not affect the LAX Northside area with the exception of the realignment of Lincoln Boulevard. The roadway realignment would be compatible with both the existing LAX Northside commercial designation and the proposed LAX Northside Plan Update designation of Airport Support. Furthermore, the slight reduction of commercial or airport support uses could be accommodated within other areas of LAX Northside. Therefore, cumulative impacts associated with consistency with the LAX Plan and LAX Specific Plan would be less than significant.

Los Angeles Airport/El Segundo Dunes Specific Plan

As previously described in Section 2.3.9.1 of this chapter, the LAWA Staff-Recommended Alternative would require changes to navigational aids within the Dunes Habitat Preserve, as designated in the Los Angeles Airport/El Segundo Dunes Specific Plan. However, with conditions that would be required for approval of a Coastal Development Permit, and implementation of LAX Master Plan and proposed SPAS mitigation measures described in Section 2.3.3, *Biological Resources*, of this chapter, the LAWA Staff-Recommended Alternative would be consistent with the Los Angeles Airport/El Segundo Dunes Specific Plan, and physical impacts associated with the plan change would be less than significant.

A cumulative project that would also affect development within the Los Angeles Airport/El Segundo Dunes Specific Plan is the Coastal Dunes Improvement Project. However, this project consists of the restoration and improvement of coastal dune habitat located in a 47-acre site in the northern portion of the Dunes. Accordingly, this project would have a beneficial effect on the Dunes.

Based on the above, the LAWA Staff-Recommended Alternative in combination with the Coastal Dunes Improvement Project would not result in significant cumulative impacts on the Dunes due to inconsistencies with the Los Angeles Airport/El Segundo Dunes Specific Plan.

City of Los Angeles Transportation Element

The LAWA Staff-Recommended Alternative would involve ground access improvements, including alterations to the existing circulation system. These improvements would be consistent with Policy 5.4 of the Transportation Element to establish ground access plans to guide future development of LAX. With

amendments to the City of Los Angeles Transportation Element to ensure precise consistency, impacts related to conflicts with plans and regulations would be less than significant.

Two cumulative projects that would also affect access to LAX are the Metro Crenshaw/LAX Transit Corridor and Station and the Airport Metro Connector Project. The Metro Crenshaw/LAX Transit Corridor and Station project includes an 8.5-mile light-rail transit line that would connect the existing Metro Green Line and the Metro Expo Line. Near LAX, the alignment would be located along Aviation Boulevard and a station is proposed near the intersection of Century Boulevard and Aviation Boulevard. The Metro Crenshaw/LAX Transit Corridor and Station would be consistent with policies of the City of Los Angeles Transportation Element to provide high capacity transit service and extend transit service along priority corridors.[97] The Airport Metro Connector Project would connect the Metro Rail System to LAX. Options under consideration include Light Rail Transit, APM, and Bus Rapid Transit along a number of different alignments. The Airport Metro Connector Project would also be consistent with the same policies of the City of Los Angeles Transportation Element as described above for the Metro Crenshaw/LAX Transit Corridor and Station.

Ground access improvements proposed under the LAWA Staff-Recommended Alternative in combination with the Metro Crenshaw/LAX Transit Corridor and Station and Airport Metro Connector Project would involve coordination between Metro and LAWA and would result in overall improved access to LAX. Furthermore, amendments to the Transportation Element in association with the LAWA Staff-Recommended Alternative and the cumulative projects would ensure precise consistency with the plan. Therefore, cumulative impacts associated with the City of Los Angeles Transportation Element would be less than significant.

City of Los Angeles 2010 Bicycle Plan

The LAWA Staff-Recommended Alternative, would include the realignment of Lincoln Boulevard, identified as a future Backbone Bikeway Network, and therefore would include proposed amendments to the 2010 Bicycle Plan to ensure precise consistency. With implementation of LAX Master Plan Commitment LU-5, Comply with City of Los Angeles Transportation Element Bicycle Plan, and an amendment to the City of Los Angeles 2010 Bicycle Plan, the LAWA Staff-Recommended Alternative would be consistent with the 2010 Bicycle Plan and impacts related to conflicts with plans and regulations would be less than significant.

Various cumulative projects shown in Figure 5-2 and listed in Table 5-2 of the SPAS Draft EIR have the potential to affect existing and proposed bicycle networks. Cumulative projects requiring discretionary review would be reviewed at a project-specific level for compliance with the 2010 Bicycle Plan and mitigation measures would be imposed, as needed, to ensure that adequate bicycle facilities are provided. Therefore, changes to the bicycle networks that could occur with the development of cumulative projects would be less than significant.

In light of cumulative project requirements for consistency with the 2010 Bicycle Plan and the potential for associated mitigation requirements, and with implementation of LAX Master Plan Commitment LU-5 under the LAWA Staff-Recommended Alternative, cumulative impacts associated with the City of Los Angeles Bicycle Plan would be less than significant.

Aircraft Noise Exposure

Cumulative noise impacts on noise-sensitive uses associated with aircraft noise, road traffic noise, construction traffic and equipment noise, and transit noise and vibration are analyzed in Section 2.3.10, *Noise*, of this chapter. As described in Section 2.3.10.1 of this chapter, the aircraft noise impacts analysis completed for the SPAS EIR accounts for present aircraft operations at LAX (i.e., baseline [2009] conditions) and reasonably foreseeable future aircraft operations at LAX (i.e., future [2025] conditions).

[97] U.S. Department of Transportation, Federal Transit Administration and Los Angeles County Metropolitan Transportation Authority (Metro), Crenshaw/LAX Transit Corridor Project Final Environmental Impact Report/Environmental Impact Statement, August 2011.

As also indicated in that discussion, implementation of the LAWA Staff-Recommended Alternative would result in significant aircraft noise impacts to noise-sensitive uses around the airport. These impacts can be reduced through implementation of LAX Master Plan commitments and mitigation measures, compliance with Title 24 requirements, and review of certain projects located within the airport influence area by the Airport Land Use Commission (ALUC) for compliance with the Los Angeles County Airport Land Use Plan (ALUP) but interim impacts prior to implementation of mitigation measures or certain residential uses with outdoor private habitable areas or parks that are newly exposed to outdoor noise levels of 75 CNEL or higher would be significant and unavoidable. In light of such impacts, implementation of the LAWA Staff-Recommended Alternative would have a cumulatively considerable contribution to significant future aircraft noise impacts on existing and potential future noise-sensitive uses within the 65 CNEL and higher noise contours.

2.4.10 Noise

The following addresses the potential for cumulative impacts associated with aircraft noise, road traffic noise, construction traffic and equipment noise, and transit noise and vibration. The cumulative impacts analysis also takes into consideration past, present, and reasonably foreseeable future projects specific to each of those four types of noise sources and also addresses the project's contribution to potential cumulative impacts from those four types of noise sources combined (i.e., the potential for noise-sensitive receptors to be impacted from project-related increases in aircraft noise, road traffic noise, transit noise, and the possibility of project-related construction equipment and traffic noise overlapping with project-related increases in operational noise). Some of the individual resource sections have already provided cumulative analyses. See Section 4.10.1.2 of the SPAS Draft EIR and Section 2.3.10.1 of this chapter (Aircraft Noise) and Section 4.10.2.2 of the SPAS Draft EIR and Section 2.3.10.2 of this chapter (Road Traffic Noise) for additional discussion of cumulative methodology and conclusions, respectively. Cumulative construction traffic and equipment noise impacts are evaluated separately for the LAWA Staff-Recommended Alternative, taking into consideration the construction activities and locations associated with the LAWA Staff-Recommended Alternative.

2.4.10.1 Aircraft Noise

The potential for cumulative aircraft noise impacts is defined primarily by past, present, and reasonably foreseeable future operations at LAX. Although there are other airports in the nearby area, such as Hawthorne Municipal Airport approximately five miles southeast of LAX and Compton Airport approximately ten miles southeast of LAX, they are primarily small municipal airports with relatively few daily operations compared to LAX and flight paths separate from the primary arrivals and departure routes for LAX. Commercial airports, such as Bob Hope International Airport approximately 20 miles northeast of LAX and Long Beach International Airport approximately 15 miles southeast of LAX, have higher daily operations than the aforementioned local airports and may share some of the same regulated air space routes as operations at LAX; however, such common use of regulated air space would occur at higher altitudes that would not contribute appreciably to cumulative noise levels on the ground in the vicinity of LAX.

The aircraft noise impacts analysis presented in Section 2.3.10.1, *Aircraft Noise*, of this chapter, accounts for present operations at LAX (i.e., baseline [2009] conditions) and reasonably foreseeable future operations at LAX (i.e., future [2025] conditions). In general, aircraft noise conditions have improved over the past two decades at most major airports in the U.S. with the federally-mandated phase-out of older noisier (FAR Part 36 Stage 2) aircraft.

As indicated in Section 2.3.10.1.3 of this chapter, implementation of the LAWA Staff-Recommended Alternative would result in significant aircraft noise impacts at buildout in 2025, compared to baseline conditions. Although LAX Master Plan Commitment N-1 and LAX Master Plan Mitigation Measure MM-N-4 would reduce aircraft noise impacts, they cannot fully mitigate the noise impacts associated with implementation of the LAWA Staff-Recommended Alternative. Further, no other operational noise abatement measures are available to fully mitigate the noise impacts of the LAWA Staff-Recommended

Alternative. Based on the above, implementation of the LAWA Staff-Recommended Alternative would have a cumulatively considerable contribution to significant future aircraft noise impacts.

Regarding classroom disruption impacts, as described in Section 2.3.10.1.3 of this chapter, LAX Master Plan Mitigation Measure MM-LU-1, Implement Revised Aircraft Noise Mitigation Program, would incorporate all eligible dwellings and non-residential noise-sensitive facilities, including schools, that are newly exposed to noise levels 65 CNEL or higher into the Aircraft Noise Mitigation Program (ANMP) to mitigate the significant noise impacts associated with the LAWA Staff-Recommended Alternative. Further, LAX Master Plan Mitigation Measures MM-LU-3, Conduct Study of the Relationship Between Aircraft Noise Levels and the Ability of Children to Learn, and MM-LU-4, Provide Additional Sound Insulation for Schools Shown by MM-LU-3 to be Significantly Impacted by Aircraft Noise, would ultimately serve to mitigate adverse noise impacts on schools as a result of the LAWA Staff-Recommended Alternative. Because the noise-related land use mitigation measures would take several years to fully implement, it is possible that significant noise impacts related to classroom disruption would be experienced in the area after implementation of the LAWA Staff-Recommended Alternative but before the mitigation measures are fully implemented. Based on the above, implementation of the LAWA Staff-Recommended Alternative would have an interim cumulatively considerable contribution to significant future classroom disruption.

Regarding nighttime awakenings, as discussed in Section 2.3.10.1, *Aircraft Noise*, of this chapter, the LAWA Staff-Recommended Alternative would not result in a substantial increase in the probability of nighttime awakenings under the project level and cumulative analyses; therefore, the impact would be less than significant and the project's contribution to cumulative impacts would not be cumulatively considerable (i.e., less than significant).

2.4.10.2 Road Traffic Noise

The analysis of road traffic noise impacts presented in Section 2.3.10.2, *Road Traffic Noise*, of this chapter, includes traffic from past, present, and reasonably foreseeable future projects in the region under future (2025) conditions, including regional growth projections from the Southern California Association of Governments (SCAG). As indicated below in **Table SRA-2.4.10.2-1** the contribution of SPAS-related traffic impacts to future cumulative road traffic noise levels at each noise-sensitive receptor location would be less than 3 dBA. As such, the LAWA Staff-Recommended Alternative would not result in a cumulatively considerable contribution to future cumulative road traffic noise.

Table SRA-2.4.10.2-1

Contribution of the LAWA Staff-Recommended Alternative to Future (2025) Road Traffic Noise Levels

	dBA CNEL Future (2025)	
	SRA	
Receptor ID	Cumulative Road Noise	SRA's Contribution
RD1	65.5	-0.2
RD2	70.0	-0.7
RD3	73.2	0.0
RD4	70.4	0.0
RD5	59.6	0.6
RD6	59.0	0.8
RD7	64.6	1.5
RD8	67.6	-0.4
RD9	64.5	0.1
RD10	64.5	0.0
RD11	60.1	0.6
RD12	64.5	-0.1
RD13	69.4	-0.1
RD14	55.6	0.8
RD15	72.3	0.1

Source: CDM Smith, 2012.

2.4.10.3 Construction Traffic and Equipment Noise

The following analysis of cumulative impacts focuses on construction equipment noise associated with development projects at/adjacent to LAX and the LAWA Staff-Recommended Alternative. There is not sufficient information at this conceptual level of planning to estimate the construction schedules, construction traffic trip generation, or trip distribution associated with the various development projects, including the LAWA Staff-Recommended Alternative. Notwithstanding, it is considered unlikely that the nature, location, and timing of the various construction projects would coincide such that traffic volumes on the nearby arterial roadways and highways would double or triple resulting in significant construction traffic noise impacts. As described in Section 2.3.10.3.1 of this chapter, even using very conservative assumptions regarding construction-related traffic generation and distribution for a recent major development project at LAX (i.e., the Bradley West Project), the traffic volumes on nearby arterial roadways and freeways would not double or triple. It would be speculative at this conceptual level of planning to estimate the nature, timing, and construction traffic characteristics of major improvements projects particular to the LAWA Staff-Recommended Alternative along with the nature, timing, and construction traffic characteristics of other development projects that may occur between now and 2025, such that a specific combination of projects would result in a doubling or tripling of traffic on specific roadways in the airport vicinity. Regarding increases in road traffic noise associated with regional growth anticipated to occur by 2025, please see Section 4.10.2, *Road Traffic Noise*, of the SPAS Draft EIR.

The geographic scope of analysis for cumulative construction equipment noise impacts generally encompasses the land uses immediately north, east, and south of the airport; specifically, the southern edges of Playa del Rey and Westchester, the northeastern edges of Inglewood and Lennox, and the northern edges of Del Aire and El Segundo. Such areas contain noise-sensitive uses that could be exposed to combined construction equipment noise from local development projects and from improvements proposed under the LAWA Staff-Recommended Alternative. The nature and location of specific noise-sensitive uses within these areas, as well as existing exterior ambient noise levels in those areas, are described in Section 4.10.3.3 of the SPAS Draft EIR (construction noise - existing conditions). Section 4.10.3.2 of the SPAS Draft EIR, (construction noise analysis methodology) describes the

assumptions and approach used to estimate a daily CNEL noise level of 89 dBA at 50 feet for overall construction activity, which, in turn, was used to estimate construction-related increases in existing exterior ambient noise levels at the nearest noise-sensitive use. An increase of 5 dBA in the existing exterior ambient noise level from construction traffic and equipment noise is defined as being a significant impact.[98]

The local development projects considered in the cumulative construction equipment noise analysis are shown in Figure 5-2, of the SPAS Draft EIR. Although the general characteristics of these projects are known, specifics regarding the proposed construction program for each project have not yet been defined. That is also the case for the LAWA Staff-Recommended Alternative. As such, the cumulative construction equipment noise analysis presented below is based on the general location of each project, the aforementioned 89 dBA CNEL at 50 feet assumed for all projects unless otherwise stated, a sound attenuation rate of -4.5 dBA per doubling of distance, no intervening topography or noise barriers unless specifically stated, and an existing exterior ambient noise level of approximately 65 dBA CNEL for all of the nearby noise-sensitive area, except for Playa del Rey, which is estimated to be approximately 68 dBA CNEL. Additionally, in evaluating combined construction equipment noise levels, the analysis below includes a conservative assumption that construction timing of future development projects coincides with that of the LAWA Staff-Recommended Alternative improvements in the nearby area. Local development projects that have been completed, such as the South Airfield Improvement Project, Crossfield Taxiway Project, and Westchester Golf Course Three-Hole Restoration Project, would not contribute to cumulative construction equipment noise impacts with the LAWA Staff-Recommended Alternative and are therefore not further addressed below.

Cumulative projects with the potential to affect noise-sensitive uses in Playa del Rey and Westchester include the Coastal Dunes Improvement Project, the City of Los Angeles Bureau of Sanitation Stormwater Infiltration and Treatment Facility, and LAX Northside, along with the airfield improvements proposed under the LAWA Staff-Recommended Alternative. Other future projects at LAX, such as the completion of the Bradley West Project, the Midfield Satellite Concourse and associated taxiways, and North Terminals Improvements, would occur over 3,000 feet away from noise-sensitive uses in Westchester and are unlikely to contribute to cumulatively significant construction equipment noise impacts in conjunction with the LAWA Staff-Recommended Alternative.

The combined construction equipment noise levels associated with the Coastal Dunes Improvement Project and the LAWA Staff-Recommended Alternative airfield improvements nearby, specifically, the relocation of runway navigational aids, would not result in significant cumulative construction equipment noise impacts to residences in Playa del Rey, based on the distances between source and receptor and the nature of construction equipment likely to be used for both projects. Based on an estimated 86 dBA at 50 feet for construction equipment noise for both projects (i.e., neither project would require a full mix of heavy construction equipment that might otherwise produce an overall noise level of 89 dBA at 50 feet), the combined noise level at the nearest residential uses in Playa del Rey from the relocation of navigational aids under the LAWA Staff-Recommended Alternative (approximately 1,300 feet away) and the Coastal Dunes Improvement Project (approximately 750 feet away) would increase the existing exterior ambient noise level by 4.1 dBA CNEL, which would be less than significant. Additional noise contribution from the development and use of Construction Staging Area A could also occur; however, based on its distance and location (i.e., is not in direct line-of-sight from the nearest residences in Playa del Rey due to an intervening hill on the northwest corner of Pershing Drive and Westchester Parkway), the combined noise level with the other two projects described above would still result in the increase in existing exterior ambient noise level being less than 5 dBA CNEL (i.e., estimated to be approximately 4.8 dBA increase).

[98] As explained in Section 2.3.10.3.1, the construction equipment noise impacts analysis focuses on the potential for a 5 dBA increase in the existing ambient exterior noise level measured in terms of CNEL. Although the threshold of significance for construction noise also recognizes a 5 dBA increase in ambient noise levels during certain evening and nighttime hours as being significant, the analysis of the impacts to 24-hour CNEL values is considered more conservative.

Relative to cumulative construction noise impacts to Saint Bernard High School, residential uses along the southern edge of Westchester, and the Park West Apartments northwest of Lincoln Boulevard south of La Tijera, all three areas would be significantly impacted by airfield-related improvements and construction staging area use under the LAWA Staff-Recommended Alternative. Construction equipment noise from other nearby projects, such as the Stormwater Infiltration and Treatment Facility and LAX Northside, would add to that significant impact. The contribution of the LAWA Staff-Recommended Alternative to the impact would be cumulatively considerable.

With regard to the residential uses along 88th Street between Liberator Avenue and Sepulveda Westway, these uses are not expected to be significantly impacted by airfield-related improvements and construction staging area use under the LAWA Staff-Recommended Alternative, based on the nature and location of activities occurring under the LAWA Staff-Recommended Alternative and the presence of an existing noise wall along the north side of 88th Street. Construction activities associated with LAX Northside would result in temporary significant noise impacts to those residences, particularly if multi-story structures are developed nearby (i.e., construction activities could occur above the heights of the existing noise wall). The contribution of the LAWA Staff-Recommended Alternative to such an impact would not exceed the significance threshold and would not be cumulatively considerable.

Within Belford and Manchester Square, potential cumulative construction equipment noise impacts would occur from construction of the Metro Crenshaw/LAX Transit Corridor and Station and the Airport Metro Connector Project (depending on the selected alignment) in combination with ground access improvements associated with the LAWA Staff-Recommended Alternative including the Intermodal Transportation Facility (ITF) and the APM system. Additionally, use of Belford and Manchester Square as construction staging sites and also future development of new uses within those two areas would further contribute to cumulative impacts. Existing noise-sensitive uses in Belford and Manchester Square, if still present when the LAWA Staff-Recommended Alternative is implemented, would be significantly impacted by ground access improvements proposed under the LAWA Staff-Recommended Alternative and by construction staging area use. Construction equipment noise from the other local development projects described above would add to that significant impact. The contribution of the LAWA Staff-Recommended Alternative to the impact would be cumulatively considerable.

The Animo Leadership Charter High School located near the northeast corner of Arbor Vitae Street and Aviation Boulevard[99] would be subject to significant cumulative construction equipment noise impacts from development of ground access improvements associated with the LAWA Staff-Recommended Alternative, specifically, the CONRAC and parking within Manchester Square, the use of Manchester Square for construction staging, and the development of the Metro Crenshaw/LAX Transit Corridor. Given the proximity of Manchester Square to the subject school site and the fact that the LAWA Staff-Recommended Alternative would alone result in a significant construction equipment noise impact at the school site, the contribution of the LAWA Staff-Recommended Alternative to the overall combined significant construction noise impact would be cumulatively considerable.

With regard to construction equipment noise impacts to residential uses in Inglewood, development of the CONRAC and parking in Manchester Square, as well as construction staging activities associated with the LAWA Staff-Recommended Alternative would generate noise; however, based on the presence of the I-405 Freeway and associated noise wall between the two subject areas, no significant construction equipment noise impacts to Inglewood are expected to occur. For that same reason, plus the fact that the nearest other local development projects - the Metro Crenshaw/LAX Transit Corridor and Station and the Airport Metro Connector Project - are located approximately 3,000 feet away from that residential area

[99] At the publication time of the Notice of Preparation for the SPAS Draft EIR, October 2010 (i.e., the baseline year for the EIR impacts analysis), the Animo Leadership Charter High School was located at the northeast corner of Aviation Boulevard and Arbor Vitae Street, across from Manchester Square. This school, however, has subsequently moved to a new location in Lennox, approximately 2.5 miles from the current site (see http://www.dailybreeze.com/news/ci_21358340/animo-leadership-has-new-lennox-campus-and-new, accessed on December 10, 2012). In order to provide a consistent basis of comparison, the impacts discussion for the LAWA Staff-Recommended Alternative contained herein assumes the location of the Animo Leadership Charter High School to be at its former location at the northeast corner of Aviation Boulevard and Arbor Vitae Street, across from Manchester Square.

of Inglewood (i.e., 89 dBA at 50 feet would attenuate to 62.3 dBA over that distance), a significant cumulative construction equipment noise impact to Inglewood is not expected to occur.

With regard to residential uses within Del Aire, the development and use of Continental City for construction staging under the LAWA Staff-Recommended Alternative, and development of the Metro Crenshaw/LAX Transit Corridor and Station would result in cumulative construction equipment noise impacts to that community. The cumulative noise impact is anticipated to increase existing exterior ambient noise levels in the residential area by more than 5 dBA, consequently resulting in a significant cumulative impact. The contribution of the LAWA Staff-Recommended Alternative to that impact is not anticipated to be cumulatively considerable, based on the relative distance of Continental City from the community compared to the proximity of the Metro Crenshaw/LAX Transit Corridor (i.e., approximately 800 feet for the former and approximately 250 feet for the latter) and the differences in work area elevations (i.e., portions of the Metro Crenshaw/LAX Transit Corridor and Station improvements would occur at elevations above, and near to, the residences, which Continental City would be at-grade with residences, consequently enabling the intervening noise wall to provide some level of noise attenuation between the construction staging area and the residences).

2.4.10.4 Transit Noise and Vibration

The only past, present, or reasonably foreseeable future projects posing the potential to result in a cumulative transit noise and vibration impact would be the combination of the transit improvements proposed under the LAWA Staff-Recommended Alternative (specifically, the APM system), the recently approved Metro Crenshaw/LAX Transit Corridor and Station, and the proposed Airport Metro Connector Project (depending on the selected alignment). The geographic scope of the cumulative transit noise and vibration impacts analysis is based on the impact screening distances set forth by the Federal Transit Administration's (FTA's) *Transit Noise and Vibration Impact Assessment*[100] relative to Category 2 land uses, which, in this case, are the hotel uses in the general vicinity of Century Boulevard and 98th Street. For light rail transit projects in the vicinity of Category 2 uses, the FTA screening distance for transit noise impacts is 175 feet and for transit vibration impacts is 150 feet.

The approved Metro Crenshaw/LAX Transit Corridor will extend south from the existing Metro Exposition Line at Crenshaw and Exposition Boulevards approximately 8.5 miles to a proposed station near Century Boulevard and Aviation Boulevard. In the vicinity of LAX, the alignment of the proposed line will extend along the east side of Aviation Boulevard north of Century Boulevard. Based on Table 4-15 in the Final EIS/EIR for the Metro Crenshaw/LAX Transit Corridor,[101] the operational noise level associated with the system near Century Boulevard and Aviation Boulevard would be 60 dBA L_{dn} at a distance of 123 feet from the line trackwork.

Overall, there would be no cumulative transit noise and vibration impacts from the combination of the Metro Crenshaw/LAX Transit Corridor and the LAWA Staff-Recommended Alternative.

The Airport Metro Connector Project is proposed to extend into the LAX Central Terminal Area (CTA). The Airport Metro Connector Project is still in the early stages of conceptual planning and the range of alternatives, including system design choices (i.e., bus rapid transit, APM, light-rail) and route alignments, to be further investigated and advanced to the EIS and EIR has not been determined. It would be speculative at this time to attempt to quantify potential noise and vibration impacts from the Airport Metro Connector Project, as they may combine with the noise and vibration impacts of the LAWA Staff-Recommended Alternative addressed in Section 4.10.4, *Transit Noise and Vibration*, of the SPAS Draft EIR. Additionally, it would be speculative to estimate and account for how the SPAS transit options, addressed in Section 4.10.4, *Transit Noise and Vibration*, of the SPAS Draft EIR, might change in design and operation if the Airport Metro Connector Project is operating on a shared or parallel corridor. As

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100 U.S. Department of Transportation, Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, FTA-VA-90-1003-06, May 2006.

101 Los Angeles County Metropolitan Transportation Authority, Crenshaw/LAX Transit Corridor Final Environmental Impact Statement/Final Environmental Impact Report, August 2011.

such, it is considered too speculative to draw conclusions at this time regarding cumulative noise and vibration impacts from the combination of the Airport Metro Connector Project and the LAWA Staff-Recommended Alternative.

2.4.11 Public Services

2.4.11.1 Fire Protection

The types of development projects at or adjacent to LAX that have the potential to result in cumulative impacts on fire protection include various airside, terminal, land development, infrastructure, security, and transportation projects. These types of projects are further described below. The geographic area of analysis includes nearby areas that may be served by the same fire response resources that serve LAX, including the communities of Playa del Rey, Loyola Village, and Vista del Mar, the Manchester Square area, and portions of Westchester and Dockweiler State Beach.

The LAWA Staff-Recommended Alternative would alter demands for fire protection services. Many of the components of the LAWA Staff-Recommended Alternative, such as airfield and ground access improvements, would enhance safety and efficiency at the airport, thereby decreasing the potential need for fire and emergency response. However, development of new terminal areas and new ground access facilities would increase demand for fire protection services. Implementation of LAX Master Plan Commitments FP-1, PS-1, PS-2, C-1, ST-9, ST-12, ST-14, ST-17, ST-18, ST-19, ST-21, and ST-22 and ongoing regulatory compliance would ensure that impacts relative to fire and emergency services would be less than significant.

Cumulative on-airport projects that are independent from SPAS include airfield safety and terminal improvements, installation of security fencing and lighting, construction of the Airport Response Coordination Center (ARCC) and the LAX Public Safety Building and Supporting Facilities, LAX Northside, and various fire system, infrastructure, electrical, and Americans with Disabilities Act (ADA) upgrades. Many of the cumulative projects, including those related to maintenance, signage, and infrastructure upgrades, would have no impact on fire protection. Other projects, such as the Airfield Operating Area (AOA) Perimeter Fence Enhancements and the ARCC, would improve overall safety at the airport and reduce the potential demand for fire and emergency response. On-airport cumulative projects that would increase passenger-serving areas, provide new maintenance or cargo facilities, or add new development, such as the Bradley West Project, Midfield Satellite Concourse (MSC), North and South Terminals Improvements, West Maintenance Area, and LAX Northside, in combination with the LAWA Staff-Recommended Alternative, have the potential to increase demand for fire and emergency services. The majority of projects that would contribute to this cumulative impact are related to the LAX Master Plan, and would be subject to LAX Master Plan commitments and regulatory requirements that would ensure that cumulative impacts from airport-related development would be less than significant. The LAX Northside project would also add new development that would have the potential to increase demand for fire and emergency services. The LAX Northside project would be reviewed through standard City processes to ensure compliance with the Uniform Fire Code, Los Angeles Fire Code, City of Los Angeles General Plan Fire Prevention Plan, and other applicable Los Angeles Fire Department (LAFD) requirements. In addition, measures that address fire protection are incorporated in the development requirements for the LAX Northside Sub-Area in the LAX Specific Plan. With implementation of these conditions, fulfillment of LAX Master Plan commitments, and the recent relocation and expansion of Station 5, the potential impacts of the LAX Northside project on levels of fire protection services would be less than significant. With implementation of LAX Master Plan commitments, regulatory requirements, past improvements in fire protection facilities, and planned upgrades such as the LAX Public Safety Building and Supporting Facilities, cumulative impacts associated with airport-related development would be less than significant.

Regarding cumulative off-airport projects, the development of the Metro Crenshaw/LAX Transit Corridor Project and the Airport Metro Connector would introduce new rail systems in the airport vicinity and within the CTA, with a corresponding potential increase in demand for fire and emergency services. However, Metro would be responsible for implementing System Safety Program Plans and System Security Plans

for Metro projects, which would address the safety and security of transit commuter operations, mitigate accidents, and support compliance with state regulations.[102] These safety measures have been established to provide employee and passenger safety, crime prevention, adequate emergency response, and emergency procedures. In addition, the proposed stations would be designed to promote pedestrian safety and would be adequately lit and monitored by security personnel.

The Metro Crenshaw/LAX Transit Corridor would have a beneficial effect on the regional transportation network compared to existing conditions.[103] Although the Airport Metro Connector Project is currently being studied with various alternatives under consideration, it is also expected to have a beneficial effect on the regional transportation network. This reduced traffic congestion would reduce the potential for degradation of response times adjacent to LAX. In addition, the removal of remaining residences within the Manchester Square and Belford areas through implementation of LAWA's residential acquisition program would reduce the overall demand for fire protection services in the LAX area.

In light of past and planned improvements to airport-related fire protection facilities, LAX Master Plan commitments, project-specific mitigation measures, design features, and regulatory compliance, improvements under the LAWA Staff-Recommended Alternative in combination with cumulative projects would not restrict emergency access, increase response times, or extend station response distances beyond the standards maintained by the agencies serving LAX and the surrounding communities. Moreover, cumulative development would not result in the need for a new fire station or the expansion, consolidation, or relocation of an existing facility to maintain adequate service levels. Therefore, cumulative impacts on fire protection services under the LAWA Staff-Recommended Alternative would be less than significant.

2.4.11.2 Law Enforcement

The types of development projects at or adjacent to LAX that have the potential to result in cumulative impacts on law enforcement include various airside, terminal, land development, infrastructure, security, and transportation projects. These types of projects are further described below.

The LAWA Staff-Recommended Alternative would alter demand for law enforcement services. Many of the components of the LAWA Staff-Recommended Alternative, such as airfield and ground access improvements, would enhance safety at the airport and improve response times, thereby reducing demand for law enforcement services. However, development of new terminal areas and new ground access facilities would increase demand for law enforcement services. Implementation of LAX Master Plan Commitments LE-1, LE-2, PS-1, PS-2, C-1, ST-9, ST-12, ST-14, ST-17, ST-18, ST-19, ST-21, and ST-22 would ensure that impacts to law enforcement services, facilities, and response times would be less than significant in most instances. The removal of the Los Angeles World Airports Police Division (LAWAPD) station and associated facilities on West 96th Street would result in a significant impact to law enforcement if the planned LAX Public Safety Building and Supporting Facilities is not completed prior to removal of these facilities. SPAS Mitigation Measure MM-LE (SPAS)-1, LAWAPD Replacement Facilities, would ensure that adequate law enforcement facilities are maintained. Therefore, impacts to law enforcement services and facilities would be less than significant.

Cumulative on-airport projects that are independent from SPAS include airfield and terminal safety improvements, installation of security fencing and lighting, construction of the Airport Response Coordination Center (ARCC) and the LAX Public Safety Building and Supporting Facilities, LAX Northside, and various other safety, infrastructure, and security upgrades. Many of the cumulative projects, including those related to maintenance, signage, and infrastructure upgrades, would have no impact on law enforcement. Other projects, such as the Airfield Operating Area (AOA) Perimeter Fence

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102 U.S. Department of Transportation, Federal Transit Administration and Los Angeles County Metropolitan Transportation Authority (Metro), Crenshaw/LAX Transit Corridor Project Final Environmental Impact Report/Environmental Impact Statement, August 2011, p. 4-267 and p. F-65.

103 U.S. Department of Transportation, Federal Transit Administration and Los Angeles County Metropolitan Transportation Authority (Metro), Crenshaw/LAX Transit Corridor Project Final Environmental Impact Report/Environmental Impact Statement, August 2011, p. 3-37.

Enhancements and the ARCC, would improve overall safety at the airport and reduce the potential demand for law enforcement services and facilities. In particular, the LAX Public Safety Building and Supporting Facilities would consolidate existing facilities and personnel under one roof, creating a larger, more modern and efficient facility that would result in an improvement and expansion of LAWAPD facilities. The new facility would be sited to ensure that adequate response times are maintained. On-airport cumulative projects that would increase passenger-serving areas, provide new maintenance or cargo facilities, or add new development, such as the Bradley West Project, Midfield Satellite Concourse (MSC), North and South Terminals Improvements, West Maintenance Area, and LAX Northside, in combination with the LAWA Staff-Recommended Alternative, have the potential to increase demands for law enforcement services. The majority of projects that would contribute to this cumulative impact are related to the LAX Master Plan, and would be subject to LAX Master Plan commitments and regulatory requirements that would ensure that cumulative impacts from airport-related development would be less than significant. The LAX Northside project would also add new development that would have the potential to increase demand for law enforcement services. With review of project plans by LAWAPD and Los Angeles Police Department (LAPD), implementation of the security features referenced in the development requirements for the LAX Northside Sub-Area in the LAX Specific Plan, provision of a police station within the area, and fulfillment of LAX Master Plan commitments, impacts on law enforcement services associated with LAX Northside would be less than significant. With implementation of LAX Master Plan commitments, regulatory requirements, and planned upgrades such as the LAX Public Safety Building and Supporting Facilities, cumulative impacts associated with airport-related development would be less than significant.

Regarding cumulative off-airport projects, the development of the Metro Crenshaw/LAX Transit Corridor Project and Airport Metro Connector Project would introduce new rail systems in the airport vicinity and within the CTA, with a corresponding potential increase in demand for law enforcement services. However, Metro would be responsible for implementing System Safety Program Plans and System Security Plans for Metro projects, which would address the safety and security of transit commuter operations, mitigate accidents, and support compliance with state regulations.[104] These safety measures have been established to provide employee and passenger safety, crime prevention, adequate emergency response, and emergency procedures. In addition, the proposed stations would be designed to avoid obstructions to visibility or observation and would be adequately lit and monitored by security personnel.

The Metro Crenshaw/LAX Transit Corridor would have a beneficial effect on the regional transportation network compared to existing conditions.[105] Although the Airport Metro Connector Project is currently being studied with various alternatives under consideration, it is also expected to have a beneficial effect on the regional transportation network. This reduced traffic congestion would reduce the potential for degradation of response times adjacent to LAX. In addition, the removal of remaining residences within the Manchester Square and Belford areas through implementation of LAWA's residential acquisition program would reduce the overall demand for law enforcement services in the LAX area.

In light of planned improvements to law enforcement facilities, LAX Master Plan commitments, SPAS and project-specific mitigation measures, design features, and regulatory compliance, improvements under the LAWA Staff-Recommended Alternative in combination with cumulative projects would not require a substantial increase in law enforcement services to maintain adequate services or require new or expanded facilities without providing adequate mechanisms for addressing these additional needs. Moreover, cumulative development would not increase emergency response times beyond the limits required by applicable jurisdictions. Therefore, cumulative impacts on law enforcement services under the LAWA Staff-Recommended Alternative would be less than significant.

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104 U.S. Department of Transportation, Federal Transit Administration and Los Angeles County Metropolitan Transportation Authority (Metro), Crenshaw/LAX Transit Corridor Project Final Environmental Impact Report/Environmental Impact Statement, August 2011, p. 4-267 and p. F-65.

105 U.S. Department of Transportation, Federal Transit Administration and Los Angeles County Metropolitan Transportation Authority (Metro), Crenshaw/LAX Transit Corridor Project Final Environmental Impact Report/Environmental Impact Statement, August 2011, p. 3-37.

2.4.12 Transportation

2.4.12.1 On-Airport Transportation

Cumulative impacts to on-airport transportation are incorporated into the analysis provided in Section 2.3.12.1, *On-Airport Transportation*, of this chapter. More specifically, the contributions of the LAWA Staff-Recommended Alternative to cumulative impacts were determined based on a comparison between Future (2025) With Alternative traffic conditions and Future (2025) Without Alternative traffic conditions. Please see Section 4.12.1 of the SPAS Draft EIR for a discussion of the methodology used in the analysis of cumulative on-airport transportation impacts, determination as to whether the contribution of each SPAS alternative, including the LAWA Staff-Recommended Alternative, to significant cumulative impacts would be considerable, and mitigation proposed to address cumulatively considerable contributions.

2.4.12.2 Off-Airport Transportation

Cumulative impacts to off-airport transportation are incorporated into the analysis provided in Section 2.3.12.2, *Off-airport Transportation*, of this chapter. More specifically, the contributions of the LAWA Staff-Recommended Alternative to cumulative impacts were determined based on a comparison between Future (2025) With Alternative traffic conditions and Future (2025) Without Alternative traffic conditions. Please see Section 4.12.2 of the SPAS Draft EIR for a discussion of the methodology used in the analysis of cumulative off-airport transportation impacts, determination as to whether the contribution of each SPAS alternative, including the LAWA Staff-Recommended Alternative, to significant cumulative impacts would be considerable, and mitigation proposed to address cumulatively considerable contributions.

2.4.13 Utilities

2.4.13.1 Energy

This section addresses potential cumulative impacts to energy supply associated with the LAWA Staff-Recommended Alternative, in combination with other past, present, and probable future projects. As discussed in Section 4.13.1.3 of the SPAS Draft EIR, electricity and natural gas consumption at LAX results from a number of activities, including space heating and cooling, airfield and terminal lighting, food preparation, and office functions. Energy is also used indirectly in the delivery, treatment, and distribution of water used at LAX and the treatment of wastewater generated by airport-related activities. Transportation-related fuel consumption includes aviation fuel (i.e., Jet A) for aircraft, as well as gasoline, diesel, and alternative fuels for on- and off-airport vehicles, construction, and ground support equipment (GSE).

Within LAX, the projects that would contribute to cumulative energy use are the Midfield Satellite Concourse (MSC) Program, LAX Northside, Bradley West Project, North Terminals Improvements, and the LAX Public Safety Building and Supporting Facilities. The regional analysis for electricity is based on future projections of electricity demand and supply from the City of Los Angeles' *Power Integrated Resource Plan*.[106] The regional analysis for natural gas is based on future projections of natural gas demand and supply from the annual *California Gas Report*, prepared by the state's natural gas utilities.[107] Cumulative impacts pertaining to petroleum fuel products consider Southern California Association of Governments (SCAG) regional projections, national demands, and the world's projected oil supply.[108,109]

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106 City of Los Angeles, Department of Water and Power, Power Integrated Resource Plan, December 11, 2011, Available: http://www.lapowerplan.org/.

107 The California Gas and Electric Utilities, 2010 California Gas Report, 2010, Available: http://www.socalgas.com/regulatory/cgr.shtml.

108 Southern California Association of Governments, 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy, April 2012.

City and regional electricity and natural gas supply planning programs would ensure adequate energy supply for projected cumulative growth within the City of Los Angeles through the year 2025. As indicated in Section 2.3.13.1, *Energy*, of this chapter, existing energy supplies of electricity, natural gas, and transportation-related fuels are considered to be adequate, with sufficient supplies to meet the future energy needs of LAX.[110,111,112]

Electricity and Natural Gas

Under the LAWA Staff-Recommended Alternative, demand for electricity and natural gas would increase due to new passenger-related facilities and energy use associated with water supply and wastewater treatment. Implementation of LAX Master Plan commitments, adherence to LAWA's *Sustainability Plan*, and compliance with federal policies and state requirements pertaining to energy efficiency would increase the energy efficiency of the proposed buildings. Measures aimed at increasing water conservation would decrease indirect consumption of electricity. As indicated in Section 2.3.13.1, *Energy*, of this chapter, existing and projected supplies of electricity and natural gas are expected to be sufficient to accommodate demand, including demand associated with the LAWA Staff-Recommended Alternative.

As indicated above, the projects at LAX that would contribute to cumulative electricity and natural gas use are the MSC, LAX Northside, Bradley West Project, North Terminals Improvements, and LAX Public Safety Building and Supporting Facilities. Cumulative development in the region would also increase electricity and natural gas demand. New buildings would be required to meet energy consumption standards prescribed for new structures in Title 24. New development at LAX would have the added requirement to comply with LAWA's *Sustainability Plan*, including the goal that all new buildings at LAX meet Leadership in Energy and Environmental Design (LEED®) Silver or higher standards. With compliance with these standards, cumulative development would be more energy efficient than buildings built previously. As a result, cumulative projects would not result in a wasteful, inefficient, or unnecessary consumption of electricity or natural gas.

As noted in Section 2.3.13.1, *Energy*, of this chapter, electricity consumption within the City of Los Angeles Department of Water and Power's (LADWP) service area is projected to increase marginally through 2030, with an annual growth rate of approximately 1.1 percent.[113] Regional natural gas demand is projected to contract at an average annual rate of approximately 0.2 percent through 2030.[114] LADWP and the Southern California Gas Company have sufficient supplies of electricity and natural gas, respectively, to meet existing and future demands. Therefore, cumulative impacts related to electricity and natural gas consumption would be less than significant.

Transportation-Related Fuel

Passenger activity levels at LAX are forecasted to be 78.9 million annual passengers (MAP) by 2025 as a result of projected natural growth. The increase in passenger activity, and related aircraft operations, is expected to occur with or without implementation of this alternative. Projected increased passenger demand and aircraft operations at LAX would result in increased consumption of transportation-related fuels associated with aircraft, on- and off-airport vehicle trips, and GSE. The increased fuel demand

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109 U.S. Energy Information Administration (EIA), Long-Term World Oil Supply Scenarios, August 2004.

110 The California Gas and Electric Utilities, 2010 California Gas Report, 2010, Available: http://www.socalgas.com/regulatory/cgr.shtml.

111 City of Los Angeles, Department of Water and Power, Power Integrated Resource Plan, December 11, 2011, Available: http://www.lapowerplan.org/.

112 U.S. Energy Information Administration (EIA), Long-Term World Oil Supply Scenarios, August 2004.

113 City of Los Angeles, Department of Water and Power, Power Integrated Resource Plan, December 11, 2011, Available: http://www.lapowerplan.org/.

114 The California Gas and Electric Utilities, 2010 California Gas Report, 2010, Available: http://www.socalgas.com/regulatory/cgr.shtml.

would be partially offset by increasingly higher vehicle fleet fuel efficiency. Construction activities associated with the LAWA Staff-Recommended Alternative would also increase fuel consumption. As indicated in Section 2.3.13.1, *Energy*, of this chapter, petroleum product supplies, including all forms of transportation-related fuels, are anticipated to be adequate well beyond 2025.[115] Therefore, the impact associated with an increase in fuel consumption under the LAWA Staff-Recommended Alternative would be less than significant.

Cumulative development at LAX and in the region would also contribute to increased demand for transportation-related fuels. As indicated above, since adequate supplies of these fuels are anticipated to be available well beyond 2025, the cumulative impact of increased fuel consumption would be less than significant.

2.4.13.2 Solid Waste

Current projections indicate that, under current conditions, existing solid waste disposal facilities will not be able to accommodate daily disposal demands in 2025.[116] Many landfills in the urbanized portions of the County of Los Angeles are at or near capacity, resulting in a need to transport waste to less urban areas of the region, or outside the region. Pursuant to Assembly Bill 939, the *2010 Annual Report on the Countywide Summary Plan and Countywide Siting Element* provided an analysis of nine scenarios to assist the County in meeting projected future disposal demands. These scenarios range from maintaining the status quo (i.e., no new landfills or expansions of existing landfills in the County) to scenarios in which the County successfully permits and develops all in-County landfill expansions; expands transfer and processing infrastructure; studies, promotes, and develops conversion technologies; develops a waste-by-rail system; and maximizes waste reduction and recycling.[117] The report concludes that six of the scenarios have the potential to meet the projected future daily disposal demand through the 15-year planning period (through 2025). Currently, extensions are being sought at several landfills, and the County of Los Angeles is pursuing development of a waste-by-rail system outside the County. Notwithstanding these plans, the ability of the County to meet future disposal demands is uncertain.

The following LAX Master Plan mitigation measure has been adopted by LAWA to reduce cumulative solid waste impacts:

- **MM-SW-1. Provide Landfill Capacity.**

  Additional landfill capacity in the Los Angeles region should be provided through the siting of new landfills, the expansion of existing landfills, or the extension of permits for existing facilities. As an alternative, or to augment regional landfill capacity, landfill capacity outside the region could be accessed by developing the necessary rail haul infrastructure. The responsibility for implementing this mitigation measure lies with state, county, and local solid waste planning authorities. The costs for implementing this mitigation measure will be passed on to LAX and other solid waste generators through increase solid waste disposal costs.

Passenger activity levels at LAX are forecasted to be 78.9 million annual passengers (MAP) by 2025 as a result of natural growth. The increase in passenger activity is expected to occur with or without implementation of the LAWA Staff-Recommended Alternative. Projected increased passenger demand at LAX, in conjunction with other regional projects and population growth, would result in cumulative increases to municipal solid waste generation within the Los Angeles region. Although the Sunshine Canyon Landfill has the existing physical and permitted capacity to accept solid waste beyond the SPAS planning horizon, and several landfills are scheduled to remain open during this timeframe, future regional

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115 California Energy Commission, Transportation Energy Forecasts and Analysis for the 2009 Integrated Energy Policy Report, May 2010.

116 County of Los Angeles, Department of Public Works, 2010 Annual Report on the Countywide Summary Plan and Countywide Siting Element, October 2011.

117 County of Los Angeles, Department of Public Works, 2010 Annual Report on the Countywide Summary Plan and Countywide Siting Element, October 2011.

solid waste disposal capacity to meet projected demand in Los Angeles County is not assured. As a result, impacts associated with cumulative increases in municipal solid waste generation would be significant and LAX's contribution to these impacts would be cumulatively considerable.

Cumulative impacts from population growth could be mitigated though implementation of LAX Master Plan Mitigation Measure MM-SW-1, Provide Landfill Capacity. Implementation of this mitigation measure is the responsibility of another agency (or agencies). If this mitigation measure is not fully implemented, cumulative impacts associated with solid waste generation and disposal would remain significant, and LAX's contribution would remain cumulatively considerable.

2.4.13.3 Wastewater Generation

The cumulative impacts analysis pertaining to wastewater generation considers the entire Hyperion Service Area (HSA), which includes the Hyperion Treatment Plant (HTP), Donald C. Tillman Water Reclamation Plant (DCTWRP), and Los Angeles-Glendale Water Reclamation Plant (LAGWRP). Within LAX, the projects that would contribute to cumulative wastewater generation are the Midfield Satellite Concourse (MSC) Program, LAX Northside, Bradley West Project, North Terminals Improvements, and the LAX Public Safety Building and Supporting Facilities. Building areas associated with these projects are consistent with the LAX Master Plan and, therefore, with the 2012 SCAG projections, which are considered by the Los Angeles Department of Water and Power (LADWP) in their wastewater planning, including their *Integrated Resources Plan* (IRP)[118] updates. The regional analysis is based on future projections of wastewater generation associated with the IRP as well as trendlines based on the Southern California Association of Governments (SCAG) 2008 *Regional Transportation Plan* (RTP), which projects the same future passenger activity level at LAX as SCAG's Draft 2012-2035 RTP/Sustainable Communities Strategy.[119]

The City's planning horizon for wastewater facilities is 2020. Projections of future flows within this horizon are provided in Figure 4.13.3-1 of the SPAS Draft EIR. As indicated in the *IRP 5-Year Review Draft Documents for Stakeholder Review* (5-Year Review) and illustrated in the figure, with implementation of the IRP, the City expects to have sufficient capacity to treat wastewater flows within the HSA through 2020 and beyond.[120] The IRP also anticipates sufficient future capacity at HTP. The plant, with a design capacity of 450 million gallons per day (mgd), had wastewater flows of 299 mgd[121] in 2010, leaving an available capacity of 151 mgd. Currently there are no plans to expand the design capacity of HTP before 2025.[122]

Under the LAWA Staff-Recommended Alternative, wastewater generation from passenger-related facilities would be 0.12 mgd in 2025. This would represent less than 0.03 percent of HTP's wastewater design capacity (450 mgd), which would not be significant compared to the existing available capacity at HTP. Moreover, as discussed in Section 2.3.13.3, *Wastewater Generation*, of this chapter, SCAG and HSA flow trendlines indicate that the HSA would have sufficient capacity to handle projected wastewater flows in 2025, including flows associated with the LAWA Staff-Recommended Alternative.

As noted in Section 2.3.13.3, *Wastewater Generation*, of this chapter, implementation of the IRP would provide sufficient capacity to treat projected wastewater flows within the HSA, including flows from

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118 City of Los Angeles, Department of Public Works, Bureau of Sanitation and Department of Water and Power, IRP 5-Year Review Draft Documents for Stakeholder Review, January 2012, Available: http://www.lacitysan.org/irp/documents/I5R_DRAFT_Documents-v2.pdf, accessed March 7, 2012.

119 SCAG recently adopted the 2012-2035 RTP/SCS, however, the 2012-2035 RTP/SCS does not include projections of wastewater generation. The 2012-2035 RTP/SCS projects a lower future regional population than did the 2008 RTP; therefore, the trendline based on the 2008 RTP is likely conservative.

120 City of Los Angeles, Department of Public Works, Bureau of Sanitation and Department of Water and Power, IRP 5-Year Review Draft Documents for Stakeholder Review, January 2012, Available: http://www.lacitysan.org/irp/documents/I5R_DRAFT_Documents-v2.pdf, accessed March 7, 2012.

121 Patel, Dipak, Process Engineer, Hyperion Service Plant, Personal Communication, April 23, 2012.

122 City of Los Angeles, Department of Public Works, Bureau of Sanitation and Department of Water and Power, IRP 5-Year Review Draft Documents for Stakeholder Review, January 2012, Available: http://www.lacitysan.org/irp/documents/I5R_DRAFT_Documents-v2.pdf, accessed March 7, 2012.

cumulative growth, through the City's 2020 planning horizon for wastewater facilities. As shown in Figure 4.13.3-1 of the SPAS Draft EIR, if the SCAG and HSA wastewater flow trendlines continue beyond 2020, the HSA would have sufficient capacity to handle projected wastewater flows in 2025, including flows associated with the LAWA Staff-Recommended Alternative, other cumulative projects at LAX, and cumulative growth in the service area. As it is reasonably foreseeable that wastewater treatment capacity would be sufficient to handle cumulative wastewater flows, the cumulative impacts of wastewater generation would be less than significant.

2.4.13.4 Water Supply

The cumulative impacts analysis pertaining to water demand and supply considers the entire Los Angeles Department of Water and Power (LADWP) service area. Within LAX, the projects that would contribute to cumulative water use are the Midfield Satellite Concourse (MSC) Program, LAX Northside, Bradley West Project, North Terminals Improvements, and the LAX Public Safety Building and Supporting Facilities. The regional analysis is based on future projections of demand and supply in LADWP's 2010 Urban Water Management Plan (UWMP)[123] and the projected growth in urbanization (i.e., population, households, and employment) within the region contained in the Southern California Association of Governments' (SCAG) 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS).[124]

As described in Section 2.3.13.4, *Water Supply*, of this chapter, water demand from passenger-related facilities under the LAWA Staff-Recommended Alternative would be 134.06 acre-feet per year (AF/yr) in 2025. This would represent less than 0.02 percent of anticipated LADWP water demand in 2025 (675,600 AF).[125] The UWMP accounts for future activity levels that are consistent with activity levels under the LAWA Staff-Recommended Alternative. In addition, and as indicated in Section 2.3.13.4, *Water Supply*, of this chapter, the conclusions of a Water Supply Assessment (WSA) prepared for the LAX Master Plan, which found that adequate water supplies will be available for the project, are still valid because passenger activity at LAX in 2025 would be 78.9 million annual passengers (MAP), the same activity level assumed in the WSA.

As indicated above, projects at LAX with the potential for cumulative impacts include the MSC, LAX Northside, Bradley West Project, North Terminals Improvements, and the LAX Public Safety Building and Supporting Facilities. Building areas associated with these improvements, and projected LAX activity level of 78.9 MAP, were included in the WSA prepared for the LAX Master Plan; hence, cumulative water demand at LAX has been considered by LADWP and is accounted for in the 2010 UWMP. As indicated in Section 4.13.4, *Water Supply*, of the SPAS Draft EIR, according to the 2010 UWMP, citywide water supply planning programs will ensure adequate water supply for projected cumulative growth within the City of Los Angeles through the year 2035. The 2010 UWMP water supply projections are based on the 2008 RTP population projections. Subsequent to adoption of the 2010 UWMP, SCAG adopted the 2012-2035 RTP/SCS, which projects a decrease in population growth compared to the SCAG 2008 RTP projections. Therefore, the 2010 UWMP water supply projections remain valid and the City will have sufficient water supplies through 2035. As a result, impacts associated with cumulative increases in water demand would be less significant.

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123 City of Los Angeles, Department of Water and Power, Urban Water Management Plan, July 2010.

124 Southern California Association of Governments, 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy, April 2012, Available: http://rtpscs.scag.ca.gov/Documents/2012/final/f2012RTPSCS.pdf.

125 City of Los Angeles, Department of Water and Power, Urban Water Management Plan, July 2010.

2.5 Summary of Impacts and Mitigation Measures Related to the LAWA Staff-Recommended Alternative

Table SRA-2.5-1 summarizes the environmental impacts after mitigation of the LAWA Staff-Recommended Alternative as identified in Section 2.3 of this chapter. Impacts associated with implementation of the LAWA Staff-Recommended Alternative include those directly associated with proposed physical improvements (e.g., impacts to biological resources that would occur from grading activities, impacts to aesthetics, views, light, and glare that would occur from development of new structures or modification of existing structures). Impacts associated with implementation of the LAWA Staff-Recommended Alternative also include those associated with proposed or anticipated changes in airport operations (e.g., noise impacts, air pollutant emissions from aircraft operations, traffic impacts from vehicles traveling to and from the airport). The majority of the operations-related impacts summarized in this section, and more fully addressed in Sections 2.3 and 2.4 of this chapter, are primarily attributable to future growth in aircraft and passenger activity levels at LAX that are projected to occur independent of the LAWA Staff-Recommended Alternative. The SPAS Draft EIR analyzes and identifies mitigation for such impacts even though they are attributable to future growth not related to the proposed project.

Specifically, the impacts analyses completed for the SPAS project include an evaluation of conditions projected to occur upon completion (buildout) of the LAWA Staff-Recommended Alternative compared to conditions that existed at the time the Notice of Preparation (NOP) for the Draft EIR was published (i.e., existing baseline conditions). The analyses of operations-related impacts, such as those pertaining to air quality, noise, and traffic, account for the growth in activity projected to occur between 2009 (56.5 MAP and 1,493 average daily aircraft operations [landings and takeoffs combined]) and 2025 (78.9 MAP and 1,937 average daily aircraft operations).[126] This 30 to 40 percent increase in aircraft and passenger activity at LAX is projected to occur regardless of SPAS (i.e., would occur even if none of the SPAS alternatives were implemented). The SPAS Draft EIR analysis evaluates how the improvements specific to each alternative would interact with that projected growth and delineates the differences, or the similarities, in impacts between alternatives.

As indicated in **Table SRA-2.5-1**, impacts are anticipated to be less than significant after mitigation for the LAWA Staff-Recommended Alternative relative to most environmental topics. Unavoidable significant impacts are expected to occur for the LAWA Staff-Recommended Alternative relative to air quality, greenhouse gas emissions, human health risk, aircraft noise, construction equipment noise, on-airport surface transportation, and off-airport surface transportation. With the exception of construction equipment noise impacts, the vast majority of the unavoidable significant impacts that occur under the LAWA Staff-Recommended Alternative are primarily attributable to the projected growth in airport activity. **Table SRA-2.5-2** provides additional summary information regarding the nature and extent of the unavoidable significant impacts associated with the LAWA Staff-Recommended Alternative, including as related to the projected growth in airport activity.

Table SRA-2.5-3 provides specific references to the applicable LAX Master Plan Commitments and mitigation measures, as well as new mitigation measures that are proposed to reduce or avoid environmental impacts associated with the LAWA Staff-Recommended Alternative, including mitigation measures that address cumulative impacts. The full text of such measures and commitments are

[126] The future passenger activity for LAX that is addressed within this SPAS Final EIR for buildout of the LAWA Staff-Recommended Alternative in 2025 is 78.9 MAP, which is consistent with the regional growth projections in the adopted 2012 SCAG Regional Transportation Plan and the fact that all of the SPAS alternatives, including the LAWA Staff-Recommended Alternative, include (i) no more than 153 gates and (ii) the amendment of LAX Specific Plan Section 7.H requiring action to encourage further shifts in passenger and airline activity to other regional airports if the annual aviation activity analysis forecasts that the annual passengers for that year at LAX are anticipated to exceed 75 MAP, and requiring a Specific Plan Amendment Study if the annual aviation activity analysis forecasts that LAX annual passengers for that year are anticipated to exceed 78.9 MAP. The passenger activity level for LAX under baseline (2009) conditions within this EIR is 56.5 MAP.

provided in the respective environmental topic sections in Chapter 4 of the SPAS Draft EIR and Section 2.3 of this chapter.[127]

Table SRA-2.5-1

Summary of Impacts By Topic - LAWA Staff-Recommended Alternative

Topic	SRA
Aesthetics	SM
Air Quality	SU
Biological Resources	SM
Coastal Resources	SM
Cultural Resources	
Historical Resources	SM
Archaeological Resources	SM
Greenhouse Gases	SU
Human Health Risk Assessment	SU
Safety	LS
Hazardous Materials	LS
Hydrology/Water Quality	SM
Land Use and Planning	
Plan Consistency	LS
Aircraft Noise Exposure	SU
Aircraft Noise	SU
Road Traffic Noise	LS
Construction Traffic and Equipment Noise	SU
Transit Noise and Vibration	LS
Fire Protection	LS
Law Enforcement	SM
On-Airport Transportation	SU
Off-Airport Transportation	SU
Energy	LS
Solid Waste	LS
Wastewater Generation	LS
Water Supply	LS

Notes:

LS = Less Than Significant Impact
SM = Significant Impact (but mitigable to Less Than Significant)
SU = Significant Unavoidable Impact

Source: CDM Smith, 2012.

[127] Please see Section 5.5.7.2.10 of the SPAS Draft EIR for the full text of SPAS Mitigation Measure MM-SAF (SPAS)-1, FAR Part 77 Review, which addresses the cumulatively considerable contribution of the LAWA Staff-Recommended Alternative to impacts to aviation safety from building/structural penetrations of FAR Part 77 imaginary surfaces.

Table SRA-2.5-2

Summary Comparison of Unavoidable Significant Impacts - LAWA Staff-Recommended Alternative

Topic	Basis of Comparison	Impacts Associated With the SRA Value
Air Quality		
Construction-Related Emissions	CO (Threshold = 550 lbs/day)	1,514
	VOC (Threshold = 75 lbs/day)	313
	NO_x (Threshold = 100 lbs/day)	3,683
	PM10 (Threshold = 150 lbs/day)	1,711
	PM2.5 (Threshold = 55 lbs/day)	263
Construction-Related Concentrations	NO_2 - 1-Hour CAAQS (Threshold = 339 µg/m^3)	1,192
	NO_2 - 1-Hour NAAQS (Threshold = 188 µg/m^3)	964
	PM10 - 24-Hour (Threshold = 10.4 µg/m^3)	41
	PM10 - Annual (Threshold = 1.0 µg/m^3)	4
Operations-Related Emissions[2]	SO_2 (Threshold = 150 lbs day)	**893 to 1,036**
	PM10 (Threshold = 150 lbs/day)	**2,510 to 2,519**
	PM2.5 (Threshold = 55 lbs/day)	**149 to 157**
Operations-Related Concentrations[2]	NO_2 - 1-Hour CAAQS (Threshold = 339 µg/m^3)	**553 to 863[3]**
	NO_2 - 1-Hour NAAQS (Threshold = 188 µg/m^3)	**279 to 313[3]**
	PM10 - 24-Hour (Threshold = 2.5 µg/m^3)	**2.3 to 2.4[3]**
	PM10 - Annual (Threshold = 1.0 µg/m^3)	**1.2[3]**
Greenhouse Gas Emissions	Reduction in per capita GHG emissions at project buildout compared to baseline conditions (Threshold = Minimum of 16% reduction)	14.73%
Human Health Risk	Acute Non-Cancer Hazard Index for Overall Off-Airport Receptors Relative to Acrolein From Aircraft Compared to Baseline (2009) Conditions (Threshold = 1.0)	3.0
Aircraft Noise Exposure	Population Newly Exposed to 65≥ CNEL in 2025 Compared to Baseline (2009) Conditions	**13,160**
	Homes Newly Exposed to 65≥ CNEL in 2025 Compared to Baseline (2009) Conditions	**4,370**
Construction Noise	Types of construction activities posing potential for temporary significant noise impacts to sensitive receptors nearby, including airfield improvements (AI), ground access improvements (GAI), and use of construction staging areas (CSA)	AI, GAI, CSA
On-Airport Transportation	Number of on-airport facilities (i.e., CTA curbsides, intersections, or roadway links) significantly impacted in 2025 with no feasible mitigation available	**1 (Intersection of World Way South and Center Way)**
Off-Airport Transportation	Number of off-airport facilities (i.e., intersections and CMP facilities) significantly impacted relative to Baseline (2010 and no airport growth) conditions with no feasible mitigation available	2 (Intersections)

Table SRA-2.5-2

Summary Comparison of Unavoidable Significant Impacts - LAWA Staff-Recommended Alternative

Topic	Basis of Comparison	Impacts Associated With the SRA Value
	Number of off-airport facilities (i.e., intersections and CMP facilities) significantly impacted relative to Future (2025 with airport growth) conditions with no feasible mitigation available	**46 (42 Intersections and 4 CMP Facilities)**

[1] Impacts identified in **Bold** type are primarily attributable to future growth in airport activity that will occur regardless of the LAWA Staff-Recommended Alternative. Also, relative to off-airport transportation, significant impacts are primarily the result of the combination of increased airport activity levels and increased regional background traffic projected to occur by 2025.

[2] The ranges of emissions and concentrations shown for each alternative are based on the analysis of aircraft-related emissions and concentrations that accounted for differences in airfield activities under different weather/visibility conditions. The low end of the range typically represents good visibility with less spacing required between aircraft, and the high end of the emission range typically represents poor weather conditions with greater spacing between aircraft and more ground delay time - see Tables SRA-2.3.2-4, SRA-2.3.2-6, and SRA-2.3.2-7 in Section 2.3.2, *Air Quality*.

[3] The project increment for the LAWA Staff-Recommended Alternative is just under the significance threshold. Given that the peak daily concentrations for all other alternatives are higher than the threshold, and that there is a very small margin between the peak daily concentration for the LAWA Staff-Recommended Alternative and the threshold, the lead agency is identifying the PM2.5 project concentration as significant.

Source: CDM Smith, 2012.

Table SRA-2.5-3

LAX Master Plan Commitments, LAX Master Plan Mitigation Measures, and SPAS-Specific Mitigation Measures as Related to the LAWA Staff-Recommended Alterative

	SRA
Aesthetics	
LAX Master Plan Commitments	
DA-1. Provide and Maintain Airport Buffer Areas	X
DA-2. Update and Integrate Design Plans and Guidelines	X
LU-2. Establishment of a Landscape Maintenance Program for Parcels Acquired Due to Airport Expansion	X
LU-4. Neighborhood Compatibility Program	X
LI-2. Use of Non-Glare Generating Building Materials	X
LI-3. Lighting Controls	X
LAX Master Plan Mitigation Measures	
MM-DA-1. Construction Fencing	X
SPAS Mitigation Measures	
MM-HA (SPAS)-2. Preservation of Historic Resources: Theme Building and Setting	X
Air Quality	
LAX Master Plan Commitments	
None	
LAX Master Plan Mitigation Measures[1]	
MM-AQ-1. LAX Master Plan Mitigation Plan for Air Quality, Framework	X
MM-AQ-2. LAX Master Plan Mitigation Plan for Air Quality, Construction-Related Mitigation Measures	X
MM-AQ-3. LAX Master Plan Mitigation Plan for Air Quality, Transportation-Related Mitigation Measures	X
MM-AQ-4. LAX Master Plan Mitigation Plan for Air Quality, Operations-Related Mitigation Measures	X
Community Benefits Agreement, Section X.A., Electrification of Passenger Gates[1]	X
Community Benefits Agreement, Section X.F., Construction Equipment[1]	X
Community Benefits Agreement, Section X.K., PM2.5[1]	X
Community Benefits Agreement, Section X.L., Rock-Crushing Operations and Construction Materials Stockpiles[1]	X
Community Benefits Agreement, Section X.M., Limits on Diesel Idling[1]	X
Community Benefits Agreement, Section X.N., Provision of Alternative Fuel[1]	X
SPAS Mitigation Measures	
MM-AQ (SPAS)-1. Additional Measures to Supplement the LAX Master Plan for Air Quality - Construction-Related	X

Table SRA-2.5-3

LAX Master Plan Commitments, LAX Master Plan Mitigation Measures, and SPAS-Specific Mitigation Measures as Related to the LAWA Staff-Recommended Alterative

	SRA
Mitigation Measures	
MM-AQ (SPAS)-2. Additional Measures to Supplement the LAX Master Plan for Air Quality - Transportation-Related Mitigation Measures	X
MM-AQ (SPAS)-3. Additional Measures to Supplement the LAX Master Plan for Air Quality - Operations-Related Mitigation Measures	X
Biological Resources	
LAX Master Plan Commitments	
None	
LAX Master Plan Mitigation Measures	
MM-BC-1. Conservation of State-Designated Sensitive Habitat Within and Adjacent to the El Segundo Blue Butterfly Habitat Restoration Area	X
MM-BC-3. Conservation of Floral Resources: Mature Tree Replacement	X
MM-ET-3. El Segundo Blue Butterfly Conservation: Dust Control	X
MM-ET-4. El Segundo Blue Butterfly Conservation: Habitat Restoration	X
SPAS Mitigation Measures	
MM-BIO (SPAS)-1. Replacement of State-Designated Sensitive Habitats	X
MM-BIO (SPAS)-2. Conservation of Floral Resources: South Coast Branching Phacelia	X
MM-BIO (SPAS)-3. Conservation of Floral Resources: Lewis' Evening Primrose	X
MM-BIO (SPAS)-4. Conservation of Floral Resources: California Spineflower	X
MM-BIO (SPAS)-5. Conservation of Floral Resources: Mesa Horkelia	X
MM-BIO (SPAS)-6. Conservation of Floral Resources: Orcutt's Pincushion	X
MM-BIO (SPAS)-7. Conservation of Floral Resources: Southern Tarplant	X
MM-BIO (SPAS)-8. Conservation of Faunal Resources: Sensitive Reptiles, Arthropods, and Gastropods	X
MM-BIO (SPAS)-9. Conservation of Faunal Resources: Loggerhead Shrike	X
MM-BIO (SPAS)-10. Conservation of Faunal Resources: Burrowing Owl	X
MM-BIO (SPAS)-11. Conservation of Floral Resources: Mature Tree Replacement - Nesting Raptors	X
MM-BIO (SPAS)-12. Conservation of Faunal Resources: Nesting Birds/Raptors	X
MM-BIO (SPAS)-13. Replacement of Jurisdictional Aquatic Features	X
MM-BIO (SPAS)-14. Replacement of Habitat Units	X
Coastal Resources	
LAX Master Plan Commitments	
None	
LAX Master Plan Mitigation Measures	
MM-BC-1. Conservation of State-Designated Sensitive Habitat Within and Adjacent to the El Segundo Blue Butterfly Habitat Restoration Area	X
MM-ET-3. El Segundo Blue Butterfly Conservation: Dust Control	X
MM-ET-4. El Segundo Blue Butterfly Conservation: Habitat Restoration	X
SPAS Mitigation Measures	
MM-BIO (SPAS)-1. Replacement of State-Designated Sensitive Habitats	X
MM-BIO (SPAS)-2. Conservation of Floral Resources: South Coast Branching Phacelia	X
MM-BIO (SPAS)-3. Conservation of Floral Resources: Lewis' Evening Primrose	X
MM-BIO (SPAS)-4. Conservation of Floral Resources: California Spineflower	X
MM-BIO (SPAS)-5. Conservation of Floral Resources: Mesa Horkelia	X
MM-BIO (SPAS)-6. Conservation of Floral Resources: Orcutt's Pincushion	X
MM-BIO (SPAS)-8. Conservation of Faunal Resources: Sensitive Reptiles and Arthropods	X
MM-BIO (SPAS)-9. Conservation of Faunal Resources: Loggerhead Shrike	X
MM-BIO (SPAS)-10. Conservation of Faunal Resources: Burrowing Owl	X
Cultural Resources	
LAX Master Plan Commitments	
HR-1. Preservation of Historic Resources	X
LAX Master Plan Mitigation Measures	
None	
SPAS Mitigation Measures	
MM-HA (SPAS)-2. Preservation of Historic Resources: Theme Building and Setting	X
MM-HA (SPAS)-4. Conformance with LAX Master Plan Archaeological Treatment Plan	X

Table SRA-2.5-3

LAX Master Plan Commitments, LAX Master Plan Mitigation Measures, and SPAS-Specific Mitigation Measures as Related to the LAWA Staff-Recommended Alterative

	SRA
Greenhouse Gases	
LAX Master Plan Commitments	
None	
LAX Master Plan Mitigation Measures	
MM-AQ-1. LAX Master Plan Mitigation Plan for Air Quality, Framework	X
MM-AQ-2. LAX Master Plan Mitigation Plan for Air Quality, Construction-Related Mitigation Measures	X
MM-AQ-3. LAX Master Plan Mitigation Plan for Air Quality, Transportation-Related Mitigation Measures	X
MM-AQ-4. LAX Master Plan Mitigation Plan for Air Quality, Operations-Related Mitigation Measures	X
Community Benefits Agreement, Section X.A., Electrification of Passenger Gates[1]	X
Community Benefits Agreement, Section X.N., Provision of Alternative Fuel[1]	X
SPAS Mitigation Measures	
MM-AQ (SPAS)-1. Additional Measures to Supplement the LAX Master Plan for Air Quality - Construction-Related Mitigation Measures	X
MM-AQ (SPAS)-2. Additional Measures to Supplement the LAX Master Plan for Air Quality - Transportation-Related Mitigation Measures	X
MM-AQ (SPAS)-3. Additional Measures to Supplement the LAX Master Plan for Air Quality - Operations-Related Mitigation Measures	X
Human Health Risk Assessment	
LAX Master Plan Commitments	
None	
LAX Master Plan Mitigation Measures	
MM-AQ-1. LAX Master Plan Mitigation Plan for Air Quality, Framework	X
MM-AQ-2. LAX Master Plan Mitigation Plan for Air Quality, Construction-Related Mitigation Measures	X
MM-AQ-3. LAX Master Plan Mitigation Plan for Air Quality, Transportation-Related Mitigation Measures	X
MM-AQ-4. LAX Master Plan Mitigation Plan for Air Quality, Operations-Related Mitigation Measures	X
Community Benefits Agreement, Section X.A., Electrification of Passenger Gates[1]	X
Community Benefits Agreement, Section X.F., Construction Equipment[1]	X
Community Benefits Agreement, Section X.K., PM2.5[1]	X
Community Benefits Agreement, Section X.L., Rock-Crushing Operations and Construction Materials Stockpiles[1]	X
Community Benefits Agreement, Section X.M., Limits on Diesel Idling[1]	X
Community Benefits Agreement, Section X.N., Provision of Alternative Fuel[1]	X
SPAS Mitigation Measures	
MM-AQ (SPAS)-1. Additional Measures to Supplement the LAX Master Plan for Air Quality - Construction-Related Mitigation Measures	X
MM-AQ (SPAS)-2. Additional Measures to Supplement the LAX Master Plan for Air Quality - Transportation-Related Mitigation Measures	X
MM-AQ (SPAS)-3. Additional Measures to Supplement the LAX Master Plan for Air Quality - Operations-Related Mitigation Measures	X
Safety	
LAX Master Plan Commitments	
None	
LAX Master Plan Mitigation Measures	
None	
SPAS Mitigation Measures	
MM-SAF (SPAS)-1. Runway Protection Zone Reviews[2]	X
Hazardous Materials	
LAX Master Plan Commitments	
HM-1. Ensure Continued Implementation of Existing Remediation Efforts	X
HM-2. Handling of Contaminated Materials Encountered During Construction	X
C-1. Establishment of a Ground Transportation/Construction Coordination Office	X
ST-9. Construction Deliveries	X
ST-12. Designated Truck Delivery Hours	X
ST-14. Construction Employee Shift Hours	X
ST-17. Maintenance of Haul Routes	X
ST-18. Construction Traffic Management Plan	X
ST-19. Closure Restrictions of Existing Roadways	X

Table SRA-2.5-3

LAX Master Plan Commitments, LAX Master Plan Mitigation Measures, and SPAS-Specific Mitigation Measures as Related to the LAWA Staff-Recommended Alterative

	SRA
ST-21. Construction Employee Parking Locations	X
ST-22. Designated Truck Routes	X
LAX Master Plan Mitigation Measures	
None	
SPAS Mitigation Measures	
None	
Hydrology/Water Quality	
LAX Master Plan Commitments	
None	
LAX Master Plan Mitigation Measures	
None	
SPAS Mitigation Measures	
MM-HWQ (SPAS)-1. Conceptual Drainage Plan Revision and Update	X
Land Use and Planning	
LAX Master Plan Commitments	
LU-2. Establishment of a Landscape Maintenance Program for Parcels Acquired Due to Airport Expansion	X
LU-4. Neighborhood Compatibility Program	X
LU-5. Comply with City of Los Angeles Transportation Element Bicycle Plan	X
RBR-1. Residential and Business Relocation Program	X
LAX Master Plan Mitigation Measures	
MM-LU-1. Implement Revised Aircraft Noise Mitigation Program	X
MM-LU-3. Conduct Study of the Relationship Between Aircraft Noise Levels and the Ability of Children to Learn	X
MM-LU-4. Provide Additional Sound Insulation for Schools Shown by MM-LU-3 to be Significantly Impacted by Aircraft Noise	X
MM-RBR-1. Phasing for Business Relocations	X
MM-RBR-2. Relocation Opportunities through Aircraft Noise Mitigation Program	X
SPAS Mitigation Measures	
None	
Aircraft Noise	
LAX Master Plan Commitments	
N-1. Maintenance of Applicable Elements of Existing Aircraft Noise Abatement Program	X
LAX Master Plan Mitigation Measures	
MM-LU-1. Implement Revised Aircraft Noise Mitigation Program	X
MM-LU-3. Conduct Study of the Relationship Between Aircraft Noise Levels and the Ability of Children to Learn	X
MM-LU-4. Provide Additional Sound Insulation for Schools Shown by MM-LU-3 to be Significantly Impacted by Aircraft Noise	X
MM-N-4. Update the Aircraft Noise Abatement Program Elements as Applicable to Adapt to the Future Airfield Configuration	X
MM-N-5. Conduct Part 161 Study to Make Over-Ocean Procedures Mandatory	X
SPAS Mitigation Measures	
None	
Road Traffic Noise	
LAX Master Plan Commitments	
None	
LAX Master Plan Mitigation Measures	
None	
SPAS Mitigation Measures	
None	
Construction Traffic and Equipment Noise	
LAX Master Plan Commitments	
ST-16. Designated Haul Routes	X
ST-18. Construction Traffic Management Plan	X
ST-22. Designated Truck Routes	X

Table SRA-2.5-3

LAX Master Plan Commitments, LAX Master Plan Mitigation Measures, and SPAS-Specific Mitigation Measures as Related to the LAWA Staff-Recommended Alterative

	SRA
LAX Master Plan Mitigation Measures	
MM-N-7. Construction Noise Control Plan	X
MM-N-8. Construction Staging	X
MM-N-9. Equipment Replacement	X
MM-N-10. Construction Scheduling	X
SPAS Mitigation Measures	
None	
Transit Noise	
LAX Master Plan Commitments	
None	
LAX Master Plan Mitigation Measures	
None	
SPAS Mitigation Measures	
MM-N (SPAS)-1. Elevated/Dedicated Busway Noise Assessment and Control Plan	X
Fire Protection	
LAX Master Plan Commitments	
FP-1. LAFD Design Recommendations	X
PS-1. Fire and Police Facility Relocation Plan	X
PS-2. Fire and Police Facility Space and Siting Requirements	X
C-1. Establishment of a Ground Transportation/Construction Coordination Office	X
ST-9. Construction Deliveries	X
ST-12. Designated Truck Delivery Hours	X
ST-14. Construction Employee Shift Hours	X
ST-17. Maintenance of Haul Routes	X
ST-18. Construction Traffic Management Plan	X
ST-19. Closure Restrictions of Existing Roadways	X
ST-21. Construction Employee Parking Locations	X
ST-22. Designated Truck Routes	X
LAX Master Plan Mitigation Measures	
None	
SPAS Mitigation Measures	
None	
Law Enforcement	
LAX Master Plan Commitments	
LE-1. Routine Evaluation of Manpower and Equipment Needs	X
LE-2. Plan Review	X
PS-1. Fire and Police Facility Relocation Plan	X
PS-2. Fire and Police Facility Space and Siting Requirements	X
C-1. Establishment of a Ground Transportation/Construction Coordination Office	X
ST-9. Construction Deliveries	X
ST-12. Designated Truck Delivery Hours	X
ST-14. Construction Employee Shift Hours	X
ST-17. Maintenance of Haul Routes	X
ST-18. Construction Traffic Management Plan	X
ST-19. Closure Restrictions of Existing Roadways	X
ST-21. Construction Employee Parking Locations	X
ST-22. Designated Truck Routes	X
LAX Master Plan Mitigation Measures	
None	
SPAS Mitigation Measures	
MM-LE (SPAS)-1. LAWAPD Replacement Facilities	X
On-Airport Transportation	
LAX Master Plan Commitments	
ST-2. Non-Peak CTA Deliveries	X
ST-8. Limited Short-Term Lane Closures	X
ST-9. Construction Deliveries	X

Table SRA-2.5-3

LAX Master Plan Commitments, LAX Master Plan Mitigation Measures, and SPAS-Specific Mitigation Measures as Related to the LAWA Staff-Recommended Alterative

	SRA
ST-18. Construction Traffic Management Plan	X
ST-19. Closure Restrictions of Existing Roadways	X
LAX Master Plan Mitigation Measures	
MM-ST-1. Require CTA Construction Vehicles to Use Designated Lanes	X
MM-ST-2. Modify CTA Signage	X
MM-ST-3. Develop Designated Shuttle Stops for Labor Buses and ITC-CTA Buses	X
Bradley West Project Mitigation Measures	
MM-ST (BWP)-2. Improve the Intersection of Center Way and World Way South	X
MM-ST (BWP)-3. Widen World Way Across from TBIT	X
SPAS Mitigation Measures	
MM-ST(OA) (SPAS)-1. Relocate Existing Taxi Loading Zone at TBIT	X
MM-ST(OA) (SPAS)-2. Change Departures and Arrivals Level Commercial Vehicle Curbside Operations	X
Off-Airport Transportation	
LAX Master Plan Commitments	
ST-9. Construction Deliveries	X
ST-12. Designated Truck Delivery Hours	X
ST-14. Construction Employee Shift Hours	X
ST-17. Maintenance of Haul Routes	X
ST-18. Construction Traffic Management Plan	X
ST-19. Closure Restrictions of Existing Roadways	X
ST-20. Stockpile Locations	X
ST-21. Construction Employee Parking Locations	X
ST-22. Designated Truck Routes	X
ST-24. Fair Share Contribution to CMP Improvements	X
LAX Master Plan Mitigation Measures	
MM-ST-14. Ground Transportation/Construction Coordination Office Outreach Program	X
SPAS Mitigation Measures	
MM-ST (SPAS)-1. Transportation Demand Management Program	X
MM-ST (SPAS)-2. Modify the Intersection of Airport Boulevard and Arbor Vitae Street/Westchester Parkway (Intersection 6)	X
MM-ST (SPAS)-3. Modify the Intersection of Airport Boulevard and Century Boulevard (Intersection 7)	X
MM-ST (SPAS)-4. Modify the Intersection of Arbor Vitae Street and Inglewood Avenue (Intersection 11)	X
MM-ST (SPAS)-5. La Brea Avenue and Arbor Vitae Street (Intersection 12)	X
MM-ST (SPAS)-8. Modify the Intersection of Aviation Boulevard/Florence Avenue and Manchester Avenue (Intersection 17)	X
MM-ST (SPAS)-9. Modify the Intersection of La Brea Avenue and Centinela Avenue (Intersection 25)	X
MM-ST (SPAS)-10. Modify the Intersection of La Cienega Boulevard and Centinela Avenue (Intersection 26)	X
MM-ST (SPAS)-12. La Brea Avenue/Hawthorne Boulevard and Century Boulevard (Intersection 34)	X
MM-ST (SPAS)-13. Inglewood Avenue and Century Boulevard (Intersection 35)	X
MM-ST (SPAS)-14. Prairie Avenue and Century Boulevard (Intersection 37)	X
MM-ST (SPAS)-15. Modify the Intersection of Sepulveda Boulevard and Century Boulevard (Intersection 38)	X
MM-ST (SPAS)-17. Modify the Intersection of La Brea Avenue and Florence Avenue (Intersection 57)	X
MM-ST (SPAS)-18. Modify the Intersection of La Cienega Boulevard and Florence Avenue (Intersection 58)	X
MM-ST (SPAS)-19. Modify the Intersection of Sepulveda Boulevard and Grand Avenue (Intersection 60)	X
MM-ST (SPAS)-20. Modify the Intersection of Hawthorne Boulevard and Imperial Avenue (Intersection 62)	X
MM-ST (SPAS)-21. Modify the Intersection of Inglewood Avenue and Imperial Highway (Intersection 66)	X
MM-ST (SPAS)-23. Modify the Intersection of Sepulveda Boulevard and Imperial Highway (Intersection 71)	X
MM-ST (SPAS)-25. Modify the Intersection of La Brea Avenue and Manchester Boulevard (Intersection 85)	X
MM-ST (SPAS)-26. Modify the Intersection of La Brea Avenue and Slauson Avenue (Intersection 87)	
MM-ST (SPAS)-27. Modify the Intersection of La Cienega Boulevard and Manchester Boulevard (Intersection 90)	X
MM-ST (SPAS)-28. Modify the intersection of La Cienega Boulevard and Southbound I-405 Ramps (north of Century Boulevard) (Intersection 96)	X
MM-ST (SPAS)-31. Modify the Intersection of Ash Avenue and Manchester Avenue (Intersection 115)	X
MM-ST (SPAS)-32. Vicksburg Avenue and 96th Street (Intersection 143)	X
MM-ST (SPAS)-34. Modify the Intersection of Hindry Avenue and Manchester Boulevard (Intersection 159)	X
MM-ST (SPAS)-35. Modify the Intersection of Prairie Avenue and Manchester Boulevard (Intersection 169)	X
MM-ST (SPAS)-36. Modify the Intersection of Prairie Avenue and Lennox Boulevard (Intersection 197)	X
MM-ST (SPAS)-37. Modify the intersection of Arbor Vitae Street and Aviation Boulevard (Intersection 10)	X
MM-ST (SPAS)-38. Modify the Intersection of La Tijera Boulevard and Centinela Avenue (Intersection 27)	X

Table SRA-2.5-3

LAX Master Plan Commitments, LAX Master Plan Mitigation Measures, and SPAS-Specific Mitigation Measures as Related to the LAWA Staff-Recommended Alterative

	SRA
MM-ST (SPAS)-40. Fair Share Contribution to a Traffic Signal at the Intersection of Overland Avenue and Sawtelle Boulevard (Intersection 154)	X
MM-ST (SPAS)-41. Fair Share Contribution to a Traffic Signal at the Intersection of Walgrove Avenue and Washington Boulevard (Intersection 156)	X
MM-ST (SPAS)-42. Contribute to ITS Improvements at 11 Study Intersections within the Jurisdiction of Los Angeles County (Intersections 27, 36, 52, 63, 76, 86, 87, 93, 95, 119, and 173)	X
Energy	
LAX Master Plan Commitments	
E-1. Energy Conservation and Efficiency Program	X
LAX Master Plan Mitigation Measures	
None	
SPAS Mitigation Measures	
None	
Solid Waste	
LAX Master Plan Commitments	
SW-1. Implement an Enhanced Recycling Program	X
LAX Master Plan Mitigation Measures	
MM SW-1. Provide Landfill Capacity[3]	X
SPAS Mitigation Measures	
None	
Wastewater Generation	
LAX Master Plan Commitments	
W-2. Enhance Existing Water Conservation Program	X
LAX Master Plan Mitigation Measures	
None	
SPAS Mitigation Measures	
None	
Water Supply	
LAX Master Plan Commitments	
W-1. Maximize Use of Reclaimed Water	X
W-2. Enhance Existing Water Conservation Program	X
LAX Master Plan Mitigation Measures	
None	
SPAS Mitigation Measures	
None	

[1] LAWA and the LAX Coalition for Economic, Environmental and Educational Justice (LAX Coalition) have developed and entered into an agreement, the Community Benefits Agreement (CBA), to ensure that communities adversely affected by the LAX Master Plan Program also receive benefits as a result of implementation of the Program. The benefits and mitigations included in the CBA were negotiated independently from, and are not a part of, the LAX Master Plan Mitigation Monitoring and Reporting Program. The CBA contains a number of air quality mitigation measures, of which Sections X.A., X.F., X.K., X.L., X.M., and X.N. are applicable to SPAS.

[2] This measure would reduce the cumulatively considerable contribution to impacts to aviation safety from building/structural penetrations of FAR Part 77 imaginary surfaces.

[3] This measure would address cumulatively significant impacts associated with solid waste generation and disposal.

Source: CDM Smith, 2012.

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3. PROPOSED AMENDMENTS TO RELATED PLANNING DOCUMENTS

Section 6.1 of the SPAS Draft EIR included a preliminary identification of the potential LAX Specific Plan amendments associated with the SPAS alternatives. Section 6.2 of the SPAS Draft EIR provided an evaluation of potential environmental impacts associated with those amendments. Section 6.2 also included a discussion of potential impacts associated with the combination of the potential amendments to LAX Specific Plan Section 7.H and the physical improvements proposed under the SPAS alternatives. That analysis considers, in particular, whether the impacts associated with the SPAS alternatives, as addressed in detail in Chapters 4 and 5 of the SPAS Draft EIR, would be materially different in light of the potential shift in aircraft and passenger activity from LAX to other airports in the region. Provided below in Section 3.1 is a reiteration of those proposed amendments to the LAX Specific Plan, including minor updates and clarifications identified during preparation of the SPAS Final EIR. Those minor modifications do not affect the environmental evaluation presented in Section 6.2 of the SPAS Draft EIR.

Section 3.2, below, provides amendments to the LAX Plan, a component of the City of Los Angeles General Plan, that would be proposed to achieve consistency with the LAX Specific Plan, as amended. Included within the description of the LAX Plan amendments is an environmental evaluation explaining that the amendments are largely administrative in nature and either would not result in any environmental impacts or would not result in environmental impacts beyond those already described in the SPAS Draft EIR.

3.1 Proposed LAX Specific Plan Amendments

3.1.1 Revision of LAX Specific Plan Section 7.H.

Proposed Amendments

In conjunction with potential LAX Specific Plan amendments arising from the physical and operational configurations of SPAS Alternatives 1 through 9, described in Section 3.1.2 below, the following amendments, applicable to all SPAS alternatives, would revise existing LAX Specific Plan Section 7.H to (a) delete Specific Plan Amendment Study requirements satisfied by this LAX Specific Plan Amendment Study and (b) add a Passenger and Airline Market survey and study requirement when the annual aviation activity analysis required in LAX Specific Plan Subsection 7.G(1) forecasts that passengers at LAX for that year are anticipated to exceed 75 million.

LAX Specific Plan Section 7.H (as previously amended by Ordinance No. 179,148) currently requires LAWA to initiate an LAX Specific Plan Amendment Study in three circumstances. It states:

> "H. Specific Plan Amendment Study. LAWA shall initiate a complete LAX Specific Plan Amendment Study comprehensively addressing security, traffic, aviation activity and corresponding environmental analysis consistent with CEQA, in the following three circumstances:
>
> 1. Prior to seeking an LAX Plan Compliance determination for any one of the following projects:
>
> (a) Development of the Ground Transportation Center, including baggage tunnel, associated structures and equipment;
>
> (b) APM 2 from GTC to CTA, including its stations and related facilities and equipment;
>
> (c) Demolition of CTA Terminals 1, 2 and 3;
>
> (d) North Runway re-configuration as contemplated in the Master Plan, including center taxiways; and
>
> (e) On-site road improvements associated only with (a) and (b) above.

2. If the annual traffic generation report required in Subsection G.1 above, and/or the annual traffic generation report considered together with any project-specific traffic study, shows that any Master Plan Projects will be generating net new airport peak hour Trips in excess of 8,236 (unless the total Trips for that year are related to construction or phasing impacts).

3. If the annual aviation activity analysis required in Subsection G.1 above forecasts that the annual passengers for that year are anticipated to exceed 78.9 million."

LAWA's current Specific Plan Amendment Study satisfies Subsection 7.H(1). Subsection 7.H(1) and related text would, therefore, be deleted. The remaining triggers to conduct a specific plan amendment study (currently contained in Subsections 7.H(2) and 7.H(3)) would be renumbered and the introductory text correspondingly revised and folded into a newly formatted Subsection 7.H(1) titled "Specific Plan Amendment Study." A new subsection -- 7.H(2) -- would be inserted requiring LAWA to initiate a Domestic Passenger and Airline Market Survey and Study triggered upon LAX reaching 75 million annual passengers (MAP).[128]

The revised Section 7.H would state:

"H. Additional Study Requirements.

1. Specific Plan Amendment Study. LAWA shall initiate a Specific Plan Amendment Study with corresponding environmental analysis in compliance with CEQA, in the following two circumstances:

   (a) If the annual traffic generation report required in Section G.1 above, and/or the annual traffic generation report considered together with any project-specific traffic study, shows that any Master Plan Projects will be generating net new airport peak hour Trips in excess of 8,236 (unless the total Trips for that year are related to construction or phasing impacts).

   (b) If the annual aviation activity analysis required in Section G.1 above forecasts that the annual passengers for that year are anticipated to exceed 78.9 million.

2. LAX Domestic Passenger and Airline Market Survey/Study. LAWA shall initiate an LAX Domestic Passenger Survey/Study and corresponding Airline Survey/Study, if the annual aviation activity analysis required in Section G.1 above forecasts that the annual passengers for that year are anticipated to exceed 75 million.

   (a) LAX Domestic Passenger Survey and Study. LAWA shall conduct a survey and study of LAX domestic passengers (those passengers not flying internationally or connecting to international flights) designed to identify, at a minimum, (i) those LAX domestic passengers with origination or destination locations closer to other commercial airports in the region, (ii) why those domestic passengers chose to fly out of, or into, LAX rather than another commercial airport closer to their location of origin or destination, and (iii) what actions, consistent with federal, state and local laws, LAWA could take to encourage those domestic passengers to use an airport closer to their location of origin or destination for domestic flights.

   (b) Airline Survey and Study. Upon completion of the LAX Domestic Passenger Survey and Study described in 2(a) above, LAWA shall conduct a survey and study of Airlines then serving the Southern California commercial air travel market designed to identify what action(s), consistent with federal, state and local laws, LAWA could take to encourage

[128] This 75 million annual passenger trigger reflects the Passenger Gate Reduction trigger set forth in Stipulated Settlement Section IV. C. It states, "LAWA need not reduce the number of passenger gates at LAX down to 153 by 2015 if either (1) the total passenger operations at LAX are below 75 million annual passengers or (2) the LAX Master Plan Program is substantially revised pursuant to the LAX Specific Plan Amendment Process such that the total number of gates is reduced to 153 or less." As discussed herein, all SPAS alternatives currently contemplate a total of no more than 153 gates.

those airlines to provide increased Domestic service at other airports in the region, particularly those owned or operated by LAWA."

3.1.2 Other LAX Specific Plan Amendments

Development of any of the potential SPAS alternatives would require various administrative amendments to the LAX Specific Plan. These amendments would be necessary to ensure precise consistency from a land use and zoning perspective. Following is a summary of the potential amendments organized by sections within the LAX Specific Plan. The exact language of the amendments would be determined during the land use entitlement process for SPAS, and reviewed and approved by various decision-making bodies, including the Los Angeles City Council.

Section 1. Establishment of the LAX Specific Plan

No amendments are anticipated to be required to this section.

Section 2. Purposes

No amendments are anticipated to be required to this section.

Section 3. Relationship to the Los Angeles Municipal Code and Other Ordinances

This section would be revised, as necessary, to ensure that the Los Angeles Municipal Code references are consistent with the current Municipal Code. Any outdated references would be corrected accordingly. Also, any new Municipal Code requirements that have become effective since the LAX Specific Plan was adopted in December of 2004, but which are not applicable to airport use or development, would be included and acknowledged as such. These amendments would occur under all nine SPAS alternatives.

Section 4. Application of Specific Plan to Development in Specific Plan Area

No amendments are anticipated to be required to this section.

Section 5. Definitions

This section would be revised to remove definitions for those facilities and improvements that are no longer planned as part of the various SPAS alternatives and add definitions for new facilities and improvements proposed under the various SPAS alternatives. The nature and extent of improvements associated with each alternative would determine the precise amendments that are required. The definitions of the Ground Transportation Center (GTC) and Intermodal Transportation Center (ITC), as well as all references to these facilities in other definitions, would be deleted under all SPAS alternatives except Alternative 3. The Automated People Mover (APM) System would be redefined under all alternatives except Alternative 3. The APM would be redefined under Alternative 9 to accurately describe the route to and from the affected facilities. The APM would be redefined under Alternatives 1, 2, 4, 5, 6, 7, and 8 to include only that segment of the APM planned between the Central Terminal Area (CTA), the Tom Bradley International Terminal, and West Satellite Concourse,[129] as other segments would no longer be implemented under these alternatives. The CTA would be redefined under all SPAS alternatives except Alternative 3, as it would no longer be a true transition point to and from landside facilities as envisioned under the approved LAX Master Plan. The Consolidated Rental Car Facility (CONRAC) would also be redefined under all SPAS alternatives except Alternative 3, as it may no longer include security screening. A new definition would be added for the Intermodal Transportation Facility (ITF) under Alternatives 1, 2, 8, and 9. A definition for the dedicated busway may be added, if determined necessary, under Alternatives 1, 2, and 8. Lastly, the West Satellite Concourse would be re-named the Midfield Satellite Concourse.

Section 6. Safety of Airport Operations

No amendments are anticipated to be required to this section.

[129] The West Satellite Concourse was subsequently renamed the Midfield Satellite Concourse.

Section 7. LAX Plan Compliance Review

This section would be revised, as necessary, to ensure that the Los Angeles Municipal Code references are consistent with the current Municipal Code. Subsections 7.F(2)(d), 7.F(4), and 7.F(5) would be revised to incorporate references to any applicable mitigation measures identified in any subsequent environmental review. Subsection 7.F(5) would be revised to delete the reference to Subsection 7.H(1), as this section would be revised as noted above. Subsection 7.G(3) would be deleted, as this requirement will have been completed as part of the LAX Specific Plan Amendment Study. Subsection 7.H(1), which outlines the requirement for initiation of a Specific Plan Amendment Study prior to seeking approval for any Yellow Light project, would be revised as discussed above. Section 7.I would be deleted due to the fact that LAWA already has in place a Design and Construction Handbook, dated May 2012, which establishes broad design and construction guidelines for all infrastructure, terminal buildings, renovations, and other facilities. These amendments would occur under all nine SPAS alternatives.

Subsection 7.F(3)(b) would also be revised to delete the references to the GTC and ITC under all SPAS alternatives except Alternative 3.

Section 8. Land Use

No amendments are anticipated to be required to this section.

Section 9. Airport Airside Sub-Area

This section would be revised, as necessary, to incorporate any uses currently relevant to the airport or anticipated under the SPAS alternatives, but which are not already included in the list of permitted uses. These amendments would occur under all SPAS alternatives except for Alternative 3.

Section 10. Airport Landside Sub-Area

This section would be revised, as necessary, to incorporate any uses currently relevant to the airport or anticipated under the SPAS alternatives, but which are not already included in the list of permitted uses. These amendments would occur under all SPAS alternatives except for Alternative 3.

Section 11. LAX Northside Sub-Area

No amendments are anticipated to be required to this section.

Section 12. Transportation Regulations

Subsection 12.A(1) would be revised, as necessary, to ensure that the list of major and secondary highways in the LAX Specific Plan area are consistent with the current street designations in the City of Los Angeles General Plan. Any streets no longer designated as major or secondary highways would be deleted from the list and any streets within the LAX Specific Plan area that have been designated as major or secondary highways since the LAX Specific Plan was originally adopted would be added to the list. These amendments would occur under all nine SPAS alternatives.

The first paragraph of Section 12.D would also be deleted under Alternatives 1, 2, 4, 5, 6, 7, and 8, as it pertains to the interface between the APM and public roadways, and this condition no longer exists under these alternatives. Alternatively, under Alternatives 1, 2, and 8, language regarding the APM may be substituted with that appropriate to the dedicated busway in order to address the interface of the dedicated busway with public roadways.

Section 13. Parking Regulations

Subsection 13.A(1) would be revised to state the maximum number of off-street parking spaces that would be provided under the various SPAS alternatives. The exact number stated would depend on the alternative, however, it is anticipated that this amendment would be required under all alternatives except Alternative 3.

Section 14. Sign Regulations

This section would be revised, as necessary, to ensure that the Los Angeles Municipal Code references are consistent with the current Municipal Code.

Section 15. Severability

No amendments are anticipated to be required to this section.

Appendix A

No amendments are anticipated to be required to this appendix.

Map 1

This map would be revised to reflect the current boundary of the airport, as well as any changes to the boundary that may occur as a result of a SPAS alternative, including any property proposed for acquisition under that alternative. It is the intent that the LAX Specific Plan boundary include all property owned by Los Angeles World Airports with the exception of the Los Angeles Airport/El Segundo Dunes Specific Plan Area and the Belford Special Study Area. No amendment to this map would be required under Alternative 3. Amendments to this map under Alternatives 1, 2, 8, and 9 would include, but are not limited to, the removal of a portion of the property currently within the LAX Specific Plan area between 96th and 98th Streets and between Sepulveda Boulevard and east of Vicksburg Avenue; the southeast corner of Sepulveda Boulevard and 98th Street; the northwest and southwest corners of Manchester Square; between Century Boulevard and approximately 104th Street east of Aviation Boulevard; and north of Imperial Highway between Aviation Boulevard and Hindry Avenue. Under Alternative 4, property at the southeast corner of Sepulveda Boulevard and 98th Street; within Manchester Square; between Century Boulevard and approximately 104th Street east of Aviation Boulevard; and north of Imperial Highway between Aviation Boulevard and Hindry Avenue would be removed. This map would also be amended under Alternatives 1, 5, and 6 to reflect the realignment of Lincoln Boulevard (including the connector streets between Lincoln Boulevard and Westchester Parkway).

Map 2

This map would be revised to be consistent with the LAX Specific Plan boundary shown on Map 1, as may be amended as described above. This map would also be amended under Alternatives 1, 5, and 6 to reflect the realignment of Lincoln Boulevard (including the connector streets between Lincoln Boulevard and Westchester Parkway).

Map 3

No amendments are anticipated to be required to this map.

3.2 Proposed LAX Plan Amendments

Should the potential LAX Specific Plan amendments identified above in Section 3.1 be adopted by the City of Los Angeles, various administrative amendments would also be required to the LAX Plan, the City's General Plan element for LAX. These amendments would be necessary to ensure precise consistency from a land use and policy perspective. Following is a summary of the potential amendments organized by sections within the LAX Plan. The exact language of the amendments would be determined during the land use entitlement process for SPAS, and reviewed and approved by various decision-making bodies, including the Los Angeles City Council. No amendments are anticipated to be required under Alternative 3, as this alternative represents the improvements originally envisioned under the LAX Master Plan and that Master Plan formed the basis of the existing LAX Plan. Also provided below, following the description of potential amendments to each section of the LAX Plan, is an explanation of how the subject amendments are administrative in nature and either would not result in any environmental impacts or would result in impacts that are addressed in the SPAS Draft EIR.

Section 1. Purpose of the Plan

Subsection 1.2 of the LAX Plan would be revised to reflect more current passenger and air cargo statistics for LAX, as well as passenger demand projections for both LAX and the region. This subsection may also be revised to acknowledge that the SPAS process was undertaken by the City to identify potential alternative designs, technologies, and configurations for the Master Plan program, with the focus continuing to be on the modernization and improvement of LAX in a manner that limits capacity, enhances safety and security, minimizes environmental impacts on the surrounding communities, and creates conditions that encourage airlines to go to other airports in the region, particularly those owned and operated by LAWA. These amendments would occur under all SPAS alternatives except Alternative 3.

Environmental Evaluation

The updating of airport activity statistics from 2004 to reflect current data and projections is for general informational purposes only and does not result in any environmental impacts. The SPAS Draft EIR included an updated baseline for the purposes of evaluating impacts associated with the SPAS alternatives. The added description of the SPAS process simply reflects LAWA's current effort to identify amendments to the LAX Specific Plan as required by the LAX Master Plan Stipulated Settlement. No environmental impacts would occur from the potential amendments to Section 1 of the LAX Plan.

Section 2. Goals and Objectives

The objectives under Goal 1 of the LAX Plan would be revised, as necessary, under Alternative 2 to reflect that there would be limited upgrades to the facilities to accommodate current and next-generation larger aircraft. These objectives would also be revised under Alternative 4 to reflect that there would not be any upgrade to the facilities to accommodate current and next-generation larger aircraft, and to acknowledge the lesser extent to which "superior facilities" and "world class service" could be provided under this alternative. Goal 2 would be revised under Alternative 2 to account for the fact that this alternative would result in higher, but not the "highest," standards of air traffic safety as compared to current conditions. Goal 2 and the objectives thereunder would also be revised under Alternative 4 to account for the fact that this alternative would not result in the "highest" standards of air traffic safety or reduce the possibility of runway incursions. Under all SPAS alternatives except Alternative 3, Objective 3 of Goal 4 would be revised to delete references to the LAX Master Plan, thus broadening the intent of the objective to encompass all applicable environmental analyses.

Environmental Evaluation

The potential amendments to the LAX Plan Goals and Objectives would reflect the specific characteristics of the approved SPAS alternative, if any, that were taken into account in the SPAS Draft EIR analysis of all the SPAS alternatives. No environmental impacts different from those already presented and analyzed in the SPAS Draft EIR, as amended by corrections and additions identified in Chapter 5 of Part II of this Final EIR, would occur as a result of the potential amendments to Section 2 of the LAX Plan.

Section 3. Policies and Programs

Subsection 3.1.1 of the LAX Plan would be revised under Alternative 2 to reflect that the runways would not be reconfigured to accommodate new larger aircraft; rather, runway extension and taxiway modifications would serve this purpose. This subsection would also be revised, as necessary, to reflect the extent to which taxiway reconfiguration, taxiway separation, and queue space would be provided under this alternative. Under Alternative 4, this subsection would be revised to reflect that the runways would not be reconfigured to accommodate new larger aircraft, nor would the taxiways be improved, other than federally-mandated Runway Safety Area (RSA) improvements. Under all SPAS alternatives except Alternative 3, Policy P8 would be revised to more appropriately encompass all FAA-designated runway safety areas, not just runway protection zones.

Subsection 3.1.2 would be revised to reflect that the concept of restricted access for non-secure private, public, and commercial vehicles into the CTA would be eliminated under all SPAS alternatives except

Alternative 3. The reference to the ITC would be deleted under all SPAS alternatives except Alternative 3, as this facility would no longer be planned. A reference to the new ITF may be added, if determined necessary, under Alternatives 1, 2, 8, and 9.

Subsection 3.2.1 would be revised under Alternative 4 to reflect that a balanced airfield is not achieved under this alternative, nor is employee parking expanded and improved.

Subsection 3.2.2 would be revised under all SPAS alternatives except Alternative 3 to reflect that restricted access to and from the CTA would not be implemented nor would secure linkages between major Landside facilities and Airport Airside facilities be developed. References to the GTC and ITC would be deleted under all SPAS alternatives except Alternative 3. References to the CONRAC would be deleted under Alternatives 1 and 2, as this facility would no longer be planned under these alternatives. References to, and general descriptions of, the proposed ITF and surface parking at Manchester Square and/or the Avis facility (east of Parking Lot C) may be added, if determined necessary, under Alternatives 1, 2, 8, and 9. The function of the APM would be redefined under Alternatives 1, 2, 4, 5, 6, 7, and 8 to acknowledge only that segment planned between the CTA, the Tom Bradley International Terminal, and the Midfield Satellite Concourse, as the other segments would no longer be implemented under these alternatives. The APM description would be revised under Alternative 9 to accurately reflect the route proposed under this alternative, as well as the facilities it is intended to serve. A description of the dedicated busway may also be added, if determined necessary, under Alternatives 1, 2, and 8. In addition, the reference to the Los Angeles County Metropolitan Transportation Authority (Metro) Green Line Station would be expanded under Alternatives 1, 2, 5, 6, 7, 8, and 9 to include any other future Metro rail facilities, thereby acknowledging that there is a planned Metro station at Century and Aviation Boulevards, to which there would be an integrated connection to LAX. Under Alternative 4, this section would be revised to reflect that there would not be an integrated connection between the Landside facilities and the Metro Green Line Station.

Subsection 3.4 would be revised under all SPAS alternatives except Alternative 3 to reflect that the development of secure linkages between major Airport Landside facilities and Airport Airside facilities would no longer be implemented under these alternatives. This subsection would be revised under Alternatives 1 and 2 to reflect that the consolidation of rental car facilities would no longer be planned under these alternatives. The reference to the Metro Green Line Station would be expanded under Alternatives 1, 2, 5, 6, 7, 8, and 9 to include any other future Metro facilities. This subsection would also be revised under Alternative 4 to reflect that an integrated connection between the airport and Metro Green Line station would no longer be developed and the provision of facilities for the regional bus system would not be implemented.

Subsection 3.5 would be revised under all SPAS alternatives except Alternative 3 to reflect more current job generation and economic output statistics for LAX.

Under Alternative 4, Subsection 3.6 would be revised to reflect that the runways would not be updated to accommodate new larger aircraft and the next generation of quieter jets. Subsection 3.7 would also be revised to reflect that the runways and taxiways would not be modified under Alternative 4 to the extent necessary to lessen air emissions through reduced aircraft idle time.

In Subsection 3.9, references to the development of an LAX Conceptual Plan and/or Design Guidelines would be deleted under all SPAS alternatives except Alternative 3 to reflect the fact that LAWA now has in place a Design and Construction Handbook, dated May 2012, which establishes broad design and construction guidelines for all infrastructure, terminal buildings, renovations, and other facilities.

Environmental Evaluation

The potential amendments to the LAX Policies and Programs would reflect the specific characteristics of the approved SPAS alternative, if any, that were taken into account in the SPAS Draft EIR analysis of all the SPAS alternatives. No environmental impacts different from those already presented and analyzed in the SPAS Draft EIR, as amended by corrections and additions identified in Chapter 5 of Part II of this Final EIR, would occur as a result of the potential amendments to Section 3 of the LAX Plan.

Section 4. Implementation

This section of the LAX Plan would be revised to acknowledge that the LAX Specific Plan has been adopted.

Environmental Evaluation

This potential amendment to the Implementation section of the LAX Plan is an administrative amendment and has no environmental impacts.

Section 5. LAX Specific Plan

This section of the LAX Plan would be updated to reference the prior amendment to the LAX Specific Plan under Ordinance No. 179,148 and any amendment adopted following the SPAS.

Environmental Evaluation

Similar to above, this potential amendment to Section 5 of the LAX Plan is an administrative amendment and has no environmental impacts. Potential environmental impacts associated with the LAX Specific Plan amendments themselves are described in Section 6.2 of the SPAS Draft EIR.

Section 6. Los Angeles Airport/El Segundo Dunes Specific Plan

No amendments are anticipated to be required to this section of the LAX Plan; hence, no environmental impacts are anticipated to occur.

Section 7. Coastal Transportation Corridor Specific Plan

No amendments are anticipated to be required to this section of the LAX Plan; hence, no environmental impacts are anticipated to occur.

Figure 1. Plan Areas

This figure in the LAX Plan would be revised to reflect the current boundary of the airport, as well as any modifications to the boundary associated with the smaller acquisition areas of all SPAS alternatives except Alternative 3, as compared to the approved LAX Master Plan. In particular, under Alternatives 1, 2, 8, and 9, portions of property between 96th and 98th Streets and between Sepulveda Boulevard and east of Vicksburg Avenue; the southeast corner of Sepulveda Boulevard and 98th Street; the northwest and southwest corners of Manchester Square; between Century Boulevard and approximately 104th Street east of Aviation Boulevard; and north of Imperial Highway between Aviation Boulevard and Hindry Avenue would be removed from the plan area. Under Alternative 4, property at the southeast corner of Sepulveda Boulevard and 98th Street; within Manchester Square; between Century Boulevard and approximately 104th Street east of Aviation Boulevard; and north of Imperial Highway between Aviation Boulevard and Hindry Avenue would be removed from the plan area. This figure would also be amended under Alternatives 1, 2, 4, 5, 6, and 7 to reflect the relocation and/or extension of the runways. This figure would be amended under Alternatives 1, 5, and 6 to reflect the realignment of Lincoln Boulevard (including the connector streets between Lincoln Boulevard and Westchester Parkway).

Environmental Evaluation

The aforementioned revisions to Figure 1 of the LAX Plan would be an administrative amendment to conform the map in Figure 1 to the specific characteristics of the approved SPAS alternative, if any, which were taken into account in the SPAS Draft EIR analysis of all the SPAS alternatives. No environmental impacts different from those already presented and analyzed in the SPAS Draft EIR, as amended by corrections and additions identified in Chapter 5 of Part II of this Final EIR, would occur as a result of the potential amendments to Figure 1 of the LAX Plan.

Figure 2. Transportation Element - Regional Highways and Freeways

This figure in the LAX Plan would be revised to be consistent with the LAX Plan boundary shown in Figure 1, as may be amended as described above. This figure would also be amended under Alternatives 1, 2, 4, 5, 6, and 7 to reflect the relocation and/or extension of the runways. This figure would be amended under Alternatives 1, 5, and 6 to reflect the realignment of Lincoln Boulevard (including the connector streets between Lincoln Boulevard and Westchester Parkway).

Environmental Evaluation

The aforementioned revisions to Figure 2 of the LAX Plan would be an administrative amendment to conform the map in Figure 2 to the specific characteristics of the approved SPAS alternative, if any, which were taken into account in the SPAS Draft EIR analysis of all the SPAS alternatives. No environmental impacts different from those already presented and analyzed in the SPAS Draft EIR, as amended by corrections and additions identified in Chapter 5 of Part II of this Final EIR, would occur as a result of the potential amendments to Figure 2 of the LAX Plan.

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4. COMMENTS AND RESPONSES ON THE SPAS DRAFT EIR

4.1 Introduction

In accordance with Section 15088 of the State CEQA Guidelines, LAWA prepared responses to all comments received on the SPAS Draft EIR. As required by the State CEQA Guidelines, the focus of the responses to comments is on "the disposition of significant environmental issues raised." Detailed responses are not provided to comments on the merits of SPAS or on other topics that do not relate to environmental issues.

This chapter of the SPAS Final EIR presents LAWA's written responses to comments received on the SPAS Draft EIR. The format for the responses to SPAS Draft EIR comments presents, on a letter-by-letter basis, each comment, which is then followed immediately by a response. The comments and responses are organized and grouped into categories based on the affiliation of the commentor. The comments are presented in the following order: federal agencies, state agencies, regional agencies, local agencies, public comments (i.e., letters from private citizens, organizations, etc.), form letters, and public meeting testimony.

An alphanumeric index system is used to identify each comment and response, and is keyed to each letter and the individual comments therein. For example, the first letter within the group of federal agencies submitting comments on the SPAS Draft EIR is from the United States Department of Homeland Security, and the text of the letter is considered to have one individual comment. The subject letter was assigned the alphanumeric label "SPAS-AF00001," representing "Specific Plan Amendment Study-Agency-Federal-Letter No. 1." The individual comment within the letter is labeled as SPAS-AF00001-1. The same basic format and approach is used for the comment letters from state agencies ("AS"), regional agencies ("AR"), local agencies ("AL"), public comments ("PC"), form letters (PF) and the public hearings ("PH").

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

Letter ID Prefix	Description
AF	Federal Agency
AS	State Agency
AR	Regional Agency
AL	Local Agency
PC	Public Comment
PF	Form Letter
PH	Public Hearing

To assist the reader's review and use of the responses to comments, three indices are provided. These indices provide the alphanumeric label number, commentor name, affiliation (i.e., name of agency or organization that the author represents), and date (if provided) of each comment letter. The first index lists all of the comment letters by alphanumeric label number, the second index lists all of the comment letters by the commentor's last name, and the third index lists all of the comment letters by the affiliation, if any, of the commentor.

The responses to comments consist of both topical responses and individual responses. Within the individual comments submitted on the SPAS Draft EIR, many of the same issues were raised by multiple commentors, and many comments pertained to a general theme that was common to multiple commentors. To respond to these comments, topical responses were prepared that provide a single comprehensive discussion of the issue of concern. A total of three topical responses are provided. Each topical response ("TR") has an alphanumeric designation related to its general subject matter. For example, the topical response pertaining to the proposed realignment of Lincoln Boulevard, which would

occur under certain SPAS alternatives, is designated "TR-SPAS-LR-1." Individual comments are cross-referenced to these topical responses. The topical responses are provided later in this chapter.

This chapter also provides individual comments and responses, presented on a letter-by-letter basis. Each comment is typed exactly as it appears in the original comment letter. No corrections to typographical errors or other edits to the original comments were made. A copy of each original comment letter is provided in Attachment 5 of Part II of this Final EIR. Videotaped comments were transcribed; this transcription is provided in Attachment 5.

Immediately following each typed comment is a written response developed by LAWA. In many instances, the response to a particular comment may refer to the response(s) to another comment(s) that expressed the same concern or is otherwise related. Cross-referencing of responses uses the alphanumeric index system described above. For example, a response may indicate "Please see Response to Comment SPAS-AL00001-2" if that response addresses the same concern expressed in a different comment.

4.2 Indices of Comment Letters

Following are three indices that organize the comment letters by letter identification number, commentor, and affiliation.

Index by Letter Identification (ID) Number

Letter ID	Commentor	Affiliation/Agency/Department	Date
SPAS-AF00001	Blackburn, Gregor	U.S. Department of Homeland Security, FEMA Region IX	8/9/2012
SPAS-AF00002	Goebel, Karen A.	U.S. Department of the Interior Fish and Wildlife Service	10/10/2012
SPAS-AF00002	Moskus, Brittni	U.S. Department of the Interior Fish and Wildlife Service	10/10/2012
SPAS-AS00001	Morgan, Scott	State of California, Governor's Office of Planning and Research, State Clearinghouse and Planning Unit	8/6/2012
SPAS-AS00002	Singleton, Dave	State of California, Native American Heritage Commission	8/13/2012
SPAS-AS00003	Morgan, Scott	State of California, Governor's Office of Planning and Research, State Clearinghouse and Planning Unit	9/11/2012
SPAS-AR00001	Lee, Pamela K.	Southern California Association of Governments	10/9/2012
SPAS-AR00001	Nadler, Jonathan	Southern California Association of Governments	10/9/2012
SPAS-AR00002	MacMillan, Ian V.	South Coast Air Quality Management District	10/25/2012
SPAS-AL00001	Kurtz, Barry	County of Los Angeles Department of Beaches and Harbors	10/3/2012
SPAS-AL00002	Poosti, Ali	City of Los Angeles Bureau of Sanitation	9/24/2012
SPAS-AL00003	Hartwell, Scott	Metropolitan Transportation Authority	10/9/2012
SPAS-AL00003	Welborne, Martha	Metropolitan Transportation Authority	10/9/2012
SPAS-AL00004	Jawad, Cynthia	Shute, Mihaly & Weinberger LLP	10/9/2012
SPAS-AL00004	Prange, Jaclyn H.	Shute, Mihaly & Weinberger LLP	10/9/2012
SPAS-AL00005	Kirk, Karen	Burbank-Glendale-Pasadena Airport Authority	10/10/2012
SPAS-AL00005	Feger, Dan	Burbank-Glendale-Pasadena Airport Authority	10/10/2012
SPAS-AL00006	Calzada, Michael F.	City of Inglewood Residential Sound Insulation Department	10/10/2012
SPAS-AL00007	Barrett, Susan	Buchalter Nemer, A Professional Law Corporation (City of Inglewood, Culver City, Ontario, and County of San Bernardino)	10/10/2012
SPAS-AL00007	Lichman, Barbara E.	Buchalter Nemer, A Professional Law Corporation (City of Inglewood, Culver City, Ontario, and County of San Bernardino)	10/10/2012
SPAS-AL00008	Fujioka, William T.	County of Los Angeles Chief Executive Office Operations and Budget	10/10/2012
SPAS-AL00008	Barbati, Isabella	County of Los Angeles Chief Executive Office Operations and Budget	10/10/2012
SPAS-AL00009	Miyamoto, Charlotte	County of Los Angeles Department of Beaches and Harbors	10/10/2012
SPAS-PC00001	Lowell, William	None Provided	8/25/2012

Index by Letter Identification (ID) Number

Letter ID	Commentor	Affiliation/Agency/Department	Date
SPAS-PC00001	Bullard, Julia	None Provided	8/25/2012
SPAS-PC00002	Schneider, Denny	LAX-Community Noise Roundtable	8/25/2012
SPAS-PC00003	Recinos, Jorge L.	None Provided	8/25/2012
SPAS-PC00004	Garner, Ryan	None Provided	8/25/2012
SPAS-PC00005	Boyiaris, Nick	None Provided	8/25/2012
SPAS-PC00006	Callahan, Edward	None Provided	8/25/2012
SPAS-PC00007	Gat, Jonathan	None Provided	8/25/2012
SPAS-PC00008	Schneider, Gary N.	None Provided	8/25/2012
SPAS-PC00009	Aguilar, Angela M.	SEIU	8/24/2012
SPAS-PC00010	Aguilar, Ramon	None Provided	8/25/2012
SPAS-PC00011	Rivas, Guadalupe	SEIU	8/24/2012
SPAS-PC00012	Bray, Sandra	ARSAC	8/25/2012
SPAS-PC00013	Rodriguez, Alfredo	SEIU	8/25/2012
SPAS-PC00014	Rodriguez, Crissel	SEIU-USWN	8/25/2012
SPAS-PC00015	Baca, Mary J.	None Provided	8/25/2012
SPAS-PC00016	Conine, Patricia	None Provided	8/25/2012
SPAS-PC00017	None Provided	None Provided	8/25/2012
SPAS-PC00018	Hamilton, Jacqueline	Tuskegee Airmen, Inc.	8/25/2012
SPAS-PC00019	Loftus, Katy	None Provided	8/25/2012
SPAS-PC00020	None Provided	None Provided	8/25/2012
SPAS-PC00021	Mitchell, Michael	Mickey's Space Ship Shuttle	8/28/2012
SPAS-PC00022	None Provided	None Provided	8/28/2012
SPAS-PC00023	Nay, Mark R.	HNTB Architecture	8/28/2012
SPAS-PC00024	Newsom, Bob	HNTB	8/28/2012
SPAS-PC00025	Underwood, Brenda	None Provided	8/28/2012
SPAS-PC00026	Rodine, Robert L.	The Polaris Group	8/28/2012
SPAS-PC00027	Cherry, Nate	RTKL	8/28/2012
SPAS-PC00028	Cherry, Nate	RTKL	8/28/2012

Index by Letter Identification (ID) Number

Letter ID	Commentor	Affiliation/Agency/Department	Date
SPAS-PC00029	Roberts, David	Candidate for Council District 9	8/28/2012
SPAS-PC00030	Hamilton, Jacqueline	Tuskegee Airmen, Inc.	8/28/2012
SPAS-PC00031	Mitchell, Michael	Mickey's Space Ship Shuttle	8/28/2012
SPAS-PC00032	Mitchell, Michael S.	Terrestrial Trolley LLC	8/28/2012
SPAS-PC00033	Riordan, Richard J.	Former Mayor of LA	8/25/2012
SPAS-PC00034	Rothenberg, Alan	LA Area Chamber of Commerce	8/29/2012
SPAS-PC00035	Paxton, Lynne	None Provided	8/29/2012
SPAS-PC00036	Kapp, Martin	None Provided	8/29/2012
SPAS-PC00037	Purdy, Richard	None Provided	8/29/2012
SPAS-PC00038	Vaughn, Vicki	None Provided	8/29/2012
SPAS-PC00039	Aniolek, Gregg	None Provided	8/29/2012
SPAS-PC00040	Bostide, Odysseus	None Provided	8/29/2012
SPAS-PC00041	Topal, Jack	None Provided	8/29/2012
SPAS-PC00042	Mitchell, Michael S.	Mickey's Space Ship Shuttle	8/29/2012
SPAS-PC00043	Whiffen, Janice	None Provided	7/30/2012
SPAS-PC00043	Hughes, John	None Provided	7/30/2012
SPAS-PC00044	Child, Dotti	None Provided	7/30/2012
SPAS-PC00044	Child, Herb	None Provided	7/30/2012
SPAS-PC00045	Edelman, Lynn	None Provided	7/28/2012
SPAS-PC00046	Pida, Jayson	None Provided	8/11/2012
SPAS-PC00047	Sturtevant, Dwight B.	None Provided	8/26/2012
SPAS-PC00048	Mitchell, Michael S.	Mickey's Space Ship Shuttle	8/29/2012
SPAS-PC00049	Briggs, Eric	None Provided	8/27/2012
SPAS-PC00050	Schneider, Barry	None Provided	7/29/2012
SPAS-PC00050	Schneider, Arleen	None Provided	7/29/2012
SPAS-PC00051	Turney, Thomas W.	NewCap Partners, Inc.	7/30/2012
SPAS-PC00052	Edie, Jay	None Provided	7/29/2012
SPAS-PC00052	Edie, Patricia	None Provided	7/29/2012

Index by Letter Identification (ID) Number

Letter ID	Commentor	Affiliation/Agency/Department	Date
SPAS-PC00053	Miller, Malcom	None Provided	8/3/2012
SPAS-PC00054	Gutierrez, Daniel	None Provided	9/5/2012
SPAS-PC00054	Daniels, Hilary	None Provided	9/5/2012
SPAS-PC00054	Gutierrez, Judy	None Provided	9/5/2012
SPAS-PC00055	Ueberroth, Peter V.	Contrarian Group, Inc.	8/27/2012
SPAS-PC00056	Whitcomb, Rudolph F.	None Provided	7/27/2012
SPAS-PC00057	Williams, Rendric	None Provided	7/29/2012
SPAS-PC00058	Rodine, Robert L.	None Provided	7/29/2012
SPAS-PC00059	Lynch, Debra	None Provided	7/31/2012
SPAS-PC00060	Teplitz, Richard	None Provided	8/16/2012
SPAS-PC00061	Parvenu, Andre	None Provided	8/17/2012
SPAS-PC00062	Rothman, Jeffrey	None Provided	8/25/2012
SPAS-PC00063	Whittman, Richard	None Provided	8/27/2012
SPAS-PC00064	Siegel, Howard	None Provided	8/25/2012
SPAS-PC00065	Haukohl, Kurt	None Provided	8/27/2012
SPAS-PC00066	Fujita, James	None Provided	8/27/2012
SPAS-PC00067	Parks, Donna	None Provided	8/27/2012
SPAS-PC00068	Rusch, Tim	None Provided	8/29/2012
SPAS-PC00069	Mitchell, Michael S.	None Provided	8/29/2012
SPAS-PC00070	McKinley Jr., James Earl	None Provided	8/29/2012

Index by Letter Identification (ID) Number

Letter ID	Commentor	Affiliation/Agency/Department	Date
SPAS-PC00071	Teplitz, Rick	None Provided	8/29/2012
SPAS-PC00072	Dina, Gregory	None Provided	8/30/2012
SPAS-PC00073	Rosen, Stan	None Provided	9/2/2012
SPAS-PC00074	Johnston, Mark R.	None Provided	9/3/2012
SPAS-PC00075	Loreal	None Provided	8/24/2012
SPAS-PC00076	Davis, Christina V.	LAX Coastal Area Chamber of Commerce	9/6/2012
SPAS-PC00077	Shapiro, Lynne	None Provided	9/6/2012
SPAS-PC00078	Ryavec, Mark	Venice Stakeholders Association	9/11/2012
SPAS-PC00079	Garner, Bryan A.	LawProse Inc.	9/12/2012
SPAS-PC00080	Kurkowski, Yoshie	The Sheppard	9/13/2012
SPAS-PC00081	Easwaran, Kenny	University of Southern California	9/15/2012
SPAS-PC00082	Garner, Bryan A.	LawProse Inc.	9/17/2012
SPAS-PC00083	Klein, Ellen	None Provided	9/17/2012
SPAS-PC00084	Ward, Brian	None Provided	9/18/2012
SPAS-PC00085	Edelman, Lynn	None Provided	9/19/2012
SPAS-PC00086	Sandoval, Paula	None Provided	9/19/2012
SPAS-PC00087	Dosch, Richard	The LA Loop	9/19/2012
SPAS-PC00088	Dunagan, Bob	None Provided	9/20/2012
SPAS-PC00089	Hench, Cyndi	Neighborhood Council of Westchester Playa	9/4/2012

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SPAS-PC00090	Hyra, J.A.	None Provided	9/8/2012
SPAS-PC00091	Wong, Ben	Southern California Edison Company	8/31/2012
SPAS-PC00092	Hyde, Shaunta	The Boeing Company	8/28/2012
SPAS-PC00094	Boxer, Aviva	None Provided	9/10/2012
SPAS-PC00095	Klein, Lee	The California Native	9/17/2012
SPAS-PC00096	Wexler, Adelle	The Guilded Cage	9/14/2012
SPAS-PC00097	Cunningham, Kim G.	None Provided	9/24/2012
SPAS-PC00097	Quinn, Donald M.	None Provided	9/24/2012
SPAS-PC00098	Garner, Bryan A.	LawProse Inc.	9/25/2012
SPAS-PC00099	Leiweke, Timothy J.	AEG	8/27/2012
SPAS-PC00100	Garner, Bryan A.	LawProse Inc.	10/2/2012
SPAS-PC00101	Shapiro, Lynne	None Provided	9/28/2012
SPAS-PC00102	None Provided, Marco	None Provided	9/28/2012
SPAS-PC00103	Wicks, Tammie	None Provided	10/4/2012
SPAS-PC00103	Wicks, Douglas	None Provided	10/4/2012
SPAS-PC00104	Kesting, Rachel	None Provided	10/1/2012
SPAS-PC00105	Camino, Julie	None Provided	10/2/2012
SPAS-PC00106	Owens, John	None Provided	10/4/2012
SPAS-PC00106	Owens, Barbara	None Provided	10/4/2012

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SPAS-PC00107	Walker, Robert W.	United	7/27/2012
SPAS-PC00108	Haythorn, Joseph D.	None Provided	9/20/2012
SPAS-PC00109	Inamoto, Sharon	None Provided	10/5/2012
SPAS-PC00110	Cassman, Mary Ellen	None Provided	10/7/2012
SPAS-PC00111	Chesney, Tom	Westchester Neighbors Association	10/8/2012
SPAS-PC00112	Shapiro, Lynne	None Provided	
SPAS-PC00113	Cohen-Nir, Dan	Airbus Americas, Inc.	10/8/2012
SPAS-PC00113	McArtor, T. Allan	Airbus Americas, Inc.	10/8/2012
SPAS-PC00114	Lebon, Lucia	None Provided	10/8/2012
SPAS-PC00114	Carlos, Juan	None Provided	10/8/2012
SPAS-PC00115	Duckworth, Donald R.	Westchester Town Center Business Improvement District	9/29/2012
SPAS-PC00116	Hughes, Laurie	Gateway to LA Business Improvement District	10/3/2012
SPAS-PC00118	Van Valkenburg, Peter	Enterprise Holdings, Inc.	10/8/2012
SPAS-PC00119	Lay, Al	LAX-Area Democratic Club	10/8/2012
SPAS-PC00120	Sirotich, Stephanie D.	None Provided	10/8/2012
SPAS-PC00121	Murray, Donna	None Provided	10/8/2012
SPAS-PC00122	Schnabl, Sheri	None Provided	10/8/2012
SPAS-PC00122	Schnabl, Val	None Provided	10/8/2012
SPAS-PC00123	Garner, Bryan	LawProse Inc.	10/9/2012

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SPAS-PC00124	Alpern, M.D., Kenneth S.	None Provided	10/9/2012
SPAS-PC00125	Hetz, Matthew	Los Angeles Council District 11 Transportation Advisory Committee	10/9/2012
SPAS-PC00128	Cope, Danna	None Provided	10/9/2012
SPAS-PC00129	Tallarico, Lorraine M.	Avis Budget Car Rental, LLC	10/9/2012
SPAS-PC00130	Schneider, Denny	ARSAC	10/9/2012
SPAS-PC00131	Commins, Sharon	Mar Vista Community Council	10/10/2012
SPAS-PC00132	Paz, Sergio	Los Angeles International Airport Area Advisory Committee	10/9/2012
SPAS-PC00133	Melton, Audrey	Iredale Mineral Cosmetics, Ltd.	10/10/2012
SPAS-PC00134	Melton, Greg	None Provided	10/10/2012
SPAS-PC00135	Citrin, Judy	None Provided	10/10/2012
SPAS-PC00136	Bergelson, Gordon	None Provided	10/9/2012
SPAS-PC00137	Mayeron, Candace	None Provided	10/9/2012
SPAS-PC00138	Wayne, Alan B.	None Provided	10/9/2012
SPAS-PC00139	Redner, Jim	theRednerGroup	10/9/2012
SPAS-PC00140	Austin, Richard	None Provided	10/9/2012
SPAS-PC00141	Austin, Mary	None Provided	10/9/2012
SPAS-PC00142	Curran, Joyce	None Provided	10/9/2012
SPAS-PC00143	Davison, Mike	None Provided	10/9/2012
SPAS-PC00144	Smith, Garrett	None Provided	10/9/2012

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SPAS-PC00145	Marcellus, Terry A.	None Provided	10/10/2012
SPAS-PC00146	Edwards, Demetra L.	Wood, Smith, Henning & Berman LLP	10/9/2012
SPAS-PC00147	Hench, Cyndi	Neighborhood Council of Westchester Playa	10/10/2012
SPAS-PC00147	Eggers, Craig	Neighborhood Council of Westchester Playa	10/10/2012
SPAS-PC00148	Morrison, Nancy-Gene	None Provided	10/10/2012
SPAS-PC00149	Voss, David	LAX Coastal Area Chamber of Commerce	10/10/2012
SPAS-PC00149	Davis, Christina	LAX Coastal Area Chamber of Commerce	10/10/2012
SPAS-PC00150	Marcellus, Terry	None Provided	10/10/2012
SPAS-PC00151	Eggers, Craig	None Provided	10/10/2012
SPAS-PC00152	Shahabi, Karim	None Provided	10/10/2012
SPAS-PC00153	Acherman, Robert	ARSAC	10/10/2012
SPAS-PC00154	Wright, Jerard	Sierra Club Angeles Chapter	10/10/2012
SPAS-PC00154	Clarke, Darrell	Sierra Club Angeles Chapter	10/10/2012
SPAS-PC00155	Dillard, Joyce	None Provided	10/10/2012
SPAS-PC00156	Cope, Danna	None Provided	10/10/2012
SPAS-PC00157	Huth, Hans	None Provided	10/10/2012
SPAS-PC00158	Branham, Tammy	Dollar Thrifty Automotive Group, Inc.	10/10/2012
SPAS-PC00159	Ouellet, James V.	None Provided	10/10/2012
SPAS-PC00160	Dial, Karen	Drollinger Properties	10/5/2012

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SPAS-PC00161	Zifkin, Walter	None Provided	10/2/2012
SPAS-PC00162	Lund, Ph.D., P.E., Russell A	None Provided	10/8/2012
SPAS-PC00163	Healy, Helen M.	None Provided	10/6/2012
SPAS-PC00164	Parris, Michael	None Provided	10/8/2012
SPAS-PC00165	Geerligs, P.R.	None Provided	8/28/2020
SPAS-PC00166	Toledo, Luis O	None Provided	9/5/2012
SPAS-PC00167	Turner, Jordann	None Provided	9/7/2012
SPAS-PC00168	Turner, Jordann	None Provided	9/7/2012
SPAS-PC00169	Mitchell, Michael S.	None Provided	9/10/2012
SPAS-PC00170	Steinbach, David	None Provided	9/10/2012
SPAS-PC00171	Davis, Janis	None Provided	9/13/2012
SPAS-PC00172	Stacey, Pamela	None Provided	9/26/2012
SPAS-PC00173	Vaughn, Vicki	None Provided	9/28/2012
SPAS-PC00174	Barry, Bill	None Provided	9/28/2012
SPAS-PC00175	Haythorn, Joseph D.	None Provided	9/30/2012
SPAS-PC00176	Montealegre, Andrew	None Provided	9/30/2012
SPAS-PC00177	Harrell, Erica	None Provided	10/2/2012
SPAS-PC00178	Mitchell, Michael	None Provided	10/3/2012
SPAS-PC00179	Smith, Chris	None Provided	10/3/2012

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SPAS-PC00180	Wiles, Jim	None Provided	10/4/2012
SPAS-PC00181	Allen, Marilyn M.	None Provided	10/4/2012
SPAS-PC00182	Lund, Julie	None Provided	10/8/2012
SPAS-PC00183	Peterson, Linda	None Provided	10/8/2012
SPAS-PC00184	White, Eugene	None Provided	10/8/2012
SPAS-PC00185	McKinnon, Christopher	None Provided	10/8/2012
SPAS-PC00186	Lund, Russell	None Provided	10/9/2012
SPAS-PC00187	Fletcher, M.D., Betty C.	None Provided	10/9/2012
SPAS-PC00188	Redner, James	None Provided	10/9/2012
SPAS-PC00189	Wallace, Erin	None Provided	10/9/2012
SPAS-PC00190	Worf, Homer	None Provided	10/9/2012
SPAS-PC00192	Melton, Greg	None Provided	10/10/2012
SPAS-PC00193	Kokelaar, Linda	None Provided	10/10/2012
SPAS-PC00194	The Allen Family	None Provided	10/10/2012
SPAS-PC00195	Gat, Jonathan	None Provided	8/25/2012
SPAS-PC00196	Livers, Gregory	None Provided	8/25/2012
SPAS-PC00197	Saifi, Sean	Central Coast Shuttle Services	8/29/2012
SPAS-PC00198	Mitchell, Michael	Mickey's Space Ship Shuttle	8/29/2012
SPAS-PC00199	Schuelein, Steve	None Provided	10/11/2012

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SPAS-PC00200	Schneider, Barry	None Provided	10/10/2012
SPAS-PC00200	Schneider, Arleen	None Provided	10/10/2012
SPAS-PC00201	Sambrano, Diane	None Provided	10/10/2012
SPAS-PC00202	Toebben, Gary	Los Angeles Area Chamber of Commerce	10/8/2012
SPAS-PFA00001	Washington Jr., James H.	None Provided	
SPAS-PFA00002	Neff, Jack	None Provided	
SPAS-PFA00003	Taylor, Lisa	None Provided	
SPAS-PFA00004	Yeager, Will	None Provided	
SPAS-PFA00005	Chavez, Mike	None Provided	
SPAS-PFA00006	Torres, Robert	None Provided	
SPAS-PFA00007	Ghasri, Kamran	None Provided	
SPAS-PFA00008	Friedwen, Alexander	None Provided	
SPAS-PFA00009	Malanaphy, Hugh	None Provided	
SPAS-PFA00010	Drummond, J.K.	None Provided	
SPAS-PH100001	Ali, Micah	Compton School Board	8/25/2012
SPAS-PH100002	Toebben, Gary	Los Angeles Area Chamber of Commerce	8/25/2012
SPAS-PH100003	Lobera, Jose	SEIU-USWW	8/25/2012
SPAS-PH100004	Reeg, Kristin	Unite Here Local 11	8/25/2012
SPAS-PH100005	Kelly, Michael	The Los Angeles Coalition for the Economy of Jobs	8/25/2012

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SPAS-PH100006	Durazo, Maria E.	LA County Federation at Labor, AFL-C10	8/25/2012
SPAS-PH100007	Cruz, Marisol	Lennox School District	8/25/2012
SPAS-PH100008	Schneider, Nancy	WNA-ARSAC	8/25/2012
SPAS-PH100009	Hunter, Robbie	LA/OC Building Trades Council	8/25/2012
SPAS-PH100010	Mishelevich, David	ARSAC	8/25/2012
SPAS-PH100011	Mendoza, Maria	USWW	8/25/2012
SPAS-PH100012	Lopez, Joe	Sheet Metal Workers	8/25/2012
SPAS-PH100013	Callahan, Edward	None Provided	8/25/2012
SPAS-PH100014	Freeman, Stefan	None Provided	8/25/2012
SPAS-PH100015	Ferrer, Mirella	Unite Here	8/25/2012
SPAS-PH100016	Lemus, Teresa	Unite Here	8/25/2012
SPAS-PH100017	Mendoza, Marlene	Unite Here 11	8/25/2012
SPAS-PH100018	Chavez, Sinia	Unite Here Local 11	8/25/2012
SPAS-PH100019	Hinson, Stephen	Sheet Metal Worker Local 105	8/25/2012
SPAS-PH100020	Morrison, Nancy-Gene	None Provided	8/25/2012
SPAS-PH100021	Schneider, Denny	ARSAC	8/25/2012
SPAS-PH100022	Cope, Danna	None Provided	8/25/2012
SPAS-PH100023	Czyzyk, Joe	Mercury Air Group	8/25/2012
SPAS-PH100024	Lestz, Patricia	None Provided	8/25/2012

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SPAS-PH100025	Widener, Bill	None Provided	8/25/2012
SPAS-PH100026	Gray, Gloria	West Basin Water District	8/25/2012
SPAS-PH100027	Orellana, Patricia	SEIU-USWW	8/25/2012
SPAS-PH100028	Hamilton, Jacqueline	Tuskegee Airmen, Inc.	8/25/2012
SPAS-PH100029	Eggers, Craig	Neighborhood Council of Westchester Playa	8/25/2012
SPAS-PH100030	Cavalier, Richard	None Provided	8/25/2012
SPAS-PH100031	Sambrano, Diane	HSCV	8/25/2012
SPAS-PH100032	Ouellet, Jim	None Provided	8/25/2012
SPAS-PH200001	Durazo, Maria E.	LA County Federation at Labor, AFL-C10	8/28/2012
SPAS-PH200002	Hathaway, Karen	Los Angeles Area Chamber of Commerce	8/28/2012
SPAS-PH200003	Simon, David	Southern California Committee for the Olympic Games	8/28/2012
SPAS-PH200004	Norton, Kevin	IBEW Local #11	8/28/2012
SPAS-PH200005	Broderick, Aaron	IBEW Local #11	8/28/2012
SPAS-PH200006	Sanchez, Maria	USWW	8/28/2012
SPAS-PH200007	Lobera, Jose	USWW	8/28/2012
SPAS-PH200008	Underwood, Brenda	None Provided	8/28/2012
SPAS-PH200009	Hunter, Robbie	LA/OC Building Trades Council	8/28/2012
SPAS-PH200010	Mitchell, Michael	Mickey's Disneyland & Orange County Bus Co.	8/28/2012
SPAS-PH200011	Bashem, Greg	Teamsters 986	8/28/2012

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SPAS-PH200012	Kelly, Michael	The Los Angeles Coalition for the Economy of Jobs	8/28/2012
SPAS-PH200013	O'Callaghan, Elsa	None Provided	8/28/2012
SPAS-PH200014	Hosmer, Liz	None Provided	8/28/2012
SPAS-PH200015	Evans, Kathryn	Neighborhood Council of Westchester Playa	8/28/2012
SPAS-PH200016	Evans, Scott	None Provided	8/28/2012
SPAS-PH200017	Amano, Robert	Hotel Association of Los Angeles	8/28/2012
SPAS-PH200018	Gat, Jonathan	None Provided	8/28/2012
SPAS-PH200019	Gonzalez, Ruben	Los Angeles Area Chamber of Commerce	8/28/2012
SPAS-PH200020	Lambros, Richard	Southern California Leadership Council	8/28/2012
SPAS-PH200021	Rodine, Robert L.	The Polaris Group	8/28/2012
SPAS-PH200022	Schneider, Denny	ARSAC	8/28/2012
SPAS-PH200023	Herbst, David	Mercury Air Group	8/28/2012
SPAS-PH200024	McOsker, Tim	Central City Association	8/28/2012
SPAS-PH200025	Eggers, Craig	Neighborhood Council of Westchester Playa	8/28/2012
SPAS-PH200026	Jackson, Stephen	None Provided	8/28/2012
SPAS-PH200027	Kanter, Karen	None Provided	8/28/2012
SPAS-PH200028	Hamilton, Jacqueline	Tuskegee Airmen, Inc.	8/28/2012
SPAS-PH200029	Ouellet, Jim	None Provided	8/28/2012
SPAS-PH300001	Stevens, Mike	Councilman (Inglewood)	8/29/2012

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SPAS-PH300002	Rothenberg, Alan	LA Chamber	8/29/2012
SPAS-PH300003	Herbst, David	None Provided	8/29/2012
SPAS-PH300003	Riordan, Richard	None Provided	8/29/2012
SPAS-PH300004	Stacey, Pam	None Provided	8/29/2012
SPAS-PH300005	Andrade, Ricardo	Laborers Local 300	8/29/2012
SPAS-PH300006	Billy, Dan	IUOE Local #12	8/29/2012
SPAS-PH300007	Miller, Ron	LA/OC Building Trades Council	8/29/2012
SPAS-PH300008	Rothenberg, Alan	Contrarian Group, Inc.	8/29/2012
SPAS-PH300008	Ueberroth, Peter	Contrarian Group, Inc.	8/29/2012
SPAS-PH300009	Morrison, Nancy-Gene W.	None Provided	8/29/2012
SPAS-PH300010	Machado-Essex, Christina	None Provided	8/29/2012
SPAS-PH300011	Cope, Danna	None Provided	8/29/2012
SPAS-PH300012	Schneider, Denny	ARSAC	8/29/2012
SPAS-PH300013	Ivy, George	None Provided	8/29/2012
SPAS-PH300014	Papana, Titus	Aviation Safeguards Org.	8/29/2012
SPAS-PH300015	Fleming, Matthew	None Provided	8/29/2012
SPAS-PH300016	Carpio, Cecil	None Provided	8/29/2012
SPAS-PH300017	Mitchell, Michael	Mickey's Space Ship Shuttle	8/29/2012
SPAS-PH300018	Solorzano, Isidro	Unite Here Local 11	8/29/2012

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SPAS-PH300020	Saifi, Sean	Central Coast Shuttle Services	8/29/2012
SPAS-PH300021	Marmol, Douglas	Unite Here Local 11	8/29/2012
SPAS-PH300022	Hanscom, Marcia	Wetlands Defense Fund and Ballona Institute	8/29/2012
SPAS-PH300023	Peterson, Linda	None Provided	8/29/2012
SPAS-PH300024	Topal, Jack	Westchester/Playa del Rey Neighborhood Council	8/29/2012
SPAS-PH300025	Klein, Ellen	None Provided	8/29/2012
SPAS-PH300026	Ouellet, Jim	None Provided	8/29/2012
SPAS-PH300027	Bashem, Greg	Teamsters Local 986	8/29/2012
SPAS-PH300028	Underwood, Brenda	None Provided	8/29/2012
SPAS-PH300029	Roten, Rusty	IBEW Local #11	8/29/2012
SPAS-PH300030	Eggers, Craig	NCWP-ARC	8/29/2012
SPAS-PH300031	Singh, Donna	None Provided	8/29/2012
SPAS-PH300032	Widener, William	None Provided	8/29/2012
SPAS-PH300033	Koefoed, Erik	None Provided	8/29/2012
SPAS-PH300034	Aniolek, Gregg	None Provided	8/29/2012
SPAS-PH300035	Ryavec, Mark	Venice Stakeholders Association	8/29/2012
SPAS-PH300036	Leal, Marco	None Provided	8/29/2012
SPAS-PH300037	Acherman, Robert	None Provided	8/29/2012

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SPAS-PH300038	Smith, Garrett	None Provided	8/29/2012
SPAS-PH300039	Paxton, Lynne	None Provided	8/29/2012
SPAS-PH300040	Sambrano, Diane	HSCV	8/29/2012

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Acherman, Robert	ARSAC	10/10/2012	SPAS-PC00153
Acherman, Robert	None Provided	8/29/2012	SPAS-PH300037
Aguilar, Angela M	SEIU	8/24/2012	SPAS-PC00009
Aguilar, Ramon	None Provided	8/25/2012	SPAS-PC00010
Ali, Micah	Compton School Board	8/25/2012	SPAS-PH100001
Allen, Marilyn M.	None Provided	10/4/2012	SPAS-PC00181
Alpern, M.D., Kenneth S.	None Provided	10/9/2012	SPAS-PC00124
Amano, Robert	Hotel Association of Los Angeles	8/28/2012	SPAS-PH200017
Andrade, Ricardo	Laborers Local 300	8/29/2012	SPAS-PH300005
Aniolek, Gregg	None Provided	8/29/2012	SPAS-PC00039
Aniolek, Gregg	None Provided	8/29/2012	SPAS-PH300034
Austin, Mary	None Provided	10/9/2012	SPAS-PC00141
Austin, Richard	None Provided	10/9/2012	SPAS-PC00140
Baca, Mary J.	None Provided	8/25/2012	SPAS-PC00015
Barbati, Isabella	County of Los Angeles Chief Executive Office Operations and Budget	10/10/2012	SPAS-AL00008
Barrett, Susan	Buchalter Nemer, A Professional Law Corporation (City of Inglewood, Culver City, Ontario, and County of San Bernardino)	10/10/2012	SPAS-AL00007
Barry, Bill	None Provided	9/28/2012	SPAS-PC00174

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Bashem, Greg	Teamsters 986	8/28/2012	SPAS-PH200011
Bashem, Greg	Teamsters Local 986	8/29/2012	SPAS-PH300027
Bergelson, Gordon	None Provided	10/9/2012	SPAS-PC00136
Billy, Dan	IUOE Local #12	8/29/2012	SPAS-PH300006
Blackburn, Gregor	U.S. Department of Homeland Security, FEMA Region IX	8/9/2012	SPAS-AF00001
Bostide, Odysseus	None Provided	8/29/2012	SPAS-PC00040
Boxer, Aviva	None Provided	9/10/2012	SPAS-PC00094
Boyiaris, Nick	None Provided	8/25/2012	SPAS-PC00005
Branham, Tammy	Dollar Thrifty Automotive Group, Inc.	10/10/2012	SPAS-PC00158
Bray, Sandra	ARSAC	8/25/2012	SPAS-PC00012
Briggs, Eric	None Provided	8/27/2012	SPAS-PC00049
Broderick, Aaron	IBEW Local #11	8/28/2012	SPAS-PH200005
Bullard, Julia	None Provided	8/25/2012	SPAS-PC00001
Callahan, Edward	None Provided	8/25/2012	SPAS-PC00006
Callahan, Edward	None Provided	8/25/2012	SPAS-PH100013
Calzada, Michael F.	City of Inglewood Residential Sound Insulation Department	10/10/2012	SPAS-AL00006
Camino, Julie	None Provided	10/2/2012	SPAS-PC00105
Carlos, Juan	None Provided	10/8/2012	SPAS-PC00114
Carpio, Cecil	None Provided	8/29/2012	SPAS-PH300016

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Cassman, Mary Ellen	None Provided	10/7/2012	SPAS-PC00110
Cavalier, Richard	None Provided	8/25/2012	SPAS-PH100030
Chavez, Mike	None Provided		SPAS-PFA00005
Chavez, Sinia	Unite Here Local 11	8/25/2012	SPAS-PH100018
Cherry, Nate	RTKL	8/28/2012	SPAS-PC00027
Cherry, Nate	RTKL	8/28/2012	SPAS-PC00028
Chesney, Tom	Westchester Neighbors Association	10/8/2012	SPAS-PC00111
Child, Dotti	None Provided	7/30/2012	SPAS-PC00044
Child, Herb	None Provided	7/30/2012	SPAS-PC00044
Citrin, Judy	None Provided	10/10/2012	SPAS-PC00135
Clarke, Darrell	Sierra Club Angeles Chapter	10/10/2012	SPAS-PC00154
Cohen-Nir, Dan	Airbus Americas, Inc.	10/8/2012	SPAS-PC00113
Commins, Sharon	Mar Vista Community Council	10/10/2012	SPAS-PC00131
Conine, Patricia	None Provided	8/25/2012	SPAS-PC00016
Cope, Danna	None Provided	10/9/2012	SPAS-PC00128
Cope, Danna	None Provided	10/10/2012	SPAS-PC00156
Cope, Danna	None Provided	8/25/2012	SPAS-PH100022
Cope, Danna	None Provided	8/29/2012	SPAS-PH300011
Cruz, Marisol	Lennox School District	8/25/2012	SPAS-PH100007

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Cunningham, Kim G.	None Provided	9/24/2012	SPAS-PC00097
Curran, Joyce	None Provided	10/9/2012	SPAS-PC00142
Czyzyk, Joe	Mercury Air Group	8/25/2012	SPAS-PH100023
Daniels, Hilary	None Provided	9/5/2012	SPAS-PC00054
Davis, Christina	LAX Coastal Area Chamber of Commerce	10/10/2012	SPAS-PC00149
Davis, Christina V.	LAX Coastal Area Chamber of Commerce	9/6/2012	SPAS-PC00076
Davis, Janis	None Provided	9/13/2012	SPAS-PC00171
Davison, Mike	None Provided	10/9/2012	SPAS-PC00143
Dial, Karen	Drollinger Properties	10/5/2012	SPAS-PC00160
Dillard, Joyce	None Provided	10/10/2012	SPAS-PC00155
Dina, Gregory	None Provided	8/30/2012	SPAS-PC00072
Dosch, Richard	The LA Loop	9/19/2012	SPAS-PC00087
Drummond, J.K.	None Provided		SPAS-PFA00010
Duckworth, Donald R.	Westchester Town Center Business Improvement District	9/29/2012	SPAS-PC00115
Dunagan, Bob	None Provided	9/20/2012	SPAS-PC00088
Durazo, Maria E.	LA County Federation at Labor, AFL-C10	8/25/2012	SPAS-PH100006
Durazo, Maria E.	LA County Federation at Labor, AFL-C10	8/28/2012	SPAS-PH200001
Easwaran, Kenny	University of Southern California	9/15/2012	SPAS-PC00081
Edelman, Lynn	None Provided	7/28/2012	SPAS-PC00045

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Edelman, Lynn	None Provided	9/19/2012	SPAS-PC00085
Edie, Jay	None Provided	7/29/2012	SPAS-PC00052
Edie, Patricia	None Provided	7/29/2012	SPAS-PC00052
Edwards, Demetra L.	Wood, Smith, Henning & Berman LLP	10/9/2012	SPAS-PC00146
Eggers, Craig	Neighborhood Council of Westchester Playa	10/10/2012	SPAS-PC00147
Eggers, Craig	None Provided	10/10/2012	SPAS-PC00151
Eggers, Craig	Neighborhood Council of Westchester Playa	8/25/2012	SPAS-PH100029
Eggers, Craig	Neighborhood Council of Westchester Playa	8/28/2012	SPAS-PH200025
Eggers, Craig	NCWP-ARC	8/29/2012	SPAS-PH300030
Evans, Kathryn	Neighborhood Council of Westchester Playa	8/28/2012	SPAS-PH200015
Evans, Scott	None Provided	8/28/2012	SPAS-PH200016
Feger, Dan	Burbank-Glendale-Pasadena Airport Authority	10/10/2012	SPAS-AL00005
Ferrer, Mirella	Unite Here	8/25/2012	SPAS-PH100015
Fleming, Matthew	None Provided	8/29/2012	SPAS-PH300015
Fletcher, M.D., Betty C.	None Provided	10/9/2012	SPAS-PC00187
Freeman, Stefan	None Provided	8/25/2012	SPAS-PH100014
Friedwen, Alexander	None Provided		SPAS-PFA00008
Fujioka, William T	County of Los Angeles Chief Executive Office Operations and Budget	10/10/2012	SPAS-AL00008
Fujita, James	None Provided	8/27/2012	SPAS-PC00066

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Garner, Bryan	LawProse Inc.	10/9/2012	SPAS-PC00123
Garner, Bryan A.	LawProse Inc.	9/12/2012	SPAS-PC00079
Garner, Bryan A.	LawProse Inc.	9/17/2012	SPAS-PC00082
Garner, Bryan A.	LawProse Inc.	9/25/2012	SPAS-PC00098
Garner, Bryan A.	LawProse Inc.	10/2/2012	SPAS-PC00100
Garner, Ryan	None Provided	8/25/2012	SPAS-PC00004
Gat, Jonathan	None Provided	8/25/2012	SPAS-PC00007
Gat, Jonathan	None Provided	8/25/2012	SPAS-PC00195
Gat, Jonathan	None Provided	8/28/2012	SPAS-PH200018
Geerligs, P.R.	None Provided	8/28/2020	SPAS-PC00165
Ghasri, Kamran	None Provided		SPAS-PFA00007
Goebel, Karen A.	U.S. Department of the Interior Fish and Wildlife Service	10/10/2012	SPAS-AF00002
Gonzalez, Ruben	Los Angeles Area Chamber of Commerce	8/28/2012	SPAS-PH200019
Gray, Gloria	West Basin Water District	8/25/2012	SPAS-PH100026
Gutierrez, Daniel	None Provided	9/5/2012	SPAS-PC00054
Gutierrez, Judy	None Provided	9/5/2012	SPAS-PC00054
Hamilton, Jacqueline	Tuskegee Airmen, Inc.	8/25/2012	SPAS-PC00018
Hamilton, Jacqueline	Tuskegee Airmen, Inc.	8/28/2012	SPAS-PC00030
Hamilton, Jacqueline	Tuskegee Airmen, Inc.	8/25/2012	SPAS-PH100028

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Hamilton, Jacqueline	Tuskegee Airmen, Inc.	8/28/2012	SPAS-PH200028
Hanscom, Marcia	Wetlands Defense Fund and Ballona Institute	8/29/2012	SPAS-PH300022
Harrell, Erica	None Provided	10/2/2012	SPAS-PC00177
Hartwell, Scott	Metropolitan Transportation Authority	10/9/2012	SPAS-AL00003
Hathaway, Karen	Los Angeles Area Chamber of Commerce	8/28/2012	SPAS-PH200002
Haukohl, Kurt	None Provided	8/27/2012	SPAS-PC00065
Haythorn, Joseph D.	None Provided	9/20/2012	SPAS-PC00108
Haythorn, Joseph D.	None Provided	9/30/2012	SPAS-PC00175
Healy, Helen M.	None Provided	10/6/2012	SPAS-PC00163
Hench, Cyndi	Neighborhood Council of Westchester Playa	9/4/2012	SPAS-PC00089
Hench, Cyndi	Neighborhood Council of Westchester Playa	10/10/2012	SPAS-PC00147
Herbst, David	Mercury Air Group	8/28/2012	SPAS-PH200023
Herbst, David	None Provided	8/29/2012	SPAS-PH300003
Hetz, Matthew	Los Angeles Council District 11 Transportation Advisory Committee	10/9/2012	SPAS-PC00125
Hinson, Stephen	Sheet Metal Worker Local 105	8/25/2012	SPAS-PH100019
Hosmer, Liz	None Provided	8/28/2012	SPAS-PH200014
Hughes, John	None Provided	7/30/2012	SPAS-PC00043
Hughes, Laurie	Gateway to LA Business Improvement District	10/3/2012	SPAS-PC00116
Hunter, Robbie	LA/OC Building Trades Council	8/25/2012	SPAS-PH100009

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Huth, Hans	None Provided	10/10/2012	SPAS-PC00157
Hyde, Shaunta	The Boeing Company	8/28/2012	SPAS-PC00092
Hyra, J.A.	None Provided	9/8/2012	SPAS-PC00090
Inamoto, Sharon	None Provided	10/5/2012	SPAS-PC00109
Ivy, George	None Provided	8/29/2012	SPAS-PH300013
Jackson, Stephen	None Provided	8/28/2012	SPAS-PH200026
Jawad, Cynthia	Shute, Mihaly & Weinberger LLP	10/9/2012	SPAS-AL00004
Johnston, Mark R.	None Provided	9/3/2012	SPAS-PC00074
Kanter, Karen	None Provided	8/28/2012	SPAS-PH200027
Kapp, Martin	None Provided	8/29/2012	SPAS-PC00036
Kelly, Michael	The Los Angeles Coalition for the Economy of Jobs	8/25/2012	SPAS-PH100005
Kelly, Michael	The Los Angeles Coalition for the Economy of Jobs	8/28/2012	SPAS-PH200012
Kesting, Rachel	None Provided	10/1/2012	SPAS-PC00104
Kirk, Karen	Burbank-Glendale-Pasadena Airport Authority	10/10/2012	SPAS-AL00005
Klein, Ellen	None Provided	9/17/2012	SPAS-PC00083
Klein, Ellen	None Provided	8/29/2012	SPAS-PH300025
Klein, Lee	The California Native	9/17/2012	SPAS-PC00095
Koefoed, Erik	None Provided	8/29/2012	SPAS-PH300033

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Kurkowski, Yoshie	The Sheppard	9/13/2012	SPAS-PC00080
Kurtz, Barry	County of Los Angeles Department of Beaches and Harbors	10/3/2012	SPAS-AL00001
Lambros, Richard	Southern California Leadership Council	8/28/2012	SPAS-PH200020
Lay, Al	LAX-Area Democratic Club	10/8/2012	SPAS-PC00119
Leal, Marco	None Provided	8/29/2012	SPAS-PH300036
Lebon, Lucia	None Provided	10/8/2012	SPAS-PC00114
Lee, Pamela K.	Southern California Association of Governments	10/9/2012	SPAS-AR00001
Leiweke, Timothy J.	AEG	8/27/2012	SPAS-PC00099
Lemus, Teresa	Unite Here	8/25/2012	SPAS-PH100016
Lestz, Patricia	None Provided	8/25/2012	SPAS-PH100024
Lichman, Barbara E.	Buchalter Nemer, A Professional Law Corporation (City of Inglewood, Culver City, Ontario, and County of San Bernardino)	10/10/2012	SPAS-AL00007
Livers, Gregory	None Provided	8/25/2012	SPAS-PC00196
Lobera, Jose	SEIU-USWW	8/25/2012	SPAS-PH100003
Lobera, Jose	USWW	8/28/2012	SPAS-PH200007
Loftus, Katy	None Provided	8/25/2012	SPAS-PC00019
Lopez, Joe	Sheet Metal Workers	8/25/2012	SPAS-PH100012
Loreal	None Provided	8/24/2012	SPAS-PC00075

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Lund, Julie	None Provided	10/8/2012	SPAS-PC00182
Lund, Ph.D., P.E., Russell A.	None Provided	10/8/2012	SPAS-PC00162
Lund, Russell	None Provided	10/9/2012	SPAS-PC00186
Lynch, Debra	None Provided	7/31/2012	SPAS-PC00059
Machado-Essex, Christina	None Provided	8/29/2012	SPAS-PH300010
MacMillan, Ian V	South Coast Air Quality Management District	10/25/2012	SPAS-AR00002
Malanaphy, Hugh	None Provided		SPAS-PFA00009
Marcellus, Terry	None Provided	10/10/2012	SPAS-PC00150
Marcellus, Terry A.	None Provided	10/10/2012	SPAS-PC00145
Marmol, Douglas	Unite Here Local 11	8/29/2012	SPAS-PH300021
Mayeron, Candace	None Provided	10/9/2012	SPAS-PC00137
McArtor, T. Allan	Airbus Americas, Inc.	10/8/2012	SPAS-PC00113
McKinley Jr., James Earl	None Provided	8/29/2012	SPAS-PC00070
McKinnon, Christopher	None Provided	10/8/2012	SPAS-PC00185
McOsker, Tim	Central City Association	8/28/2012	SPAS-PH200024
Melton, Audrey	Iredale Mineral Cosmetics, Ltd.	10/10/2012	SPAS-PC00133
Melton, Greg	None Provided	10/10/2012	SPAS-PC00134
Melton, Greg	None Provided	10/10/2012	SPAS-PC00192

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Mendoza, Marlene	Unite Here 11	8/25/2012	SPAS-PH100017
Miller, Malcom	None Provided	8/3/2012	SPAS-PC00053
Miller, Ron	LA/OC Building Trades Council	8/29/2012	SPAS-PH300007
Mishelevich, David	ARSAC	8/25/2012	SPAS-PH100010
Mitchell, Michael	Mickey's Space Ship Shuttle	8/28/2012	SPAS-PC00021
Mitchell, Michael	Mickey's Space Ship Shuttle	8/28/2012	SPAS-PC00031
Mitchell, Michael	None Provided	10/3/2012	SPAS-PC00178
Mitchell, Michael	Mickey's Space Ship Shuttle	8/29/2012	SPAS-PC00198
Mitchell, Michael	Mickey's Disneyland & Orange County Bus Co.	8/28/2012	SPAS-PH200010
Mitchell, Michael	Mickey's Space Ship Shuttle	8/29/2012	SPAS-PH300017
Mitchell, Michael S.	Terrestrial Trolley LLC	8/28/2012	SPAS-PC00032
Mitchell, Michael S.	Mickey's Space Ship Shuttle	8/29/2012	SPAS-PC00042
Mitchell, Michael S.	Mickey's Space Ship Shuttle	8/29/2012	SPAS-PC00048
Mitchell, Michael S.	None Provided	8/29/2012	SPAS-PC00069
Mitchell, Michael S.	None Provided	9/10/2012	SPAS-PC00169
Miyamoto, Charlotte	County of Los Angeles Department of Beaches and Harbors	10/10/2012	SPAS-AL00009
Montealegre, Andrew	None Provided	9/30/2012	SPAS-PC00176
Morgan, Scott	State of California, Governor's Office of Planning and Research, State	8/6/2012	SPAS-AS00001

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	Clearinghouse and Planning Unit		
Morgan, Scott	State of California, Governor's Office of Planning and Research, State Clearinghouse and Planning Unit	9/11/2012	SPAS-AS00003
Morrison, Nancy-Gene	None Provided	10/10/2012	SPAS-PC00148
Morrison, Nancy-Gene	None Provided	8/25/2012	SPAS-PH100020
Morrison, Nancy-Gene W.	None Provided	8/29/2012	SPAS-PH300009
Moskus, Brittni	U.S. Department of the Interior Fish and Wildlife Service	10/10/2012	SPAS-AF00002
Murray, Donna	None Provided	10/8/2012	SPAS-PC00121
Nadler, Jonathan	Southern California Association of Governments	10/9/2012	SPAS-AR00001
Nay, Mark R	HNTB Architecture	8/28/2012	SPAS-PC00023
Neff, Jack	None Provided		SPAS-PFA00002
Newsom, Bob	HNTB	8/28/2012	SPAS-PC00024
None Provided	None Provided	8/25/2012	SPAS-PC00017
None Provided	None Provided	8/25/2012	SPAS-PC00020
None Provided	None Provided	8/28/2012	SPAS-PC00022
None Provided, Marco	None Provided	9/28/2012	SPAS-PC00102
Norton, Kevin	IBEW Local #11	8/28/2012	SPAS-PH200004
O'Callaghan, Elsa	None Provided	8/28/2012	SPAS-PH200013
Orellana, Patricia	SEIU-USWW	8/25/2012	SPAS-PH100027

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Ouellet, James V.	None Provided	10/10/2012	SPAS-PC00159
Ouellet, Jim	None Provided	8/25/2012	SPAS-PH100032
Ouellet, Jim	None Provided	8/28/2012	SPAS-PH200029
Ouellet, Jim	None Provided	8/29/2012	SPAS-PH300026
Owens, Barbara	None Provided	10/4/2012	SPAS-PC00106
Owens, John	None Provided	10/4/2012	SPAS-PC00106
Papana, Titus	Aviation Safeguards Org.	8/29/2012	SPAS-PH300014
Parks, Donna	None Provided	8/27/2012	SPAS-PC00067
Parris, Michael	None Provided	10/8/2012	SPAS-PC00164
Parvenu, Andre	None Provided	8/17/2012	SPAS-PC00061
Paxton, Lynne	None Provided	8/29/2012	SPAS-PC00035
Paxton, Lynne	None Provided	8/29/2012	SPAS-PH300039
Paz, Sergio	Los Angeles International Airport Area Advisory Committee	10/9/2012	SPAS-PC00132
Peterson, Linda	None Provided	10/8/2012	SPAS-PC00183
Peterson, Linda	None Provided	8/29/2012	SPAS-PH300023
Pida, Jayson	None Provided	8/11/2012	SPAS-PC00046
Poosti, Ali	City of Los Angeles Bureau of Sanitation	9/24/2012	SPAS-AL00002
Prange, Jaclyn H.	Shute, Mihaly & Weinberger LLP	10/9/2012	SPAS-AL00004
Purdy, Richard	None Provided	8/29/2012	SPAS-PC00037

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Quinn, Donald M	None Provided	9/24/2012	SPAS-PC00097
Recinos, Jorge L.	None Provided	8/25/2012	SPAS-PC00003
Redner, James	None Provided	10/9/2012	SPAS-PC00188
Redner, Jim	theRednerGroup	10/9/2012	SPAS-PC00139
Reeg, Kristin	Unite Here Local 11	8/25/2012	SPAS-PH100004
Reeg, Kristin	Unite Here Local 11	8/29/2012	SPAS-PH300019
Riordan, Richard	None Provided	8/29/2012	SPAS-PH300003
Riordan, Richard J.	Former Mayor of LA	8/25/2012	SPAS-PC00033
Rivas, Guadalupe	SEIU	8/24/2012	SPAS-PC00011
Roberts, David	Candidate for Council District 9	8/28/2012	SPAS-PC00029
Rodine, Robert L.	The Polaris Group	8/28/2012	SPAS-PC00026
Rodine, Robert L.	None Provided	7/29/2012	SPAS-PC00058
Rodine, Robert L.	The Polaris Group	8/28/2012	SPAS-PH200021
Rodriguez, Alfredo	SEIU	8/25/2012	SPAS-PC00013
Rodriguez, Crissel	SEIU-USWN	8/25/2012	SPAS-PC00014
Rosen, Stan	None Provided	9/2/2012	SPAS-PC00073
Roten, Rusty	IBEW Local #11	8/29/2012	SPAS-PH300029
Rothenberg, Alan	LA Area Chamber of Commerce	8/29/2012	SPAS-PC00034
Rothenberg, Alan	LA Chamber	8/29/2012	SPAS-PH300002

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Rothman, Jeffrey	None Provided	8/25/2012	SPAS-PC00062
Rusch, Tim	None Provided	8/29/2012	SPAS-PC00068
Ryavec, Mark	Venice Stakeholders Association	9/11/2012	SPAS-PC00078
Ryavec, Mark	Venice Stakeholders Association	8/29/2012	SPAS-PH300035
Saifi, Sean	Central Coast Shuttle Services	8/29/2012	SPAS-PC00197
Saifi, Sean	Central Coast Shuttle Services	8/29/2012	SPAS-PH300020
Sambrano, Diane	None Provided	10/10/2012	SPAS-PC00201
Sambrano, Diane	HSCV	8/25/2012	SPAS-PH100031
Sambrano, Diane	HSCV	8/29/2012	SPAS-PH300040
Sanchez, Maria	USWW	8/28/2012	SPAS-PH200006
Sandoval, Paula	None Provided	9/19/2012	SPAS-PC00086
Schnabl, Sheri	None Provided	10/8/2012	SPAS-PC00122
Schnabl, Val	None Provided	10/8/2012	SPAS-PC00122
Schneider, Arleen	None Provided	7/29/2012	SPAS-PC00050
Schneider, Arleen	None Provided	10/10/2012	SPAS-PC00200
Schneider, Barry	None Provided	7/29/2012	SPAS-PC00050
Schneider, Barry	None Provided	10/10/2012	SPAS-PC00200
Schneider, Denny	LAX-Community Noise Roundtable	8/25/2012	SPAS-PC00002

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Schneider, Denny	ARSAC	8/25/2012	SPAS-PH100021
Schneider, Denny	ARSAC	8/28/2012	SPAS-PH200022
Schneider, Denny	ARSAC	8/29/2012	SPAS-PH300012
Schneider, Gary N.	None Provided	8/25/2012	SPAS-PC00008
Schneider, Nancy	WNA-ARSAC	8/25/2012	SPAS-PH100008
Schuelein, Steve	None Provided	10/11/2012	SPAS-PC00199
Shahabi, Karim	None Provided	10/10/2012	SPAS-PC00152
Shapiro, Lynne	None Provided	9/6/2012	SPAS-PC00077
Shapiro, Lynne	None Provided	9/28/2012	SPAS-PC00101
Shapiro, Lynne	None Provided		SPAS-PC00112
Siegel, Howard	None Provided	8/25/2012	SPAS-PC00064
Simon, David	Southern California Committee for the Olympic Games	8/28/2012	SPAS-PH200003
Singh, Donna	None Provided	8/29/2012	SPAS-PH300031
Singleton, Dave	State of California, Native American Heritage Commission	8/13/2012	SPAS-AS00002
Sirotich, Stephanie D.	None Provided	10/8/2012	SPAS-PC00120
Smith, Chris	None Provided	10/3/2012	SPAS-PC00179
Smith, Garrett	None Provided	10/9/2012	SPAS-PC00144
Smith, Garrett	None Provided	8/29/2012	SPAS-PH300038

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Solorzano, Isidro	Unite Here Local 11	8/29/2012	SPAS-PH300018
Stacey, Pam	None Provided	8/29/2012	SPAS-PH300004
Stacey, Pamela	None Provided	9/26/2012	SPAS-PC00172
Steinbach, David	None Provided	9/10/2012	SPAS-PC00170
Stevens, Mike	Councilman (Inglewood)	8/29/2012	SPAS-PH300001
Sturtevant, Dwight B.	None Provided	8/26/2012	SPAS-PC00047
Tallarico, Lorraine M.	Avis Budget Car Rental, LLC	10/9/2012	SPAS-PC00129
Taylor, Lisa	None Provided		SPAS-PFA00003
Teplitz, Richard	None Provided	8/16/2012	SPAS-PC00060
Teplitz, Rick	None Provided	8/29/2012	SPAS-PC00071
The Allen Family	None Provided	10/10/2012	SPAS-PC00194
Toebben, Gary	Los Angeles Area Chamber of Commerce	10/8/2012	SPAS-PC00202
Toebben, Gary	Los Angeles Area Chamber of Commerce	8/25/2012	SPAS-PH100002
Toledo, Luis O.	None Provided	9/5/2012	SPAS-PC00166
Topal, Jack	None Provided	8/29/2012	SPAS-PC00041
Topal, Jack	Westchester/Playa del Rey Neighborhood Council	8/29/2012	SPAS-PH300024
Torres, Robert	None Provided		SPAS-PFA00006
Turner, Jordann	None Provided	9/7/2012	SPAS-PC00167
Turner, Jordann	None Provided	9/7/2012	SPAS-PC00168

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Ueberroth, Peter	Contrarian Group, Inc.	8/29/2012	SPAS-PH300008
Ueberroth, Peter V.	Contrarian Group, Inc.	8/27/2012	SPAS-PC00055
Underwood, Brenda	None Provided	8/28/2012	SPAS-PC00025
Underwood, Brenda	None Provided	8/28/2012	SPAS-PH200008
Underwood, Brenda	None Provided	8/29/2012	SPAS-PH300028
Van Valkenburg, Peter	Enterprise Holdings, Inc.	10/8/2012	SPAS-PC00118
Vaughn, Vicki	None Provided	8/29/2012	SPAS-PC00038
Vaughn, Vicki	None Provided	9/28/2012	SPAS-PC00173
Voss, David	LAX Coastal Area Chamber of Commerce	10/10/2012	SPAS-PC00149
Walker, Robert W.	United	7/27/2012	SPAS-PC00107
Wallace, Erin	None Provided	10/9/2012	SPAS-PC00189
Ward, Brian	None Provided	9/18/2012	SPAS-PC00084
Washington Jr., James H.	None Provided		SPAS-PFA00001
Wayne, Alan B	None Provided	10/9/2012	SPAS-PC00138
Welborne, Martha	Metropolitan Transportation Authority	10/9/2012	SPAS-AL00003
Wexler, Adelle	The Guilded Cage	9/14/2012	SPAS-PC00096
Whiffen, Janice	None Provided	7/30/2012	SPAS-PC00043
Whitcomb, Rudolph F.	None Provided	7/27/2012	SPAS-PC00056

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White, Eugene	None Provided	10/8/2012	SPAS-PC00184
Whittman, Richard	None Provided	8/27/2012	SPAS-PC00063
Wicks, Douglas	None Provided	10/4/2012	SPAS-PC00103
Wicks, Tammie	None Provided	10/4/2012	SPAS-PC00103
Widener, Bill	None Provided	8/25/2012	SPAS-PH100025
Widener, William	None Provided	8/29/2012	SPAS-PH300032
Wiles, Jim	None Provided	10/4/2012	SPAS-PC00180
Williams, Rendric	None Provided	7/29/2012	SPAS-PC00057
Wong, Ben	Southern California Edison Company	8/31/2012	SPAS-PC00091
Worf, Homer	None Provided	10/9/2012	SPAS-PC00190
Wright, Jerard	Sierra Club Angeles Chapter	10/10/2012	SPAS-PC00154
Yeager, Will	None Provided		SPAS-PFA00004
Zifkin, Walter	None Provided	10/2/2012	SPAS-PC00161

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Airbus Americas, Inc.	McArtor, T. Allan	10/8/2012	SPAS-PC00113
ARSAC	Bray, Sandra	8/25/2012	SPAS-PC00012
ARSAC	Schneider, Denny	10/9/2012	SPAS-PC00130
ARSAC	Acherman, Robert	10/10/2012	SPAS-PC00153
ARSAC	Mishelevich, David	8/25/2012	SPAS-PH100010
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ARSAC	Schneider, Denny	8/28/2012	SPAS-PH200022
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Avis Budget Car Rental, LLC	Tallarico, Lorraine M.	10/9/2012	SPAS-PC00129
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Buchalter Nemer, A. Professional Law Corporation (City of Inglewood, Culver City, Ontario, and County of San Bernardino)	Lichman, Barbara E.	10/10/2012	SPAS-AL00007
Burbank-Glendale-Pasadena Airport Authority	Kirk, Karen	10/10/2012	SPAS-AL00005
Burbank-Glendale-Pasadena Airport Authority	Feger, Dan	10/10/2012	SPAS-AL00005
Candidate for Council District 9	Roberts, David	8/28/2012	SPAS-PC00029
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City of Inglewood Residential Sound Insulation Department	Calzada, Michael F.	10/10/2012	SPAS-AL00006
City of Los Angeles Bureau of Sanitation	Poosti, Ali	9/24/2012	SPAS-AL00002
Compton School Board	Ali, Micah	8/25/2012	SPAS-PH100001
Contrarian Group, Inc.	Ueberroth, Peter V.	8/27/2012	SPAS-PC00055
Contrarian Group, Inc.	Ueberroth, Peter	8/29/2012	SPAS-PH300008
Contrarian Group, Inc.	Rothenberg, Alan	8/29/2012	SPAS-PH300008
Councilman (Inglewood)	Stevens, Mike	8/29/2012	SPAS-PH300001
County of Los Angeles Chief Executive Office Operations and Budget	Fujioka, William T.	10/10/2012	SPAS-AL00008
County of Los Angeles Chief Executive Office Operations and Budget	Barbati, Isabella	10/10/2012	SPAS-AL00008
County of Los Angeles Department of Beaches and Harbors	Kurtz, Barry	10/3/2012	SPAS-AL00001
County of Los Angeles Department of Beaches and Harbors	Miyamoto, Charlotte	10/10/2012	SPAS-AL00009
Dollar Thrifty Automotive Group, Inc.	Branham, Tammy	10/10/2012	SPAS-PC00158
Drollinger Properties	Dial, Karen	10/5/2012	SPAS-PC00160
Enterprise Holdings, Inc.	Van Valkenburg, Peter	10/8/2012	SPAS-PC00118
Former Mayor of LA	Riordan, Richard J.	8/25/2012	SPAS-PC00033
Gateway to LA Business Improvement District	Hughes, Laurie	10/3/2012	SPAS-PC00116
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HSCV	Sambrano, Diane	8/25/2012	SPAS-PH100031
HSCV	Sambrano, Diane	8/29/2012	SPAS-PH300040
IBEW Local #11	Norton, Kevin	8/28/2012	SPAS-PH200004
IBEW Local #11	Broderick, Aaron	8/28/2012	SPAS-PH200005
IBEW Local #11	Roten, Rusty	8/29/2012	SPAS-PH300029
Iredale Mineral Cosmetics, Ltd.	Melton, Audrey	10/10/2012	SPAS-PC00133
IUOE Local #12	Billy, Dan	8/29/2012	SPAS-PH300006
LA Area Chamber of Commerce	Rothenberg, Alan	8/29/2012	SPAS-PC00034
LA Chamber	Rothenberg, Alan	8/29/2012	SPAS-PH300002
LA County Federation at Labor, AFL-C10	Durazo, Maria E.	8/25/2012	SPAS-PH100006
LA County Federation at Labor, AFL-C10	Durazo, Maria E.	8/28/2012	SPAS-PH200001
LA/OC Building Trades Council	Hunter, Robbie	8/25/2012	SPAS-PH100009
LA/OC Building Trades Council	Hunter, Robbie	8/28/2012	SPAS-PH200009
LA/OC Building Trades Council	Miller, Ron	8/29/2012	SPAS-PH300007
Laborers Local 300	Andrade, Ricardo	8/29/2012	SPAS-PH300005
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LawProse Inc.	Garner, Bryan	10/9/2012	SPAS-PC00123
LAX Coastal Area Chamber of Commerce	Davis, Christina V.	9/6/2012	SPAS-PC00076
LAX Coastal Area Chamber of Commerce	Voss, David	10/10/2012	SPAS-PC00149
LAX Coastal Area Chamber of Commerce	Davis, Christina	10/10/2012	SPAS-PC00149
LAX-Area Democratic Club	Lay, Al	10/8/2012	SPAS-PC00119
LAX-Community Noise Roundtable	Schneider, Denny	8/25/2012	SPAS-PC00002
Lennox School District	Cruz, Marisol	8/25/2012	SPAS-PH100007
Los Angeles Area Chamber of Commerce	Toebben, Gary	10/8/2012	SPAS-PC00202
Los Angeles Area Chamber of Commerce	Toebben, Gary	8/25/2012	SPAS-PH100002
Los Angeles Area Chamber of Commerce	Hathaway, Karen	8/28/2012	SPAS-PH200002
Los Angeles Area Chamber of Commerce	Gonzalez, Ruben	8/28/2012	SPAS-PH200019
Los Angeles Council District 11 Transportation Advisory Committee	Hetz, Matthew	10/9/2012	SPAS-PC00125
Los Angeles International Airport Area Advisory Committee	Paz, Sergio	10/9/2012	SPAS-PC00132
Mar Vista Community Council	Commins, Sharon	10/10/2012	SPAS-PC00131
Mercury Air Group	Czyzyk, Joe	8/25/2012	SPAS-PH100023
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Mickey's Space Ship Shuttle	Mitchell, Michael	8/28/2012	SPAS-PC00021
Mickey's Space Ship Shuttle	Mitchell, Michael	8/28/2012	SPAS-PC00031
Mickey's Space Ship Shuttle	Mitchell, Michael S	8/29/2012	SPAS-PC00042
Mickey's Space Ship Shuttle	Mitchell, Michael S	8/29/2012	SPAS-PC00048
Mickey's Space Ship Shuttle	Mitchell, Michael	8/29/2012	SPAS-PC00198
Mickey's Space Ship Shuttle	Mitchell, Michael	8/29/2012	SPAS-PH300017
NCWP-ARC	Eggers, Craig	8/29/2012	SPAS-PH300030
Neighborhood Council of Westchester Playa	Hench, Cyndi	9/4/2012	SPAS-PC00089
Neighborhood Council of Westchester Playa	Eggers, Craig	10/10/2012	SPAS-PC00147
Neighborhood Council of Westchester Playa	Hench, Cyndi	10/10/2012	SPAS-PC00147
Neighborhood Council of Westchester Playa	Eggers, Craig	8/25/2012	SPAS-PH100029
Neighborhood Council of Westchester Playa	Evans, Kathryn	8/28/2012	SPAS-PH200015
Neighborhood Council of Westchester Playa	Eggers, Craig	8/28/2012	SPAS-PH200025
NewCap Partners, Inc.	Turney, Thomas W	7/30/2012	SPAS-PC00051
None Provided	Bullard, Julia	8/25/2012	SPAS-PC00001
None Provided	Lowell, William	8/25/2012	SPAS-PC00001
None Provided	Recinos, Jorge L.	8/25/2012	SPAS-PC00003

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None Provided	Gat, Jonathan	8/25/2012	SPAS-PC00007
None Provided	Schneider, Gary N.	8/25/2012	SPAS-PC00008
None Provided	Aguilar, Ramon	8/25/2012	SPAS-PC00010
None Provided	Baca, Mary J.	8/25/2012	SPAS-PC00015
None Provided	Conine, Patricia	8/25/2012	SPAS-PC00016
None Provided	None Provided	8/25/2012	SPAS-PC00017
None Provided	Loftus, Katy	8/25/2012	SPAS-PC00019
None Provided	None Provided	8/25/2012	SPAS-PC00020
None Provided	None Provided	8/28/2012	SPAS-PC00022
None Provided	Underwood, Brenda	8/28/2012	SPAS-PC00025
None Provided	Paxton, Lynne	8/29/2012	SPAS-PC00035
None Provided	Kapp, Martin	8/29/2012	SPAS-PC00036
None Provided	Purdy, Richard	8/29/2012	SPAS-PC00037
None Provided	Vaughn, Vicki	8/29/2012	SPAS-PC00038
None Provided	Aniolek, Gregg	8/29/2012	SPAS-PC00039
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None Provided	Child, Dotti	7/30/2012	SPAS-PC00044
None Provided	Child, Herb	7/30/2012	SPAS-PC00044
None Provided	Edelman, Lynn	7/28/2012	SPAS-PC00045
None Provided	Pida, Jayson	8/11/2012	SPAS-PC00046
None Provided	Sturtevant, Dwight B.	8/26/2012	SPAS-PC00047
None Provided	Briggs, Eric	8/27/2012	SPAS-PC00049
None Provided	Schneider, Arleen	7/29/2012	SPAS-PC00050
None Provided	Schneider, Barry	7/29/2012	SPAS-PC00050
None Provided	Edie, Patricia	7/29/2012	SPAS-PC00052
None Provided	Edie, Jay	7/29/2012	SPAS-PC00052
None Provided	Miller, Malcom	8/3/2012	SPAS-PC00053
None Provided	Daniels, Hilary	9/5/2012	SPAS-PC00054
None Provided	Gutierrez, Daniel	9/5/2012	SPAS-PC00054
None Provided	Gutierrez, Judy	9/5/2012	SPAS-PC00054
None Provided	Whitcomb, Rudolph F.	7/27/2012	SPAS-PC00056
None Provided	Williams, Rendric	7/29/2012	SPAS-PC00057

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None Provided	Teplitz, Richard	8/16/2012	SPAS-PC00060
None Provided	Parvenu, Andre	8/17/2012	SPAS-PC00061
None Provided	Rothman, Jeffrey	8/25/2012	SPAS-PC00062
None Provided	Whittman, Richard	8/27/2012	SPAS-PC00063
None Provided	Siegel, Howard	8/25/2012	SPAS-PC00064
None Provided	Haukohl, Kurt	8/27/2012	SPAS-PC00065
None Provided	Fujita, James	8/27/2012	SPAS-PC00066
None Provided	Parks, Donna	8/27/2012	SPAS-PC00067
None Provided	Rusch, Tim	8/29/2012	SPAS-PC00068
None Provided	Mitchell, Michael S.	8/29/2012	SPAS-PC00069
None Provided	McKinley Jr., James Earl	8/29/2012	SPAS-PC00070
None Provided	Teplitz, Rick	8/29/2012	SPAS-PC00071
None Provided	Dina, Gregory	8/30/2012	SPAS-PC00072
None Provided	Rosen, Stan	9/2/2012	SPAS-PC00073
None Provided	Johnston, Mark R.	9/3/2012	SPAS-PC00074
None Provided	Loreal	8/24/2012	SPAS-PC00075
None Provided	Shapiro, Lynne	9/6/2012	SPAS-PC00077

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None Provided	Edelman, Lynn	9/19/2012	SPAS-PC00085
None Provided	Sandoval, Paula	9/19/2012	SPAS-PC00086
None Provided	Dunagan, Bob	9/20/2012	SPAS-PC00088
None Provided	Hyra, J.A.	9/8/2012	SPAS-PC00090
None Provided	Boxer, Aviva	9/10/2012	SPAS-PC00094
None Provided	Quinn, Donald M	9/24/2012	SPAS-PC00097
None Provided	Cunningham, Kim G	9/24/2012	SPAS-PC00097
None Provided	Shapiro, Lynne	9/28/2012	SPAS-PC00101
None Provided	None Provided, Marco	9/28/2012	SPAS-PC00102
None Provided	Wicks, Douglas	10/4/2012	SPAS-PC00103
None Provided	Wicks, Tammie	10/4/2012	SPAS-PC00103
None Provided	Kesting, Rachel	10/1/2012	SPAS-PC00104
None Provided	Camino, Julie	10/2/2012	SPAS-PC00105
None Provided	Owens, John	10/4/2012	SPAS-PC00106
None Provided	Owens, Barbara	10/4/2012	SPAS-PC00106
None Provided	Haythorn, Joseph D.	9/20/2012	SPAS-PC00108
None Provided	Inamoto, Sharon	10/5/2012	SPAS-PC00109

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None Provided	Carlos, Juan	10/8/2012	SPAS-PC00114
None Provided	Sirotich, Stephanie D.	10/8/2012	SPAS-PC00120
None Provided	Murray, Donna	10/8/2012	SPAS-PC00121
None Provided	Schnabl, Sheri	10/8/2012	SPAS-PC00122
None Provided	Schnabl, Val	10/8/2012	SPAS-PC00122
None Provided	Alpern, M.D., Kenneth S	10/9/2012	SPAS-PC00124
None Provided	Cope, Danna	10/9/2012	SPAS-PC00128
None Provided	Melton, Greg	10/10/2012	SPAS-PC00134
None Provided	Citrin, Judy	10/10/2012	SPAS-PC00135
None Provided	Bergelson, Gordon	10/9/2012	SPAS-PC00136
None Provided	Mayeron, Candace	10/9/2012	SPAS-PC00137
None Provided	Wayne, Alan B.	10/9/2012	SPAS-PC00138
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None Provided	Austin, Mary	10/9/2012	SPAS-PC00141
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None Provided	Morrison, Nancy-Gene	10/10/2012	SPAS-PC00148
None Provided	Marcellus, Terry	10/10/2012	SPAS-PC00150
None Provided	Eggers, Craig	10/10/2012	SPAS-PC00151
None Provided	Shahabi, Karim	10/10/2012	SPAS-PC00152
None Provided	Dillard, Joyce	10/10/2012	SPAS-PC00155
None Provided	Cope, Danna	10/10/2012	SPAS-PC00156
None Provided	Huth, Hans	10/10/2012	SPAS-PC00157
None Provided	Ouellet, James V.	10/10/2012	SPAS-PC00159
None Provided	Zifkin, Walter	10/2/2012	SPAS-PC00161
None Provided	Lund, Ph.D., P.E., Russell A.	10/8/2012	SPAS-PC00162
None Provided	Healy, Helen M.	10/6/2012	SPAS-PC00163
None Provided	Parris, Michael	10/8/2012	SPAS-PC00164
None Provided	Geerligs, P.R.	8/28/2020	SPAS-PC00165
None Provided	Toledo, Luis O	9/5/2012	SPAS-PC00166
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None Provided	Stacey, Pamela	9/26/2012	SPAS-PC00172
None Provided	Vaughn, Vicki	9/28/2012	SPAS-PC00173
None Provided	Barry, Bill	9/28/2012	SPAS-PC00174
None Provided	Haythorn, Joseph D.	9/30/2012	SPAS-PC00175
None Provided	Montealegre, Andrew	9/30/2012	SPAS-PC00176
None Provided	Harrell, Erica	10/2/2012	SPAS-PC00177
None Provided	Mitchell, Michael	10/3/2012	SPAS-PC00178
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None Provided	Lund, Julie	10/8/2012	SPAS-PC00182
None Provided	Peterson, Linda	10/8/2012	SPAS-PC00183
None Provided	White, Eugene	10/8/2012	SPAS-PC00184
None Provided	McKinnon, Christopher	10/8/2012	SPAS-PC00185
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None Provided	Melton, Greg	10/10/2012	SPAS-PC00192
None Provided	Kokelaar, Linda	10/10/2012	SPAS-PC00193
None Provided	The Allen Family	10/10/2012	SPAS-PC00194
None Provided	Gat, Jonathan	8/25/2012	SPAS-PC00195
None Provided	Livers, Gregory	8/25/2012	SPAS-PC00196
None Provided	Schuelein, Steve	10/11/2012	SPAS-PC00199
None Provided	Schneider, Barry	10/10/2012	SPAS-PC00200
None Provided	Schneider, Arleen	10/10/2012	SPAS-PC00200
None Provided	Sambrano, Diane	10/10/2012	SPAS-PC00201
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None Provided	Neff, Jack		SPAS-PFA00002
None Provided	Taylor, Lisa		SPAS-PFA00003
None Provided	Yeager, Will		SPAS-PFA00004
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None Provided	Torres, Robert		SPAS-PFA00006
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None Provided	Freeman, Stefan	8/25/2012	SPAS-PH100014
None Provided	Morrison, Nancy-Gene	8/25/2012	SPAS-PH100020
None Provided	Cope, Danna	8/25/2012	SPAS-PH100022
None Provided	Lestz, Patricia	8/25/2012	SPAS-PH100024
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None Provided	O'Callaghan, Elsa	8/28/2012	SPAS-PH200013
None Provided	Hosmer, Liz	8/28/2012	SPAS-PH200014
None Provided	Evans, Scott	8/28/2012	SPAS-PH200016
None Provided	Gat, Jonathan	8/28/2012	SPAS-PH200018
None Provided	Jackson, Stephen	8/28/2012	SPAS-PH200026
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None Provided	Ouellet, Jim	8/28/2012	SPAS-PH200029

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None Provided	Morrison, Nancy-Gene W.	8/29/2012	SPAS-PH300009
None Provided	Machado-Essex, Christina	8/29/2012	SPAS-PH300010
None Provided	Cope, Danna	8/29/2012	SPAS-PH300011
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None Provided	Fleming, Matthew	8/29/2012	SPAS-PH300015
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None Provided	Ouellet, Jim	8/29/2012	SPAS-PH300026
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None Provided	Singh, Donna	8/29/2012	SPAS-PH300031
None Provided	Widener, William	8/29/2012	SPAS-PH300032
None Provided	Koefoed, Erik	8/29/2012	SPAS-PH300033
None Provided	Aniolek, Gregg	8/29/2012	SPAS-PH300034
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RTKL	Cherry, Nate	8/28/2012	SPAS-PC00028
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SEIU	Rivas, Guadalupe	8/24/2012	SPAS-PC00011
SEIU	Rodriguez, Alfredo	8/25/2012	SPAS-PC00013
SEIU-USWN	Rodriguez, Crissel	8/25/2012	SPAS-PC00014
SEIU-USWW	Lobera, Jose	8/25/2012	SPAS-PH100003
SEIU-USWW	Orellana, Patricia	8/25/2012	SPAS-PH100027
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Southern California Leadership Council	Lambros, Richard	8/28/2012	SPAS-PH200020
State of California, Governor's Office of Planning and Research, State Clearinghouse and Planning Unit	Morgan, Scott	8/6/2012	SPAS-AS00001
State of California, Governor's Office of Planning and Research, State Clearinghouse and Planning Unit	Morgan, Scott	9/11/2012	SPAS-AS00003
State of California, Native American Heritage Commission	Singleton, Dave	8/13/2012	SPAS-AS00002
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The Boeing Company	Hyde, Shaunta	8/28/2012	SPAS-PC00092
The California Native	Klein, Lee	9/17/2012	SPAS-PC00095
The Guilded Cage	Wexler, Adelle	9/14/2012	SPAS-PC00096
The LA Loop	Dosch, Richard	9/19/2012	SPAS-PC00087
The Los Angeles Coalition for the Economy of Jobs	Kelly, Michael	8/25/2012	SPAS-PH100005
The Los Angeles Coalition for the Economy of Jobs	Kelly, Michael	8/28/2012	SPAS-PH200012
The Polaris Group	Rodine, Robert L.	8/28/2012	SPAS-PC00026
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The Sheppard	Kurkowski, Yoshie	9/13/2012	SPAS-PC00080

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theRednerGroup	Redner, Jim	10/9/2012	SPAS-PC00139
Tuskegee Airmen, Inc.	Hamilton, Jacqueline	8/25/2012	SPAS-PC00018
Tuskegee Airmen, Inc.	Hamilton, Jacqueline	8/28/2012	SPAS-PC00030
Tuskegee Airmen, Inc.	Hamilton, Jacqueline	8/25/2012	SPAS-PH100028
Tuskegee Airmen, Inc.	Hamilton, Jacqueline	8/28/2012	SPAS-PH200028
U.S. Department of Homeland Security, FEMA Region IX	Blackburn, Gregor	8/9/2012	SPAS-AF00001
U.S. Department of the Interior Fish and Wildlife Service	Goebel, Karen A.	10/10/2012	SPAS-AF00002
U.S. Department of the Interior Fish and Wildlife Service	Moskus, Brittni	10/10/2012	SPAS-AF00002
Unite Here	Ferrer, Mirella	8/25/2012	SPAS-PH100015
Unite Here	Lemus, Teresa	8/25/2012	SPAS-PH100016
Unite Here 11	Mendoza, Marlene	8/25/2012	SPAS-PH100017
Unite Here Local 11	Reeg, Kristin	8/25/2012	SPAS-PH100004
Unite Here Local 11	Chavez, Sinia	8/25/2012	SPAS-PH100018
Unite Here Local 11	Solorzano, Isidro	8/29/2012	SPAS-PH300018
Unite Here Local 11	Reeg, Kristin	8/29/2012	SPAS-PH300019
Unite Here Local 11	Marmol, Douglas	8/29/2012	SPAS-PH300021
United	Walker, Robert W.	7/27/2012	SPAS-PC00107
University of Southern California	Easwaran, Kenny	9/15/2012	SPAS-PC00081
USWW	Mendoza, Maria	8/25/2012	SPAS-PH100011

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USWW	Sanchez, Maria	8/28/2012	SPAS-PH200006
USWW	Lobera, Jose	8/28/2012	SPAS-PH200007
Venice Stakeholders Association	Ryavec, Mark	9/11/2012	SPAS-PC00078
Venice Stakeholders Association	Ryavec, Mark	8/29/2012	SPAS-PH300035
West Basin Water District	Gray, Gloria	8/25/2012	SPAS-PH100026
Westchester Neighbors Association	Chesney, Tom	10/8/2012	SPAS-PC00111
Westchester Town Center Business Improvement District	Duckworth, Donald R.	9/29/2012	SPAS-PC00115
Westchester/Playa del Rey Neighborhood Council	Topal, Jack	8/29/2012	SPAS-PH300024
Wetlands Defense Fund and Ballona Institute	Hanscom, Marcia	8/29/2012	SPAS-PH300022
WNA-ARSAC	Schneider, Nancy	8/25/2012	SPAS-PH100008
Wood, Smith, Henning & Berman LLP	Edwards, Demetra L.	10/9/2012	SPAS-PC00146

4.3 Comments and Responses

The following provides the Topical Responses and individual responses to comments on the SPAS Draft EIR.

4.3.1 Topical Responses

TR-SPAS-LR-1 Lincoln Boulevard Realignment

Introduction

This topical response responds to comments on the SPAS Draft EIR regarding the realignment of Lincoln Boulevard that would occur under SPAS Alternatives 1, 5, and 6. As explained below, the SPAS Draft EIR analyzes the Lincoln Boulevard realignment at a program-level of detail appropriate for this stage of the SPAS process.

Description of the Lincoln Boulevard Realignment

Lincoln Boulevard is a State highway that runs generally parallel to, and north of, the eastern portion of Runway 6L/24R before turning northwest through the community of Westchester. Under the SPAS alternatives that would relocate Runway 6L/24R to the north (i.e., Alternatives 1, 5, and 6), a portion of Lincoln Boulevard would also be realigned to the north in order to move the roadway out of the footprint of the runway and outside of the Runway Safety Area (RSA) and Object Free Area (OFA), to the extent possible. A small portion of the realigned roadway could remain within the RSA and/or the OFA under each of the SPAS alternatives. The portion of the roadway within the RSA and/or OFA would be required to be below grade (i.e., in a trench) or covered (i.e., in a covered trench or tunnel) to meet FAA runway safety requirements.

The need to relocate Lincoln Boulevard under Alternatives 1, 5, and 6 is clearly identified in the SPAS Draft EIR. Specifically, this project component is identified and accurately described on pages 2-10, 2-29, 2-33, and 2-55, listed in Table 2-3, and illustrated in Figures 2-1, 2-5, 2-6, and 2-10 in Chapter 2 of the SPAS Draft EIR. As described in Chapter 2, under Alternative 1, approximately 540 linear feet of the road segment would need to be covered; under Alternative 5, approximately 765 linear feet would need to be covered; and under Alternative 6, approximately 252 linear feet would need to be covered.

The portion of the roadway to be realigned starts northwest of the intersection of Lincoln Boulevard and Sepulveda Boulevard and extends to just past the Westchester Parkway underpass. The intersection of Lincoln Boulevard and Sepulveda Boulevard itself would remain in its current configuration; a minor modification to the right turn movement from southbound Sepulveda Boulevard to westbound Lincoln Boulevard may be required. At its greatest distance, the roadway would be moved approximately 500 feet to the north. For the portion of the roadway that would need to be below grade, the depth of the depression would not exceed approximately 30 feet.

The road would be realigned south of Westchester Parkway and north of the existing alignment of Lincoln Boulevard. This area is almost entirely vacant, with the exception of a roadway that accommodates movements from westbound Lincoln Boulevard to Westchester Parkway and from Westchester Parkway to westbound Lincoln Boulevard, and a radar facility located immediately east of this roadway. The area is entirely within airport property. The airport perimeter fence is located along the south side of Lincoln Boulevard between El Manor Avenue and Northside Parkway. If Lincoln Boulevard were realigned, this portion of the perimeter fence would also be relocated, remaining on the south side of the realigned roadway. The relocation of the perimeter fence would not affect any homes or businesses and would not alter the airport property line. No acquisition would be required to realign Lincoln Boulevard and there was, therefore, no need for Section 2.3.1.1 of the SPAS Draft EIR to list the Lincoln Boulevard and Sepulveda Boulevard intersection as a potential acquisition.

Required Level of Detail in SPAS Draft Program EIR

As discussed on page 4-3 of the SPAS Draft EIR, the Draft EIR is a program-level document prepared pursuant to the State CEQA Guidelines. State CEQA Guidelines Section 15168(a) states that a program EIR "may be prepared on a series of actions that can be characterized as one large project" and applies to projects that are related either geographically or as logical parts in the chain of contemplated actions. A program EIR is prepared at a more general level of planning than a project-level EIR and allows a lead agency to "consider broad policy alternatives and program-wide mitigation measures at an early time when the agency has greater flexibility to deal with basic problems or cumulative impacts" (State CEQA Guidelines Section 15168(b)(4)).

Section 15146(b) of the State CEQA Guidelines states that "An EIR on a project such as the… amendment of… a local general plan should focus on the secondary effects that can be expected to follow from the… amendment, but the EIR need not be as detailed as an EIR on the specific construction projects that might follow."[130]

Program EIRs are commonly used in conjunction with the tiering process, which is "the coverage of general matters in broader EIRs (such as general plans or policy statements) with subsequent narrower EIRs or ultimately site-specific EIRs…concentrating solely on the issues specific to the EIR subsequently prepared." (State CEQA Guidelines Section 15385.) Under CEQA's tiering principles, it is proper for a lead agency to focus a first-tier EIR on only the program's general impacts, "leaving project-level details to subsequent EIRs when specific projects are being considered." (State CEQA Guidelines Section 15152(c); *In re Bay-Delta* (2008) 43 Cal.4th 1143, 1174-1175.)

The State CEQA Guidelines establish several additional principles related to the level of detail appropriate for a first-tier program EIR. For example, an EIR project description should be "general" and "not supply extensive detail beyond that needed for an evaluation and review of the environmental impacts." (State CEQA Guidelines Section 15124.) Also, the degree of specificity in an EIR corresponds to the degree of specificity of the underlying activity being evaluated. (State CEQA Guidelines Section 15146(b).) An EIR's sufficiency is reviewed in the light of what is "reasonably feasible." (State CEQA Guidelines Section 15151.)

The requirements and principles for first-tier program EIRs reviewed above apply directly to the SPAS Draft EIR. As stated on page 1-10 in Section 1.2.1 of the SPAS Draft EIR, "[t]he project is to complete a Specific Plan Amendment Study (SPAS) that fulfills Section 7.H of the LAX Specific Plan consistent with the definition of the SPAS set forth in the LAX Master Plan Stipulated Settlement." The outcome of SPAS is the possible amendment of the LAX Specific Plan, which is an element of the City's General Plan. Therefore, the SPAS Draft EIR is appropriately a program EIR that focuses on program-wide impacts, and is not a project-level EIR. Because it is a program EIR, the SPAS Draft EIR is not required to analyze the impacts of specific construction projects included in the program at a project-specific level of detail.

As indicated on page 2-74 in Section 2.4 of the SPAS Draft EIR, "Certification of the SPAS EIR would complete the program-level CEQA compliance review for the SPAS process. Depending on the outcome of the SPAS process, additional project-level CEQA review may be required for implementation of the improvements associated with the selected SPAS alternative." LAWA's approach to preparing second-tier project-level CEQA documents is exemplified by project-specific EIRs prepared for major elements of the LAX Master Plan implemented to date, such as the South Airfield Improvement Project EIR, the Bradley West Project EIR, and the Crossfield Taxiway Project EIR.

During the SPAS process, LAWA has evaluated a wide range of options that would fulfill the requirements of the LAX Specific Plan, the Stipulated Settlement, and the project objectives. Detailed project-specific planning, phasing, and design for individual components in the SPAS alternatives are not included in this

[130] Contrary to Comment SPAS-PC00130-637, Section 15146(b) of the State CEQA Guidelines does not state that a program-level EIR may be used to adopt a general plan for the conceptual planning of a district or area, or that a program-level EIR applies to "future and unspecified" projects.

phase of the SPAS process. Therefore, not only is project-level analysis of the Lincoln Boulevard realignment not required by CEQA, but it also would be technically infeasible and speculative.

Responsibility for Preparation and Scope of Second-Tier Project-Specific EIR

Lincoln Boulevard is a State highway (State Route 1) under the jurisdiction of Caltrans. Responsibility for the realignment of Lincoln Boulevard, if required due to selection of SPAS Alternatives 1, 5, or 6, was not known at the time of SPAS Draft EIR and Final EIR preparation. Should the Board of Airport Commissioners and the Los Angeles City Council ultimately approve an alternative that includes realignment of Lincoln Boulevard, the realignment may go through the Caltrans design and approval process, including preparation of a Project Study Report and completion of CEQA review. Alternatively, in the event that ownership and/or control of this portion of the road is transferred to the City of Los Angeles, the City may be responsible for implementing the realignment, including preparation of detailed design plans and completion of required CEQA review. In either case, LAWA would have a prominent role in the project and would provide the funding for its design, environmental review, and implementation.

For the project-specific Lincoln Boulevard realignment CEQA review, construction details would be developed during the detailed engineering phase, and included in the document's project description. Detailed project-specific impact analysis would then be conducted, including impacts during construction on adjacent residences and businesses. Construction details would include construction plans and phasing; specifications for the portion of the roadway that would be covered, including vehicle restrictions, hazardous materials restrictions, ventilation, emergency exits, emergency response, traffic controls, security issues, and maintenance; an evaluation of utilities beneath the site and relocation plans for these utilities; the nature and duration of roadway closures and related detours; and relocation or preservation plans for the memorial marker for LAWA Police Officer Tommy Scott, if required. Under either of the options for review identified above, LAWA would consult with all relevant agencies during detailed engineering and project-specific CEQA review, including Caltrans (as noted on page 2-75 of the SPAS Draft EIR), the Bureau of Sanitation, Department of Water and Power, and other agencies.

Approach to Lincoln Boulevard Realignment in SPAS Draft EIR, Including Rough-Order-of-Magnitude Cost Estimates

LAWA developed conceptual plans for the Lincoln Boulevard realignment as part of SPAS in order to enable this project component to be evaluated at a program level of detail. These plans included conceptual engineering to define the Lincoln Boulevard realignment associated with Alternatives 1, 5, and 6.

Rough-order-of-magnitude (ROM) cost estimates were prepared for all of the components of all of the SPAS alternatives (see Appendix G of the Preliminary LAX SPAS Report). In addition to providing an equal basis of cost comparison between the SPAS alternatives, as presented in Chapter 8 of the Preliminary LAX SPAS Report, these cost estimates were used as a basis for the program-level air quality construction analysis. In order to complete the ROM cost estimates, assumptions were made as to the characteristics of the various improvements. For the Lincoln Boulevard ROM cost estimate, these assumptions included the quantities of materials that would be used during construction, which were determined based on assumptions that included the depth of the subbase, base, and asphalt, as well as many other factors.

The SPAS ROM cost estimates, prepared by professionals experienced in the development of construction cost estimates and familiar with the construction programs at LAX, were detailed and thorough estimates for this level of planning and, as the name states, provide a rough-order-of-magnitude of the costs associated with constructing the improvements associated with the various SPAS alternatives. The cost estimates consider a wide range of factors, and provide assumptions and allowances for those factors that are not known at this time. For example, the ROM cost estimates for the Lincoln Boulevard realignment include allowances related to utilities (e.g., electrical, sewer, and water

lines). There are no known cost considerations that were intentionally omitted from the ROM cost estimates, as asserted in Comment SPAS-PC00130-637.

The fact that specific assumptions were made in the development of ROM cost estimates does not mean that detailed engineering design has been completed or that detailed studies of soil conditions and subsurface utilities have been or should be conducted at this level of planning. In fact, detailed engineering design has not yet been conducted and will not be conducted unless (1) a SPAS alternative is approved that includes the realignment of Lincoln Boulevard and (2) the Lincoln Boulevard project is proposed for implementation, at which time detailed planning, engineering design, and environmental review will be undertaken. Nevertheless, the level of detail that was developed as part of the SPAS process was appropriate and sufficient, for this level of planning and evaluation, to determine the general location of the realigned roadway, its approximate depth, the approximate length of the roadway that would need to be depressed, and other general characteristics. This level of specificity was sufficient to determine the distance of the realigned roadway to off-airport land uses, and the impacts of the realignment at a program-level of detail, including impacts to aesthetics and visual resources, biological resources, air quality, and other environmental topics.

The SPAS Draft EIR treats the realignment of Lincoln Boulevard under Alternatives 1, 5, and 6 as an integral component of these alternatives, as evidenced by the specific evaluation of the realignment throughout the environmental analysis (as described below), and the level of detail in the ROM cost estimates. As indicated in the cost estimates, the realignment of Lincoln Boulevard is estimated to cost between $45 million and $90 million, depending upon the alternative (not $1 billion as stated in Comment SPAS-PC00130-637, which provides no supporting documentation or discussion to support that estimate). LAWA recognizes that this is a substantial expenditure. The reference to the realignment of Lincoln Boulevard as an "improvement" or "modification" in the SPAS Draft EIR does not imply that LAWA is not evaluating this project component at the same level of detail as all other components of the various SPAS alternatives.

Environmental Analysis of Lincoln Boulevard Realignment in SPAS Draft EIR

Comment SPAS-PC00130-637 presents a large number of comments and questions on the SPAS Draft EIR's description and environmental assessment of the Lincoln Boulevard realignment. For the most part, these comments and questions do not point out any specific deficiencies in the substantial evidence supporting the EIR's impact analysis conclusions. Further, these comments and questions present personal opinions that are not supported by facts or evidence.

The following discussion addresses the environmental topics raised in Comment SPAS-PC00130-637.

Aesthetics - The light and glare impacts of the proposed SPAS alternatives, including the potential light and glare impacts associated with the realignment of Lincoln Boulevard northward under Alternatives 1, 5, and 6, are evaluated in Section 4.1 of the SPAS Draft EIR. The analysis does not "discount the significance of possible light and glare problems" associated with moving Lincoln Boulevard northward. Rather, the potential light and glare impacts associated with the realignment of Lincoln Boulevard under SPAS Alternatives 1, 5, and 6, have been fully evaluated in the SPAS Draft EIR at a program level of detail.

As indicated on page 4-44 in Section 4.1 of the SPAS Draft EIR, under the impact analysis of Alternative 1, which also applies to Alternatives 5 and 6 as stated through cross-references, light and glare impacts associated with operation of the realignment of Lincoln Boulevard would be less than significant due to several factors, including: (1) the several hundred foot distance between the proposed roadway alignment and the existing light-sensitive receptors to the north; (2) the presence of intervening features between the roadway and the sensitive receptors, including the Westchester Golf Course (lit at night) and a 12-foot-high noise wall atop an 8-foot high berm located south of W. 88th Street; (3) a portion of the realigned roadway would be developed below grade, thereby reducing the height of the required light poles; and (4) the realignment would represent the realignment of an existing lit roadway rather than the introduction of new lighting in a currently unlit environment. Furthermore, the realigned roadway and light

poles would be subject to existing requirements formulated to ensure that airport development does not result in light spillover onto adjacent properties or substantial glare, including LAX Master Plan Commitments DA-1 (Provide and Maintain Airport Buffer Areas), LI-2 (Use of Non-Glare Generating Building Materials), and LI-3 (Lighting Controls); Los Angeles Municipal Code Section 93.0117, which prohibits light spillover and requires that light sources be shielded and directed downward; the light and glare standards of the LAX Northside Plan and Development Guidelines; and the light standards and objectives of the Los Angeles Transportation Element. Based on the above, the analysis concludes that the realignment of Lincoln Boulevard under SPAS Alternatives 1, 5, and 6 would not result in light spillover onto light-sensitive receptors or substantial glare, and thus would result in a less than significant light and glare impact.

The light and glare impacts associated with the construction of the proposed Lincoln Boulevard realignment under SPAS Alternatives 1, 5, and 6 are also addressed in Section 4.1 of the SPAS Draft EIR. As indicated on page 4-45 in Section 4.1 of the SPAS Draft EIR, the impact analysis for Alternative 1, which also applies to Alternatives 5 and 6, acknowledges that construction lighting would be required at both the construction site itself and within the proposed construction staging areas (including within proposed Construction Staging Areas B, C, and D proposed along the north and south sides of Westchester Parkway, as identified in Figure 2-15 in Chapter 2 of the SPAS Draft EIR). As indicated, sound walls currently separate some of the residential uses from the proposed construction sites and construction staging areas (including, in the case of Construction Staging Areas B, C and D, the 12-foot nigh noise wall atop an 8-foot high berm noted above). As further indicated, construction fencing would be installed in accordance with LAX Master Plan Mitigation Measure MM-DA-1 (Construction Fencing), to block and/or buffer views of the construction sites and construction staging areas; some of the construction staging areas (including Construction Staging Area D) are already the sites of airport-related construction staging activities, and thus are already sources of construction light and glare; and the construction sites and construction staging areas are already located in a well-lit urban environment. Furthermore, the construction activities and associated construction lighting for the proposed Lincoln Boulevard realignment would be temporary. Therefore, while the analysis acknowledges on page 4-45 of Section 4.1 of the SPAS Draft EIR that there would be greater levels of ambient lighting during construction of the Lincoln Boulevard realignment, the analysis also determines that this light and any associated glare would not result in a change in lighting or lighting intensity such that light would spill off and affect light-sensitive uses, and that the realignment construction would not result in substantial new sources of glare which would adversely affect nighttime views. Hence, the construction-related light and glare impacts associated with the realignment of Lincoln Boulevard would be less than significant.

As demonstrated above, the SPAS Draft EIR's analysis of the light and glare impacts of Lincoln Boulevard realignment meets CEQA requirements for a program EIR, and is supported by substantial evidence. If the realignment is later proposed for implementation, a project-level CEQA document would evaluate light and glare impacts in greater detail, based on detailed project engineering and design.

Air Quality - As mentioned previously, the ROM cost estimates were used as a basis for calculating construction-related air quality impacts, which included both emissions and concentrations. The ROM cost estimates included costs associated with the realignment of Lincoln Boulevard (see Tables AF-3 through AF-5 of Appendix G of the Preliminary LAX SPAS Report). Therefore, the Lincoln Boulevard realignment was accounted for in the construction air quality analysis. As described on page 4-88 in Section 4.2.2.1 of the SPAS Draft EIR, construction activities were grouped geographically by source. The Lincoln Boulevard realignment was grouped with the north airfield construction activity, due to the proximity of Lincoln Boulevard to the north airfield. Therefore, the impacts of routing Lincoln Boulevard closer to off-airport land uses under some of the SPAS alternatives were analyzed; in addition, the impacts of using heavy construction equipment were included in the analysis. Based on existing information and analysis, pollutant emissions and concentrations from construction of the SPAS improvements, which include the Lincoln Boulevard realignment, are expected to be significant; however, if the realignment is proposed for implementation, additional detailed air quality analysis would occur in conjunction with project-level CEQA review.

The SPAS Draft EIR's air quality analysis evaluated the impacts associated with construction of all of the construction projects associated with each of the SPAS alternatives at a program level of detail. The fact that the results reported in Sections 4.2.6.1 and 4.2.6.2 of the SPAS Draft EIR do not specifically mention air quality impacts associated with the Lincoln Boulevard realignment does not mean that these impacts were not evaluated. As noted above, the construction air quality analysis did include the Lincoln Boulevard realignment.

As demonstrated above, the SPAS Draft EIR's analysis of the air quality impacts of Lincoln Boulevard realignment meets CEQA requirements for a program EIR, and is supported by substantial evidence. If the realignment is later proposed for implementation, a project-level CEQA document would evaluate air quality impacts in greater detail, based on detailed project engineering and design.

Biological Resources - The SPAS Draft EIR biological resources analysis considered the impacts of the realignment of Lincoln Boulevard. The area between Lincoln Boulevard and Westchester Parkway where the realignment would occur was included in the habitat surveys and vegetation maps (see Figure 4.3-1 of the SPAS Draft EIR). The relationship between the Lincoln Boulevard realignment and existing habitat is shown in Figures 4.3-6, 4.3-14, and 4.3-16 of the SPAS Draft EIR. Moreover, the habitat area that would be affected by the Lincoln Boulevard alignment under Alternatives 1, 5, and 6 is included in the calculations of impacts to habitat areas and habitat units for each alternative (see Tables 4.3-3 and 4.3-5 of the SPAS Draft EIR, respectively). Page 4-207 of the SPAS Draft EIR specifically states that the analysis of habitats and vegetation associations included roadway modifications. Mitigation for impacts associated with the loss of habitat units is provided in MM-BIO (SPAS)-14 (Replacement of Habitat Units), and includes mitigation for habitat losses caused by the Lincoln Boulevard realignment. The biological resources analysis also identified impacts to mature trees associated with the Lincoln Boulevard realignment under Alternatives 1, 5, and 6 (pages 4-212, 4-254, and 4-265, respectively), which would be less than significant with implementation of LAX Master Plan Mitigation Measure MM-BC-3 (Conservation of Floral Resources: Mature Tree Replacement).

As demonstrated above, the SPAS Draft EIR's analysis of the biological resources impacts of Lincoln Boulevard realignment meets CEQA requirements for a program EIR, and is supported by substantial evidence. If the realignment is later proposed for implementation, a project-level CEQA document would evaluate biological impacts in greater detail, based on detailed project engineering and design.

Coastal Resources - The analysis of impacts to coastal resources in Section 4.4 of the SPAS Draft EIR focused on resources within the coastal zone. The Lincoln Boulevard realignment would not be located within, or in proximity to, the coastal zone, and thus would not affect coastal resources.

Cultural Resources - Similar to the analysis of biological resources, the cultural resources analysis considered the realignment of Lincoln Boulevard. Relative to archaeological resources, a pedestrian survey for archaeological resources was conducted that consisted of surveyed areas and areas that were only spot-checked due to poor ground surface area visibility. The area that was subject to the pedestrian survey is illustrated in Figure 4.5-2 of the SPAS Draft EIR and clearly includes the area in which the realignment of Lincoln Boulevard would occur. The only components of the SPAS alternatives that would be located in proximity to recorded archaeological resources are the airfield improvements and Construction Staging Area A; the Lincoln Boulevard realignment would not be located in proximity to any such resources. Nevertheless, the SPAS Draft EIR acknowledges that previously unrecorded resources could be encountered during construction of any of the SPAS project components. This impact would be mitigated by Mitigation Measure MM-HA (SPAS)-4 (Conformance with LAX Master Plan Archaeological Treatment Plan).

The Lincoln Boulevard realignment was also included within the SPAS study area for historical resources, as were buildings located along Sepulveda Boulevard. As described on page 4-355 of the SPAS Draft EIR, properties over 45 years of age that could be affected by the proposed SPAS alternatives due to demolition, alteration, or adjacent new construction were surveyed and evaluated, including properties along Sepulveda Boulevard such as the Union Savings and Loan Building. The Lincoln Boulevard realignment would be located on vacant land; there are no eligible or designated historical resources

adjacent to the portion of the roadway that would be relocated under Alternatives 1, 5, and 6. The Union Savings and Loan Building at 9800 S. Sepulveda Boulevard is the only historical resource along Sepulveda Boulevard that would be impacted by the SPAS alternatives, but it would not be affected by the roadway realignment. In fact, page 4-367 of the SPAS Draft EIR specifically states that the realignment of Lincoln Boulevard would have no impact on identified eligible and listed historical resources.

As demonstrated above, the SPAS Draft EIR's analysis of the cultural resources impacts of Lincoln Boulevard realignment meets CEQA requirements for a program EIR, and is supported by substantial evidence.

Greenhouse Gas Emissions - As with the air quality analysis, the evaluation of greenhouse gas emissions associated with construction of the SPAS alternatives was based on the ROM cost estimates that were prepared for the SPAS alternatives. As noted above, these cost estimates accounted for the realignment of Lincoln Boulevard under Alternatives 1, 5, and 6; therefore, the analysis of greenhouse gas emissions considers emissions related to construction of the roadway realignment.

Therefore, the SPAS Draft EIR's analysis of the greenhouse gas impacts of Lincoln Boulevard realignment meets CEQA requirements for a program EIR, and is supported by substantial evidence. If the realignment is later proposed for implementation, a project-level CEQA document would evaluate project-level greenhouse gas impacts in greater detail, based on detailed project engineering and design.

With respect to the potential for greenhouse gas emissions associated with disturbance of old petroleum lines and major sewer lines, as described in the discussion of utilities below, disturbance of major sewer lines by the Lincoln Boulevard realignment is unlikely. Nevertheless, in the event that disturbance of major sewer lines or old petroleum lines were to occur, the potential for "significant" greenhouse gas emissions would be low based on several considerations: (1) Petroleum transmission lines that are no longer in service typically undergo procedures by the operator in order to reduce potential liability concerns, maintain proper product management (i.e., avoid having to deal with old unusable product), and meet regulatory requirements.[131,132] Such procedures typically include draining/evacuating the affected pipeline segment of all bulk product and filling it with a concrete slurry or grout if that segment of the line segment is being permanently taken out of service or, if the line segment may be reused in the future, cleaning the line segment by using compressed air to force one or more "pigs" (i.e., plugs) that scrape the walls of the pipeline, and possibly running nitrogen gas through the line to purge it of petrochemical vapors; (2) GHG emissions from petroleum products come primarily from the refinement and combustion processes, and are relatively minor from product transmission;[133] and (3) Most sewer lines, such as the major conveyance lines running to the Hyperion Treatment Plant, are gravity-flow systems that maintain normal atmospheric pressure within the pipeline through the use of venting stations located along the pipeline route.[134]

Human Health Risk Assessment - Contrary to the statement in Comment SPAS-PC00130-637 that the analysis of toxic air contaminants (TAC) focuses primarily on cancer, as stated in the introduction to Section 4.7.1 of the SPAS Draft EIR (page 4-423), the analysis of impacts to human health associated with releases of TAC includes increased cancer risks, chronic (long-term) non-cancer health hazards, and

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131 49 CFR 195.402, Procedural Manual for Operations, Maintenance and Emergencies.

132 California State Fire Marshal, Pipeline Safety Division, Information Bulletin: Pipeline Status Terminology, August 1, 2009, Available: http://osfm.fire.ca.gov/informationbulletin/pdf/2009/pipelinestatusterminology.pdf, accessed January 3, 2013.

133 Gerdes, Kristin J., U.S. Department of Energy, National Energy Technology Laboratory, Office of Systems, Analyses and Planning, NETL's Capability to Compare Transportation Fuels: GHG Emissions and Energy Security Impacts, Briefing for NETL Director, February 25, 2009, updated April 2, 2009, Available: http://www.netl.doe.gov/energy-analyses/pubs/Petroleum%20Fuels%20GHG%20Modeling_Feb%2025a.pdf, accessed January 2, 2013.

134 City of Los Angeles Department of Public Works, Bureau of Sanitation, Bureau of Contract Administration, Bureau of Engineering, Joint Board Report No. 1, July 18, 2007, Available: http://www.lasewers.org/ssmp/pdfs/WDR_Signed.pdf, accessed January 2, 2013.

acute (short-term) non-cancer health hazards. Impacts to on-airport workers are also evaluated. Each of these areas is uniformly assessed in the SPAS Draft EIR.

Comment SPAS-PC00130-637 states that the SPAS Draft EIR "conceal[s] and explain[s] away the impact of locating, opening and relocating major petroleum, sewer and other underground facilities despite the apparent risk of release of toxic substances including explosive gases." However, as described in the discussion of utilities below, disturbance of major sewers by the Lincoln Boulevard realignment is unlikely.

Further, it is important to note that the human health risk assessment (HHRA) deals, appropriately, with emissions that cannot be effectively controlled. For example, during construction, some diesel emissions are anticipated at LAX regardless of any control measures implemented. It is these uncontrolled emissions that present unavoidable exposure to people in areas surrounding LAX. The types of risk cited in the comment do not fall under the category of long-term emissions and each can be effectively controlled. Accidental releases of vapors or gases as a result of breaks in sewer lines, petroleum or gas pipelines, or other utility lines (1) fall under the category of acute releases and risks, and (2) are issues that are typical to most major construction projects. People most at risk from these types of releases are construction workers themselves, and safety of these workers falls under Occupational Safety and Health Administration (OSHA) requirements and guidelines. Moreover, regulations governing safe work practices have been developed and are routinely implemented for the situations that may be encountered during LAX construction activities.[135] All construction at LAX has and would continue to follow OSHA safety requirements and best construction practices to maintain worker safety. These measures would also protect people living, working, or going to school around a construction site. Therefore, health risks associated with potential accidental releases of vapors or gases from utility lines during construction of Lincoln Boulevard realignment (as well as construction of other SPAS components) would be less than significant.

The analysis of construction-related human health risks was done at a program level of detail, which is appropriate for this level of planning, as described previously in this Topical Response. No attempt to conceal the limitations of the analysis was made. The text cited in Comment SPAS-PC00130-637, which is from the introduction to Section 4.7.1 of the SPAS Draft EIR (page 4-424), is clear in describing the limits that this level of analysis imposes and explains how the analysis that was provided was developed. It should be noted that HHRA efforts associated with the LAX Master Plan have been ongoing for many years. During this time, project-level health risks from construction have been evaluated for several projects that have gone on to implementation/completion. Experience with these projects, for which detailed construction schedules were developed, provides a strong background for evaluating possible impacts of construction of the similar projects evaluated in the SPAS Draft EIR. Risk estimates in the SPAS Draft EIR provide a sound basis for assessing the SPAS alternatives and proceeding with more detailed health risk assessments in the future, as appropriate.

As with the air quality analysis and the analysis of greenhouse gas emissions, the SPAS Draft EIR's program-level evaluation of construction-related human health risks in Section 4.7.1 was based on the ROM cost estimates that were prepared for the SPAS alternatives. A discussion of the ROM cost estimates, which include construction of the Lincoln Boulevard realignment, is provided previously in this Topical Response.

Contrary to Comment SPAS-PC00130-637, the analysis on page 4-452 of the SPAS Draft EIR does not indicate that health risks associated with operation of a realigned Lincoln Boulevard would be outweighed by efficiencies in airfield operation and transit facilities. Rather, the discussion on page 4-452 states that adverse impacts associated with increases in aircraft operations and changes in airfield and terminal

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[135] U.S. Department of Labor, Occupational Safety and Health Administration, 29 CFR Part 1910: Occupational Safety and Health Standards; U.S. Department of Labor, Occupational Safety and Health Administration, 29 CFR Part 1926: Safety and Health Regulations for Construction; U.S. Department of Labor, Occupational Safety and Health Administration, 29 CFR Part 1952: Approved State Plans for Enforcement of State Standards; State of California Department of Industrial Relations, Division of Occupational Safety and Health (Cal/OSHA), Title 8 California Code of Regulations, Subchapter 4, Sections 1500-1938: Construction Safety Orders.

facilities would be offset by the ongoing implementation of more stringent motor vehicle emission standards, cleaner future fleet mixes, and the decrease in stationary source emissions attributable to the replacement Central Utility Plant. Moreover, the cleaner future fleet mixes referred to on page 4-452 are not unfunded or related to the construction of SPAS facilities; rather, these are changes in the future vehicle fleet mix that will occur over time and are based on California Air Resources Board (CARB) and South Coast Air Quality Management District (SCAQMD) default assumptions.

As demonstrated above, the SPAS Draft EIR's analysis of the human health risks associated with Lincoln Boulevard realignment meets CEQA requirements for a program EIR, and is supported by substantial evidence. If the realignment is later proposed for implementation, a project-level health risk assessment would evaluate health risks in greater detail, based on detailed project engineering and design.

Hazardous Materials - As indicated on page 4-573 in Section 4.7.3 of the SPAS Draft EIR, the analysis of hazardous materials was based on a records search performed by Environmental Data Resources, Inc. (EDR) of all sites with known contamination (including both soil and groundwater contamination) within the airport property and SPAS alternatives acquisition areas. As the area to which Lincoln Boulevard would be relocated under SPAS Alternatives 1, 5, and 6 is airport property, the records search included that area. The EDR Report, which is provided in Appendix G3 of the SPAS Draft EIR, identifies the sites with known contamination throughout the airport property, as well as known contamination in some areas adjacent to the airport. As illustrated in the EDR DataMap in Appendix G3, there are no sites with known contamination within the Lincoln Boulevard realignment area. The results of the EDR Report were supplemented by LAWA's existing records and knowledge of known contamination, which do not identify any known contamination within the Lincoln Boulevard realignment area. The complete listing of sites with known contamination within the airport property and SPAS alternatives acquisition area is provided in Table 4.7.3-1 of the SPAS Draft EIR; the locations of the sites are illustrated in Figure 4.7.3-1.

As stated on page 4-573 of the SPAS Draft EIR, the analysis of the potential to interfere with current or planned remediation activities was conducted by mapping areas of known contamination and comparing those locations to areas of planned excavation under the SPAS alternatives. For this reason, the analysis of such impacts associated with Alternative 5 on page 4-592 of the SPAS Draft EIR, and noted in Comment SPAS-PC00130-637, addresses impacts from construction activities associated with Terminal 0, the realignment of Taxilane D, and modifications to the Terminal 1 concourse. Because there is no current or planned remediation in the vicinity of the Lincoln Boulevard realignment area, this area is not addressed in this portion of the analysis.

Notwithstanding the fact no contamination is known to exist within the Lincoln Boulevard realignment area, the SPAS Draft EIR acknowledges that previously unknown contamination may be encountered during construction of any of the project components. With compliance with existing laws and regulations, including LAWA's *Procedure for the Management of Contaminated Materials Encountered During Construction*, which was prepared in accordance with LAX Master Plan Commitment HM-2 (Handling of Contaminated Materials Encountered During Construction), this impact was found to be less than significant.

Analysis of soil conditions, including the presence of contaminated soils, associated with the Lincoln Boulevard realignment would be undertaken during detailed engineering and project-level CEQA review of that project, were the alternative that is ultimately approved by the Board of Airport Commissioners and Los Angeles City Council to require the realignment of the roadway.

As demonstrated above, the SPAS Draft EIR's analysis of the hazardous materials impacts of Lincoln Boulevard realignment meets CEQA requirements for a program EIR, and is supported by substantial evidence. The EIR is not "fatally flawed" for not having conducted a project-specific analysis.

Hydrology and Water Quality - As stated on page 4-599 of the SPAS Draft EIR, and noted in Comment SPAS-PC00130-637, the hydrology and water quality study area (HWQSA) includes the existing LAX property, the Manchester Square area, and SPAS acquisition areas. The realignment of Lincoln Boulevard would occur entirely within existing LAX property and is therefore included in the analysis of

hydrology and water quality impacts. (As noted in the discussion of Hazardous Materials above, the evaluation of worker safety and groundwater contamination similarly included the entire airport property, including the Lincoln Boulevard realignment area.) The hydrology analysis evaluated the change in impervious areas and the associated increase in storm water peak flows within the entire HWQSA. The water quality analysis estimated annual total pollutant loads that would be generated within the HWQSA with implementation of the SPAS alternatives. Both program-level analyses concluded that associated impacts would be significant but could be mitigated with Mitigation Measure MM-HWQ (SPAS)-1 (Conceptual Drainage Plan Revision and Update), which would tailor the LAX Conceptual Drainage Plan recommendations to the specific characteristics of the selected SPAS alternative, including Alternatives 1, 5, and 6.

As demonstrated above, the SPAS Draft EIR's analysis of the hydrology and water quality impacts of Lincoln Boulevard realignment meets CEQA requirements for a program EIR, and is supported by substantial evidence. If the realignment is later proposed for implementation, a project-level CEQA document would evaluate hydrology and water quality impacts in greater detail, based on detailed project engineering and design.

Land Use and Planning - Comment SPAS-PC00130-637 does not raise any new significant environmental issues pertaining to land use and planning or address the adequacy of the land use and planning analysis included in the SPAS Draft EIR.

Noise - As indicated in the discussion of road traffic noise on page 4-935 in Section 4.10.2 of the SPAS Draft EIR, project-related impacts to traffic conditions on roadways around the airport are influenced primarily by the ground access improvements proposed under SPAS Alternatives 1, 2, 3, 4, 8, and 9. As further noted in that discussion, Alternatives 5, 6, and 7 focus on airfield improvements, but would be paired with the ground access improvements associated with Alternatives 1, 2, 8, or 9. Therefore, potential traffic noise impacts associated with Alternatives 5 through 7 are addressed through those other alternatives.

As discussed in Section 4.10.2.2 of the SPAS Draft EIR, the analysis evaluated the program-level change in ambient noise levels at sensitive noise receptors resulting from changes in traffic levels and traffic distribution on affected roadways. As illustrated in Figure 4.10.2-1 of the SPAS Draft EIR, noise-sensitive receptors were identified in a number of locations surrounding the airport. Receptor RD2, located adjacent to Lincoln Boulevard just north of the airport, provides the most representative indication of future changes in noise levels along Lincoln Boulevard. As indicated in Tables 4.10.2-3 and 4.10.2-4, noise levels at Receptor RD2 with implementation of Alternatives 1, 2, 8, and 9 would be slightly less (i.e., -0.1 dBA to -0.7 dBA CNEL) than those of baseline conditions or future (2025) conditions without any of the SPAS alternatives. These conclusions would also apply to Alternatives 5, 6, and 7, given that the airfield improvement of these alternatives would be paired with the ground access improvements of Alternatives 1, 2, 8, or 9, as noted above.

The residential development immediately north of the subject area (i.e., homes located on the north side of West 88th Street between Liberator Avenue and Sepulveda Westway) would be shielded from roadway noise by existing noise barriers/walls, which range in height from approximately 8 feet to approximately 20 feet, as identified on pages 4-29 and 4-956 of the SPAS Draft EIR. Additionally, the intervening area between the proposed realigned roadway and existing residential development to the north is anticipated to be developed as part of LAX Northside. The structures, landforms, and landscaping associated with that future development would provide additional shielding of roadway noise relative to existing residential development to the north, as noted on page 4-654 of the SPAS Draft EIR. Please also see Responses to Comments SPAS-PC00130-428 and SPAS-PC00130-737 regarding attenuation of ground-level noise impacts to areas north of the airport. Based on existing information and analysis, no significant traffic noise impacts to noise-sensitive receptors would result from the SPAS alternatives that include realignment of Lincoln Boulevard. If the Lincoln Boulevard realignment is proposed for implementation, the project-specific CEQA document would present a detailed evaluation of project-level traffic noise impacts, based on detailed project engineering and design.

As noted in Comment SPAS-PC00130-637, the analysis of construction traffic and equipment noise in Section 4.10.3 of the SPAS Draft EIR identified a significant, unavoidable construction equipment noise impact at the Park West Apartments from the realignment of Lincoln Boulevard. However, as documented throughout this Topical Response, this is not the sole area where the impacts of the Lincoln Boulevard realignment are considered in the SPAS Draft EIR. To the contrary, as shown in this Topical Response, impacts of the Lincoln Boulevard realignment were evaluated throughout the SPAS Draft EIR.

The transit noise and vibration analysis in Section 4.10.4 of the SPAS Draft EIR evaluated the impacts of the transit systems proposed under certain SPAS alternatives, specifically the elevated/dedicated busway system proposed under Alternatives 1, 2, and 8 and the APM system proposed under Alternatives 3 and 9. As further noted in that discussion, Alternatives 5, 6, and 7 do not include an elevated/dedicated busway or an APM, and are therefore not further addressed in the analysis. However, as stated elsewhere throughout the SPAS Draft EIR, these alternatives would be paired with the ground access improvements associated with Alternatives 1, 2, 8, or 9. Therefore, potential transit noise and vibration impacts associated with Alternatives 5 through 7 are addressed through those other alternatives. It should be noted that the analysis of transit noise and vibration is not associated with the realignment of Lincoln Boulevard, as no airport transit system is proposed along this roadway as a part of SPAS.

As demonstrated above, the SPAS Draft EIR's analysis of the noise and vibration impacts of Lincoln Boulevard realignment meets CEQA requirements for a program EIR, and is supported by substantial evidence. If the realignment is later proposed for implementation, a project-level CEQA document would evaluate traffic noise in greater detail, based on detailed project engineering.

Public Services - Sections 4.11.1 and 4.11.2 of the SPAS Draft EIR address impacts to fire protection and law enforcement services from construction of the proposed SPAS improvements at a program level, and acknowledge that construction may hamper or delay emergency response. The SPAS Draft EIR does not dismiss adverse impacts from implementation of the SPAS alternatives, nor does the analysis rely solely on LAX Master Plan Commitment C-1 (Establishment of a Ground Transportation/Construction Coordination Office), as stated in Comment SPAS-PC00130-637. Rather, as noted in Sections 4.11.1 and 4.11.2, LAX Master Plan Commitments ST-9, ST-12, ST-14, ST-17, ST-18, ST-19, ST-21, and ST-22 would also serve to further reduce potential traffic congestion during construction and, as a result, delays in emergency response. The SPAS Draft EIR further states that, in the event construction activities were to result in deterioration of traffic conditions even with these LAX Master Plan commitments, use of emergency sirens, alternate response routes, and multiple station responses when necessary would help facilitate emergency access and response as occurs under current congested conditions. Therefore, the analysis concludes that impacts to emergency response times related to construction of the SPAS improvements, including Lincoln Boulevard realignment, would be less than significant.

As demonstrated above, the SPAS Draft EIR's analysis of the public services impacts of Lincoln Boulevard realignment meets CEQA requirements for a program EIR, and is supported by substantial evidence. If the realignment is later proposed for implementation, a project-level CEQA document would evaluate public services impacts in greater detail, based on detailed project engineering and design.

Off-Airport Transportation - The SPAS Draft EIR does not minimize the impacts to off-airport transportation that may result from construction of SPAS improvements. Rather, Section 4.12.2.6.3 of the SPAS Draft EIR presents a program-level analysis of off-airport transportation impacts, and acknowledges that there is the potential for traffic delays due to SPAS improvements, including closures of key roadways and intersections, closures of sidewalks that could affect pedestrian access or bicycle lanes, and impacts to transit service due to the need to temporarily relocate bus stops.

Nowhere does the SPAS Draft EIR state that the realignment of Lincoln Boulevard could be accomplished by single-lane closures in off-peak hours, as stated in Comment SPAS-PC00130-637. The reference to that language in the comment is misleading. The actual text of the SPAS Draft EIR states, on page 4-1282, "[T]here is the potential for additional disruption in the event a project-related improvement requires temporary closure of at least one lane adjacent to its site. Closures of key roadways and intersections could cause delays, except if done for short durations during periods of very

low vehicular volumes" (emphasis added). In fact, the analysis concludes that, even with implementation of LAX Master Plan commitments and mitigation measures that are specifically designed to reduce such impacts, construction-related impacts associated with project components, such as Lincoln Boulevard realignment, could result in temporary significant and unavoidable impacts on the streets surrounding LAX.

As demonstrated above, the SPAS Draft EIR's analysis of the off-airport transportation impacts of Lincoln Boulevard realignment meets CEQA requirements for a program EIR, and is supported by substantial evidence. If Lincoln Boulevard realignment is proposed for implementation, the project-specific CEQA document would present a detailed evaluation of project-level off-airport transportation impacts, based on project-specific construction details such as construction plans and phasing; specifications for the portion of the roadway that would be covered; an evaluation of utilities beneath the site and relocation plans for these utilities; and the nature and duration of roadway closures and related detours.

Utilities - A number of comments were received concerning the presence of utilities beneath Lincoln Boulevard that would be disrupted as a result of the roadway realignment under Alternatives 1, 5, and 6. As stated previously in this Topical Response, detailed project-level planning and design have not occurred at this stage in the SPAS process, including detailed engineering design for the Lincoln Boulevard realignment. Detailed information on soil conditions, geotechnical concerns, and subsurface utilities can feasibly be developed during construction-level planning. As such, these issues would be evaluated during engineering design and project-level CEQA review for the Lincoln Boulevard realignment, if it is proposed for implementation.

Two major outfall sewers lie beneath the portion of Lincoln Boulevard that would be realigned under Alternatives 1, 5, and 6. The North Central Outfall Sewer (NCOS) runs diagonally from northeast to southwest across the Westchester Golf Course and directly beneath the intersection of Lincoln Boulevard and Westchester Parkway, continuing beneath the north airfield and the LAXFUEL fuel farm to the Hyperion Treatment Plant. The NCOS has a maximum diameter of 114 inches, or 9½ feet,[136] and is located at an approximate depth of over 65 feet below the surface in the area of the Lincoln Boulevard realignment.[137] The North Outfall Replacement Sewer (NORS) lies to the east of NCOS and also runs diagonally from northeast to southwest through the intersection of Sepulveda Boulevard and La Tijera Boulevard, crossing Lincoln Boulevard east of Emerson Avenue, and turning southerly west of Tom Bradley International Terminal towards the Hyperion Treatment Plant. The NORS ranges in diameter from 96 to 150 inches (8 to 12½ feet).[138] This outfall sewer is also at least 65 feet below the surface in the vicinity of the Lincoln Boulevard realignment. At these depths, the Lincoln Boulevard realignment, whose depression would not exceed approximately 30 feet, would not interfere with these outfall sewers, as acknowledged by the City of Los Angeles Bureau of Sanitation, Wastewater Engineering Services Division.[139]

As noted above, detailed project-level planning and design have not occurred at this stage in the SPAS process. Therefore, specific impacts on individual subsurface utilities cannot be determined. LAWA has not identified other major utilities, including oil pipelines, in the vicinity of the Lincoln Boulevard realignment. Nevertheless, it is expected that numerous utilities could require relocation, which could include smaller sewers, water lines, storm drains, electrical lines, fiber optic cables, oil pipelines, and other utilities. (There are no known plugged or abandoned oil or gas wells in the vicinity of the Lincoln Boulevard realignment. See Figure F4.17.2-1 in Section 4.17.2 of the LAX Master Plan Final EIR.) Such

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136 City of Los Angeles Bureau of Sanitation, Wastewater Engineering Services Division, City of Los Angeles Sewer Odor Control Master Plan, August 2010.

137 City of Los Angeles, Bureau of Sanitation, Wastewater Engineering Services Division, Letter from Mr. Ali Poosti, Division Manager, to Mr. Denny Schneider, September 14, 2012.

138 City of Los Angeles Bureau of Sanitation, Wastewater Engineering Services Division, City of Los Angeles Sewer Odor Control Master Plan, August 2010.

139 City of Los Angeles, Bureau of Sanitation, Wastewater Engineering Services Division, Letter from Mr. Ali Poosti, Division Manager, to Mr. Denny Schneider, September 14, 2012.

impacts would be identified during project-level engineering and environmental review. Construction of SPAS-related improvements, such as Lincoln Boulevard, that have the potential to interfere with existing subsurface utilities would be subject to LAX Master Plan Commitment PU-1, which requires that a utility relocation program be implemented during construction to minimize potential impacts to existing subsurface utilities, including service disruptions, and to ensure that potential impacts to such utilities would be less than significant. Developing and implementing a utility relocation program would ensure that impacts on existing utility services and distribution facilities would be less than significant. As noted previously in this Topical Response, allowances for the realignment of utilities were included in the ROM cost estimates for the Lincoln Boulevard realignment (see Table AF-4 in Appendix G of the Preliminary LAX SPAS Report).

It should be noted that scoping under CEQA allows agencies to obtain input regarding the significant effects to be addressed in a Draft EIR (State CEQA Guidelines Section 15083(a)). However, a lead agency is not obligated to conduct a project-level analysis in a program EIR merely because comments concerning this issue were raised during scoping. Rather, as discussed previously, a program-level EIR "need not be as detailed as an EIR on the specific construction projects that might follow" (State CEQA Guidelines Section 15146(b)). Therefore, despite the fact that members of the public may have requested a project-level evaluation of the Lincoln Boulevard realignment's impacts on subsurface utilities in their comments on the SPAS Draft EIR Notice of Preparation (NOP) or SPAS Draft EIR Revised NOP, LAWA is not required to perform such an evaluation due to the program-level nature of the SPAS Draft EIR.

Conclusions

As demonstrated in this Topical Response, the SPAS Draft EIR analyzes the Lincoln Boulevard realignment at a program level of detail appropriate for this stage of the SPAS process. The level of detail in the ROM cost estimates demonstrates that LAWA considers the Lincoln Boulevard realignment to be a substantial undertaking. Impacts of the roadway realignment are evaluated at a program level throughout the SPAS Draft EIR environmental analysis.

If Lincoln Boulevard realignment is proposed for implementation, a project-specific EIR would be required and would present a detailed evaluation of project-specific impacts, based on detailed project engineering and design. Project-level analysis of Lincoln Boulevard realignment is neither required nor appropriate for the SPAS Draft EIR since it is a program EIR, and recirculation of the SPAS Draft EIR to include such analysis is not warranted.

TR-SPAS-REG-1 Regionalization

Introduction

Numerous comments on the SPAS Draft EIR claim that other airports in Southern California should be used instead of LAX to accommodate regional air travel demands. In particular, several commentors suggested there is a greater need to improve and/or use other airports such as LA/Ontario International Airport (ONT) and Palmdale Regional Airport (PMD) as a means to avoid or lessen increased aviation activity at LAX and the associated impacts on surrounding communities. The following response addresses the comments on these issues, collectively referred to as "regionalization."

The Relationship of SPAS to Regionalization of Air Travel

As indicated in Chapter 1 of the SPAS Draft EIR and further explained in Chapter 2, the proposed project under consideration is the LAX SPAS. The SPAS process involves the identification and evaluation of potential alternative designs, technologies, and configurations for the LAX Master Plan Program that would provide solutions to the problems that the Yellow Light Projects were designed to address. The SPAS process also includes identification of potential amendments to the LAX Specific Plan that plan for the modernization and improvement of LAX in a manner that is designed for a practical capacity of 78.9 MAP, which is the same future passenger activity level of the LAX Master Plan that was incorporated into

the SCAG RTP relative to regionalization of commercial air travel. All of the SPAS alternatives maintain the basic design parameters of the LAX Master Plan in planning for a future activity level of 78.9 MAP and allowing for no more than 153 passenger gates.

Several comments received on the SPAS Draft EIR suggested that regionalization of air travel demand in Southern California should have been included, and addressed, as a SPAS alternative in the Draft EIR. Under the Airport Noise and Capacity Act of 1990 (commonly called "ANCA"), and its implementing regulations,[140] LAWA cannot force passengers or airlines to utilize one airport over the other. More specifically, federal law prohibits an airport proprietor from unilaterally imposing any restrictions on "access" to an airport by Stage 3 aircraft. Following the phase-out of most noisy Stage 2 aircraft during the 1990s, Stage 3 aircraft comprise essentially all commercial aircraft landing at any U.S. airport. Any Stage 3 restriction is subject to review and approval by the FAA based on strict regulatory criteria that limit the ability to implement any such measures. The FAA strongly discourages any operational limits imposed under Part 161 and prefers and promotes permanent solutions to operational concerns and inefficiencies through capacity improvements. Further, the federal Airline Deregulation Act of 1978 expressly preempted the ability of airport proprietors to control the "price, route or service of an air carrier."[141] The United States Supreme Court has interpreted this prohibition broadly to mean that airports "may not seek to impose their own public policies or theories of ... regulation on the operations of an air carrier."[142] For this reason, an alternative that would have required passengers or airlines to utilize another airport, even one managed by LAWA, is legally infeasible.

Other commentors have suggested that the further development of ONT or PMD would lead to a redistribution of air traffic to those airports and away from LAX. However, the facilities at ONT are already operating below capacity and could support additional activity level even utilizing the existing facilities.[143] Furthermore, as documented below in the discussion of efforts to market and develop air services at PMD, when PMD had an operating certificate and capacity was available, airlines were unable to sustain air service without subsidies provided by the FAA. As a result, LAWA can conclude that the development of new passenger facilities would not induce airlines to relocate air service at either of these airports.

Also, several comments received on the SPAS Draft EIR suggested that regionalization of air travel demand in Southern California should have been included as a project objective for SPAS. Regionalization was not included as a project objective because it is built into the SPAS project description itself. As indicated in Chapter 1 of the SPAS Draft EIR, the SPAS process includes identification of potential amendments to the LAX Specific Plan that, among other things, create conditions that encourage airlines to go to other airports in the region, particularly those owned and operated by LAWA.

As discussed in Section 6.2 of the Preliminary LAX SPAS Report, all of the SPAS alternatives have been designed with 153 gates and analyzed at a practical capacity of 78.9 MAP, which is consistent with the planning framework of the LAX Master Plan that was taken into account in the SCAG regional aviation plan (i.e., air aviation element of the RTP). LAWA acknowledges that while the passenger activity projections are based upon the best available evidence and expert opinion, history demonstrates it is possible that over the next ten years, currently unexpected fluctuations in the economy, aviation industry practices, passenger demand, and other known and unknown factors may result in LAX annual passengers increasing (or decreasing) at a different rate than expected. Therefore, in addition to alternatives with physical configurations of no more than 153 gates, the SPAS considers a potential amendment to Section 7.H. of the LAX Specific Plan. The LAX Specific Plan Section 7.H amendment (applicable to all alternatives, including the existing LAX Master Plan) would provide opportunities for adjustments if LAX reaches 75 or 78.9 MAP earlier than expected. This amendment, set forth in detail in

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140 14 C.F.R. Part 161.

141 49 USC Section 41713(b)(1).

142 Morales v. Trans World Airlines, Inc. (1992) 504 US 374, 384.

143 ONT served 7.2 million passengers in 2005 and 2007, 2.7 million more passengers than were served in 2011.

Chapter 7 of the Preliminary LAX SPAS Report, would address potential variations over time, first by requiring action (where feasible and lawful) to encourage further shifts in passenger and airline activity to other regional airports if the annual aviation activity analysis forecasts that the annual passengers for that year at LAX are anticipated to exceed 75 MAP, and, second, by requiring a Specific Plan Amendment Study if the annual aviation activity analysis forecasts that LAX annual passengers for that year are anticipated to exceed 79.9 MAP. This amendment is intended to enhance LAWA's ability to anticipate and plan for the potential for aviation activities at LAX to reach 78.9 and identify appropriate actions to help shift additional growth to other airports in the region, including, in particular, ONT. As discussed in Section 6.2 of the SPAS Draft EIR, to the extent that implementation of the above measure is successful in shifting aviation activity from LAX to other airports such as ONT, the resultant reduction or avoidance of impacts to communities surrounding LAX would be accompanied by the creation or increase of aviation-related impacts to communities around those other affected airports. The nature and extent of such secondary impacts would depend on the type and amount of aviation activity that is shifted and the environmental setting specific to each affected airport. Section 6.2 describes, in general, the types of environmental impacts that could occur; however, any attempt at this time to provide a detailed analysis of changes in impacts at LAX and other affected airports due to a shift in aviation activity would be purely speculative.

LAWA's Participation in Efforts for the Regionalization of Air Travel in Southern California

Certain commentors have inferred that LAWA has not worked to encourage the regionalization of air travel. In fact, LAWA has continuously encouraged the regionalization of aviation traffic by supporting the reconstitution of the Southern California Regional Airport Authority (SCRAA), efforts to initiate air service at Palmdale Regional Airport, and through the development and implementation of market studies, analyses, and strategic plans.

The SCRAA was created in 1984 through a joint powers agreement between the City and County of Los Angeles, and the Counties of Orange, Riverside, and San Bernardino. However, the panel became inactive in 2003. Following the adoption of the LAX Master Plan in 2004, LAWA provided staffing and financial support to the SCRAA as it attempted to reconstitute. In October of 2006, LAWA supported the Chair of the SCRAA, Los Angeles Councilman Bill Rosendahl, with organizational support as SCRAA attempted to develop new governance and membership plans. Following that initial coordination effort, LAWA staff assisted by developing reports for the SCRAA Board of Directors, hosting workshops, and performing outreach to potential SCRAA members. LAWA also supported the hiring of a consultant to assist in the development of governance strategies informed by the potential SCRAA members, decision-makers, and the public. Despite these efforts, with an absence of a consensus on governance and the lack of participation by other regional airport sponsors, the SCRAA has been inactive since 2009.

Furthermore, LAWA has presented and implemented a series of market studies, analyses, and plans on the issue of regionalization since 2006. These reports have been provided to the BOAC, the Los Angeles City Council, and the public, starting on February 5, 2007. The reports contain summaries of aviation industry trends, marketing efforts, and recommendations for policy changes related to the management of LAWA airports. Most recently, reports were given to the Board of Airport Commissioners on this topic on December 11, 2011, May 7, 2012, and September 17, 2012.

LAWA Efforts to Market and Develop Air Service at LA/Ontario International Airport

Certain commentors suggested that LAWA has made insufficient progress in expanding air service at ONT. LAWA has sought to utilize the facilities at Ontario to better distribute aviation activity in the Southern California region. The City of Los Angeles is the owner of ONT, with LAWA being the airport operator. ONT covers approximately 1,700 acres, has two runways, and three terminals with 38 passenger gates (http://lawa.org/welcome_ont.aspx?id=808 accessed on December 16, 2012).

Since becoming part of the City of Los Angeles' regional airport system in 1967, ONT experienced gradual increases in passenger activity levels, from when it first passed the 1 MAP level in 1971 up to a peak of 7.2 MAP in 2007. During that time, LAWA implemented numerous measures to expand and improve airport facilities and operations and encourage airlines and airline passengers to choose ONT for air travel. Such measures include, but are not limited to, the opening of a new runway in 1981 to accommodate wide-body jets, the completion of a $244 million terminal expansion project in 1998, the development of a new ground transportation center in 1999, and the completion of several other improvement projects such as taxiway improvements, parking lot expansions, and airfield security access point improvements. In 2005, LAWA launched the "Fly Ontario" ad campaign aimed at increasing passenger volume at ONT. In 2006, LAWA changed the airport's name to LA/Ontario International Airport in order to increase the airport's visibility and recognition as being part of the Los Angeles regional airport system, particularly as related to travelers seeking to book flights to the Los Angeles area (http://lawa.org/welcome_ont.aspx?id=1364 - Accessed on December 16, 2012).

In 2008, ONT experienced a sharp decline in passenger volume, as did LAX, John Wayne Airport, Bob Hope Airport, and many other airports throughout the state and country, due primarily to the nationwide economic recession and increased fuel prices ("ONT and LAWA Regionalization" Presentation to LAWA Board of Airport Commissioners (BOAC), December 15, 2011). Passenger activity levels at ONT continued to decline over the next several years, dropping to a low of 4.5 MAP in 2011.

In response, LAWA has for several years continued to formulate and implement various initiatives to address issues and concerns regarding activity levels at ONT. The objectives of such initiatives are specifically targeted towards reducing expenses, increasing passenger traffic, and increasing airline activity at ONT. On September 17, 2012, the LAWA BOAC was provided a status update by LAWA staff on the management initiatives and marketing efforts that were outlined for ONT in May 2012. Table 1 summarizes the nature and status of those initiatives and efforts.

Table 1

Summary of 2012 Management Initiatives and Marketing Efforts for ONT

Initiative/Effort	Status
Management Initiative	
1. Reduce Terminal Rates and Freeze Landing Fees	Completed in June as part of FY 2013 budget approval process. Terminal rents reduced by 6%.
2. Reduce Passenger Facility Charge (PFC) Level	Application filed with FAA. PFC to be reduced from $4.50 to $2.00 on January 1, 2013 if approved.
3. Initiate Airline Consortium	Agreement with airlines reached and airlines are drafting documents. Obtain Board approval by first quarter of 2013.
4. Improve Parking Performance	Request for Proposal (RFP) issued for new manager and revenue control system. Proposals due September 27.
5. Rationalize Bus Services	RFP for dedicated rationalized services to be issued in October.
6. Redevelop Concessions Through Single Manager/Operator	ONT-wide concessionaire Draft RFP to be issued for industry comment and input in next 10 days.
7. Further Reduce Headcount and Costs	Since April, a total of 26 additional staff reductions have been implemented.
Marketing Effort	
8. Define New Air Service Incentive Plan	Issued letter to airlines on Aug. 2 proposing to wave terminal rent associated with new air service. Results to Date: Airlines responded that incentive programs do not result in sustained increased service.
9. Develop Cooperative Marketing Plan with Airlines	Issued letter to airlines on Aug. 2 proposing $500,000 for marketing for new routes with a maximum of $5 million to be rate based. Results to Date: Airlines responded with concerns that such an amount would increase the Cost Per Enplanement. Airlines acknowledged need for this but

Table 1

Summary of 2012 Management Initiatives and Marketing Efforts for ONT

Initiative/Effort	Status
	questioned extent and source of funding.
10. Restart Direct Marketing Efforts with Airlines Regarding Air Service	Had meetings with 7 airlines currently serving ONT and with the following airlines: PeopleExpress, jetBlue and Westjet. Results to Date: Non-incumbent airlines expressed interest in air service incentive plan; incumbent airlines expressed little interest in expanding service.
11. Establish Factual Market Research Basis for Future Initiatives	Completed the following: Market capture analysis; Comparative air fare analysis; Focus group interviews; Direct survey of passengers to occur during first two weeks of October. Findings to Date: ONT's fares are consistently lower than Bob Hope Airport and John Wayne Airport but higher than Long Beach Airport; All secondary airports face significant fare competition from LAX; ONT retains a higher percentage of its primary service area passengers than its peers; ONT's primary service area has significantly fewer target households than its peers do; Airlines provide more service to areas with higher incomes;ONT's service area has fewer households with higher income levels; and, to grow ONT traffic, need to draw passengers from outside of ONT's primary service area.

Source: LAWA 2012.

As summarized above, given the actual passenger activity levels at airports throughout the region, LAWA and executive management of the City of Los Angeles have implemented, and will continue to evaluate appropriate measures relative to increased stability and growth of ONT. Such measures are intended to enhance the viability and attractiveness of ONT as a preferred airport for passengers and airlines within the Southern California regional airport system.

LAWA Efforts to Market and Develop Air Service at LA/Palmdale Regional Airport

Some comments assert that LAWA has failed to support efforts to establish air service at LA/Palmdale Regional Airport. PMD is located in the Antelope Valley, in the northeast portion of the City of Palmdale, approximately 60 miles northeast of downtown Los Angeles. These assertions have no basis in fact.

Since the adoption of the LAX Master Plan, LAWA has supported efforts to develop air service at Palmdale Regional Airport (PMD). For example, LAWA worked cooperatively with the "Wheels-Up Palmdale Coalition" to apply for federal grants that would support the establishment of air service at PMD. In August of 2006, the FAA awarded a grant that provided operating subsidies to an air carrier that offered service from PMD, and subsequently to the launch of a new flight operated by United Airlines between PMD and SFO in June of 2007. Although efforts by the U.S. Department of Transportation, LAWA, and the City of Palmdale resulted in more than $238 per passenger subsidy for air service at PMD, United Airlines discontinued flights to PMD after 18 months. ("ONT and LAWA Regionalization" Presentation to LAWA BOAC, December 15, 2011).

TR-SPAS-T-1 Transit/Rail

Introduction

Many comments were received containing questions regarding various modes of mass transportation to the airport, including both rail and bus. This topical response provides a detailed discussion of the assumed roles and background assumptions pertaining to mass transportation modes used in the LAX SPAS Draft EIR and the current state of transit planning relative to LAX.

The SPAS analysis assumed a modest increase in the percentage of airline passengers who would use transit with the improved access provided by the planned passenger conveyance system linking the planned Metro Aviation/Century station to the CTA. While actual ridership may be higher, this assumption resulted in a conservative assessment of the impacts of passenger activity increases on transit systems between 2009 and 2025. Please refer to Response to Comment SPAS-PC00130-329 for additional information on transit trip assumptions.

Background

The Los Angeles County Metropolitan Transportation Authority (Metro) has been actively engaged in planning an expansion of its light rail network throughout the County. Within the vicinity of LAX, Metro is undertaking two key projects: the Metro Crenshaw/LAX Transit Corridor Project, which was approved in 2012 and is now starting construction, and the Airport Metro Connector Project, which is in the conceptual planning stage. The Metro Crenshaw/LAX Transit Corridor Project will extend from Metro's existing Exposition Line at the intersection of Crenshaw Boulevard and Exposition Boulevard to the existing Green Line Aviation/LAX station. This line will include a station at Aviation and Century Boulevards (Aviation/Century station), serving as a stop for both the Green Line and Crenshaw/LAX Transit Corridor Line. With the Airport Metro Connector Project, Metro is considering various alignments to connect the Metro rail system to LAX.[144]

Relationship of SPAS to Metro Crenshaw/LAX Transit Corridor Project

When LAWA's current SPAS planning efforts began, Metro had not yet developed definitive concept plans for projects in the LAX vicinity. Absent definitive plans, the SPAS analysis assumed that the new Crenshaw/LAX Transit Corridor would be constructed east of the airport along the Aviation Boulevard corridor, and that this line would also serve as an extension of the Green Line, which is currently located along the I-105 corridor and turns south just west of Aviation Boulevard. (Currently, transit passengers who wish to access the airport can transfer for free to a LAWA-operated shuttle at the Green Line Aviation/LAX station.) It was assumed that the co-located lines would include a new light rail station to be located north of Century and Aviation Boulevards on the west side of Aviation Boulevard. The new light rail station was assumed to be elevated above the surrounding roadways to accommodate the crossing of Century Boulevard, with the passenger platform oriented in the north-south direction.

As discussed and depicted in Chapter 2 of the SPAS Draft EIR, each of the SPAS alternatives, with the exception of Alternative 4, includes a connection to the planned Metro Aviation/Century station that would provide improved passenger connectivity as compared to the existing service. The SPAS alternatives that include connectivity to regional transit are Alternatives 1, 2, 3, 8 and 9. (Alternatives 5 through 7, which focus on airfield improvements, would only be approved in conjunction with the ground access components associated with Alternatives 1, 2, 8, or 9.) Each of these SPAS alternatives includes one or more new ground access facilities that are intended to offer passengers convenient alternative locations outside of the CTA to be picked up, dropped off, or to park their vehicle before boarding a passenger conveyance system that would provide a direct and more time-certain mode of travel for accessing the CTA as compared with driving the local area roadways.

Alternatives 1, 2, 8, and 9 would all include ground access facilities at Century and Aviation Boulevards in Manchester Square, as well as a new Intermodal Transportation Facility (ITF) between 96th and 98th Streets, and between approximately Vicksburg Avenue and Airport Boulevard. Under Alternatives 1 and 2, parking would be provided in Manchester Square. Under Alternatives 8 and 9, Manchester Square would be developed with a Consolidated Rent-A-Car (CONRAC) facility as well as parking. The passenger conveyance system proposed in Alternatives 1, 2, and 8 would employ a busing operation on a dedicated, elevated busway to transport passengers between these facilities and the CTA. Within the CTA, the buses would travel in mixed flow traffic. Under Alternative 9, an Automated People Mover

[144] Los Angeles County Metropolitan Transportation Authority, Revised Planning and Programming Committee Report, Metro Green Line to LAX, April 18, 2012.

(APM) would be used instead of a busway. Alternative 3 includes a Ground Transportation Center (GTC) in Manchester Square, an Intermodal Transportation Center (ITC) in the area known as Continental City at Aviation Boulevard and Imperial Highway, and a CONRAC in the Lot C area. Alternative 3 includes two separate APM systems: one APM would convey passengers between the ITC, CONRAC, and CTA, while a second APM would transport passengers between the GTC and the CTA. Under Alternative 3 as originally planned as part of the approved LAX Master Plan (i.e., Alternative D), an elevated pedestrian bridge would link the ITC to the Metro Green Line Aviation/LAX station, which at the time was the closest existing or planned transit station to LAX. With the now-planned transit station at Century and Aviation Boulevards, Alternative 3 would provide connectivity with the new transit station as well.

Both passenger conveyance systems defined in SPAS Alternatives 1, 2, 3, 8, and 9 assume a pedestrian connection would be provided for passengers between LAWA's APM or busway and the planned Metro Aviation/Century station. Additionally, SPAS Alternatives 1, 2, 8, and 9 assume that LAWA's future conveyance system connecting Manchester Square and the planned Metro Aviation/Century station to the CTA would include a stop at the proposed ITF, while Alternative 3 would include a stop at the proposed CONRAC, which in this alternative would be located along 98th Street. These stops could serve as a connection point between the airport conveyance system and Metro's current transit bus depot located at Lot C, as well as a possible future Metro rail line serving the Lincoln or Sepulveda Boulevard corridors.

Recent coordination between LAWA and Metro indicates that Metro's current concept planning is consistent with the transit-related assumptions included in the SPAS Draft EIR with the exception of the location of the planned light rail station. Metro's current plans, which have evolved as the agency continues to move forward, shift the new light rail station to the south and locate it above Century Boulevard.[145] This location differs slightly from the location depicted in the figures provided for each alternative in Chapter 2 of the SPAS Draft EIR, in which the station was depicted as being slightly north of Century Boulevard on the west side of Aviation Boulevard. While the location of the light rail station has changed, the transit line remains planned within the existing right-of-way along the west side of Aviation Boulevard. The new light rail transit line was included in the study area travel mode. Because the connectivity with the planned Metro light rail station was evaluated at a program level in the SPAS Draft EIR, the slight modification to the planned station location does not result in new or substantially more severe significant environmental impacts, or change the conclusions of the impact analyses completed for the SPAS Draft EIR.

Relationship of SPAS to Airport Metro Connector Project

Metro is currently examining ways to connect the regional rail system to LAX in order to provide its customers with improved connectivity to the airport. Metro has completed an Alternatives Analysis Report for the Airport Metro Connector Project[146] and has narrowed the number of alternatives to four build alternatives. These alternatives are depicted in Figure 1 and described below.

- Direct Light Rail Transit (LRT) Branch (extension of the Metro Green Line and/or Metro Crenshaw/LAX Transit Corridor) into the CTA, providing Metro Green Line passengers with a direct connection to the CTA without requiring a transfer. Passengers on the Crenshaw/LAX Transit Corridor line would be required to transfer at the Aviation/Century Station before being transported to the CTA. The Airport Connector alternative would branch off the Crenshaw/LAX Transit Corridor just south of Metro's planned maintenance yard at W. Arbor Vitae Street and Bellanca Avenue, with a stop at the proposed ITF before continuing into the CTA. This Airport Metro Connector alternative is not included in any of the SPAS alternatives.

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145 Los Angeles County Metropolitan Transportation Authority, Crenshaw/LAX Transit Corridor, Volume 7: Project Definition Drawings, Part 7.1 - Harbor Subdivision Segment Fixed Facilities, June 1, 2012.

146 Los Angeles County Metropolitan Transportation Authority, Metro Green Line to LAX Alternatives Analysis Report, April 2012, Available: http://www.metro.net/projects_studies/green_line_lax/images/mgllax_aa_report__3preliminary_definition_of_alternatives.pdf, accessed November 14, 2012.

- Modified Light Rail Transit Trunk (Through LAX), which would connect to the Crenshaw/LAX Transit Corridor south of the planned maintenance yard, with a stop at the ITC, following a similar alignment to the CTA as described above for the Direct LRT Branch. West of Sepulveda Boulevard, this trunk line would pass through the CTA underground with a single station serving LAX. The line would continue south, remaining underground until passing Imperial Highway where the line would connect with the Green Line near E. Maple Avenue, north of the Mariposa Station. This Airport Metro Connector alternative is not included in any of the SPAS alternatives.
- An airport circulator using an APM system (similar to the proposed APM system in SPAS Alternative 9) connecting to Metro's service at the planned Aviation/Century station. The alignment for this system would be on a dedicated, elevated guideway along 98th Street, and would include a stop at the proposed ITF prior to entering the CTA. This system is conceptually similar to the proposed APM system under SPAS Alternative 9.
- An airport circulator using a Bus Rapid Transit (BRT) system on a dedicated, elevated busway to transport passengers between the airport's facilities outside of the CTA (conceptually similar to the proposed busway system in SPAS Alternatives 1, 2, and 8), including the planned Metro Aviation/Century station, with the CTA. As with the busing operation proposed in SPAS Alternatives 1, 2, and 8, buses would mix with other vehicles to circulate around the CTA, with a stop at each terminal.

As noted above, when LAWA's planning efforts for SPAS began, and when preparation of the SPAS Draft EIR was initiated, Metro had not yet developed definitive concept plans for projects in the LAX vicinity. Therefore, only two of the alternatives identified above, the airport circulator using an APM system and the airport circulator using a BRT, were considered in the SPAS Draft EIR as project elements. The Airport Metro Connector Project, including all four alternatives, is considered in the SPAS Draft EIR as a cumulative project. Metro is currently performing technical studies of the four alternatives identified above as well as additional alternatives analysis,[147] with the aim of initiating environmental analysis following the completion of SPAS. The relationship of each of the Metro alternatives to the SPAS alternative, should one be selected, will be evaluated in project planning and environmental studies prepared by Metro for the Airport Metro Connector Project. These studies will address modifications to airport facilities, including SPAS-related facilities, that would be required, if any, to accommodate each of the Metro alternatives being evaluated. Should a SPAS alternative be selected, further project-level review of ground transportation and terminal elements would be conducted by LAWA for individual improvements and modifications. This level of review would include environmental analysis that incorporates all details about the Airport Metro Connector Project known at that time.

Collaboration between LAWA and Metro

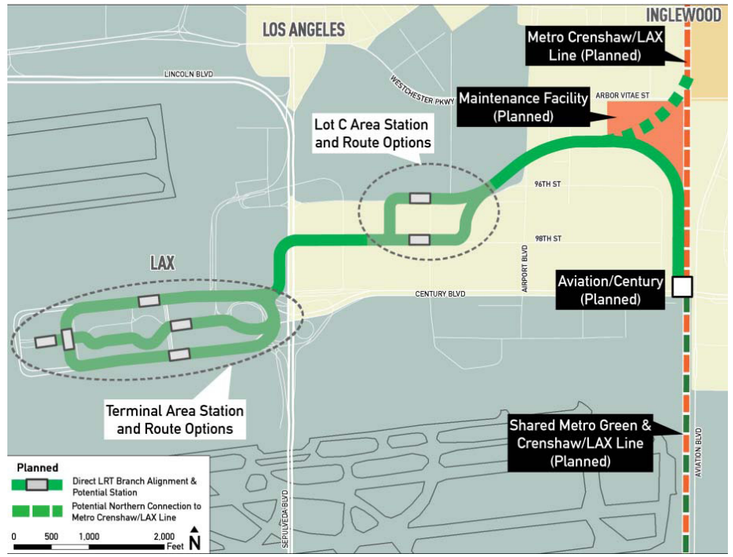
LAWA and Metro will be coordinating throughout the planning of the Airport Metro Connector Project and implementation of the Metro Crenshaw/LAX Transit Corridor Project. As stated in the Metro Planning and Programming Committee Report on the Regional Airport Connectivity Plan, dated November 14, 2012,[148] in support of the Airport Metro Connector Project, Metro and LAWA have "formed a joint task force to develop a mutually agreeable solution to providing rail access at LAX. This task force could eventually work on joint funding strategies to implement the mutually agreed upon solution."

LAWA is committed to working collaboratively with Metro to create a robust connection between LAX and the Metro rail system. As stated in a letter from LAWA to Metro dated October 12, 2012 (Attachment B of the November 2012 Metro Planning and Programming Committee Report: Regional Airport Connectivity Plan), LAWA is dedicated to accommodating all existing and future airport-related traffic and delivering an

147 Los Angeles County Metropolitan Transportation Authority, Report to Board of Directors: Airport Metro Connector Project, July 20, 2012.

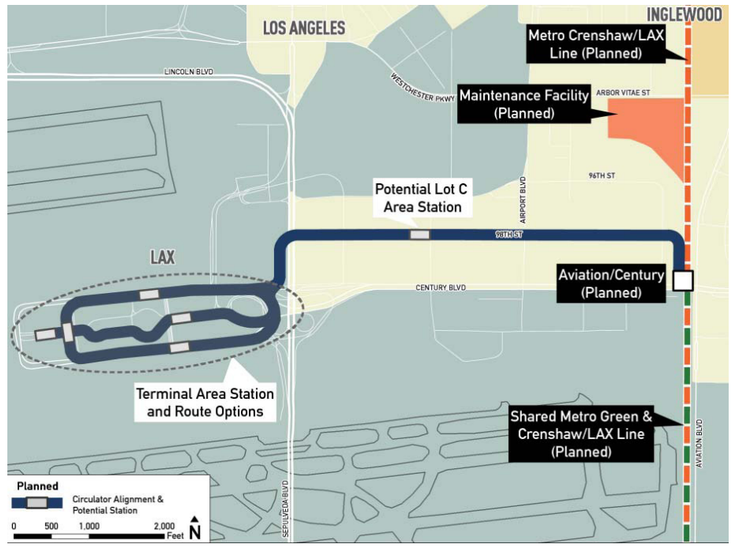
148 Los Angeles County Metropolitan Transportation Authority, Planning and Programming Committee Report: Regional Airport Connectivity Plan, November 14, 2012, Available: http://www.metro.net/projects_studies/green_line_lax/images/november_2012_board_report.pdf, accessed November 14, 2012.

Direct Light Rail Transit (LRT) Branch

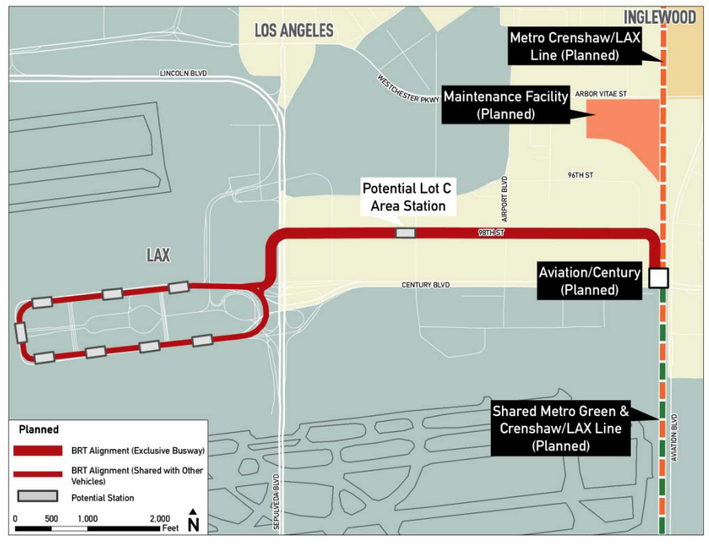


Modified Light Rail Transit (LRT) Trunk (Through LAX)

Airport Circulator with Automated People Mover (APM)



Airport Circulator with Bus Rapid Transit (BRT)



Source: Los Angeles County Metropolitan Transportation Authority, Revised Planning and Programming Committee Report, Metro Green Line to LAX, April 18, 2012.
Prepared by: CDM Smith, 2013.

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appropriate level of service for all transportation modes at LAX. In response to Metro's plans, LAWA has accelerated its work to ensure the best interface and connection to the planned Metro Aviation/Century light rail station. LAWA is convening a series of workshops designed to facilitate collaboration between Metro staff, LAWA staff, and technical experts to define real and achievable outcomes for consideration by Metro and LAWA decision-makers with the goal of designing public transit systems that work for LAX, for Metro, and for the traveling public. To the extent that these efforts further refine connectivity between LAX and the Metro transit system as identified in the SPAS Draft EIR, this collaboration will inform project-level planning, design, and environmental analysis for individual SPAS projects. To the extent that such efforts represent changes in the connectivity between LAX and the Metro transit system from that evaluated in the SPAS Draft EIR, as noted above, the relationship of such solutions to LAX in general, and to the SPAS alternatives in particular, would be addressed in the Metro planning process and related environmental analyses.

4.3.2 Comments and Individual Responses

SPAS-AF00001 Blackburn, Gregor U.S. Department of Homeland Security, FEMA Region IX 8/9/2012

SPAS-AF00001-1

Comment:

This is in response to your request for comments on the Public Review and Comment document, Draft Environmental Impact Report (EIR) Review for the Los Angeles International Airport (LAX) Specific Plan Amendment Study (SPAS).

Please review the current effective countywide Flood Insurance Rate Maps (FIRMs) for the County of Los Angeles (Community Number 065043) and City of Los Angeles (Community Number 060137), Maps revised September 26, 2008. Please note that the City of Los Angeles, Los Angeles County, California is a participant in the National Flood Insurance Program (NFIP). The minimum, basic NFIP floodplain management building requirements are described in Vol. 44 Code of Federal Regulations (44 CFR), Sections 59 through 65.

A summary of these NFIP floodplain management building requirements are as follows:

- All buildings constructed within a riverine floodplain, (i.e., Flood Zones A, AO, AH, AE, and Al through A30 as delineated on the FIRM), must be elevated so that the lowest floor is at or above the Base Flood Elevation level in accordance with the effective Flood Insurance Rate Map.

- If the area of construction is located within a Regulatory Floodway as delineated on the FIRM, any development must not increase base flood elevation levels. The term development means any man-made change to improved or unimproved real estate, including but not limited to buildings, other structures, mining, dredging, filling, grading, paving, excavation or drilling operations, and storage of equipment or materials. A hydrologic and hydraulic analysis must be performed prior to the start of development, and must demonstrate that the development would not cause any rise in base flood levels. No rise is permitted within regulatory floodways.

- All buildings constructed within a coastal high hazard area, (any of the "V" Flood Zones as delineated on the FIRM), must be elevated on pilings and columns, so that the lowest horizontal structural member, (excluding the pilings and columns), is elevated to or above the base flood elevation level. In addition, the posts and pilings foundation and the structure attached thereto, is anchored to resist flotation, collapse and lateral movement due to the effects of wind and water loads acting simultaneously on all building components.

- Upon completion of any development that changes existing Special Flood Hazard Areas, the NFIP directs all participating communities to submit the appropriate hydrologic and hydraulic data to FEMA

for a FIRM revision. In accordance with 44 CFR, Section 65.3, as soon as practicable, but not later than six months after such data becomes available, a community shall notify FEMA of the changes by submitting technical data for a flood map revision. To obtain copies of FEMA's Flood Map Revision Application Packages, please refer to the FEMA website at http://www.fema.gov/business/nfip/forms.shtm.

Please Note:

Many NFIP participating communities have adopted floodplain management building requirements which are more restrictive than the minimum federal standards described in 44 CFR. Please contact the local community's floodplain manager for more information on local floodplain management building requirements. The City of Los Angeles floodplain manager can be reached by calling Gary L. Moore, City Engineer, at (213) 485-4935. The Los Angeles County floodplain manager can be reached by calling George De La O, Senior Civil Engineer, at (626) 458-7155.

Response:

None of the project components associated with any of the SPAS alternatives are located within a floodplain, as mapped and identified under the National Flood Insurance Program of the Federal Emergency Management Agency.1 For additional details regarding flooding, please see Section 4.8 of the SPAS Draft EIR.

1. Flood Insurance Rate Map (FIRM) Panels 06037C1754F, 06037C1760F, 06037C1770F, and 06037C1780F. Available: https://msc.fema.gov/webapp/wcs/stores/servlet/FemaWelcomeView?storeId=10001&catalogId=10001&langId=-1.

SPAS-AF00002 Goebel, Karen A U.S. Department of the Interior Fish and Wildlife Service 10/10/2012

SPAS-AF00002-1

Comment:

The U.S. Fish and Wildlife Service (Service) has reviewed the Draft Environmental Impact Report (DEIR) for the above-referenced project, dated July 2012. In 2004, we issued a biological opinion addressing impacts to the federally endangered Riverside fairy shrimp (Streptocephalus woottoni, "RFS") and El Segundo blue butterfly (Euphilotes battoides allyni "ESB") in accordance with section 7 of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 et seq.), based on our review of Alternative D of the Draft Environmental Impact Statement/Environmental Impact Report (EIR/EIS) for the Los Angeles World Airports Master Plan for LAX. The Specific Plan Amendment Study has been prepared to satisfy a lawsuit settlement regarding approval of the LAX Master Plan, and the study involves the identification and evaluation of potential alternative designs, technologies, and configurations that could be implemented consistent with the LAX Master Plan Program.

The primary mission of the Service is to "work with others to conserve, protect, and enhance fish, wildlife, and plants and their habitats for the continuing benefit of the American people." Specifically, the Service administers the Endangered Species Act of 1973 (87 Stat. 884, as amended; 16 U.S.C. 1531 et seq.), and provides support to other Federal agencies in accordance with the provisions of the Fish and Wildlife Coordination Act (48 Stat. 401, as amended; 16 U.S.C. 661 et seq.).

As indicated above, our prior biological opinion addressed proposed impacts to RFS and ESB anticipated under one of four primary alternatives considered for the LAX Master Plan. The current DEIR is tiered off of the prior EIR/EIS (i.e., impacts and mitigation measures proposed under the prior impact analysis are discussed as part of the baseline) and addresses impacts associated with approximately nine different proposed alternatives that include various airfield, terminal, and ground access improvements. Components of these alternatives are interchangeable such that airfield and terminal improvements from one alternative could be implemented in association with the ground access improvements proposed under another alternative. Due to the inter-relationship of the Specific

Plan Amendment Study with implementation of programmatic alternatives identified in the LAX Master Plan and our prior biological opinion, we have the following specific comments and concerns:

Response:

The comment is noted. It should be noted that the SPAS Draft EIR is not tiered off of the LAX Master Plan EIS/EIR, although the LAX Master Plan Final EIR is incorporated by reference (see page 1-105 in Section 1.7 of the SPAS Draft EIR). Please see Responses to Comments SPAS-AF00002-2 and SPAS-AF00002-3 below.

SPAS-AF00002-2

Comment:

1. The DEIR indicates that 2.69 acres of disturbed southern dune scrub occur on the northerly edge of the north airfield, an area that is proposed to be permanently removed in association with construction staging areas and airfield improvements from most, if not all, of the alternatives. This area is noted to be degraded and surrounded by urban development but is also characterized as supporting various indicator species of this plant community, including coast buckwheat (Eriogonum parvifolium), the known host plant of the endangered ESB. Although the DEIR discusses recent survey efforts for ESB within the El Segundo Dunes and ESB Preserve west of Pershing Drive, we were not able to determine what survey efforts have been performed within the 2.69 acres of disturbed southern dune scrub in the vicinity of the airfield. Because ESB is vagile with potential to colonize suitable habitat adjoining the ESB Preserve, we request that the DEIR identify what survey efforts have been performed at this location. If no recent survey efforts (i.e., within the last year) have been performed at this location, then we recommend that appropriately timed updated surveys for ESB be performed so that the potential impacts to ESB from removal of this habitat area can be properly disclosed and addressed.

Response:

The description of the 2.69-acre Disturbed Southern Dune Scrub on page 4-179 of the SPAS Draft EIR inadvertently included coast buckwheat (Eriogonum parviflorum), which is the larval host plant for the El Segundo blue butterfly (Euphilotes battoides allyni), and bush lupine (Lupinus chamissonis) in the list of species observed; however, neither of these species is present. Additionally, several native and non-native species were inadvertently omitted, none of which are larvel host plants for the El Segundo blue butterfly. Native species inadvertently omitted, but which occur within the subject 2.69-acre area of disturbed southern dune scrub, include deerweed (Acmispon glaber), beach evening primrose (Camissonia cheiranthifolia), annual bur-sage (Ambrosia acanthicarpa), and white everlasting (Pseudognaphalium canescens). Non-native species inadvertently omitted, but which occur within the subject area, include wavy sea lavender (Limonium perezii), filaree (Erodium spp.), pampas grass (Cortadaria selloana), fountain grass (Pennisetum setaceum), veldt grass (Ehrharta spp.), hottentot fig (Carpobrotus edulis), English plantain (Plantago lanceolata), and wild oats (Avena fatua). These findings were confirmed in a general biological survey of the 2.69-acre parcel by Glenn Lukos Associates, conducted on November 7, 2012. Accordingly, page 4-179 of the SPAS Draft EIR has been revised. Please see Chapter 5, Corrections and Additions Related to the SPAS Draft EIR. The revisions to page 4-179 of the SPAS Draft EIR do not change the classification of the 2.69-acre area as Disturbed Southern Dune Scrub because these species are consistent with this classification.

No surveys for the federally endangered El Segundo blue butterfly have been conducted within the 2.69 acres of disturbed southern dune scrub identified by the SPAS Draft EIR, either as part of the SPAS Draft EIR survey efforts or any other survey program. No surveys are necessary as coast buckwheat, the larval host plant for the El Segundo blue butterfly, does not occur.

SPAS-AF00002-3

Comment:

2. The DEIR indicates that the relocation of navigational aids proposed in association with implementation of Alternatives 1 through 7 will result in impacts to undeveloped areas within the Los Angeles/El Segundo Dunes, including impacts ranging between 0.33 to 1.03 acres of disturbed southern foredune vegetation, depending on the alternative. Because ESB is anticipated to be impacted in association with impacts to the disturbed southern foredune plant community, the DEIR proposes to

implement LAX Master Plan Mitigation Measures MM-BC-1, MM-ET-3, and MM-ET-4 to reduce the anticipated impacts to this species to a level below significance. Mitigation Measure MM-ET-4 makes specific reference to the Service's April 2004 biological opinion addressing the LAX Master Plan and references a number of conservation measures that were committed to in association with that biological opinion.

Among the conservation measures that were included as the basis for our biological opinion was the commitment to limit activities associated with navigational aid development to the existing roads and proposed impact areas depicted in Figure S4.14-1 and F4.14-1, Location of Proposed Navigational Aids-Alternative D, in Section 4.14, Coastal Zone Management and Coastal Barriers, of the Supplement to the Draft EIS/EIR and Final EIS/EIR, respectively. Based on this commitment we anticipated that construction of the proposed navigational aids would permanently convert 0.25 acre of the El Segundo sand dune complex to structures supporting the navigational lighting system in an area where there are very few coast buckwheat plants. Therefore, we anticipated that construction of the navigational lighting system would result in the removal and translocation of two coast buckwheat plants, causing a small but unquantifiable number of ESB pupae being killed as a result of ground disturbance and the loss of the food source from these plants. Because the DEIR suggests that implementation of any of Alternatives 1 through 7 will impact more disturbed southern foredune vegetation than was addressed in our biological opinion, it appears that the amount or extent of take that was anticipated in association with the removal of two coast buckwheat plants could be exceeded.

As provided for in 50 CFR § 402.16, reinitiation of formal consultation is required when an action proposed by a Federal agency is subsequently modified in a manner that causes an effect to the listed species or critical habitat not considered in the original biological opinion. Because there appears to be a discrepancy between the extent of habitat impact that was anticipated to be removed in association with construction of navigational lighting in our biological opinion and implementation of the various alternatives presented in the DEIR, we request that the DEIR be revised to include a discussion of consistency of each of the potential alternatives with the analysis of the biological opinion. For those alternatives anticipated to exceed the loss or removal of two coast buckwheat plants, the DEIR should identify the need for further consultation with the Service prior to implementation of those alternatives.

Response:

As discussed in Sections 1.4 and 4.3 of the SPAS Draft EIR, relocation of navigational aids in the Los Angeles/El Segundo Dunes associated with SPAS Alternatives 1 through 7 would not result in significant impacts to the federally endangered El Segundo blue butterfly (Euphilotes battoides allyni). Impacts to Disturbed Southern Foredune (which provides habitat for El Segundo blue butterfly) associated with relocation of navigational aids would be significant but mitigable to a level that is less than significant (see Table 4.3.6 of the SPAS Draft EIR). As noted on page 4-170 of the SPAS Draft EIR, the project alternatives are conceptual in nature, and the full scope of the impacts cannot be ascertained at this level of planning. Impacts to El Segundo blue butterfly habitat in the Los Angeles/El Segundo Dunes for each alternative were estimated based upon the sizes of the pads, roads, localizer antennae, and ancillary facilities associated with LAX Master Plan Alternative D. These estimated impacts were refined based upon the updated impact calculations provided by Appendix A-3a, Coastal Zone Management Act Consistency Determination, of the LAX Master Plan Final EIR. Nevertheless, the impact calculations for El Segundo blue butterfly habitat (disturbed southern foredune vegetation) remain conceptual at this level of planning, and final engineering analysis may determine impacts to be greater or lesser. As explained on page 1-18 in the SPAS Draft EIR, Alternative 3 represents what would reasonably be expected to occur in the foreseeable future if the LAX Master Plan (i.e., "Alternative D") and all of the LAX Master Plan improvements were implemented. Please note that, as indicated on page 4-289 of the SPAS Draft EIR, LAX Master Plan Mitigation Measures MM-BC-1, MM-ET-3, and MM-ET-4 are relevant to the impact analysis for biological resources for SPAS Alternatives 1 through 7 and would ensure that impacts to the El Segundo blue butterfly and the Habitat Restoration Area would be less than significant.

The commentor requests that the SPAS Draft EIR be revised to discuss the consistency of each of the individual alternatives with the analysis in the U.S. Fish and Wildlife Service's (USFWS) April 2004 biological opinion. However, for the reasons stated above, additional analysis would be speculative prior to completion of final project engineering design.

The commentor additionally states that "reinitiation of formal consultation is required when an action proposed by a Federal agency is subsequently modified in a manner that causes an effect to the listed species or critical habitat not considered in the original biological opinion." However, the SPAS Draft EIR was released by the City of Los Angeles, and no action is being proposed by a Federal agency at this time. If the City of Los Angeles certifies the Final EIR and approves a SPAS alternative other than Alternative 3, the Federal Aviation Administration (FAA), in connection with review under NEPA, would determine whether previously authorized incidental take would exceed the incidental take authorized by the April 2004 biological opinion, and whether consultation must be reinitiated.

SPAS-AS00001 Morgan, Scott State of California, Governor's Office of Planning and Research, State Clearinghouse and Planning Unit 8/6/2012

SPAS-AS00001-1

Comment:

The Lead Agency has corrected some information regarding the above-mentioned project. Please see the attached materials for more specific information. All other project information remains the same.

SUBJECT: Printable Files for the Draft Environmental Impact Report (DEIR) for the Los Angeles International Airport (LAX) Specific Plan Amendment Study (SPAS)

To Whom It May Concern:

You recently received a DVD containing the Draft EIR for the LAX Specific Plan Amendment Study. The DVD included a file named "LAX SPAS DEIR Appendix A NOP-Scoping Part 1 of 2." While the subject file is viewable on a computer screen, the file on the disk was inadvertently encrypted in a manner that does not enable it to print.

Should you desire a printable version of the file, one is available on the project website, laxspas.org, at the following link:

http://laxspas.org/Draft_EIR.aspx

If you prefer to receive a replacement DVD, please contact me at 424/646-5179 or dalvarez@lawa.org.

Response:

The comment is noted. A printable version of Appendix A NOP-Scoping Part 1 of 2 was posted at laxspas.org on July 30, 2012.

SPAS-AS00002 Singleton, Dave State of California, Native American Heritage Commission 8/13/2012

SPAS-AS00002-1

Comment:

The Native American Heritage Commission (NAHC), the State of California 'Trustee Agency' for the protection and preservation of Native American cultural resources pursuant to California Public Resources Code §21070 and affirmed by the Third Appellate Court in the case of EPIC v. Johnson (1985: 170 Cal App. 3rd 604).

This letter includes state and federal statutes relating to Native American historic properties or resources of religious and cultural significance to American Indian tribes and interested Native

American individuals as 'consulting parties' under both state and federal law. State law also addresses the freedom of Native American Religious Expression in Public Resources Code §5097.9. This project is also subject to California Government Code Section 65352.3 et seq. This project is also subject to California Government Code Section 65352.3 et seq. This project is also subject to California Government Code Section 65352.3 et seq.

The California Environmental Quality Act (CEQA - CA Public Resources Code 21000-21177, amendments effective 3/18/2010) requires that any project that causes a substantial adverse change in the significance of an historical resource, that includes archaeological resources, is a 'significant effect' requiring the preparation of an Environmental Impact Report (EIR) per the CEQA Guidelines defines a significant impact on the environment as 'a substantial, or potentially substantial, adverse change in any of physical conditions within an area affected by the proposed project, including ... objects of historic or aesthetic significance." In order to comply with this provision, the lead agency is required to assess whether the project will have an adverse impact on these resources within the 'area of potential effect (APE), and if so, to mitigate that effect. The NAHC recommends that the lead agency request that the NAHC do a Sacred Lands File search as part of the careful planning for the proposed project.

The NAHC "Sacred Sites,' as defined by the Native American Heritage Commission and the California Legislature in California Public Resources Code §§5097.94(a) and 5097.96. Items in the NAHC Sacred Lands Inventory are confidential and exempt from the Public Records Act pursuant to California Government Code §6254 (r).

Early consultation with Native American tribes in your area is the best way to avoid unanticipated discoveries of cultural resources or burial sites once a project is underway. Culturally affiliated tribes and individuals may have knowledge of the religious and cultural significance of the historic properties in the project area (e.g. APE). We strongly urge that you make contact with the list of Native American Contacts on the attached list of Native American contacts, to see if your proposed project might impact Native American cultural resources and to obtain their recommendations concerning the proposed project. Pursuant to CA Public Resources Code § 5097.95, the NAHC requests cooperation from other public agencies in order that the Native American consulting parties be provided pertinent project information. Consultation with Native American communities is also a matter of environmental justice as defined by California Government Code §65040.12(e). Pursuant to CA Public Resources Code §5097.95, the NAHC requests that pertinent project information be provided consulting tribal parties, including archaeological studies. The NAHC recommends avoidance as defined by CEQA Guidelines §15370(a) to pursuing a project that would damage or destroy Native American cultural resources and Section 2183.2 that requires documentation, data recovery of cultural resources.

Furthermore, the NAHC if the proposed project is under the jurisdiction of the statutes and regulations of the National Environmental Policy Act (e.g. NEPA; 42 U.S.C. 4321-43351). Consultation with tribes and interested Native American consulting parties, on the NAHC list, should be conducted in compliance with the requirements of federal NEPA and Section 106 and 4(f) of federal NHPA (16 U.S.C. 470 et seq), 36 CFR Part 800.3 (f) (2) & .5, the President's Council on Environmental Quality (CSQ, 42 U.S.C 4371 et seq. and NAGPRA (25 U.S.C. 3001-3013) as appropriate. The 1992 Secretary of the Interiors Standards for the Treatment of Historic Properties were revised so that they could be applied to all historic resource types included in the National Register of Historic Places and including cultural landscapes. Also, federal Executive Orders Nos. 11593 (preservation of cultural environment), 13175 (coordination & consultation) and 13007 (Sacred Sites) are helpful, supportive guides for Section 106 consultation. The aforementioned Secretary of the Interior's Standards include recommendations for all 'lead agencies' to consider the historic context of proposed projects and to ''research" the cultural landscape that might include the area of potential effect.'

Confidentiality of "historic properties of religious and cultural significance" should also be considered as protected by California Government Code §6254(r) and may also be protected under Section 304 of he NHPA or at the Secretary of the Interior discretion if not eligible for listing on the National Register of Historic Places. The Secretary may also be advised by the federal Indian Religious Freedom Act (cf. 42 U.S.C., 1996) in issuing a decision on whether or not to disclose items of religious and/or cultural significance identified in or near the APEs and possibility threatened by proposed project activity.

Furthermore, Public Resources Code Section 5097.98, California Government Code §27491 and Health & Safety Code Section 7050.5 provide for provisions for inadvertent discovery of human remains mandate the processes to be followed in the event of a discovery of human remains in a project location other than a 'dedicated cemetery'.

To be effective, consultation on specific projects must be the result of an ongoing relationship between Native American tribes and lead agencies, project proponents and their contractors, in the opinion of the NAHC. Regarding tribal consultation, a relationship built around regular meetings and informal involvement with local tribes will lead to more qualitative consultation tribal input on specific projects.

Finally, when Native American cultural sites and/or Native American burial sites are prevalent within the project site, the NAHC recommends 'avoidance' of the site as referenced by CEQA Guidelines Section 15370(a).

Response:

As stated on page 4-363 in Section 4.5.3.3 of the SPAS Draft EIR, LAWA initiated Senate Bill (SB) 18 consultation with local Native American groups and individuals in December 2011 in coordination with the California Native American Heritage Commission (NAHC) seeking their assistance in the identification of traditional tribal "cultural places." As part of this effort, LAWA also requested a Sacred Lands File (SLF) search of the project site. The NAHC provided an SB 18 Contact List and the results of the SLF search in a letter to PCR Services Corporation dated December 7, 2011. The letter indicated that "Native American cultural resources were identified in the project site" and included the contact information of five individuals for consultation purposes.

On December 19, 2011 PCR Services Corporation, on behalf of LAWA, submitted "request to consult" letters to the five Native American contacts on the SB 18 Contact List. LAWA received responses from Mr. Sam Dunlap (Chairperson of the Gabrielino Tongva Nation) and Mr. Andy Salas (Chairman of the Gabrielino Band of Mission Indians) that highlighted the potential for the project site to contain Native American cultural resources. Both Mr. Dunlap and Mr. Salas recommended the presence of a Native American monitor during construction excavations associated with the project given the potential to encounter Native American cultural resources. LAWA submitted responses to Mr. Dunlap and Mr. Salas on May 15, 2012. In the letters, LAWA summarized recent archaeological construction monitoring efforts and highlighted LAWA's conformance to the Archaeological Treatment Plan document, which stipulates the requirement for Native American construction monitoring after Native American cultural resources are encountered.

The Native American consultation documentation is provided in Appendix B and Appendix E-1 of the SPAS Draft EIR.

SPAS-AS00003 — Morgan, Scott — State of California, Governor's Office of Planning and Research, State Clearinghouse and Planning Unit — 9/11/2012

SPAS-AS00003-1

Comment:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on September 10, 2012, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Response:

The comment is noted. It is further noted that this letter included as an attachment a copy of the comment letter on the SPAS Draft EIR that was submitted separately by the Native American Heritage Commission (SPAS-AS00002); please refer to the response to comment letter SPAS-AS00002.

SPAS-AR00001 Nadler, Jonathan Southern California Association of Governments 10/9/2012

SPAS-AR00001-1

Comment:

Thank you for submitting the Draft Environmental Impact Report for the Los Angeles International Airport Specific Plan Amendment Study (SPAS) to the Southern California Association of Governments (SCAG) for review and comment. SCAG is the authorized regional agency for Inter-Governmental Review (IGR) of programs proposed for federal financial assistance and direct development activities, pursuant to Presidential Executive Order 12372. Additionally, SCAG reviews the Environmental Impact Reports of projects of regional significance for consistency with regional plans pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.

SCAG is also the designated Regional Transportation Planning Agency under state law, and as such is responsible for preparation of the Regional Transportation Plan including its Sustainable Communities Strategy component pursuant to SB 375. As the clearinghouse for regionally significant projects per Executive Order 12372, SCAG reviews the consistency of local plans, projects, and programs with regional plans.1 Guidance provided by these reviews is intended to assist local agencies and project sponsors to take actions that contribute to the attainment of the regional goals and policies in the RTP/SCS.

SCAG staff has determined that the proposed project is regionally significant per CEQA Guidelines, Sections 15125 and 15206 and evaluated this project based on the goals of SCAG's 2012-2035 Regional Transportation Plan/Sustainable Community Strategy.

When available, please send a copy of the Final Environmental Impact Report to the attention of Pamela Lee at SCAG, 818 West 7th Street, 12th floor, Los Angeles, California, 90017. If you have any questions regarding the attached comments, please contact Pamela Lee at (213) 236-1895 or leep@scag.ca.gov. Thank you.

1 SB 375 amends CEQA to add Chapter 4.2 Implementation of the Sustainable Communities Strategy, which allows for certain CEQA streamlining for projects consistent with the RTP/SCS. Lead agencies (including local jurisdictions) maintain the discretion and will be solely responsible for determining "consistency" of any future project with the SCS. Any "consistency" finding by SCAG pursuant to the IGR process should not be construed as a finding of consistency under SB 375 for purposes of CEQA streamlining.

Response:

The comment is noted. Please see Responses to Comments SPAS-AR00001-2 through SPAS-AR00001-4 below. A copy of the Final EIR will be sent to the Southern California Association of Governments at least 10 days prior to certification of the Final EIR. The Final EIR will also be available at www.laxspas.org.

SPAS-AR00001-2

Comment:

COMMENTS ON THE ENVIRONMENTAL IMPACT REPORT FOR THE LOS ANGELES INTERNATIONAL AIRPORT SPECIFIC PLAN AMENDMENT STUDY
[SCAG NO.I20120136]

SUMMARY

Based on SCAG staff review, the proposed project supports the SCAG 2012 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), where applicable.

2012-2035 RTP/SCS

The 2012-20135 RTP/SCS links the goal of sustaining mobility with the goals of fostering economic development, enhancing the environment, reducing energy consumption, promoting transportation-friendly development patterns, and encouraging fair and equitable access to residents affected by socio-economic, geographic and commercial limitations (see http://rtpscs.scag.ca.gov). The goals included in the 2012 RTP/SCS, listed below, may be pertinent to the proposed project.

2012-2035 RTP/SCS GOALS

RTP/SCS G1: Align the plan investments and policies with improving regional economic development and competitiveness

RTP/SCS G2: Maximize mobility and accessibility for all people and goods in the region

RTP/SCS G3: Ensure travel safety and reliability for all people and goods in the region

RTP/SCS G4: Preserve and ensure a sustainable regional transportation system

RTP/SCS G5: Maximize the productivity of our transportation system

RTP/SCS G6: Protect the environment and health for our residents by improving air quality and encouraging active transportation (non-motorized transportation, such as bicycling and walking)

RTP/SCS G7: Actively encourage and create incentives for energy efficiency, where possible

RTP/SCS G8: Encourage land use and growth patterns that facilitate transit and non-motorized transportation

RTP/SCS G9: Maximize the security of the regional transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies

The 2012-2035 RTP/SCS also contains regional aviation policies (http://rtpscs.scag.ca.gov/Documents/2012/final/SR/2012fRTP_Aviation.pdf), including Airport and Land Use Compatibility and Environmental Impacts policies.

2012-2035 RTP/SCS Regional Aviation Policies
III.A. Airport and Land Use Compatibility and Environmental Impacts Regional Aviation Policies

- Increased coordination between airport planning and land use planning on both regional and local levels should be promoted
- Regional support and coordination should be extended to the region's Airport Land Use Commissions
- Information on aviation environmental "best practices" should be shared and disseminated on a regional level
- Mechanisms for promoting cleaner and quieter aircraft at the region's airports should be identified and supported

The proposed project is listed in SCAG's 2012-2035 RTP/SCS, Aviation and Airport Ground Access Report Appendix, as the LAX Specific Plan 'Yellow Light Projects'.

The adopted 2012-2035 RTP/SCS's includes total regional and LAX air passenger demand forecasts for 2035 of 145.9 million of annual passengers (MAP) and 78.9 MAP, respectively.

SCAG Staff Comments
The proposed Los Angeles International Airport Specific Plan Amendment is consistent with SCAG's 2012-2035 RTP/SCS air passenger demand forecast of 78.9 MAP.

Chapter 4.9 (Land Use and Planning) and Appendix I (Land Use and Planning) of the proposed project Draft EIR analyze, where applicable, each project alternative's consistency with SCAG's 2012-2035 RTP/SCS Airport Land Use Compatibility and Environmental Impacts regional aviation policies, as well as SCAG's 2004 Compass Blueprint principles (which are precursors to the mobility and sustainability goals in the 2012-2035 RTP/SCS). The proposed project's Final EIR should clarify the information in Chapter 4.9 and Appendix I to also specifically address the 2012-2035 RTP/SCS goals listed above, where applicable.

Response:

The comment regarding the project supporting the 2012-2035 RTP/SCS is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project.

Section 4.9.3 of the SPAS Draft EIR discusses the goals of the Southern California Association of Governments (SCAG) 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), which were also considered in relation to each of the nine proposed SPAS alternatives, in Section 4.9.6. A consistency evaluation of RTP/SCS Aviation and Ground Access Appendix (AAGA Appendix) aviation-specific policies was also conducted for each alternative and included in Appendix I-1 of the SPAS Draft EIR.

To address SCAG's request to specifically address Goals 1 through 9 of the RTP/SCS in the Final EIR, an addition to the SPAS Draft EIR, Table 1 analyzes the consistency of the SPAS alternatives with the nine goals of the RTP/SCS.

Table 1

Comparison of the LAX SPAS Alternatives to the SCAG 2012-2035 RTP/SCS Goals

Goal	Comparison
Goal 1. Align the plan investments and policies with improving regional economic development and competitiveness.	Consistent: SPAS would support the goal of promoting the alignment of plan investments with the improvement of regional and economic development and competitiveness, as development of SPAS would include major airfield, terminal, and ground access improvements which would upgrade the regional air transportation system. Construction of major airfield, terminal and ground access improvements would foster economic development associated with LAX, which plays an important role in the Southern California economy through employment, generation of taxes and other revenue, and by facilitating the movement of people, goods, and services.

Table 1

Comparison of the LAX SPAS Alternatives to the SCAG 2012-2035 RTP/SCS Goals

Goal	Comparison
Goal 2. **Maximize the mobility and accessibility for all people and goods in the region.**	Consistent: SPAS would maximize the mobility and accessibility for all people and goods in the region, as it would improve mobility for residents by constructing major ground access improvements and by providing transit connectivity. Such improvements include the modification of Sky Way, parking within Manchester Square, and development of an elevated/dedicated busway providing connectivity to the CTA, the ITF, the future Metro LAX/Crenshaw Light Rail Transit Station, and other public transit. New airfield and terminal improvements, including redesigned airport entry roadways, would provide more convenient access to air transportation services, as well as increase the efficiency of the region's air transportation system. These and other improvements, as described within each of the SPAS alternatives, would encourage transportation investments, transit-oriented development, and the promotion of a variety of travel choices.
Goal 3. **Ensure travel safety and reliability for all people and goods in the region.**	Consistent: This goal would be supported as SPAS includes enhancements in the safety and efficiency of the airfield that promote greater travel safety. The reliability of travel for people and movement of goods would also be supported by the proposed major airfield, terminal, and ground access improvements.
Goal 4. **Preserve and ensure a sustainable regional transportation system.**	Consistent: SPAS would be consistent with Goal 4, as it would preserve and ensure a sustainable regional transportation system by developing airfield, terminal, and ground access improvements, such as redesigned airport entry roadways, the modification of Sky Way, parking within Manchester Square, and development of an elevated/dedicated busway providing connectivity to the CTA, the ITF, the future Metro LAX/Crenshaw Light Rail Transit Station, and other public transit. Development of major ground access improvements would be focused in an existing urban center, as the ground access improvements would offer alternative means of travel to and from LAX and other areas, thereby reducing vehicle miles traveled. Furthermore, airfield, terminal, and other facility improvements would be designed in compliance with LAWA's Sustainability Plan, thereby implementing strategies which use resources efficiently and utilize "green" development techniques, as further described in Section 4.6, of the SPAS Draft EIR. In addition, development of the proposed airfield, terminal and ground access improvements would be undertaken following other environmental best practices such as those required through implementation of LAX Master Plan commitments, LAX Master Plan mitigation measures, and the Community Benefits Agreement, further demonstrating consistency with Goal 4.
Goal 5. **Maximize the productivity of our transportation system.**	Consistent: SPAS would be consistent with Goal 5, as it would maximize the productivity of our transportation system by developing major airfield, terminal, and ground access improvements. Productivity would be achieved under Goal 5 for many of the same reasons described in the above-discussed RTP/SCS Goals, since the major airfield, terminal, and ground access improvements would improve the current transportation and transit systems around and within LAX. New airfield and terminal improvements, including redesigned airport entry roadways, would provide more convenient access to air transportation services, as well as increase the efficiency of the region's air transportation system. These improvements would encourage transportation investments, transit-oriented development and the promotion of a variety of travel choices.
Goal 6. **Protect the environment and health of our residents by improving air quality and encouraging active transportation (non-motorized transportation, such as bicycling and walking).**	Consistent: SPAS would be consistent with Goal 6, as it would protect the environment and the health of residents by developing major airfield, terminal, and ground access improvements, such as the development of an elevated/dedicated busway providing connectivity to the CTA, the ITF, the future Metro LAX/Crenshaw Light Rail Transit Station, and other public transit. Development of major ground access improvements would be focused in an existing urban center, as the ground access improvements would offer alternative means of travel to and from LAX and other areas, thereby reducing vehicle miles traveled. Furthermore, airfield, terminal, and other facility improvements would be designed in compliance with LAWA's Sustainability Plan, thereby implementing strategies which use resources efficiently and utilize "green" development techniques, as further described in Section 4.6 of the SPAS Draft EIR.

Table 1

Comparison of the LAX SPAS Alternatives to the SCAG 2012-2035 RTP/SCS Goals

Goal	Comparison
Goal 7. Actively encourage and create incentives for energy efficiency, where possible.	Consistent: SPAS would be consistent with Goal 7, as it would encourage and create incentives for energy efficiency, where feasible. Development of major ground access improvements would be designed in compliance with LAWA's Sustainability Plan, thereby implementing strategies which use resources efficiently and utilize "green" development techniques, as further described in Section 4.6, *Greenhouse Gases*, of the SPAS Draft EIR. LAWA would also incorporate energy conserving measures into the design of new buildings and airport facilities, including the use of energy-efficient building materials, energy-saving lighting systems, energy-efficient water heating systems, and designed-in access for alternative means of surface transportation, including the Green Line and the APM, as further described in Section 4.13.1 of the SPAS Draft EIR. Development of the SPAS improvements would also be undertaken pursuant to other environmental best practices required through implementation of LAX Master Plan commitments, LAX mitigation measures, and the Community Benefits Agreement, further demonstrating consistency with Goal 7.
Goal 8. Encourage land use and growth patterns that facilitate transit and non-motorized transportation.	Consistent: SPAS would be consistent with Goal 8, as it would encourage land use and growth patterns that facilitate transit and non-motorized transportation, such as the development of an elevated/dedicated busway providing connectivity to the CTA, the ITF, the future Metro LAX/Crenshaw Light Rail Transit Station, and other public transit. Development of major ground access improvements would be focused in an existing urban center, as the ground access improvements would offer alternative means of travel to and from LAX and other areas, thereby reducing vehicle miles traveled. In addition, provisions for bicycle access and amenities, such as bicycle parking, lockers and showers, will be provided, where feasible.
Goal 9. Maximize the security of the regional transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies.	Consistent: Security compliance for SPAS would be assured through various design features and security measures such as access control systems, employee I.D. requirements, and other current TSA requirements included in the Airport Security Program. Continued upgrades to security systems, review of future plans for compliance with current and future TSA and other applicable security related requirements, and continued coordination with and between the multiple agencies involved in security at LAX would help maximize the security of the regional transportation system. Also see Appendix I, SPAS Security Assessment, and Section 4.11.2, *Law Enforcement*, for detailed discussions of security and law enforcement.

Source: PCR Services Corporation, 2012.

SPAS-AR00001-3

Comment:

The Draft EIR includes some of alternatives that do not propose ground access improvements. SCAG encourages selection of a preferred alternative that maximizes implementation of the economic, mobility, and sustainability goals of the 2012-2035 RTP/SCS, which would include ground access improvements and close collaboration with Los Angeles County Metropolitan Transportation Authority on the proposed Crenshaw/LAX Transit Corridor.

Response:

As provided in Section 1.2.1 of the SPAS Draft EIR, one of the project objectives is to improve the ground access system at LAX. More specific goals associated with improving the ground access system, including integrating the ground access system improvements with regional transit facilities nearby, such as the recently approved Metro Crenshaw/LAX Transit Corridor and Station, are described in detail on page 1-12 of the SPAS Draft EIR. The ground access improvements associated with the alternatives are discussed on page 1-17 of the SPAS Draft EIR.

The SPAS Draft EIR evaluated nine alternatives. Of these, four alternatives, Alternatives 1 through 4, are "fully integrated" alternatives that include specific airfield, terminal, and ground access improvements. Alternatives 5 through 7 focus on variations to the airfield improvements which, in turn,

would affect terminal improvements. Alternatives 8 and 9 focus on variations to the ground access improvements. However, as stated on page 1-17 of the SPAS Draft EIR, there is a certain amount of compatibility or "interchangeability" between the SPAS alternatives. Specifically, the airfield and terminal improvements in Alternatives 5 through 7 are equally compatible with the ground access improvements in Alternatives 1, 2, 8, and 9. Alternatives 5 through 7 would only address all of the problems that the Yellow Light Projects were designed to address in conjunction with the ground access improvements associated with Alternatives 1, 2, 8, or 9.

As to the commentor's suggestion, the comment is noted and is hereby part of the Final EIR. It will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS Project.

SPAS-AR00001-4

Comment:

MITIGATION

SCAG Staff Comments
SCAG staff recommends that you review the SCAG 2012-2035 RTP/SCS Final Program EIR List of Mitigation Measures Appendix for additional guidance, as appropriate. The SCAG List of Mitigation Measures may be found here: http://scag.ca.gov/igr/pdf/SCAG_IGRMMRP_2012.pdf

Response:

The commentor recommends that LAWA review the 2012-2035 RTP/SCS Final Program EIR list of example mitigation measures for additional guidance, which is provided in Appendix G, Examples of Measures that Could Reduce Impacts from Planning, Development and Transportation Projects. LAWA has reviewed these measures and confirmed that the applicable LAX Master Plan mitigation measures, LAX Master Plan commitments, and new mitigation measures included in the SPAS Draft EIR (refer to Table 1-6 in Chapter 1) address the potentially significant impacts associated with the project in a manner that is comprehensive and that supports the general intent and expected benefits reflected in the 2012-2035 RTP/SCS Final Program EIR list of example mitigation measures.

There are multiple examples of applicable LAX Master Plan commitments and mitigation measures or SPAS mitigation measures which fulfill the intent of Appendix G, several of which are described below. For instance, SCAG Appendix G construction-related air quality impact mitigation measures AQ3, AQ4, and AQ6 would be implemented through LAX Master Plan Mitigation Measure MM-AQ-2, which includes mitigation measures to minimize fugitive dust emissions during construction of the SPAS alternatives. Components of SCAG Appendix G Greenhouse Gas Emissions mitigation measure GHG2 would be implemented through LAX Master Plan Mitigation Measure MM-AQ-3, which encourages the use of low emission vehicles for LAX operations, including those associated with the SPAS alternatives. Components of SCAG Appendix G Land Use mitigation measure LU2 would be implemented through LAX Master Plan Commitment RBR-1 and LAX Master Plan Mitigation Measure MM-RBR-1, which provide for the relocation of businesses which may be acquired as a result of the development of SPAS alternatives. SCAG Appendix G Noise mitigation measure NO9 would be implemented through corresponding LAX Master Plan Commitment N-1 and LAX Master Plan Mitigation Measures MM-N-4 and MM-N-5, which would reduce aircraft noise resulting from the development of SPAS alternatives. Components of SCAG Appendix G Traffic mitigation measure TR13 would be implemented through corresponding LAX Master Plan Commitments ST-9, ST-12, ST-14, ST-17, ST-18, ST-19, ST-21, and ST-22, which would minimize traffic congestion during construction of the LAX SPAS alternatives. These are but a few examples of the SPAS Draft EIR fulfilling the general intent of the SCAG Appendix G mitigation guidance document.

SPAS-AR00002 MacMillan, Ian V — South Coast Air Quality Management District — 10/25/2012

SPAS-AR00002-1

Comment:

The South Coast Air Quality Management District (AQMD) staff appreciates the opportunity to comment on the above-mentioned document and the lead agency's consideration of the enclosed comments beyond the comment period. The following comments are intended to provide guidance to the lead agency and should be incorporated into the Final Environmental Impact Report (EIR) as appropriate.

Response:

The comment is noted. Please see Responses to Comments SPAS-AR00002-2 through SPAS-AR00002-53 below. LAWA has incorporated SCAQMD's comments pertaining to mitigation into the Final EIR. Please see Responses to Comments AR00002-27, AR00002-28, AR00002-31, AR00002-32, AR00002-35, and AR00002-36.

SPAS-AR00002-2

Comment:

Based on a review of the Draft EIR the proposed project will generate significant regional and local air quality impacts during operations. The project's significant air quality impacts are predominantly from aircraft emissions generated by a significant increase of air passenger capacity at the project site. For example, the project could result in an additional 11,000 lbs/day of NOx emissions from future aircraft activity, resulting in significant localized impacts. Therefore, it is imperative that the lead agency provide additional mitigation measures that address these significant project emissions pursuant to CEQA Guidelines Section 15126.4. Because of the high baseline and future emissions from the project site, the lead agency should also ensure that any approved build alternatives minimize exposures wherever feasible, including through providing the largest possible buffer between emission sources (such as runways) and sensitive receptors.

Response:

Implementation of the proposed project, specifically, airfield improvements associated with certain SPAS alternatives (i.e., Alternatives 1, 2, 3, 5, 6, and 7) would reduce local and regional air quality impacts compared to future conditions if no airfield improvements are made. As explained in Section 4.2 of the SPAS Draft EIR, the increase in air pollutant emissions from aircraft, which are the predominant source daily emissions, over baseline (2009) levels is due to the growth in airport activity projected to occur by the future horizon year (2025). Such growth would occur regardless of SPAS. The airfield improvements proposed under the SPAS alternatives are intended to improve the safety and efficiency of airfield operations at LAX compared to what would otherwise occur in the future if no improvements are made. Alternative 4 represents a scenario whereby no airfield improvements are implemented, other than federally mandated runway safety area improvement, which do not affect normal daily operations. As evident in Tables 4.2-13, 4.2-14, 4.2-15, and 4.2-16, airfield-related emissions and concentrations associated with alternatives that include airfield improvements (Alternatives 1, 2, 3, 5, 6, and 7) would, in general, be less than those that would occur if no improvements were made (Alternative 4), with the most notable exception being Alternative 3, which would have greater impacts for some pollutants due to a greater amount of aircraft taxiing required under this scenario.

Note that Alternative 3 would provide the largest buffer between the northernmost runway and the north fence-line. However, by leaving Runway 24R where it is today and moving Runway 24L farther south, the emissions actually increase above those alternatives where Runway 24R is moved north. This can be seen be looking at the aircraft NOx emissions in Table 4.2-13 (page 4-123) of the SPAS Draft EIR. Alternative 3 would have the highest range of emissions of any of the airfield improvement alternatives

(Alternatives 1, 2, 3, 5, 6, and 7). Even Alternative 7, which leaves Runway 24R where it is today and moves Runway 24L farther south, has a higher emissions range than the alternatives that move Runway 24R north (Alternatives 1, 5, and 6). The attempts to provide a buffer between the northern runway and north fence-line actually increase air emissions in the airport area.

The SPAS Draft EIR identifies numerous LAX Master Plan commitments and mitigation measures that will reduce air quality impacts associated with airport operations. LAWA has carefully reviewed and considered the mitigation measures proposed elsewhere in this comment letter and has provided responses as to the necessity, effectiveness, and/or feasibility of each. In addition, this is a programmatic EIR. Appropriate project-level mitigation would be implemented as necessary when individual projects are considered. As discussed on page 4-3 of the SPAS Draft EIR, the Draft EIR is a program-level document prepared pursuant to the State CEQA Guidelines. State CEQA Guidelines Section 15168(a) states that a program EIR "may be prepared on a series of actions that can be characterized as one large project" and applies to projects that are related either geographically or as logical parts in the chain of contemplated actions. A program EIR is prepared at a more general level of planning than a project-level EIR and allows a lead agency to "consider broad policy alternatives and program-wide mitigation measures at an early time when the agency has greater flexibility to deal with basic problems or cumulative impacts" (State CEQA Guidelines Section 15168(b)(4)).

Please see Responses to Comments SPAS-AR00002-7 through SPAS-AR00002-41, and SPAS-AR00002-44 for specific responses addressing the mitigation measures proposed in this comment letter.

SPAS-AR00002-3

Comment:

Further, the Draft EIR lacks necessary specificity in several areas, including how mitigation will be implemented, what other air quality work has been recently completed for LAX and the surrounding community, and in many of the air quality analysis methodologies. Without presenting the details of the analysis, AQMD staff is unable to confirm whether the air quality analysis is consistent with our guidance. Further, by omitting this information, the decision makers and the public are not afforded the opportunity to review all of the pertinent information prior to determining the environmental impacts of this project. As a result, AQMD staff has suggested revisions to this analysis (included in the attachment).

Response:

Please see the responses to specific comments in Responses to Comments SPAS-AR00002-7 through SPAS-AR00002-53.

SPAS-AR00002-4

Comment:

Pursuant to Public Resources Code Section 21092.5, please provide the AQMD with written responses to all comments contained herein prior to the adoption of the Final EIR. Staff is available to work with the lead agency to address these issues and recommends that the lead agency coordinate with our staff prior to releasing the Final EIR.

Response:

The comment is noted. Written responses to all comments contained in the letter from SCAQMD will be sent to SCAQMD at least 10 days prior to certification of the Final EIR. As suggested in this comment, LAWA held a follow-up meeting with SCAQMD staff on November 29, 2012 to review and discuss the SPAS EIR air quality analysis.

SPAS-AR00002-5

Comment:

Operational Emissions Mitigation

1. Given that the lead agency's operational air quality analysis demonstrates significant regional air quality impacts from PM10 and PM2.5 and localized air quality impacts from NO2, SO2, PM10, and PM2.5 emissions the AQMD staff recommends that the lead agency provide additional mitigation measures pursuant to CEQA Guidelines Section 15126.4. Because of these significant current and future air quality impacts, the lead agency should ensure that any approved build alternative looks to minimize exposures wherever possible. This can include providing the maximum buffer between emission sources (such as runways, major travel routes, parking lot entrances, etc.) and sensitive receptors.

Response:

The airport is now accommodating the arrival and departure of Aircraft Design Group (ADG) VI aircraft, including the Airbus 380. One of the major objectives of the proposed program is the development of an airport layout that is safe and more efficient than the current airfield. The lead agency will be balancing the numerous environmental impacts of each alternative with the safety requirements of the Federal Aviation Administration as well as other objectives in the stated project purpose when selecting a preferred alternative. LAWA has carefully reviewed and considered the mitigation measures proposed elsewhere in this comment letter. In addition, this is a programmatic EIR. Appropriate project-level mitigation would be implemented as necessary when individual projects are considered. Please see Responses to Comments SPAS-AR00002-7 through SPAS-AR00002-41, and SPAS-AR00002-44.

SPAS-AR00002-6

Comment:

2. In addition, the AQMD staff recommends that the lead agency minimize or eliminate significant adverse air quality impacts by adding the mitigation measures provided below.

Response:

Please refer to Responses to Comments SPAS-AR00002-7 through SPAS-AR00002-41, and SPAS-AR00002-44 for discussions of the individual mitigation measures proposed in this comment letter.

SPAS-AR00002-7

Comment:

Aircraft Emissions.
a) Encourage or incentivize airlines to route the cleanest aircraft engines to serve the South Coast Air Basin.

Response:

As noted in Appendix IV-B of the Revised Draft 2012 Air Quality Management Plan developed by the South Coast Air Quality Management District 1, state and local aircraft emission regulation is preempted by the Clean Air Act which gives that authority to the U.S. Environmental Protection Agency (USEPA) in consultation with the Federal Aviation Administration (FAA). New engine emission standards for nitrogen oxides (NOx) were recently adopted by the USEPA 2, making the federal standards consistent with international aircraft engine emission standards. The new, Tier 6 NOx standard applies to newly certified engines after July 18, 2012, and represents a 12 percent reduction compared to the current, Tier 4 NOx standard. In addition, the future Tier 8 NOx standard will apply to newly certified engines in 2014. The Tier 8 standard is approximately 15 percent lower (more stringent) than the Tier 6 standard.

The airline industry balances a number of constraints when routing aircraft to various cities across the country. The industry's biggest cost today is that of fuel. Because fuel cost is such a driver in aircraft routing decisions, it is unlikely that the lead agency could develop an incentive policy that would change routing decisions to bring cleaner aircraft to LAX. However, LAWA will continue to encourage the routing of newer aircraft to LAX and other Southern California airports through its ongoing coordination with its tenants.

1. South Coast Air Quality Management District. 2012. Revised Draft 2012 Air Quality Management Plan, Appendix IV-B, Control Measure No. ADV-07 (September).
2. U.S. Environmental Protection Agency. 2012. Control of Air Pollution from Aircraft and Aircraft Engines; Emission Standards and Test Procedures. Final Rule. 77 FR 36341 (June 18).

SPAS-AR00002-8

Comment:

Energy Efficiency Mitigation Measures
b) Maximize use of solar energy including solar panels; specifically, the lead agency should review, estimate and commit to a minimum installation based on the total available space at the project site. The lead agency should provide a brief justification for any areas found to be infeasible for solar panel installation.

Response:

As a general note, LAWA must now comply with the Los Angeles Green Building Code 2, approved in 2010. As part of LAWA's new Sustainability Guidelines, a Standard of Tier 1 has been set for all building projects with a Los Angeles Department of Building and Safety permit-valuation over $200,000. This requirement will address a number of the suggested mitigation measures listed in Comments SPAS-AR00002-9, 10, 11, 12, 13, and 14.

LAWA will consider solar energy options in the project planning and design phases of any approved SPAS alternative. However, space at LAX is limited for construction of solar energy systems in a manner that does not conflict with airport operations. The general design of any solar energy systems would be addressed in the project-level CEQA documents that will be developed to implement the programmatic SPAS alternatives. Please refer to Responses to Comments SPAS-PC00130-225 and SPAS-PC00130-142 for a discussion of the appropriateness of the programmatic review conducted for the SPAS project.

Solar energy includes both passive (solar lighting) and active (solar panels) systems and designs. Typically, large areas are needed to install solar panels in sufficient quantity to offset the cost of installation in a reasonable time. One of the largest airports in the U.S. that operates a solar system is Denver International, which has large areas within its property line that can accommodate large solar panel arrays. Space for a solar energy system at LAX, which is in the middle of urban Los Angeles, is substantially more limited than at Denver International Airport and the effectiveness of a such system on a smaller scale is uncertain. Approximately 30 acres of space is required for solar photovoltaic panels to generate 9 MW of power. Additionally, solar energy systems at airports have been known to result in operational issues. For example, a recent solar panel installation at the Manchester-Boston Regional Airport in New Hampshire had approximately 25 percent of its panels covered with tarps to eliminate the glare in the air traffic control tower 1.

LAWA will also consider passive solar design, the use of sunlight to light rooms in the daytime, in the project planning and design phases of any approved SPAS alternative. As noted above, LAWA must now comply with the Los Angeles Green Building Code 2, approved in 2010. As part of LAWA's new Sustainability Guidelines, a Standard of Tier 1 has been set for all on-airport building projects with a Los Angeles Department of Building and Safety permit-valuation over $200,000. The design criteria for passive solar lighting is located in Section A5.507.2. In summary, building designs should incorporate daylit spaces for toplighting and sidelighting indicated in the California Energy Code.

1. Hayward, M., Airport controllers complain of solar panels' glare, New Hampshire Union Leader, 2012.
2. City of Los Angeles, Ordinance No. 181480 An ordinance amending Chapter IX of the Los Angeles Municipal Code by adding a new Article 9 to incorporate various provisions of the 2010 California Green Building Standards Code (CALGreen Code), approved December 15, 2010.

SPAS-AR00002-9

Comment:

c) Require all lighting fixtures, including signage, to be energy efficient, and require that new traffic signals have light-emitting diode (LED) bulbs and require that light fixtures be energy efficient compact fluorescent and/or LED light bulbs. Where feasible use solar powered lighting.

Response:

The City of Los Angeles and LAWA have incorporated energy efficiency measures into the municipal building code and LAWA Design and Construction Handbook (DCH). The City adopted the Los Angeles Green Building Code (LAGBC) in 2010 1, and the energy efficiency measures in this code are incorporated into the DCH. The LAGBC contains voluntary Tier 1 and Tier 2 goals for energy reduction. As part of LAWA's Sustainability Guidelines, a Standard of meeting Tier 1 has been set for all on-airport LAWA building projects. The Tier 1 goal is to reduce energy consumption by 15 percent below 2008 California Energy Code requirements.

Under LAWA's Sustainability Program, energy efficient lighting fixtures, ballasts, and bulbs have been retrofitted at LAX (and LA/Ontario International Airport, ONT) over the last several years. LAWA has successfully completed the replacement of incandescent light bulbs with compact florescent light (CFL) bulbs at LAX and ONT. CFL bulbs use less electricity and have a longer life span than incandescent bulbs. For outside facilities such as runways, signage, outdoor lighting, etc., light-emitting diodes (LED) have been installed wherever feasible 2. When specific projects are approved, appropriate energy efficient measures, including LED lights, will be incorporated. See Tables 4.6-7 and 4.6-8 of the SPAS Draft EIR which present a comprehensive list of suggested mitigation measures for new development projects throughout the state of California. As explained on page 4-414 of the SPAS Draft EIR, the use of energy efficient lighting, systems and equipment in new facilities and in the renovation/modification of existing facilities is standard practice by LAWA and is generally reflected in the Green Building Ordinance. No emission reduction credit is taken for these measures.

1. City of Los Angeles, Ordinance No. 181480 An ordinance amending Chapter IX of the Los Angeles Municipal Code by adding a new Article 9 to incorporate various provisions of the 2010 California Green Building Standards Code (CALGreen Code), Approved December 15, 2010.
2. City of Los Angeles, Los Angeles World Airports, Los Angeles World Airports Sustainability Report 2010, June 30, 2011.

SPAS-AR00002-10

Comment:

d) Use light colored paving and roofing materials.

Response:

The City of Los Angeles and LAWA have incorporated energy efficiency measures into the municipal building code and LAWA Design and Construction Handbook (DCH). The City adopted the Los Angeles Green Building Code (LAGBC) in 2010 1, and the energy efficiency measures in this code are incorporated into the DCH. It should be noted that the LAGBC contains voluntary Tier 1 and Tier 2 goals for energy reduction. As part of LAWA's Sustainability Guideline, a Standard of meeting Tier 1 has been set for all on-airport LAWA building projects. The Tier 1 goal is to reduce energy consumption by 15 percent below 2008 California Energy Code requirements.

LAWA will address the use of light colored paving and roofing materials during project design according the LAGBC A5.106.11, which includes use of light colored/high albedo materials, and cool roof

materials. Note that much of the airport's existing surfaces designed for aircraft movement are made of concrete or asphaltic concrete which tends to be lighter in color than standard asphalt. Many of the existing roof structures are also light gray (concrete) colored as well. Light colored paving and roofing materials are included in LAWA Sustainability Guidelines (adopted). They include provisions for "heat island' reduction, including the use of cool roofs as an option under all the SPAS alternatives as set forth in Table 4.6-7 (page 4-414) of the SPAS Draft EIR.

1. City of Los Angeles. 2010. Ordinance No. 181480 An ordinance amending Chapter IX of the Los Angeles Municipal Code by adding a new Article 9 to incorporate various provisions of the 2010 California Green Building Standards Code (CALGreen Code). (Approved December 15).

SPAS-AR00002-11

Comment:

e) Use passive heating, natural cooling, and solar hot water systems for buildings, and reduced pavement for non-roadway areas where possible.

Response:

The City of Los Angeles and LAWA have incorporated energy efficiency measures into the municipal building code and LAWA Design and Construction Handbook (DCH). The City adopted the Los Angeles Green Building Code (LAGBC) in 2010 1, and the energy efficiency measures in this code are incorporated into the DCH. It should be noted that the LAGBC contains voluntary Tier 1 and Tier 2 goals for energy reduction. As part of LAWA's Sustainability Guidelines, a Standard of meeting Tier 1 has been set for all on-airport LAWA building projects. The Tier 1 goal is to reduce energy consumption by 15 percent below 2008 California Energy Code requirements.

LAWA will consider adopting reduced pavement for non-roadway areas where possible and feasible, i.e., where it will not impact airport and runway safety and security).

In response to the comment regarding heating and cooling systems, LAWA has adopted and implemented energy efficient cooling and heating systems at LAX. The Central Utility Plant (CUP) Replacement Project elements include (1) new facility and plant equipment, combustion gas turbine, heat-recovery steam generators, cooling tower, water refrigeration/heating equipment; (2) replacement cooling/heating for buildings; (3) 1.6 million-gallon thermal energy storage tanks. LAWA, therefore, has already adopted and implemented reduced energy heating and cooling. The new CUP was built in accordance with LAWA's Sustainable Design and Construction Guidelines, and systems and their components for the new CUP are designed to achieve LEED® Silver certification from the U.S. Green Building Council. The new design will be approximately 25 percent more energy-efficient than the current facility and will meet all current air-quality regulations. No emission reduction credit is taken for these measures.

1. City of Los Angeles, Ordinance No. 181480 An ordinance amending Chapter IX of the Los Angeles Municipal Code by adding a new Article 9 to incorporate various provisions of the 2010 California Green Building Standards Code (CALGreen Code), Approved December 15, 2010.

SPAS-AR00002-12

Comment:

f) Utilize only Energy Star heating, cooling, and lighting devices, and appliances.

Response:

The City of Los Angeles and LAWA have incorporated energy efficiency measures into the municipal building code and LAWA Design and Construction Handbook (DCH). The City adopted the Los Angeles Green Building Code (LAGBC) in 2010 1, and the energy efficiency measures in this code are incorporated into the DCH. It should be noted that the LAGBC contains voluntary Tier 1 and Tier 2

goals for energy reduction. As part of LAWA's Sustainability Guidelines, a Standard of meeting Tier 1 has been set for all LAWA on-airport building projects. The Tier 1 goal is to reduce energy consumption by 15 percent below 2008 California Energy Code requirements.

LAWA will use Energy Star heating and cooling units, lighting devices, and appliances where appropriate and feasible, as this is a requirement under LAGBC. See Tables 4.6-7 and 4.6-8 of the SPAS Draft EIR for a discussion of adoption of these measures. Note that LAWA continuously upgrades and performs preventative maintenance on its air-handling equipment. As LAWA upgrades and replaces its air-handling equipment, new units with variable frequency drives and soft-start controls that are more energy efficient are installed. Because these drives do not operate at full load at all times, the energy savings can be substantial. As of May 2010, LAWA's Maintenance Service Division (MSD) had converted 80 percent of fan drives to these newer, more efficient units 2.

Please also see Responses to Comments SPAS-AR00002-9 regarding lighting fixtures at LAX and SPAS-AR00002-10 and SPAS-AR00002-11 regarding heating and cooling. No emission reduction credit is taken for these measures.

1. City of Los Angeles, Ordinance No. 181480 An ordinance amending Chapter IX of the Los Angeles Municipal Code by adding a new Article 9 to incorporate various provisions of the 2010 California Green Building Standards Code (CALGreen Code), Approved December 15, 2010.
2. City of Los Angeles, Los Angeles World Airports, Los Angeles World Airports Sustainability Report 2010, June 30, 2011.

SPAS-AR00002-13

Comment:

g) Limit the hours of operation of outdoor lighting where possible.

Response:

The City of Los Angeles and LAWA have incorporated energy efficiency measures into the municipal building code and LAWA Design and Construction Handbook (DCH). The City adopted the Los Angeles Green Building Code (LAGBC) in 2010 1, and the energy efficiency measures in this code are incorporated into the DCH. It should be noted that the LAGBC contains voluntary Tier 1 and Tier 2 goals for energy reduction. As part of LAWA's Sustainability Guideline, a Standard of meeting Tier 1 has been set for all on-airport LAWA building projects. The Tier 1 goal is to reduce energy consumption by 15 percent below 2008 California Energy Code requirements.

LAWA currently limits the use of outdoor lighting where appropriate and feasible, giving priority, however, to maintaining proper illumination for airport security purposes.

See Table 4.6-7 of the SPAS Draft EIR for a discussion of adoption of the feasible outdoor lighting measures.

1. City of Los Angeles, Ordinance No. 181480 An ordinance amending Chapter IX of the Los Angeles Municipal Code by adding a new Article 9 to incorporate various provisions of the 2010 California Green Building Standards Code (CALGreen Code), Approved December 15, 2010.

SPAS-AR00002-14

Comment:

h) Install energy efficient heating and cooling systems, appliances and equipment, and control systems.

Response:

The City of Los Angeles and LAWA have incorporated energy efficiency measures into the municipal building code and LAWA Design and Construction Handbook (DCH). The City adopted the Los

Angeles Green Building Code (LAGBC) in 2010 1, and the energy efficiency measures in this code are incorporated into the DCH. It should be noted that the LAGBC contains voluntary Tier 1 and Tier 2 goals for energy reduction. As part of LAWA's Sustainability Guidelines, a Standard of meeting Tier 1 has been set for all on-airport LAWA building projects. The Tier 1 goal is to reduce energy consumption by 15 percent below 2008 California Energy Code requirements.

Please see Responses to Comments SPAS-AR00002-8 and SPAS-AR00002-11 regarding use of passive lighting, Response to Comment SPAS-AR00002-9 regarding use of efficient lighting, and Response to Comment SPAS-AR00002-12 regarding use of energy efficient heating/cooling systems and appliances at LAX.

See Table 4.6-7 of the SPAS Draft EIR for a discussion of adoption of the feasible energy efficient measures

1. City of Los Angeles, Ordinance No. 181480 An ordinance amending Chapter IX of the Los Angeles Municipal Code by adding a new Article 9 to incorporate various provisions of the 2010 California Green Building Standards Code (CALGreen Code), Approved December 15, 2010.

SPAS-AR00002-15

Comment:

Transportation Mitigation Measures
i) Set specific goals for service levels applicable to LAX Flyaway Service that will provide direct shuttle service between the site and off-site locations.

Response:

LAWA provides detailed information on the LAWA website about the FlyAway program and other alternative modes of transportation to and from LAX (lawa.org/welcome_LAX.aspx?id=132), and also provides FlyAway information brochures at transit centers, such as Union Station, and to major employers upon request as part of their transportation demand management/trip reduction programs.

The LAX FlyAway program was expanded since development of the LAX Master Plan to include FlyAway connections at Union Station in downtown Los Angeles, in Westwood/UCLA, as well as continued use of the original FlyAway station in Van Nuys. Although LAWA also initiated FlyAway service to and from the Irvine Transit Center in Orange County, that service was terminated on August 31, 2012 due to low ridership. LAWA staff continues to work on establishing additional FlyAway sites. The next FlyAway service, connecting LAX with the Metro Exposition light rail line at its Expo/LaBrea station, was approved by the LAWA Board of Airport Commissioners in October 2012 and is expected to begin service in spring 2013. Other potential LAX FlyAway locations which LAWA staff is currently evaluating for service include Santa Monica, Long Beach, Torrance, Hollywood, and Glendale.

The percentage of passengers using the FlyAway service during the peak arrival and peak departure periods in the 2009 baseline is included in Table 4.12.1-5 (page 4-1073) in Section 4.12.1.3.11 of the SPAS Draft EIR. The percentage of passengers assumed to use FlyAway service during the peak arrival and peak departure periods in the 2025 alternatives are included in Table 4.12.1-15 (page 4-1103) in Section 4.12.1.7.2 of the SPAS Draft EIR. FlyAway use by passengers was between 1.49 and 1.90 percent for the 2009 baseline during peak arrival and departure periods, and is estimated to be up to 3.1 percent in 2025. While the existing FlyAway routes demonstrate a consistent and mature level of passenger demand, this change does not substantially alter the number of private vehicles driving to or from LAX; thus, the FlyAway impact on the emissions for each alternative were not specifically quantified, and the analysis did not assume any reduction in emissions as a result of the FlyAway service. However, LAWA remains committed to developing and providing FlyAway service.

The commentor is also referred to Response to Comment SPAS-PC00130-231.

SPAS-AR00002-16

Comment:

j) Set goals for the introduction of zero/near zero emission shuttles serving LAX.

Response:

LAWA continues to make progress towards meeting the requirements of the Community Benefits Agreement (CBA), paragraphs X.J.2.b and c, which requires conversion of on-road commercial vehicles operating at LAX to convert to alternative fuels or clean engine technology within 10 years of the effective date of the CBA. LAWA's fleet is the largest Alternative Fuel Vehicle (AFV) airport fleet in the nation and includes over 590 AFVs. Currently, over 63 percent of LAWA's fleet vehicles and equipment at LAX are AFV's. Additionally, 100 percent of the LAX courtesy shuttle fleet is powered by natural gas.1 LAWA has designed and built a state-of-the-art, high-technology LNG/CNG fueling station at LAX and acquired over $5 million in grant funding to offset the differential cost of AFVs. LAWA also has adopted an "Alternative Fuel Vehicle Requirement Program" that applies to all on-road vehicles weighing 8,500 pounds or larger.2 The program ensures the alternative fuel conversion of car rental shuttles, trucks, and other large vehicles or heavy equipment at LAX. The overall compliance rate of the program was close to 90 percent in 2010 and LAWA intends to expand the program to include more off-airport parking lot shuttles.3 Based on the above, there is substantial evidence that goals related to the introduction of zero/near zero emission shuttles serving LAX already exist.

1. City of Los Angeles, Los Angeles World Airports, LAX Master Plan Mitigation Monitoring and Reporting Program (MMRP), 2011 Annual Progress Report, October 2012.
2. City of Los Angeles, Los Angeles World Airports, Alternative Fuel Vehicle Requirement Program, Available: http://www.lawa.org/uploadedfiles/AirOps/pdf/Exh%20C%20-%20Alt%20Fuel%20Program .pdf, accessed January 1, 2013.
3. City of Los Angeles, Los Angeles World Airports, Los Angeles World Airports Sustainability Report 2010, June 30, 2011.

SPAS-AR00002-17

Comment:

k) Ensure that LAX Flyaway Services provide adequate seating capacity for employees.

Response:

LAWA policy states that the FlyAway contractor will provide an additional bus to a FlyAway route if demand for seats on that route is not being met. Please also refer to Response to Comment SPAS-AR00002-15 for additional discussion regarding the LAX FlyAway service. Also, with regard to employees using the LAX FlyAway service, LAWA encourages such use by providing a $110 per month allotment to its employees choosing to use public transit, including the FlyAway, for commuting to and from work at LAX. A monthly pass for the FlyAway is $120 per month, meaning that the "out of pocket" expense for LAWA employees using the FlyAway is only $10, which is substantially less than the cost of gas, insurance, maintenance/repairs, and other expenses otherwise associated with commuting in a private vehicle.

SPAS-AR00002-18

Comment:

l) Implement a home dispatching system where employees receive routing schedules by phone.

Response:

It is not clear if the comment refers to incident management or general traffic congestion at LAX. LAWA operates an incident reporting and response system, Everbridge, to alert employees, via e-mail, of

incidents at the airport and specify appropriate responses. For general traffic congestion, employees have access to the same internet-based traffic reporting website available to the general public (such as "SigAlert.com" for regional highway/freeway traffic conditions and "trafficinfo.lacity.org" for local roadway traffic conditions). In addition, LAX utilizes portable and fixed electronic message boards to provide real-time information so that motorists can make knowledgeable driving decisions. Eight portable changeable message signs are available at LAX during peak travel times or for special occurrences. The quantity of traffic information on www.lawa.org has increased to traffic alerts, a link to LADOT real-time traffic maps, and airport-specific maps showing the current lane closures and detours in the LAX area.1

Notwithstanding the above, LAWA will develop, as a SPAS mitigation measure, an information technology system that LAWA employees and the general public can utilize with consumer electronics that will provide links, such as to the sources mentioned above, for real-time information regarding local and regional traffic conditions for travel to and from LAX. As such, Section 4.2.7 of the SPAS Draft EIR has been revised to add this new mitigation measure for air quality. Please see Chapter 5, Corrections and Additions Related to the SPAS Draft EIR. No emission reduction credit is taken for this measure.

1. City of Los Angeles, Los Angeles World Airports, Los Angeles World Airports Sustainability Report 2010, June 30, 2011.

SPAS-AR00002-19

Comment:

m) Provide incentives to encourage public transportation and carpooling (e.g., through internal retail and restaurant discounts).

Response:

As discussed in Table 4.6-8 of the SPAS Draft EIR, LAWA has a comprehensive rideshare and vanpool program available to all employees, which offers financial incentives and discounts to participating employees. As noted in the annual Sustainability Report,1 LAWA's Rideshare Program has eliminated eight billion pounds of air pollutants and over seven million vehicle miles traveled since its inception, which has led to reduced congestion during peak morning and evening commuting hours at the LAWA airports. Additionally the U.S. Environmental Protection Agency (EPA) considers the LAWA program to be one of the most comprehensive programs offered by an employer in Southern California. It is part of the EPA's Best Workplaces for Commuters Program that distinguishes and provides national recognition to employers offering outstanding commuter benefits. In order to participate in this program, employers must meet the EPA's National Standard of Excellence in commuter benefits. This program would continue agency-wide and is not particular to any SPAS alternative.

LAWA's multi-faceted Rideshare Program includes 66 vanpools, 88 carpool program participants, 320 free monthly transit passes, and numerous marketing and advocacy activities to recruit and retain program participants. Currently, about 26 percent of LAWA's employees are participating in the Rideshare Program, saving over 1,000 vehicle trips to LAWA facilities every day.2

LAWA also provides a transit subsidy for LAWA employees, which can be used to purchase Metrorail/Metrobus or FlyAway tickets or passes, so long as the participating employees make a specified number of commutes using the transit service over the course of a month.

Additionally, as discussed in Section 4.6 of the SPAS Draft EIR, the City of Los Angeles' Green Building Code includes measures to provide designated parking for any combination of low emitting, fuel-efficient, and carpool/vanpool vehicles.

1. City of Los Angeles, Los Angeles World Airports, Los Angeles World Airports Sustainability Report 2010, June 30, 2011.
2. City of Los Angeles, Los Angeles World Airports, LAX Master Plan Mitigation Monitoring and Reporting Program (MMRP), 2011 Annual Progress Report, October 2012.

SPAS-AR00002-20

Comment:

n) Provide incentives for employees and the public to use public transportation such as discounted transit passes, reduced ticket prices, and/or other incentives.

Response:

Please see Response to Comment SPAS-AR00002-19 regarding discount transit passes for employees. As noted in that response, LAWA has an aggressive ridership program. All of the SPAS alternatives, except for Alternative 4, include ground transportation systems improvements that will be integrated with the recently-approved Metro Crenshaw/LAX Transit Corridor and Station, which is specifically intended to encourage and improve the use of transit by the public, and employees, traveling to and from LAX.

SPAS-AR00002-21

Comment:

o) Implement and/or enhance a rideshare program for employees.

Response:

Please see Response to Comment SPAS-AR00002-19 regarding LAWA's Ridershare Program.

SPAS-AR00002-22

Comment:

p) Require the use of 2010 diesel, or alternatively fueled, delivery trucks (e.g., food, retail and vendor supply delivery trucks) as soon as feasible and prior to the 2023 CARB compliance deadline.

Response:

Please see Response to Comment SPAS-AR00002-16 regarding LAWA's Alternative Fuel Vehicle Requirement Program.

SPAS-AR00002-23

Comment:

q) Provide electric infrastructure (wiring, panel upgrades, etc.) for truck loading areas to allow future charging station installation.

Response:

The SPAS project does not alter air cargo handling at LAX. However, LAWA will provide the appropriate electrical infrastructure for those cargo handling tenants that have a need for such facilities and request it from LAWA. In general, LAWA intends to monitor the development of electric truck engines and the design standards for these engines and associated charging infrastructure. The selection of appropriate infrastructure for installation at LAX would be made when air cargo facilities are updated. Electrical infrastructure upgrade goals have been incorporated into the SPAS Final EIR mitigation measures. Please see Chapter 5, Corrections and Additions Related to the SPAS Draft EIR. No emission reduction credit is taken for measure.

SPAS-AR00002-24

Comment:

r) Provide a direct connection between the MTA Green Line/Crenshaw Line and any constructed Automated People Mover (APM).

Response:

As described in Section 2.3.1.3 of the SPAS Draft EIR, Alternative 3 includes a Ground Transportation Center (GTC) in Manchester Square, an Intermodal Transportation Center (ITC) in the area known as Continental City at Aviation Boulevard and Imperial Highway, and a CONRAC in the Lot C area. Alternative 3 includes two separate APM systems: one APM would convey passengers between the ITC, CONRAC, and CTA, while a second APM would transport passengers between the GTC and the CTA. Under Alternative 3 as originally planned as part of the LAX Master Plan (i.e., Alternative D), an elevated pedestrian bridge would link the ITC to the Metro Green Line Aviation/LAX station, which at the time was the closest existing or planned transit station to LAX. With the now-planned transit station at Century and Aviation Boulevards, Alternative 3 would also provide connectivity with the new transit station as well.

An automated people mover (APM) would be incorporated into the SPAS program if LAWA selects the ground access design under Alternative 9. As described in Section 2.3.1.9.3 of the SPAS Draft EIR, the Alternative 9 ground access facilities would include an APM with "stops at the future Metro LAX/Crenshaw Light Rail Transit Station at/near Century and Aviation Boulevards…" The Alternative 9 ground access design can be incorporated into the overall SPAS design under Alternatives 1, 2, 5, 6, and 7. In addition, even if the APM is not selected, the dedicated busway that is part of the SPAS Alternatives 1, 2, 5, 6, and 7 would also have connect with the future Metro LAX/Crenshaw Light Rail Transit Station at/near Century and Aviation Boulevards as described in Sections 2.3.1.1.3 (page 2-13), 2.3.1.2.3 (page 2-17), 2.3.1.5.3 (page 2-30), 2.3.1.6.3 (page 2-33), and 2.3.1.7.3 (page 2-37) of the SPAS Draft EIR). Finally, Alternative 8 would also include a dedicated busway that connects to the Metro LAX/Crenshaw station (see Section 2.3.1.8.2 on page 2-38 of the SPAS Draft EIR).

Please also see Topical Response TR-SPAS-T-1 regarding SPAS connectivity to transit.

SPAS-AR00002-25

Comment:

s) Require the APM to operate with zero emissions technology.

Response:

The automated people mover (APM) included under Alternatives 3 and 9 would be an electric-powered system with zero local emissions from the motors.

SPAS-AR00002-26

Comment:

t) Provide zero/near-zero emissions and alternative fueled technologies to transport passengers from nearby locations such as rental car centers.

Response:

Please see Response to Comment SPAS-AR00002-16 regarding LAWA's Alternative Fuel Vehicle Requirement Program that applies to all on-road vehicles weighing 8,500 pounds or more. Note that this program applies to rental car shuttles.

SPAS-AR00002-27

Comment:

Parking Mitigation Measures
u) Provide parking system for quick entry and exit that will reduce vehicle idling time. A system should also be installed that provides sufficient signage or communication for available parking, parking locations, and parking fee.

Response:

LAWA will incorporate quick entry and exit parking systems in the project level design of future parking structures associated with the SPAS project. Signage will be included in the design to assist passengers in finding available parking locations. These design goals have been incorporated into the SPAS Final EIR mitigation measures. Please see Chapter 5, Corrections and Additions Related to the SPAS Draft EIR. No emission reduction credit is taken for this measure.

SPAS-AR00002-28

Comment:

v) Provide real time information on parking availability in the parking structures to minimize the time it takes to find available parking.

Response:

LAWA will include advanced signage in the design of future parking structures that could advise airport users of available parking spaces within that facility. This design goal has been included in the SPAS Final EIR list of mitigation measures. Please see Chapter 5, Corrections and Additions Related to the SPAS Draft EIR. No emission reduction credit is taken for this measure.

SPAS-AR00002-29

Comment:

w) Install electrical hookups at docks for any TRU's.

Response:

The LAX SPAS project does not alter Transportation Refrigeration Unit (TRU) facilities or operations at LAX. However, LAWA will provide the appropriate TRU electrical infrastructure for those tenants that have a need for such facilities and request it from LAWA. Such electrical infrastructure upgrades for TRU facilities would be provided in conjunction with the mitigation measures added in Response to Comment SPAS-AR00002-23. In general, LAWA intends to monitor the development of electric TRU docking design standards for such infrastructure. The selection of appropriate infrastructure for installation at LAX would be made when TRU facilities are updated. No emission reduction credit is taken for this measure.

SPAS-AR00002-30

Comment:

Other Mitigation Measures
x) Require diesel particulate filters on all diesel-fueled emergency generators.

Response:

The installation of diesel particulate filters on emergency power generators is not feasible. The cost effectiveness of such a measure is likely to be high given the minimal amount of emissions associated with emergency generators. However, because these generators are stationary sources, subject to

SCAQMD rules and regulations, any regulations requiring the installation of filters on emergency power generators will be complied with by LAWA.

SPAS-AR00002-31

Comment:

y) Require use of electric lawn mowers and leaf blowers.

Response:

LAWA will require the use of electric lawn mowers and leaf blowers for landscape maintenance, as these units become available for commercial use, associated with the SPAS project. This requirement has been incorporated into the SPAS Final EIR mitigation measures. Please see Chapter 5, Corrections and Additions Related to the SPAS Draft EIR. No emission reduction credit is taken for this measure.

SPAS-AR00002-32

Comment:

z) Require use of electric or alternatively fueled sweepers with HEPA filters.

Response:

LAWA will require the conversion of sweepers to alternative fuels or electric power for ongoing airfield and roadway maintenance. In the 2006 GSE inventory, two (2) of 10 sweepers were electric powered and one (1) was either CNG or LPG fueled. HEPA files will be installed on airport sweepers where the use of HEPA filters is technologically and financially feasible and does not pose a safety hazard to airport operations. This requirement has been included in the SPAS Final EIR mitigation measures. Please see Chapter 5, Corrections and Additions Related to the SPAS Draft EIR. No emission reduction credit is taken for this measure.

SPAS-AR00002-33

Comment:

Further, given that the lead agency incorporates MMAQ-4 from the Final EIR for the LAX Master Plan in the proposed project the AQMD staff recommends that the lead agency provide an updated inventory in the Final EIR that demonstrates the lead agency's progress toward achieving a zero/near zero (low emission) fleet of ground support equipment. The aforementioned inventory should provide an overview of the existing ground support equipment fleet and near future milestones toward achieving a low emission fleet.

Response:

Progress towards compliance with MM-AQ-4, as with all LAX Master Plan commitments and mitigation measures, is reported annually in the LAX Master Plan Mitigation Monitoring and Reporting Program (MMRP) Annual Progress Report found at: http://ourlax.org/publications.aspx.

The survey of GSE conducted in 2006 indicated that approximately 3,050 pieces of ground support equipment (GSE) were operating at LAX. Of these, 27 percent were diesel, 32 percent were gasoline, 24 percent were electric, and 17 percent were natural gas or LPG fueled.

LAWA is continuing to pursue the expansion of electronic GSE (EGSE) use at LAX and is currently reevaluating the overall electrical power infrastructure around the airport for the planning of future EGSE charging stations at the airport. In conjunction with that effort, and in response to the commentor's suggestion, LAWA will conduct a comprehensive GSE inventory update to identify and assess the current fuel type composition of GSE operating at LAX, as will help to guide next steps in supporting and encouraging the use of alternative fuel GSE at LAX. As such, Section 4.2.7 of the SPAS Draft EIR has been revised to add this new mitigation measure for air quality. Please see

Chapter 5, Corrections and Additions Related to the SPAS Draft EIR. No emission reduction credit is taken for this measure.

SPAS-AR00002-34

Comment:

Construction Emissions Mitigation

3. The lead agency determined that the proposed project will exceed the CEQA regional construction significance thresholds for NOx, VOC, CO, PM10, and PM2.5; therefore, beyond MMAQ-1 and MMAQ-2 and the requirements of the applicable settlement agreement the AQMD staff recommends that the lead agency provide the following additional mitigation measures pursuant to CEQA Guidelines Section 15126.4.

Response:

The comment provides an introduction to the commentor's suggestions for additional mitigation measures. Those additional measures are described in subsequent comments, which LAWA has addressed as follows: Please see Response to Comment SPAS-AR00002-35 regarding mitigation for on-road trucks used during SPAS construction; and, please see Response to Comment SPAS-AR00002-36 regarding mitigation for off-road equipment used during SPAS construction.

SPAS-AR00002-35

Comment:

- Require the use of 2010 and newer diesel haul trucks (e.g., material delivery trucks and soil import/export) and if the lead agency determines that 2010 model year or newer diesel trucks cannot be obtained the lead agency shall use trucks that meet EPA 2007 model year NOx emissions requirements,

Response:

LAWA agrees that construction on-road truck measures can be incorporated into project construction specifications. For future on-road trucks used on SPAS-related projects, LAWA has incorporated the following mitigation action as part of MM-AQ-2:

On-road trucks with a gross vehicle weight rating of at least 19,500 pounds must, at a minimum, comply with USEPA 2007 on-road emission standards for PM10 and NOx.

No emission reduction credit is taken for these measures. Please see Chapter 5, Corrections and Additions Related to the SPAS Draft EIR.

SPAS-AR00002-36

Comment:

- Consistent with measures that other lead agencies in the region (including Port of Los Angeles, Port of Long Beach, Metro and City of Los Angeles)1 have enacted, require all on-site construction equipment to meet EPA Tier 3 or higher emissions standards according to the following:

- Project start, to December 31, 2014: All offroad diesel-powered construction equipment greater than 50 hp shall meet Tier 3 offroad emissions standards. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.

- Post-January 1, 2015: All offroad diesel-powered construction equipment greater than 50 hp shall meet the Tier 4 emission standards, where available. In addition, all construction equipment shall be

outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.

- A copy of each unit‟s certified tier specification, BACT documentation, and CARB or SCAQMD operating permit shall be provided at the time of mobilization of each applicable unit of equipment.

- Encourage construction contractors to apply for AQMD "SOON" funds. Incentives could be provided for those construction contractors who apply for AQMD "SOON" funds. The "SOON" program provides funds to accelerate clean up of off-road diesel vehicles, such as heavy duty construction equipment. More information on this program can be found at the following website: http://www.aqmd.gov/tao/Implementation/SOONProgram.htm

Additional measures to reduce off-road construction equipment can be found at the following website: www.aqmd.gov/ceqa/handbook/mitigation/MM intro.html.

1 For example see the Metro Green Construction Policy at: http://www.metro.net/projects_studies/sustainability/images/Green_Construction_Policy.pdf

Response:

LAWA agrees that construction off-road equipment measures can be incorporated into project construction specifications. For future off-road equipment used on SPAS-related projects, LAWA has incorporated the following mitigation action as part of MM-AQ-2:

Prior to January 1, 2015, all off-road diesel-powered construction equipment greater than 50 HP will meet USEPA Tier 3 off-road emission standards. After December 31, 2014, all off-road diesel-powered construction equipment greater than 50 HP will meet Tier 4 off-road emissions standards. Tier 4 equipment shall be considered based on availability at the time the construction bid is issued. LAWA will encourage construction contractors to apply for SCAQMD "SOON" funds to accelerate clean up of off-road diesel engine emissions.

No emission reduction credit is taken for this measures. Please see Chapter 5, Corrections and Additions Related to the SPAS Draft EIR.

SPAS-AR00002-37

Comment:

Specificity of Mitigation Measures

4. Many of the mitigation measures from the LAX Master Plan that are carried forward into the LAX SPAS Draft EIR are vague and need further clarification in the Final EIR. Without this added specificity, it is unclear how effectively the proposed measures from Table 4.2-9 of the Draft EIR may mitigate air quality impacts. The Final EIR should include additional discussion of the following items:

Response:

As discussed on page 4-3 of the SPAS Draft EIR, the Draft EIR is a program-level document prepared pursuant to the State CEQA Guidelines. State CEQA Guidelines Section 15168(a) states that a program EIR "may be prepared on a series of actions that can be characterized as one large project" and applies to projects that are related either geographically or as logical parts in the chain of contemplated actions. A program EIR is prepared at a more general level of planning than a project-level EIR and allows a lead agency to "consider broad policy alternatives and program-wide mitigation measures at an early time when the agency has greater flexibility to deal with basic problems or cumulative impacts" (State CEQA Guidelines Section 15168(b)(4)). Section 15146(b) of the State CEQA Guidelines states that "An EIR on a project such as the… amendment of… a local general plan should focus on the secondary effects that can be expected to follow from the… amendment, but the EIR need not be as detailed as an EIR on the specific construction projects that might follow."

Program EIRs are commonly used in conjunction with the tiering process, which is "the coverage of general matters in broader EIRs (such as general plans or policy statements) with subsequent narrower EIRs or ultimately site-specific EIRs…concentrating solely on the issues specific to the EIR subsequently prepared." (State CEQA Guidelines Section 15385.) Under CEQA's tiering principles, it is proper for a lead agency to focus a first-tier EIR on only the program's general impacts, "leaving project-level details to subsequent EIRs when specific projects are being considered." (State CEQA Guidelines Section 15152(c); In re Bay-Delta (2008) 43 Cal.4th 1143, 1174-1175.)

The CEQA Guidelines establish several additional principles related to the level of detail appropriate for a first-tier program EIR. For example, an EIR project description should be "general" and "not supply extensive detail beyond that needed for an evaluation and review of the environmental impacts." (CEQA Guidelines Section 15124.) Also, the degree of specificity in an EIR corresponds to the degree of specificity of the underlying activity being evaluated. (CEQA Guidelines Section 15146(b).) An EIR's sufficiency is reviewed in the light of what is "reasonably feasible." (CEQA Guidelines Section 15151.)

The requirements and principles for first-tier program EIRs reviewed above apply directly to the SPAS Draft EIR. As stated on page 1-10 in Section 1.2.1 of the SPAS Draft EIR, "The project is to complete a Specific Plan Amendment Study (SPAS) that fulfills Section 7.H of the LAX Specific Plan consistent with the definition of the SPAS set forth in the LAX Master Plan Stipulated Settlement." The outcome of SPAS is the possible amendment of the LAX Specific Plan, which is an element of the City's General Plan. Therefore, the SPAS Draft EIR is appropriately a program EIR that focuses on program-wide impacts, and is not a project-level EIR. Because it is a program EIR, the SPAS Draft EIR is not required to analyze the impacts of specific construction projects included in the program at a project-specific level of detail.

As with the analysis in the EIR, the level of detail in mitigation measures can only be as specific as the program that they are designed to address. Where, as here, the project is at the general planning-level, it is appropriate to consider broad policy alternatives and program-wide mitigation measures rather than develop project-level, specific mitigation measures in the absence of specific project details. (State CEQA Guidelines Section 15168(b)(4).) Specific, project-level mitigation measures would be identified in connection with the environmental analysis of future projects.

Please see Response to Comment SPAS-AR00002-38 regarding electric charging stations in parking structures. Please see Responses to Comment SPAS-AR00002-39 regarding rental car fleets. Please see Response to Comment SPAS-AR00002-16 regarding LAWA's Alternative Fuel Vehicle Requirement Program that is applicable to all commercial vehicles using the terminal areas.

SPAS-AR00002-38

Comment:

- It is unclear how many charging stations will be provided by implementing this project. The currently installed electric vehicle charging stations are commonly overcrowded, thus not allowing electric vehicles the ability to charge while onsite. At a minimum, enough Level 1 charging capacity should be added to accommodate demand.

Response:

LAWA has partnered with the Department of Water and Power to install over 30 public access Level 2 electric vehicle charging stations at LAX. These stations are located in Parking Structures P1 and P6. LAWA's recent replacement of old style chargers and the provision of additional chargers was in response to increased usage. LAWA will continue to evaluate the charging station use to determine when additional charging stations are warranted. Charging stations will also be installed in the new parking facilities constructed under SPAS.

SPAS-AR00002-39

Comment:

- It is unclear how promoting "best engine" technologies at rental car fleets will be implemented. The types of technologies that will be promoted and the incentives provided should be detailed in the Final EIR.

Response:

LAWA has a number of existing programs in place to promote the use of alternative fuel vehicles at LAX, such as the extensive amount of CNG vehicles within LAWA's current fleet mix and the alternative fuel conversion program for trucks, shuttles, passenger vans, and buses over 8,500 pounds gross vehicle weight ratings that was developed through the LAX Master Plan Community Benefits Agreement. The increased use of such vehicles, particularly CNG/LNG-fueled vehicles, at and around LAX can provide a greater demand for CNG/LNG-fueling stations around LAX, which, in-turn, can support a greater use of CNG rental cars, such as those available through Hertz Green Traveler Program.

SPAS-AR00002-40

Comment:

- It is unclear how the lead agency will promote SULEV/ZEV technology for commercial vehicles using terminal areas. The Final EIR should specify the types of incentives that will be offered, as well as the applicability of these incentives (e.g., how will it apply to heavy duty delivery trucks, shuttle buses, etc?)

Response:

Please see Response to Comment SPAS-AR00002-16 regarding LAWA's Alternative Fuel Vehicle Requirement Program that is applicable to all commercial vehicles using the terminal areas.

SPAS-AR00002-41

Comment:

Electrification of Passenger Gates

5. Page 4-107 of the Draft EIR states that newly constructed passenger gates will be electrified (Measure X.A). Because of the significant air quality impacts of this project, the lead agency should investigate the feasibility of electrifying all gates at LAX. The Final EIR should include a discussion of the feasibility of this additional mitigation, as well as the time frame that would be needed to implement it.

Response:

All existing passenger gates (terminal and regional boarding ramp gates) at LAX have been retrofitted with 400 Hz gate power.1

1. City of Los Angeles, Los Angeles World Airports, LAX Master Plan Community Benefits Agreement (CBA), 2011 Annual Progress Report, August 2012.

SPAS-AR00002-42

Comment:

CEQA Baseline

6. Establishing a proper baseline is fundamental to accurately assessing a project's impacts. The function of the baseline is to set conditions against which project impacts are compared to determine whether an environmental impact is significant. As such, the baseline should not be established in a way that understates project impacts. The baseline emissions in this Draft EIR are from 2010. While conditions at the time the NOP is released normally constitutes the baseline for analysis of project impacts, a future conditions baseline is the more appropriate baseline to evaluate the impacts from this proposed project. This is because use of a current conditions baseline underestimates project impacts by taking credit for projected improvements to air quality that are unrelated to the proposed project. These improvements include the future air quality benefits from currently adopted and enforceable vehicle emission standards. Crediting the project with such benefits does not disclose the impacts of the project. Therefore, in order to ensure that the impacts of this project are accurately described, the AQMD staff believes the impacts of the proposed Project should be measured against future conditions without the proposed Project. In other words, a baseline should be presented that includes current activity levels along with project build-out emission standards.

Response:

The baseline analysis was conducted pursuant to, and complies with, the requirements of CEQA. (State CEQA Guidelines Section 15125(a).) The operational emissions comparison using the standard CEQA approach (i.e., baseline as existing conditions at time of the Notice of Preparation (NOP)), was presented in Table 4.2-13 (pages 4-122 through 4-125) of the SPAS Draft EIR. The results of this analysis indicated that aircraft and on-board auxiliary power unit (APU) emissions would be substantially higher in the future under all SPAS alternatives compared to existing aircraft and APU emissions. The results also indicate that despite anticipated growth in activity levels of traffic and ground handling support, emissions would decrease relative to existing emission inventories for parking lots, roadways, and airport ground support equipment (GSE). The emission reductions would mostly be due to existing regulations that substantially lower future motor vehicle and offroad equipment emission rates. The only exception to this finding is for PM10 and PM2.5, which are driven by fugitive road dust. Because the dust emission factors do not decline over time, the roadway emissions of PM10 and PM2.5 increase over time with the increased activity. Removing regulations from analysis is inconsistent with CEQA case law and the reality of air emissions modeling. New regulations are part of the reasons the EMFAC and OFFROAD emissions models are updated. In addition, CEQA case law provides for the use of regulations in analyzing impacts. See for example, Oakland Heritage Alliance v. City of Oakland (2011) 195 Cal.App.4th 884, 904, where petitioners argued that the lead agency could not rely on existing regulations and codes to support its conclusion that the project's impact would be less than significant. The Court rejected this argument, holding that "compliance with the Building Code, and other regulatory provisions . . . provided substantial evidence that the mitigation measures would reduce seismic impact to a less than significant level." See also, Sundstrom v. County of Mendocino (1988) 202 Cal.App.3d 296, 308, where the Court noted "(a) condition requiring compliance with environmental regulations is a common and reasonable mitigating measure."

The anticipated growth at LAX assumed in the SPAS Draft EIR, which is consistent with growth projections in the SCAG 2012-2035 RTP, would occur with or without construction of any of the SPAS alternatives. The airport satisfies a demand for air travel, and the SPAS alternatives are proposed to improve the ability to handle the anticipated passenger and cargo activity levels. Since all future alternatives are assumed to handle the same level of activity, useful information about the relative emissions of each of the SPAS alternatives is obtained by comparing each build alternative to a future no-build alternative. Alternative 4 in the SPAS Draft EIR represents what would reasonably be expected to occur if all ongoing and reasonably foreseeble non-Yellow Light improvements identified in the LAX Master Plan were implemented, and none of the Yellow Light Projects or any of the SPAS alternatives were constructed or implemented. (See Section 2.3.1.4 of the SPAS Draft EIR.) In this sense, it is almost a no-build alternative in that it would include no changes to terminal facilities, minimal airfield improvements, and only the installation of a consolidated rental car facility in a current parking lot (Lot C) and development of additional parking on the southeast corner of the airport. As explained on page 4-121 of the SPAS Draft EIR, using Alternative 4 as a basis of comparison between alternatives better respresents the differences in aircraft emissions that are directly attributable to the different airfield configurations under consideration. For informational purposes, Table 4.2-14 (pages 4-126 through 4-129) of the SPAS Draft EIR provides a comparison of criteria pollutant emissions from each build alternative (Alternatives 1 through 3, and 5 through 9) in 2025 to Alternative 4's 2025

emissions. The results of this comparison indicate that SPAS Alternatives 1, 2, and 5 through 9 would have lower aircraft and APU emissions than Alternative 4, indicating that each possible SPAS alternative (except Alternative 3, the previously approved LAX Master Plan including all Yellow Light Projects) would reduce aircraft time in mode (e.g., approach, taxi/idle-in, taxi/idle-out, takeoff, and climbout) relative to Alternative 4. The results of this comparison are discussed in detail on pages 4-130 through 4-136 of the SPAS Draft EIR. GSE would be approximately the same for all alternatives, and traffic is dependent on the specific alternative with Alternatives 8 and 9 having the lowest traffic emissions.

SPAS-AR00002-43

Comment:

Air Quality Analysis Interim Milestone Years Needed in Air Quality Analysis

7. The analysis years for the Draft EIR includes only two analysis years: baseline year 2009/2010 and build out year 2025. It is not clear that 2025 captures the peak daily emissions. By 2025, the project will be at full build and vehicle and truck fleets will meet the most stringent emission standards currently required. Although the proposed project may not be at peak capacity in earlier years, it is possible that due to higher emission rates of vehicles and trucks in earlier years that peak daily emissions may occur before 2025. The overall emission rates of vehicles and trucks are higher in earlier years as more stringent emission standards have not been fully implemented and fleets have not fully turned over. The Final EIR must provide additional information to demonstrate that 2025 is the peak year, and if it is found that an earlier year is the peak year, that year should be presented in the air quality analysis.

Response:

The SPAS Draft EIR analyzed impacts at a programmatic level; thus, it is reasonable to assess the baseline and build-out year as was done because specific details about individual project construction schedules are not available at this time. Interim year evaluations would be conducted for the project level EIRs as each specific project is undertaken. Notwithstanding, LAWA has completed a review of the SPAS air quality mobile source emission calculations in light of EMFAC emissions factors for years earlier than 2025 to confirm, on a preliminary basis, that such "interim year" emissions would be less than the baseline emissions was conducted, as is summarized below.

Operational emissions of SO2, PM10, and PM2.5 would peak in 2025 since these pollutants are driven by either aircraft operations (SO2) or fugitive road dust (PM10 and PM2.5) and are thus highest at the highest activity levels. The emissions of CO, VOC, and NOx would be expected to remain less than significant during interim years as follows:

- The forecasted growth in activity between 2009/2010 and 2025 is expected to be roughly linear, based on passenger forecasts between 2009 and 2025 presented in Table 4 in Appendix F-1 of the Preliminary LAX SPAS Report. Please also see Attachment 2 of this Final EIR for a plot of the LAX passenger forecast between 2009 and 2025. Therefore, if the on-road vehicle emission factors decline at least linearly between the baseline and build-out year, then it would be expected that SPAS-related emissions in interim years would be no higher than the baseline emissions, and would probably be lower. If the on-road vehicle emission factors decline more rapidly in the earlier years than later years during this period, the interim year emissions would be lower than the baseline year emissions, and impacts would remain less than significant.

- The EMFAC 2011 emission factors for LDA, LDT1, and LDT2 categories (representing passenger vehicular traffic) for 2010, 2015, 2020, and 2025 were reviewed.1 During the first 1/3rd of the period, between 2010 and 2015, emission factors for criteria pollutants dropped between 42 percent and 53 percent. Reviewing heavy duty diesel truck (EMFAC T7 category) emission factors indicates that between 2010 and 2015, these factors dropped between 41 percent and 53 percent. Since this five year period represents only 33 percent growth in activity, it is clear that the vehicular emissions would be lower by 2015 than during the baseline period. The emissions from on-road vehicles are substantially higher than those from airside equipment (aircraft, auxiliary power units, and ground support equipment). Therefore, the program level emissions in the interim years would still be less than the baseline period emissions, and would be less than significant for operational emissions of CO, VOC,

and NOx. The results of this evaluation are provided in Table 1 for passenger cars and Table 2 for heavy duty diesel trucks. EMFAC emission factor files are provided in Attachment 2.

Table 1

Emission Factors for Light Duty Gasoline Vehicles
Change in Emission Factors during Interim Years

	Emission Factors for Light Duty Vehicles[2,3]						
Year	ROG g/mile	TOG g/mile	CO g/mile	NO_x g/mile	PM10 g/mile	PM2.5 g/mile	SO_x g/mile
2010	0.104	0.135	2.788	0.282	0.005	0.004	0.004
2015	0.048	0.067	1.606	0.157	0.003	0.002	0.004
2020	0.022	0.035	1.002	0.098	0.002	0.002	0.004
2025	0.016	0.028	0.796	0.077	0.002	0.002	0.004
	Change in Emission Factors from 2010						
2010	NA	NA	NA	NA	NA	NA	NA
2015	-53.7%	-50.2%	-42.4%	-44.1%	-42.8%	-42.3%	0.0%
2020	-79.0%	-74.0%	-64.1%	-65.1%	-49.8%	-48.7%	-0.5%
2025	-84.2%	-79.4%	-71.4%	-72.6%	-46.9%	-45.7%	0.6%
	Change in Emission Factors Every 5 Years[4]						
2010	NA	NA	NA	NA	NA	NA	NA
2015	-53.7%	-50.2%	-42.4%	-44.1%	-42.8%	-42.3%	0.0%
2020	-54.6%	-47.8%	-37.6%	-37.5%	-12.2%	-11.1%	-0.4%
2025	-24.7%	-20.5%	-20.5%	-21.5%	5.8%	5.9%	1.1%

[1] Assumes linear growth in vehicle-miles traveled between 2010 and 2025.
[2] Light duty vehicles refer to passenger cars and pick-up trucks with EMFAC2011 vehicle technology classes LDA, LDT1 and LDT2.
[3] All light duty vehicles are assumed to be gasoline operated.
[4] Change in emission factors every 5 years is the difference between emission factors in 2010 and 2015, 2015 and 2020, and 2020 and 2025.

Source: CDM Smith, 2012

Table 2

Emission Factors for Heavy-Heavy Duty Diesel Trucks
Change in Emission Factors during Interim Years

	Emission Factors for Heavy-Heavy Duty Diesel Trucks[2,3]						
Year	ROG g/mile	TOG g/mile	CO g/mile	NO_x g/mile	PM10 g/mile	PM2.5 g/mile	SO_x g/mile
2010	0.602	0.685	2.812	12.102	0.461	0.424	0.017
2015	0.283	0.322	1.362	7.151	0.120	0.110	0.017
2020	0.245	0.279	1.210	4.375	0.086	0.079	0.017
2025	0.219	0.249	1.069	2.346	0.084	0.078	0.016
	Change in Emission Factors from 2010						
2010	NA	NA	NA	NA	NA	NA	NA
2015	-53.0%	-53.0%	-51.6%	-40.9%	-74.0%	-74.0%	0.0%
2020	-59.3%	-59.3%	-57.0%	-63.9%	-81.3%	-81.3%	-1.1%
2025	-63.7%	-63.7%	-62.0%	-80.6%	-81.7%	-81.7%	-1.9%
	Change in Emission Factors Every 5 Years[4]						
2010	NA	NA	NA	NA	NA	NA	NA
2015	-53.0%	-53.0%	-51.6%	-40.9%	-74.0%	-74.0%	0.0%
2020	-13.4%	-13.4%	-11.2%	-38.8%	-28.2%	-28.2%	-1.1%
2025	-10.8%	-10.8%	-11.6%	-46.4%	-1.9%	-1.9%	-0.8%

[1] Assumes linear growth in vehicle-miles traveled between 2010 and 2025.
[2] Heavy-heavy duty trucks refer to EMFAC2011 vehicle technology class T7.
[3] All heavy-heavy duty trucks are assumed to be diesel fuel operated.
[4] Change in emission factors every 5 years is the difference between emission factors in 2010 and 2015, 2015 and 2020, and 2020 and 2025.

Source: CDM Smith, 2012

1. California Air Resources Board, EMFAC2011 Web Based Data Access, 2011, Available: http:/ /www.arb.ca.gov/jpub/webapp//EMFAC2011WebApp/rateSelectionPage_1.jsp, accessed November 24, 2012.

SPAS-AR00002-44

Comment:

Diesel Idling

8. Page 4-108 of the Draft EIR describes a ten minute idling limitation for vehicles onsite (Measure X.M). This measure should be revisited and made consistent with the most recent CARB rule on diesel idling, including no more than five minutes of idling for trucks.

Response:

The Community Benefits Agreement, Section X.M, Limits on Diesel Idling, listed on page 4-108 of the SPAS Draft EIR currently states, "LAWA shall prohibit diesel-powered vehicles from idling or queuing for more than ten consecutive minutes On-Site, unless CARB adopts a stricter standard, in which case LAWA shall enforce that standard. Exemptions to this rule may be granted for safety-related and operational reasons, as defined in CARB regulations."1 The limitation on idling time will be revised to five (5) minutes per current CARB regulations. Please see Chapter 5, Corrections and Additions Related to the SPAS Draft EIR.

1. City of Los Angeles, Los Angeles World Airports, LAX Master Plan Community Benefits Agreement (CBA) 2011 Annual Progress Report, August 2012.

SPAS-AR00002-45

Comment:

Monitoring Studies Evaluating Black Carbon and Ultrafine Particles

9. LAX is currently undertaking a monitoring study to evaluate the community impacts of air pollution from the existing facility.2 According to the LAWA website, the study will be complete by Spring of 2013. This study will evaluate a diverse suite of pollutants, including two pollutants commonly associated with health impacts, ultrafine particles and black carbon. Another recent study that investigated pollutant concentrations near LAX found that black carbon and ultrafine particles are substantially elevated during aircraft takeoffs and landings.3 However AQMD staff was unable to identify any discussion of either study in the Draft EIR. As both of these studies were conducted to help the public and decision makers for this project evaluate potential air quality impacts from this facility, a robust description should be included in the Final EIR.

2 http://www.lawa.org/welcome_LAX.aspx?id=1066
3 http://arb.ca.gov/research/apr/past/04-325.pdf

Response:

LAWA has committed to conduct a study to determine and quantify LAX's contribution to air pollutant impacts on neighborhoods surrounding the airport by conducting the LAX Air Quality and Source Apportionment Study (AQSAS), pursuant to the LAX Master Plan Community Benefits Agreement, Section VII and Section E of Exhibit A of the LAX Master Plan Stipulated Settlement. The study is not tied to any specific LAX project, since the timing of the study could be affected by events outside of LAWA's control (such as the events of 9/11 which delayed the original study implementation). The LAX AQSAS uses methodologies and techniques that are research oriented, state-of-the-art, and sometimes different than USEPA-approved methods for analyzing pollutant concentrations for comparison to ambient air quality standards.

The LAX AQSAS is overseen by the study's Technical Working Group. The Technical Working Group provides oversight of the technical quality of the AQSAS and is comprised of air quality scientists, researchers, and engineers from the U.S. Environmental Protection Agency (U.S. EPA), California Air Resources Board (CARB), South Coast Air Quality Management District (SCAQMD), State of California Office of Environmental Health Hazard Assessment (OEHHA), Federal Aviation Administration (FAA), and community organizations.

The LAX AQSAS is currently in its third and final phase, including monitoring at numerous locations in the communities around the airport, conducting laboratory analyses, applying receptor modeling techniques to the monitored data, interpreting the results, and preparing the final report. LAWA has committed to publish the study final report in the spring of 2013. The project status can be viewed at: http://www.lawa.org/welcome_LAX.aspx?id=1066.

SPAS-AR00002-46

Comment:

Receptors Used in Dispersion Modeling

10. The dispersion modeling used to determine criteria and toxic air pollutant concentrations uses a set of receptors along the boundary of the project site. As shown in Table 4.2-15 of the Draft EIR, most of the pollutants exceed significance thresholds, some by a large margin. However, because receptors were not included farther out in the community, it is impossible to determine the extent of these impacts. While knowing whether predicted concentrations exceed the Ambient Air Quality Standards (AAQS) is important, the public and decision makers also need to know if this impact is strictly at the fenceline or if it impacts a substantial number of people in the surrounding community. The Final EIR should include results of the dispersion model, including contour maps, showing the extent of criteria pollutant impacts

offsite. Guidance regarding receptor placement for dispersion modeling can be found at the website below:
http://www.aqmd.gov/smog/metdata/AERMOD ModelingGuidance.html.

Response:

The peak impact locations for each pollutant and averaging period are presented for Alternatives 1 through 7 in Figures 4.2-2 through 4.2-8 of the SPAS Draft EIR (pages 4-137, 145, 147, 149, 151, 153, and 157). While not plotted specifically, the range of impacts above the thresholds for 1-hour NO2, PM10, and PM2.5 are confined to well under 1 kilometer (0.62 mile) beyond the fence-line to the east and no more than 100 meters (328 feet) to the north. The PM2.5 impacts at the fence-line are just at or below the significance threshold for Alternatives 1, 2, 5, 6, 7, 8, and 9. The PM10 impacts at the fence-line are slightly above the threshold for these same alternatives. Under Alternative 5, which would relocate Runway 6L/24R 350 feet northward, the extent of the threshold of significance exceedance for 1-hour NO2 beyond the fence-line would only reach the southernmost portion of the residential area located between Westchester Parkway, Kittyhawk Avenue, and Will Rogers Avenue. Specifically, the area in which the threshold would be exceeded includes fewer than five residences. The area in which there would be PM2.5 and PM10 exceedances would be even smaller. For alternatives that do not move Runway 6L/24R as far north, or do not move the runway north at all, there may be no exceedances in the surrounding community.

Impacts east of the southern runways would not be significant beyond La Cienega Boulevard. That is, peak impacts for 1-hour NO2, PM10, and PM2.5 drop below the significance threshold between the eastern LAX fence-line and La Cienega Boulevard, which is primarily an industrial area. As noted above, impacts to the north do not extend more than 100 meters beyond the northern LAX fence-line.

The peak impact locations for acute non-cancer risk from exposure to acrolein are presented for Alternatives 1 through 7 in Figures 4.7.1-6 and 4.7.1-7 of the SPAS Draft EIR (pages 4-469 and 4-471). The extent which acrolein impacts would exceed the acute hazard index of 1 is limited to the area bounded by Westchester Parkway to the south, Manchester Parkway to the north, Lincoln Boulevard to the east (between Westchester and Manchester), and Stanmoor Drive to the west.

As requested in comment SPAS-AR00002-4, LAWA met with SCAQMD on November 29, 2012, at which two CDs with the detailed calculations and model input and output files were provided to SCAQMD. These files are available, upon request, in electronic format and are also available for public review in hard copy form at LAWA's Capital Programming and Planning Division, Room 208, One World Way, Los Angeles, California. Technical working files that delineate raw EDMS input/output data would be approximately 60,000 to 80,000 pages long if printed. Because of the sheer volume and the lack of added value they provide, the technical working files were not included within the SPAS Draft EIR air quality technical appendix. Instead, the summary EDMS output results for each alternative was included in the 400+ page Appendix C of the SPAS Draft EIR. The detailed input/output EDMS data were available upon request to LAWA (SPAS Contact Person: Diego Alvarez as indicated on SPAS public notices and SPAS website) during the 75-day public review period of the SPAS Draft EIR.

SPAS-AR00002-47

Comment:

Dispersion Modeling Source Treatment

11. The Draft EIR does not contain any description of how emission sources were treated in the dispersion model. Without this key description of the modeling exercise, neither AQMD staff, nor the public, is able to confirm the validity of the dispersion modeling analysis. Key parameters that require additional clarification include source type, placement, strength, dispersion parameters, etc. The Final EIR should include a copy of the dispersion modeling input and output files as a separate appendix. AQMD staff also requests that the input and output files be provided to us in their native format (consistent with our request from our comment letter on the project"s NOP) when available.

Response:

The EDMS and AERMOD input and output files in native formats were provided by LAWA to SCAQMD on CDs during a meeting scheduled to discuss the LAX SPAS project with SCAQMD on November 29, 2012. Also included on the disks were the emission calculation spreadsheets for construction and operational sources. Producing a hard copy of this information would generate 60,000 to 80,000 pages of material; therefore, LAWA has chosen not to create hard copies, since most of this material is only useful in electronic format as used in the modeling programs. The SPAS Draft EIR provided all required and necessary information from the air quality impact analysis for decision making, including construction and operational emissions and concentrations by alternative, in Section 4.2 and Appendix C of the SPAS Draft EIR. The emissions were developed from standard sanctioned regulatory models (EMFAC2011, OFFROAD2007, CalEEMod, and EDMS v.5.1.3) for the sources considered in the analysis.

Much of the treatment of aviation sources in the FAA EDMS program is hardwired in the program and the modeler is not allowed to modify those components of the analysis. The selection of aircraft types was based on the fleet mixes presented in Appendix J1-1, Aircraft Noise Technical Analysis of the SPAS Draft EIR. Table 3 in Appendix J1-1 presents the fleet mix used for the Baseline (2009) conditions, while Table 8 presents the fleet mix used for all alternatives in 2025. Please also see Response to Comment SPAS-PC00130-770 for more detail on the fleet mixes and aircraft equipment included in the air quality analysis. Once the aircraft/engine combination is selected, EDMS calculates emissions, develops the aviation source parameters from runway, taxiway, and terminal coordinates and assigns emissions to each source it generates.

SPAS-AR00002-48

Comment:

Meteorological Data Used in Dispersion Model

12. Page 4-88 of the Draft EIR states that one year of meteorological data was used to complete the dispersion modeling analysis. While one year of meteorological data is appropriate if collected onsite for most modeling purposes, it is not clear how the NO2 and SO2 modeling analysis comparing against the federal standards were completed. The federal NO2 and SO2 standards are based on the three year average of the 98th and 99th percentile (respectively) of the daily maximum hourly concentration. Three years of meteorological data is available from the LAX met station4 and should be used to determine these potential impacts.

4 http://www.aqmd.gov/smog/metdata/AERMOD.html

Response:

Prior to conducting the air dispersion modeling for all SPAS alternatives and all pollutants, a screening study was conducted to evaluate the potential impacts from each of the three years of meteorological data obtained from the LAX station (2005, 2006, and 2007). This analysis was conducted using the 2009 baseline source dataset, and the results indicated that peak hourly NOx and 8th high NOx would occur with the 2007 meteorological data. The variation in other pollutants was never more than 20 percent, and was typically less than 10 percent between the years. Therefore, 2007 meteorological data was chosen to analyze all alternatives. The concentration results shown in Tables 4.2-15 and 4.2-16 on pages 4-139 through 4-142 of the SPAS Draft EIR, were either so far below (better than) the threshold that an increase of 20 percent would not change the significance finding, or the impacts were already identified as significant. No change in the significance findings would occur if additional modeling were conducted with two more years of meteorological data. In addition, the ranking between the alternatives would not change.

SPAS-AR00002-49

Comment:

Emissions Inventory Calculations for Vehicles

13. It is unclear how the emission inventories were calculated for vehicles accessing the project site. For example, Table 56 of Attachment 2 of Appendix of the Draft EIR presents estimates of Vehicle Miles Travelled (VMT) for different speed bins and different vehicle types for the baseline scenario. This VMT estimate is then presumably multiplied by the emission factors from Table 61 of the same appendix to determine the total emission inventory from this source. However, there are several parameters that are not clear from Table 56 including 1) how the VMT was apportioned to each speed bin (it does not correlate with EMFAC 2011 for example); 2) how the different vehicles classes (at least 6 classes of vehicles likely travel to LAX) were weighted down to the two classes presented in Table 56; 3) how the VMT per trip value was determined; and 4) how the number of trips presented in Table 56 correlates with Tables 4.12.1-2 and 4.12.1-5 from the transportation analysis in the Draft EIR. The Final EIR should include a more thorough explanation of how the emission calculations were performed, including providing additional calculation sheets if necessary.

Response:

The emission factors for on-road motor vehicles were obtained from the EMFAC2011 model,1 as noted on page 4-93 in Section 4.2.2.2 of the SPAS Draft EIR. The passenger automobiles, including taxis and limousines, were based on a composite emission factor for EMFAC vehicle categories LDA, LDT1, and LDT2. The composite weighting factor is the vehicle miles traveled (VMT) for Los Angeles County for the year of analysis. Emission factors for trucks (cargo trucks) calling at LAX were based on heavy-heavy duty truck (EMFAC vehicle category T7) factors.2 For the on-airport roadways with substantial bus and large shuttle vehicles, the EMFAC factors for medium heavy duty truck (EMFAC vehicle category T6) were used 2 for these vehicles.2

The number of trips and VMT by speed bin presented in Tables 56 through 60 in Attachment 2 of Appendix C of the SPAS Draft EIR were developed by the transportation consultants analyzing traffic impacts. Please refer to Response to Comment SPAS-AR00002-51 for a brief summary of traffic models used in the SPAS analysis. Note that these values are only for trips associated with LAX (i.e., trips that begin or end at LAX), not for all trips in Los Angeles County. Therefore, these VMT values will not be found in EMFAC 2011 output because they are SPAS program-specific values only.

A check of the calculation for NOx emissions for the 40 to 45 mph speed bin is presented here (table numbers are for tables in Attachment 2 of Appendix C): The car NOx emission factor for cars traveling at 45 mph from Table 61 is 0.2867 grams/VMT (rounded). The VMT for cars in the 40 to 45 mph bin from Table 56 is 943,157. The truck NOx emission factor for truck traveling at 45 mph from Table 62 is 14.09 grams/VMT (rounded). The VMT for trucks in the 40 to 45 mph speed bin from Table 56 is 50,997. The result is calculated from [(0.2867 x 943157)+(14.09 x 50997)]/453.59 = 2180 lbs/day ~ 2179 lbs/day in Table 56.

1. California Air Resources Board. 2011. EMFAC2011 Web Based Data Access. Available at http:// www.arb.ca.gov/jpub/webapp//EMFAC2011WebApp/rateSelectionPage_1.jsp. Accessed November 24, 2012.
2. The truck emission factors in EMFAC2011 were obtained for the EMFAC2007 categories (T6 and T7) instead of the EMFAC2011 categories which had numerous T6 and T7 subcategories. Note that the emission factors are from EMFAC2011. Since the traffic analysis data did not have detailed evaluations of bus and truck sizes (gross vehicle weights), the simplified categories were appropriate for use.

SPAS-AR00002-50

Comment:

Emissions Inventory Calculations for Aircraft

14. The Draft EIR and its appendices only contain summary results for the emission inventory for aircraft emissions. AQMD staff could not find any backup calculations, including spreadsheets or EDMS input or output files in any of the project files. Without these emission calculations, neither AQMD staff, nor the public, is able to confirm the validity of the aircraft emission calculations. The Final EIR should include all of the calculation sheets and model files used to determine air quality impacts from aircraft emissions.

Response:

The aircraft fleet mix used in the air quality impact analysis is the same fleet mix used in the aircraft noise impact analysis. Please refer to Response to Comment SPAS-PC00130-110 regarding the aircraft fleet mix and emission model used to develop aircraft emissions for each alternative.

In addition, as requested in comment SPAS-AR00002-4, LAWA held a follow-up meeting with SCAQMD staff on November 29, 2012, to review and discuss the air quality analysis, impacts, and mitigation. Detailed aircraft emission calculation spreadsheets and modeling input and output files associated with the SPAS Draft EIR air quality analysis were provided to SCAQMD on two CDs at this meeting. These file are available, upon request, in electronic format and are also available for public review in hard-copy form at LAWA's Capital Programming and Planning Division, Room 208, One World Way, Los Angeles, California. Please also see Response to Comment SPAS-AR00002-46 regarding these files.

However, the data and information in the SPAS Draft EIR is more than sufficient for the decision-makers and public to understand aircraft emissions and the air quality impacts of the SPAS alternatives.

SPAS-AR00002-51

Comment:

Consistency with the AQMP

15. The Draft EIR does not address how the project is consistent with the AQMP. Although the capped number of passengers (78.9 million annually) appears to be consistent with assumptions in the Regional Transportation Plan / Sustainable Community Strategy (RTP/SCS), it is not clear if the assumptions about on-road vehicular travel are consistent with the RTP. The AQMP relies on the assumptions contained within the RTP/SCS. Given the volume of vehicles travelling to LAX, it is important to understand if the analysis contained within this EIR is consistent with regional planning assumptions. The Final EIR should include a discussion of the consistency between this project's traffic analysis and the RTP/SCS and the AQMP in general.

Response:

As noted in the comment, the future passenger activity for LAX evaluated in the SPAS Draft EIR in 2025 is 78.9 million annual passengers (MAP), which is consistent with the regional growth projections in the adopted 2012-2035 SCAG Regional Transportation Plan/Sustainable Communities Strategies. This level of activity was also consistent with the previous 2008 Regional Transportation Plan, which is part of the mobile emissions strategy for the AQMP. In addition, all of the SPAS alternatives include no more than 153 gates, and an amendment to the LAX Specific Plan Section 7.H requiring action to encourage further shifts in passenger and airline activity to other regional airports when and if forecasts for LAX exceed 75 MAP.

The description of the traffic model used is summarized in Section 4.12.2.2.2 (beginning on page 4-1202) of the SPAS Draft EIR. The description notes that the traffic volume forecasts for SPAS were developed from a version of the City of Los Angeles TDF Model, which was originally developed from the SCAG regional travel forecasting model and was calibrated and validated for conditions in the City of Los Angeles. The LAX SPAS Traffic Model utilizes TransCAD Version 4.8 Build 500 modeling

software consistent with the SCAG and City of Los Angeles TDF models. The traffic projections are consistent with the 2012 RTP/SCS. Thus, the SPAS Draft EIR traffic analysis is consistent with the SCAG RTP/SCS and the AQMP. See 2012 AQMP, Appendix IV-C. http://www.aqmd.gov/aqmp/2012 aqmp/DraftFinal/index.html.

SPAS-AR00002-52

Comment:

Greenhouse Gas Calculations for Aircraft

16. Page 4-389 of the Draft EIR describes how the GHG emissions were calculated from aircraft. Consistent with the criteria pollutant analysis, emissions were only included below the average mixing height of 1,806 feet above sea level. While using the mixing height is an appropriate method for a criteria pollutant analysis, it is not clear why this is appropriate for a GHG analysis. Aircraft travel the vast majority of their trip above the mixing height, and hence emit the bulk of their GHG's above this level. The Final EIR should include further clarification about why this is an appropriate method. The lead agency should also describe why other methods are not more appropriate (e.g., calculating aircraft GHG's based on the amount of fuel dispensed from LAX).

Response:

Section 4.6.2 of the SPAS Draft EIR describes the methodology and basis for the SPAS greenhouse gas (GHG) analysis and Section 4.6.4 provides additional discussion of the analytical framework and basis for determining significant GHG impacts associated with the SPAS alternatives. The approach described therein is considered reasonable and appropriate for disclosing GHG impacts associated with the SPAS project and provides the basis for a meaningful comparison of impacts between the SPAS alternatives for the public and decision-makers to review and consider. The commentor questions LAWA's use of the 1,806 feet above sea level mixing height as the basis for estimating aircraft-related GHG emissions, notwithstanding that specific elevation level is set forth by the South Coast Air Quality Management District for the purposes of air quality modeling, and instead suggests that calculating aircraft GHG emissions based on the amount of fuel dispensed from LAX. That alternative approach would, however, simply provide an estimate of the inherent GHG emission potential of a specific quantity of fuel that would be consumed (burned) somewhere in the world while the aircraft are operating. While it is understood (and is acknowledged in Section 4.6.1.1 of the SPAS Draft EIR) that GHG emissions contribute to global climate change, and that consequently, the sale and subsequent combustion of aircraft fuel dispensed at LAX would arguably contribute to global climate change, the dispensing of aircraft fuel at LAX is based on market forces (i.e., fuel prices that can vary across the globe and can change within a short amount of time), fuel contracts, and airline carrier policies, practices, and preferences regarding where their aircraft take on fuel, and how much fuel, between the various airports at which they operate. All of those factors are completely independent of SPAS; hence, the development of aircraft GHG emissions based on the amount of aircraft fuel dispensed at LAX on an annual basis would be: (1) speculative as to estimating the amount to be dispersed in 2025; and, (2), meaningless relative to the impacts of SPAS. The approach used in the SPAS Draft EIR analysis for estimating aircraft GHG focuses on the operational characteristics of aircraft at LAX, including aircraft engine time-in-mode for landing, taxiing/idling, and taking-off from LAX, as would vary between the SPAS alternatives. The different airfield improvement configurations reflected in SPAS Alternatives 1 through 7 would affect aircraft operations at LAX, especially relative to time-in-mode for aircraft that are taxiing and idling. Those differences in the estimated aircraft GHG emissions for the SPAS alternatives are evident in the Table 4.6-6 of the SPAS Draft EIR, providing a meaningful basis for the public and decision-makers to compare among and consider the impacts of the SPAS alternatives. Had the aircraft GHG emissions estimates been based on the amount of fuel dispensed at LAX, there would be no difference among the alternatives. In summary, the approach described therein is considered reasonable and appropriate for disclosing GHG impacts associated with the SPAS project and, moreover, provides the basis for a meaningful comparison of impacts among the SPAS alternatives for the public and decision-makers to review and consider.

SPAS-AR00002-53

Comment:

Greenhouse Gas Emissions Mitigation

17. Based on a review of the Draft EIR the lead agency has determined that the proposed project will not achieve a greenhouse gas (GHG) reduction target of 16% per passenger below 2009 levels by 2025. However, the lead agency indicates that, at a minimum, the project will achieve a 13.05% reduction in GHG emissions per capita. Therefore, the AQMD staff recommends that the lead agency provide the following additional mitigation measures pursuant to CEQA Guidelines Section 15126.4.

- Incorporate mitigation measures (b) through (x) in comment #2 and all mitigation measures in comment #3 identified above.

- Develop a monitoring and reporting plan that ensures the implementation of the applicable mitigation measures and requires future updates of the project's GHG emissions inventory. At a minimum, the inventory should demonstrate that the project achieves 13.05% reduction per capita consistent with the lead agency's GHG emissions analysis in the Draft EIR.

Response:

Please see Responses to Comments SPAS-AR00002-8 through SPAS-AR00002-30 and SPAS-AR00002-34 through SPAS-AR00002-36 regarding the mitigation measures suggested by the commentor. In accordance with State CEQA Guidelines Section 15097, should a SPAS alternative be selected for implementation, a mitigation monitoring and reporting program (MMRP) will be adopted to document and ensure implementation of the EIR GHG mitigation measures.

SPAS-AL00001 Kurtz, Barry — County of Los Angeles Department of Beaches and Harbors — 10/3/2012

SPAS-AL00001-1

Comment:

The Los Angeles County Department of Beaches and Harbors has the following comments on the Draft Environmental Impact Report (Draft EIR) for the Los Angeles International Airport (LAX) Specific Plan Amendment Study (SPAS):

The Off-Airport Transportation traffic study on Page 4-1301 indicates the project would have a significant impact at the intersection of Lincoln Boulevard and Washington Boulevard. The report states, "The addition of a southbound through lane would fully mitigate the project at this location. However, adding a southbound through lane would require widening of the southbound approach and departure...is considered infeasible...No other feasible improvements has been identified to fully mitigate the project impact...Therefore, this impact would remain significant and unavoidable..." We disagree that there are no other feasible mitigation measures. Costco also had an impact on the Lincoln/Washington intersection and was required to pay Culver City $1.5million towards the SR90 Connector Road to Admiralty Way project to mitigate their impact. Similarly, this project should contribute towards the SR90 Connector Road to Admiralty Way project to mitigate this project's impact or contribute to Admiralty Way improvements, since Admiralty Way serves as a "relief valve" to Lincoln Boulevard when it reaches capacity.

Response:

The comment correctly notes that the SPAS Draft EIR identifies a significant and unavoidable impact at the intersection of Washington Boulevard and Lincoln Boulevard under Alternatives 1-2, 4, 8, and 9. A mitigation measure was considered based on the projected future volumes at the intersection (addition of a southbound through lane) but it was found to be infeasible (see page 4-1301 in Section 4.12.2. of the SPAS Draft EIR). The comment claims that this significant impact can be mitigated through

monetary contributions to the Los Angeles County Department of Beaches and Harbors for: (a) an SR-90 connector road to Admiralty Way; and, (b) unspecified improvements to Admiralty Way. The comment also cites a monetary contribution made by Costco toward improvement (a) above.

While the traffic impact analysis was being prepared for the SPAS Draft EIR, Los Angeles County Department of Beaches and Harbors was contacted to determine the status of the extension of SR-90 and whether it was a reasonably foreseeable project that should be included in the cumulative 2025 without alternative scenario (page 4-1208 of the SPAS Draft EIR). The extension of SR-90 has been discussed for many years but has been controversial due to the need for property acquisition and other issues. The necessary approvals from Caltrans and the City of Los Angeles have not been obtained, and it is not included in the RTP, STIP or Metro's LRDP. Thus, after consultation with Los Angeles County, the project was determined not to be reasonably foreseeable within the 2025 timeframe of the SPAS project and was not included in the cumulative scenario or as a feasible mitigation measure. It would therefore be inappropriate to offer a contribution toward its implementation, particularly in light of the additional complications and restrictions that LAWA is subject to under federal law regarding the use of airport funds. Simply contributing funds toward an unspecified future improvement would not constitute mitigation under CEQA, since there is currently no mechanism to ensure that any specific improvements addressing the specific impacts are made. As discussed in Anderson First Coalition v. City of Anderson (2005) 130 Cal.App. 4th 1173and Carson Coalition for Healthy Families v. City of Carson (2007) 2007 WL 3408624 at page 18 [unpublished], without an actual plan and a commitment, a fair-share fee is not an adequate mitigation measure. The statement that the Costco project paid Culver City for this improvement to mitigate its traffic impact, and the fact that the Costco store has been in operation for well over a decade, suggests that its traffic impacts remain unmitigated.

Regarding the improvements to Admiralty Way, Los Angeles County is currently reconstructing a major section of Admiralty Way. On October 9, 2012 the Los Angeles County Board of Supervisors approved an addendum to a Mitigated Negative Declaration for the Admiralty Way Settlement Repair Project. The staff report posted on-line1 states that the project is fully funded. A review of the original Mitigated Negative Declaration, which was approved on August 14, 2012, shows that the future lane configuration of Admiralty Way at Bali Way, at Mindinao Way and at Palawan Way will be changed from the existing conditions.2 These three locations are study intersections #1, #3, and #4 in the SPAS Draft EIR. No significant traffic impacts were identified at those intersections in the SPAS Draft EIR, but because improvements currently being constructed were unknown during the preparation of the SPAS Draft EIR, LAWA has further evaluated the subject intersections to account for these new improvements and assess whether the conclusions of the SPAS Draft EIR analysis would be affected.

In response to this comment, Table 4.12.2-19 on pages 4-1255 and 4-1256 and Tables 4.12.2-21 through 4.12.2-25 on pages 4-1261 through 4-1280 of the SPAS Draft EIR have been revised for three study intersections: Admiralty Way at Bali Way (#1), Admiralty Way at Mindinao Way (#3) and Admiralty Way at Palawan Way (#4). Please see Chapter 5, Corrections and Additions Related to the SPAS Draft EIR. The refined analysis presented in the revised Tables 4.12.2-19 and 4.12.2-21 through 4.12.2-25 in Chapter 5, Corrections and Additions Related to the SPAS Draft EIR, is substantially the same as what is presented in the SPAS Draft EIR, did not identify any significant impacts at these three intersections, and the improvements identified in the Mitigated Negative Declaration for the Admiralty Way Settlement Repair Project would not worsen traffic conditions; therefore, the SPAS Draft EIR conclusions of no significant impacts at these three intersections are still valid.

1. County of Los Angeles, Department of Public Works, Admiralty Way Settlement Repair Project Staff Report, October 9, 2012, Available: http://file.lacounty.gov/bos/supdocs/71703.pdf.
2. County of Los Angeles, Department of Public Works, Draft Mitigated Negative Declaration and Initial Study for Admiralty Way Street Improvement Project, August 2012, Available: http://file.lacounty.gov/dbh/docs/cms1_181869.pdf.

SPAS-AL00001-2

Comment:

Table 4.12.2-25 shows in the PM peak hour Admiralty/Fiji LOS A, Admiralty/Mindanao LOS B and Admiralty/Palawan LOS B. These levels of service show less congestion than the levels of service shown in recent previous traffic studies. Provide the backup data to verify these levels of service.

Response:

The comment requests that backup up information be provided for the projected future levels of service at Admiralty Way and Fiji Way (study intersection 2), Admiralty Way and Mindanao Way (study intersection 3) and Admiralty Way and Palawan Way (study intersection 4) in Table 4.12.2-25 of the SPAS Draft EIR. The baseline traffic count data for these intersections is provided on page 1 through 3 of the PDF file of Appendix K2-4 of the SPAS Draft EIR. Detailed level of service calculations for the intersections are provided on page 1579 and 2135 of the PDF file of Appendix K2-6 of the SPAS Draft EIR. Appendices K2-4 and K2-6 of the SPAS Draft EIR are available for review at laxspas.org.

While the vast majority of base traffic count data for the SPAS off-airport traffic impacts analysis were collected in July and August 2010, it was not possible to collect valid traffic count data for several intersections in the Marina del Rey area due to construction activity occurring at that time (i.e., normal traffic patterns in that area were disrupted and detoured at times due to construction). Due to construction occurring in 2010, baseline counts collected in July 2008 were used at Study Intersections 4, 5, 119 and 122. In order to confirm that the 2008 data represents 2010 conditions, a comparison of "existing" levels of service was made between the SPAS Draft EIR and a traffic study prepared for the Marina Del Rey Local Coastal Program Amendment.1 The Marina del Rey study states that it is based on traffic counts collected in May 2009 and January 2010 and reports "Existing Conditions" as 2009. The levels of service for the three intersections that are the subject of this comment, as reported in the Marina del Rey study, are very similar to the "Baseline (2010) Without Alternative" levels of service. Both studies show that those three intersections are operating at good level of service under existing conditions. A review of the incremental differences in V/C or delay that would result from the SPAS alternatives shows that these minor differences in the baseline levels of service would not alter the conclusions of the traffic impact analysis presented in the SPAS Draft EIR. Based on the above, the analysis presented in the SPAS Draft EIR is considered to be valid and the traffic impact significance conclusions in the SPAS Draft EIR are unchanged.

1. Los Angeles County, Department of Beaches and Harbors, Draft Traffic Study for the Marine Del Rey Local Coastal Program Amendment, prepared by Raju Associates, April 29, 2010, Available: http://file.lacounty.gov/dbh/docs/cms1_148597.pdf, accessed December 11, 2012.

SPAS-AL00001-3

Comment:

All the intersections of Lincoln Boulevard near Marina del Rey show worse levels of service after the project, except the intersection of Lincoln/Mindanao shows no change in the PM peak hour. This appears to be an error. Provide the backup data to verify these levels of service.

Response:

The comment requests that backup up information be provided to verify the projected levels of service at Lincoln Boulevard and Mindanao Way (study intersection 107). The baseline traffic count data for this intersection is provided on pages 80 and 81 of the PDF file of Technical Appendix K2-4 of the SPAS Draft EIR. Detailed level of service calculations for the analyzed Existing and Future scenarios are provided on pages 45, 185, 264, 343, 422, 501, 1537, 1677, 1756, 1835, 1914, and 1993 of the PDF file of Appendix K2-6 of the SPAS Draft EIR. Appendices K2-4 and K2-6 of the SPAS Draft EIR are available for review at laxspas.org. As shown, while the level of service would not worsen, the v/c ratio and intersection volumes would not increase under all of the SPAS alternatives. For additional details regarding development and verification of the traffic model please see Draft EIR Section 4.12.2.2.2, and for discussion of methodology please see Section 4.12.2.2.3 of the SPAS Draft EIR.

SPAS-AL00001-4

Comment:

We will follow up with a letter with these comments.

Response:

The subject comment letter was submitted via email on October 3, 2012. It is noted that the Los Angeles County Department of Beaches and Harbors submitted a letter, dated October 10, 2012, via mail, which consists of identical comments to those included in this comment letter (SPAS-AL00001). The October 10, 2012 comment letter is designated as comment letter SPAS-AL00009.

SPAS-AL00002 Poosti, Ali City of Los Angeles Bureau of Sanitation 9/24/2012

SPAS-AL00002-1

Comment:

Los Angeles International Airport (LAX) Specific Plan Amendment Study - Draft EIR

This is in response to your letter requesting a review of your proposed Specific Plan Amendment Study project. The Bureau of Sanitation has conducted a preliminary study of the wastewater and stormwater systems of the proposed project.

WASTEWATER REQUIREMENT

The Bureau of Sanitation, Wastewater Engineering Services Division (WESD) has reviewed the request and found the project to be related to enhancing safety and security, minimizing environmental impacts on surrounding communities, and designing for a practical capacity only.

Based on the project description, we have determined the project is unrelated to sewer capacity availability and therefore do not have sufficient detail to offer an analysis at this time. Should the project description change, please continue to send us information so that we may determine if a sewer assessment is required in the future.

If you have any questions, please call Kwasi Berko of my staff at (323) 342-1562.

Response:

The fact that the Bureau of Sanitation, Wastewater Engineering Services Division (WESD) has no comments on the Draft EIR is noted. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-AL00002-2

Comment:

STORMWATER REQUIREMENTS

The Bureau of Sanitation, Watershed Protection Division (WPD) is charged with the task of ensuring the implementation of the Municipal Stormwater Permit requirements within the City of Los Angeles. We anticipate the following requirements would apply for this project.

POST-CONSTRUCTION MITIGATION REQUIREMENTS

The project requires implementation of stormwater mitigation measures. These requirements are based on the Standard Urban Stormwater Mitigation Plan (SUSMP) and the recently adopted Low Impact Development (LID) requirements. The projects that are subject to SUSMP/LID are required to incorporate measures to mitigate the impact of stormwater runoff. The requirements are outlined in the guidance manual titled"Development Best Management Practices Handbook - Part B: Planning Activities". Current regulations prioritize infiltration, capture/use, and then biofiltration as the preferred stormwater control measures. The relevant documents can be found at: www.lastormwater.org. It is advised that input regarding SUSMP requirements be received in the early phases of the project from WPD's plan-checking staff.

Response:

This comment is noted. As indicated on page 4-620 of the SPAS Draft EIR, the update to the CDP required by Mitigation Measure MM-HWQ (SPAS)-1 would integrate applicable BMP requirements related to SUSMP and the City's LID Ordinance.

SPAS-AL00002-3

Comment:

GREEN STREETS

The City is developing a Green Street initiative that will require projects to implement Green Street elements in the parkway areas between the roadway and sidewalk of the public right-of-away to capture and retain stormwater and urban runoff to mitigate the impact of stormwater runoff and other environmental concerns. The goals of the Green Street elements are to improve the water quality of stormwater runoff, recharge local ground water basins, improve air quality, reduce the heat island effect of street pavement, enhance pedestrian use of sidewalks, and encourage alternate means of transportation. The Green Street elements may include infiltration systems, biofiltration swales, and permeable pavements where stormwater can be easily directed from the streets into the parkways and can be implemented in conjunction with the SUSMP/LID requirements.

Response:

This comment is noted. As noted in Section 4.8 of the SPAS Draft EIR, the CDP would be updated in conjunction with all of the SPAS alternatives except for Alternative 3, for which a CDP has already been prepared. As noted in Mitigation Measure MM-HWQ (SPAS)-1 on page 4-638 of the SPAS Draft EIR, the updated CDP would take into account current regulatory programs related to water quality, such as the application of SUSMP and LID requirements by the City Bureau of Sanitation - Watershed Protection Division. In accordance with the updated CDP, measures that are consistent with the City's Green Street initiative, which is another current regulatory program, would be incorporated into project design, to the extent feasible and applicable.

SPAS-AL00002-4

Comment:

CONSTRUCTION REQUIREMENTS

The project is required to implement stormwater control measures during its construction phase. All projects are subject to a set of minimum control measures to lessen the impact of stormwater pollution.
In addition for projects that involve construction during the rainy season that is between October 1 and April 15, a Wet Weather Erosion Control Plan is required to be prepared. Also projects that disturbed more than one-acre of land are subject to the California General Construction Stormwater Permit. As part of this requirement a Notice of Intent (N01) needs to be filed with the State of California and a Storm Water Pollution Prevention Plan (SWPPP) needs to be prepared. The SWPPP must be maintained on-site during the duration of construction.

Response:

This comment is noted. The comment is consistent with the discussion of construction-related water quality requirements included in Section 4.8 of the SPAS Draft EIR.

SPAS-AL00002-5

Comment:

If there are questions regarding the stormwater requirements, please call Kosta Kaporis at (213) 485-0586, or WPD's plan-checking counter at (213) 482-7066. WPD's plan-checking counter can also be visited at 201 N. Figueroa, 3rd Fl, Station 18.

Response:

The comment is noted.

SPAS-AL00003 Welborne, Martha Metropolitan Transportation Authority 10/9/2012

SPAS-AL00003-1

Comment:

Thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) for the LAX Specific Plan Amendment Study (SPAS). The Los Angeles County Metropolitan Transportation Authority (LACMTA) is responding in its capacity as a responsible agency with respect to the proposed project's potential impacts on existing and planned Metro and municipal transit services.

Response:

The comment is noted. Please see Responses to Comments SPAS-AL00003-2 through SPAS-AL00003-12 below.

SPAS-AL00003-2

Comment:

Valuable Analysis Tools to Clarify Differences in Benefits / Impacts among Alternatives

To support a better understanding of the benefits of various ground transportation solutions when comparing alternatives, please note the following suggestions for the traffic analysis:

1) Traffic Micro-simulation

The traffic analysis performed for the SPAS presents a significant level of rigor following the Critical Movement Analysis methodology using the TRAFFIX traffic modeling tool (as indicated on Page 4-1079). It may be helpful to complement the Critical Movement Analysis with more detailed micro-simulation to clarify differences in benefits and impacts to ground transportation among the various ground transportation and transit alternatives. Traffic flow micro-simulation is often able to capture interactions across many roadway segments (links) and intersections (nodes) and can simulate compounding downstream effects of traffic delay and queuing ("spill back") and bottlenecks ("lane blocking") that are common to airports, especially those with ring roads. Especially in the Central Terminal Area (CTA), there are complex interactions with different curb configurations, ramps, turn lanes, parking garage entrances and exits, weaving lanes, and drop off areas that create location-specific bottlenecks and weaving friction. Capturing these differences in performance of the roadway system will help to clarify the differences between the performance of transit buses operating in mixed flow traffic and other transit solutions that are not affected by roadway performance (elevated busway, automated people movers, and light rail).

Response:

Please see Response to Comment SPAS-PC00130-687 regarding the STV analysis of ground access conducted as part of SPAS.

As discussed on pages 4-1044 and 1045 in Section 4.12.1.2 of the SPAS Draft EIR, the SPAS on-airport transportation analysis methodology is consistent with that used in analysis in the LAX Master Plan Final EIS/EIR. Quantification of impacts is based on projected supply and demand, and takes into account projected availability of on-airport parking. These analytic methods provide a program-level impact analysis, which is appropriate at this stage of the planning process. Detailed project-specific planning, phasing, and design for individual components in the SPAS alternatives are not included in this phase of the SPAS process. Should a SPAS alternative be selected for implementation, detailed design-level data and traffic impact analyses would be developed as future projects are proposed, providing the basis to complete a more detailed project level CEQA analysis using micro-simulation. Please see Responses to Comments SPAS-PC00139-142 and SPAS-PC00130-235 for a discussion of the appropriateness of the programmatic environmental review conducted for the SPAS project.

SPAS-AL00003-3

Comment:

2) Without Alternative Condition with Future Traffic Levels

The Without Alternative condition for 2025 is presented with air passenger traffic levels for 2009. As noted on Page 4-1048, this approach is conservative for determining the extent of impacts for each individual "With Alternative" condition. It may be worthwhile to compare some "With Alternative" conditions to a Without Alternative Condition at 2025 air passenger traffic levels, rather than 2009 traffic levels. Alternatively, it may be useful to compare them to the 2025 traffic levels and impacts that would be generated using either Alternative 5, 6, or 7 as a baseline (if this is pursued, Alternatives 5, 6, and 7 should include the proposed Metro station at Aviation and Century Boulevards as part of the baseline). Comparing these scenarios with 2025 traffic levels may help to clarify the benefits of transit investments and to test the robustness of the background roadway and transportation networks.

Response:

The comment correctly states that the cumulative traffic impact analysis in the SPAS Draft EIR was based on a comparison between the Future (2025) With Alternative scenario and the Future (2025) Without Alternative scenario. LAX is projected to grow naturally along with greater Los Angeles with or without implementation of any SPAS alternative. Passenger growth at LAX was not included in the Future (2025) Without Alternative scenario, although it was included in the Future (2025) With Alternative scenario. Therefore, the Future (2025) Without Alternative scenario was based upon a projection of 56.5 MAP, not the 78.9 MAP expected in 2025. This approach was utilized because it presents a very conservative delineation of the future off-airport traffic impacts of the SPAS alternatives since the vehicle trips associated with projected growth in aviation activity at LAX would occur regardless of whether the SPAS project is implemented. (See Section 4.12.2.2.3 of the SPAS Draft EIR.)

The comment states that it may be beneficial to compare the Future (2025) With Alternative scenario to a Future (2025) Without Alternative scenario that includes traffic associated with the projected growth at LAX or, alternatively, to Alternatives 5, 6, or 7. The comment also recommends including the future Metro station at Aviation and Century Boulevards as part of the future baseline.

The commentor's suggestion that the analysis use Alternative 5, 6, or 7 as a baseline, and that if one of those alternatives is pursued it should include the subject Metro station, does not reflect the fact that adoption of any one of those alternatives would be paired with the ground transportation system improvements proposed under either Alternative 1, 2, 8, or 9. Although Alternatives 5, 6, and 7 focus on airfield and terminal improvements, they are not "stand alone" alternatives, as explained on page 2-8 in Section 2.3.1 of the SPAS Draft EIR, and would therefore not be an appropriate comparison.

As discussed on page 4-1208 and shown in Appendix K2-1 of the SPAS Draft EIR, the Future (2025) Without Alternative conditions used in the SPAS Draft EIR do include the Metro station at Century and

Aviation Boulevards on the Metro Crenshaw/LAX Transit Corridor, as well as other committed future transportation improvements in the study area. As discussed on page 4-1208 of the SPAS Draft EIR, Future (2025) Without Alternative conditions were identified in a manner that provides a conservative analysis. It is agreed, however, that, while not required by CEQA or considered necessary to the decision-making process, additional analysis, specifically an analysis that includes a scenario that accounts for natural growth at LAX, may provide useful information to the public and to the decision-makers. Therefore, this response to comment, part of the SPAS Final EIR, presents below an analysis of a Future (2025) Without Alternative scenario that includes the natural growth at LAX but does not include the physical changes proposed under the analyzed SPAS alternatives ("Future (2025) Without Alternative With Future MAP Levels").

LAWA has prepared a Future (2025) Without Alternative With Future MAP Levels scenario and provided additional analysis using this scenario. The subject analysis provides a comparison of the Future (2025) With Alternative scenario to a Future (2025) Without Alternative scenario that includes the natural growth at LAX (i.e., future 78.9 MAP in 2025) and the Metro station at Century and Aviation Boulevards on the Metro Crenshaw/LAX Transit Corridor (as well as other reasonably foreseeable improvements as described on page 4-1208 of the SPAS Draft EIR), but does not include the physical changes proposed under the analyzed SPAS alternatives. Under this comparison, as identified below, impacts would be reduced relative to the impacts disclosed in the SPAS Draft EIR. Table 1 summarizes the results of the analysis, and is followed by a description of the analysis. Detailed tables delineating the specific impacts at all of the transportation facilities addressed in the SPAS traffic analysis (i.e., 200 intersections and CMP facilities) are provided in Attachment 4 of Part II of the Final EIR.

Summary

Table 1 below summarizes the off-airport intersection traffic analysis using the Future (2025) Without Alternative With Future MAP Levels (i.e., future 78.9 MAP in 2025) as the comparison scenario with each SPAS alternative. The table provides a comparison of traffic impacts when using the Future (2025) Without Alternative scenario, which does not include future MAP levels (i.e., baseline 56.5 MAP in 2009), previously identified in the SPAS Draft EIR, and the traffic impacts, as described above. The analysis in the SPAS Draft EIR (Future (2025) With Alternative scenario compared to Future (2025) Without Alternative scenario (56.5 MAP)), as amended by corrections and additions to the SPAS Draft EIR identified in Chapter 5 of this Part of the Final EIR, indicates that the number of impacted locations after mitigation ranged between 37 and 42 intersections, depending on the alternative.

When comparing the alternatives to the Future (2025) Without Alternative With Future MAP Levels scenario, impacts were reduced considerably both before and after mitigation. After mitigation, between 14 and 20 intersections would remain significantly impacted (all of which were already determined to be significant and unavoidable in the SPAS Draft EIR analysis). It should be noted that, although between 14 and 20 intersections within the total 200 intersections evaluated would have significant and unavoidable impacts, the redistribution of traffic associated with each SPAS alternative would have a corresponding improvement in the volume to capacity (v/c) ratios during one or more of the peak hours at the majority of the other intersections. As can be seen in review of Tables B-8 through B-12 in Attachment 3B, between 133 and 151 intersections within the total of 200 intersections would experience an improvement in v/c ratio under the different alternatives, with the improvements in v/c ratio generally ranging from 0.001 to 0.020.

Table 1

Summary Comparison of Intersection Impacts

	"Future (2025) With Alternative" Scenario compared to "Future (2025) Without Alternative" Scenario (56.5 MAP)[1]		"Future (2025) With Alternative" Scenario compared to "Future (2025) Without Alternative With Future MAP Levels" Scenario (78.9 MAP)	
Alternatives	**Number of Significantly Impacted Intersections Before Mitigation**	**Number of Significantly Impacted Intersections After Mitigation**	**Number of Significantly Impacted Intersections Before Mitigation**	**Number of Significantly Impacted Intersections After Mitigation**
Alts 1-2	55	38	23	14
Alt 3	50	37	23	20
Alt 4	51	38	23	16
Alt 8	57	42	28	17
Alt 9	57	42	28	17

[1] As amended by corrections and additions to the SPAS Draft EIR, presented in Chapter 5 of Part II of the Final EIR.

Source: Fehr & Peers, January 2013.

Future (2025) Without Alternative With Future Map Levels Trip Generation

The trip generation estimates for the Future (2025) Without Alternative With Future MAP Levels scenario prepared by Ricondo & Associates are provided in Attachment 3A. The Future (2025) Without Alternative With Future MAP Levels scenario is estimated to generate a total of 15,245 a.m. peak hour trips (7,830 inbound and 7,415 outbound), 20,163 midday peak hour trips (10,054 inbound, 10,109 outbound) and 17,660 p.m. peak hour trips (9,663 inbound and 7,997 outbound).

The airport-generated trips for each of the SPAS alternatives used in the Future (2025) Without Alternative With Future MAP Levels scenario analysis are consistent with the off-airport trip generation in Appendix K2-8 of the SPAS Draft EIR.

Table 2 below provides a comparison of the trip generation estimates for the Future (2025) Without Alternative With Future MAP Levels scenario against the trip generation estimates of each of the SPAS alternatives as well as the Future (2025) Without Alternative scenario from the SPAS Draft EIR.

Table 2

Comparison of Trip Generation Estimates

Alternative	AM Peak Hour Trips[1]			MD Peak Hour Trips[1]			PM Peak Hour Trips[1]		
	In	Out	Total	In	Out	Total	In	Out	Total
Future (2025) Without Alternative Scenario (56.5 MAP)	5,682	4,281	9,963	6,927	7,102	14,029	5,697	6,210	11,907
Future (2025) Without Alternative With Future MAP Levels Scenario (78.9 MAP)	7,830	7,415	15,245	10,054	10,109	20,163	9,663	7,997	17,660
Alt 1-2	7,899	7,446	15,345	10,078	10,123	20,201	9,718	8,066	17,784
Alt 3	7,571	7,124	14,695	9,767	9,824	19,591	9,368	7,727	17,095
Alt 4	7,763	7,329	15,092	9,976	10,029	20,005	9,639	7,966	17,605
Alt 8	7,812	7,345	15,157	9,977	10,026	20,003	9,668	8,013	17,681
Alt 9	7,643	7,190	14,833	9,801	9,849	19,650	9,492	7,839	17,331

[1] Peak hour trips represent all vehicles, including shuttles.

Source: Ricondo & Associates, December 2012.

Intersection Traffic Analysis

As discussed in greater detail in Section 4.12.2.2.3 of the SPAS Draft EIR (Future (2025) Comparison Methodology), the SPAS Draft EIR compared the Future (2025) With Alternative scenario against the Future (2025) Without Alternative scenario for each alternative to calculate the alternatives' contribution to cumulative impacts. The Future (2025) Without Alternative scenario included cumulative growth projections related to vehicle trips in the area surrounding LAX and traffic generated by reasonably foreseeable planned development, but held airport-related trip generation levels at Baseline (2010) Without Alternative MAP levels. This approach is considered to be very conservative in delineating the future off-airport traffic impacts of the SPAS alternatives because the vehicle trips associated with projected growth in aviation activity at LAX would occur regardless of whether the project is implemented.

The analysis presented below compares the Future (2025) With Alternative scenario provided in the SPAS Draft EIR against the Future (2025) Without Alternative With Future MAP Levels scenario. With the inclusion of projected natural growth at LAX in the new scenario, the alternatives' contribution to cumulative impacts would be reduced in comparison to the cumulative contribution disclosed in the SPAS Draft EIR (i.e., impacts would be reduced).

Criteria for Determination of Significant Traffic Impact

LAWA's off-airport traffic consultant, Fehr & Peers, assessed the alternatives' incremental contribution to cumulative traffic impacts at 200 intersections. The alternatives' traffic impact analysis was conducted for three traffic analysis periods (i.e., weekday a.m. peak hour, airport midday peak hour, and weekday afternoon p.m. peak hour). Each study intersection was evaluated for potential significant traffic impacts using the significant traffic impact criteria described in Section 4.12.2.4 of the SPAS Draft EIR.

Impacts Relative to Future (2025) Without Alternative With Future MAP Levels

The impact comparison for the SPAS alternatives is shown in Table B-1 of Attachment 3B. The associated level of service (LOS) worksheets used to calculate these impacts are provided in Attachment 3H for the Future (2025) Without Alternative With Future MAP Levels scenario and in Appendix K2-6 of the SPAS Draft EIR for the Future (2025) With Alternatives 1-2, 3, 4, 8, and 9 scenarios.

The following section summarizes the impacts associated with each alternative in comparison to Future (2025) Without Alternative With Future MAP Levels. In addition, Table 3 below shows the percentage change in the number of impacted intersections for the SPAS alternatives between the two Future Without Alternative scenarios, without and with MAP growth.

Table 3

Summary of Intersection Impact Analysis Before Mitigation

Alternatives	Impact Analysis using "Future (2025) Without Alternative" Conditions with 56.5 MAP (Number of Significantly Impacted Intersections)[1]	Impact Analysis using "Future (2025) Without Alternative With Future MAP Levels" Conditions with 78.9 MAP (Number of Significantly Impacted Intersections)	Change in Number of Significant Impacts	% Change
Alts 1-2	55	23	-32	-58%
Alt 3	50	23	-27	-54%
Alt 4	51	23	-28	-55%
Alt 8	57	28	-29	-51%
Alt 9	57	28	-29	-51%

Note:

For the purposes determining the 'Number of Significantly Impacted Intersections' in this table, an intersection was counted if it was impacted during the a.m., midday, or the p.m. peak hours.

[1] As amended by corrections and additions to the SPAS Draft EIR, presented in Chapter 5 of Part II of the Final EIR.

Source: Fehr & Peers, 2013.

Detailed intersection analysis showing LOS and v/c ratios are presented in Tables B-2 through Table B-6 of Attachment 3B.

Alternatives 1-2, Alternative 3, and Alternative 4

As indicated in Tables B-1 through B-4 of Attachment 3B, 23 of the 200 intersections would be significantly impacted, before mitigation, during one or more peak hours under the comparison utilizing the Future (2025) Without Alternative With Future MAP Levels scenario. The number of intersections that would be reduced to a less than significant level after implementation of mitigation is presented in Table 1, above.

Alternatives 8 and 9

As indicated in Tables B-1, B-5, and B-6 of Attachment 3B, 28 of the 200 intersections would be significantly impacted, before mitigation, during one or more peak hours under the comparison utilizing the Future (2025) Without Alternative With Future MAP Levels scenario. The number of intersections that would be reduced to a less than significant level after implementation of mitigation is presented in Table 1, above.

Intersection Mitigation Analysis

The identification of mitigation measures for significantly impacted intersections under the off-airport traffic impact analysis using the Future (2025) Without Alternative With Future MAP Levels scenario is consistent with the corresponding intersection improvements discussed in Sections 4.12.2.7.1 and 4.12.2.7.2 of the SPAS Draft EIR for those intersections, along with revisions made in the Final EIR to Section 4.12.2 (see Chapter 5, Corrections and Additions Related to the SPAS Draft EIR). Table 4 below summarizes the intersection mitigation analysis in comparison to the SPAS Draft EIR results, as amended.

Table 4

Summary of Intersection Mitigation Analysis

	SPAS Draft EIR Impact Analysis using "Future (2025) Without Alternative" Conditions with 56.5 MAP[1]				Impact Analysis using "Future (2025) Without Alternative With Future MAP Levels" Conditions with 78.9 MAP			
		Number of Impacted Intersections After Mitigation				Number of Impacted Intersections After Mitigation		
Alternatives	Number of Non-Impacted Intersections	Fully Mitigated	Partially Mitigated	No Feasible Mitigation	Number of Non-Impacted Intersections	Fully Mitigated	Partially Mitigated	No Feasible Mitigation
Alts1-2	145	17	13	25	177	9	4	10
Alt 3	150	13	15	22	177	3	11	9
Alt 4	149	13	16	22	177	7	7	9
Alt 8	143	15	17	25	172	11	7	10
Alt 9	143	15	17	25	172	11	7	10

Note:

Non-impacted intersections include those with no change or change that is less than significant.

[1] As amended by corrections and additions to the SPAS Draft EIR, presented in Chapter 5 of Part II of the Final EIR.

Source: Fehr & Peers, 2013.

A summary of the mitigation effectiveness is presented in Table B-7 of Attachment 3B, with details for each alternative provided in Tables B-8 through B-12. Figures C-1 through C-5 in Attachment 3C illustrate the impacted locations and the effectiveness of the mitigation measures.

The analysis results indicated that there is a decrease in the number of intersections remaining significantly impacted after the implementation of recommended mitigation when utilizing the Future (2025) Without Alternative With Future MAP Levels conditions, compared to what was identified in the SPAS Draft EIR.

Regional Transportation System Analysis

Similar to the SPAS Draft EIR, this off-airport traffic analysis using the Future (2025) Without Alternative With Future MAP Levels scenario indicated alternative-related impacts at the same Congestion Management Plan (CMP) arterial and freeway monitoring stations, as well as the transit system. The methodologies used to conduct the Future (2025) Without Alternative With Future Map Levels scenario, such as the evaluation of intersection operating conditions and the assessment of impacts under the SPAS alternatives on CMP facilities, are consistent with the methodologies described in Section 4.12.2.2 of the SPAS Draft EIR, with the exception that the Future (2025) Without Alternative With Future MAP Levels scenario replaces the Future (2025) Without Alternative scenario.

CMP Freeway Analysis

Tables D-1 through D-4 (Attachment 3D) describe the traffic impacts on CMP freeway monitoring stations by comparing each SPAS alternative scenario to the Future (2025) Without Alternative With Future MAP Levels scenario. None of the CMP freeway monitoring stations that were identified as impacted in the SPAS Draft EIR would be significantly impacted in the comparative analysis against the Future (2025) Without Alternative With Future MAP Levels scenario. The conclusion that CMP freeway impacts would be less than significant applies to all alternatives when utilizing the Future (2025) Without Alternative With Future MAP Levels scenario. Please see Section 4.12.2.6.2 of the SPAS Draft EIR for a discussion of the impacts of the various alternatives to CMP freeway monitoring stations under the analysis utilizing the Future (2025) Without Alternative scenario.

CMP Arterial Intersection Analysis
Tables E-1 through Table E-5 (Attachment 3E) show the impacts of each SPAS alternative to the 15 CMP arterial monitoring stations by comparing the SPAS Future (2025) With Alternative scenarios against the Future (2025) Without Alternative With Future MAP Levels scenario.

None of the CMP arterial monitoring stations would be significantly impacted in the CMP arterial intersection analysis when utilizing the Future (2025) Without Alternative With Future MAP Levels scenario under Alternatives 1-2, 4, 8, and 9. However, under Alternative 3, the CMP arterial monitoring station at La Cienega Boulevard and Centinela Avenue (Intersection #26) would be significantly impacted. This impact was fully disclosed on page 4-1231 of the SPAS Draft EIR and was partially mitigated as stated on page 4-1309 of the SPAS Draft EIR. Please see Section 4.12.2.6.2 of the SPAS Draft EIR for a discussion of the impacts of the various alternatives to CMP arterial monitoring stations under the Future (2025) Without Alternative scenario.

Under this requested analysis, this CMP arterial impact at La Cienega Boulevard and Centinela Avenue under Alternative 3 can be fully mitigated to a level that is less than significant with implementation of Mitigation Measure MM-ST (SPAS)-10.

HCM Freeway Ramp Analysis
In evaluating freeway ramp impacts related to the Future (2025) Without Alternative With Future MAP Levels scenario, the analysis was conducted using the Highway Capacity Manual (HCM) methodology to comply with the requirements in Caltrans' Guide for the Preparation of Traffic Impact Studies and is included in Tables F-1 through F-4 of Attachment 3F. These tables provide side-by-side comparisons of the Future (2025) Without Alternative With Future MAP Levels and the Future (2025) With Alternative in terms of the average control delay per vehicle and operating conditions for key ramp intersections based on the average delay of all vehicles passing through the intersection. Tables F-5 through F-8 also provide the density (passenger cars per hour per lane) and operating conditions for the key freeway ramp terminals.

This requested HCM Freeway Ramp analysis indicated that the incremental changes in average vehicle delay between the SPAS alternatives and Future (2025) Without Alternative With Future MAP Levels conditions at the analyzed freeway ramps are all less than the incremental vehicle delay shown in the SPAS Draft EIR analysis in Appendix K2-9. Therefore, the requested HCM Freeway Ramp analysis indicated no new significant impacts or increase in the severity of impacts compared to the SPAS Draft EIR traffic analysis.

CMP Transit Analysis
With regard to CMP transit impacts, Table G-1 of Attachment 3G shows the total change in transit demand for each alternative by comparing Future (2025) With Alternative scenarios to the Future (2025) Without Alternative With Future MAP Levels scenario. Table G-2 indicates how the change in transit demand associated with each alternative would affect the utilization of the major north/south and east/west CMP transit corridors in the vicinity of LAX. Alternatives 1-2 would minimally increase transit system utilization and would not represent a significant impact in transit demand. Alternatives 3, 4, 8, and 9 would decrease transit system utilization and decrease transit demand. Consistent with the SPAS Draft EIR, the impacts of each analyzed alternative to the regional transit system would be considered less than significant when utilizing the Future (2025) Without Alternative With Future MAP Levels scenario.

Conclusion
The SPAS Draft EIR analyzed the impacts of the alternatives by comparing the Future (2025) With Alternative scenario with the Future (2025) Without Alternative scenario. The Future (2025) Without Alternative scenario did not include the projected natural growth at LAX, and thus relied, conservatively, on a usage of 56.6 MAP. The analysis presented here compares the Future (2025) With Alternative scenarios to the Future (2025) Without Alternative With Future MAP Levels scenario. The SPAS Draft EIR analysis concluded that the number of significant and unavoidable impacted intersections, as identified in the SPAS Draft EIR (after mitigation) and as modified by the SPAS Final EIR, would range between 37 and 42, depending on the alternative. These were reduced considerably to between 14 and 20 intersections in the comparative analysis using the Future (2025) Without Alternative With

Future MAP Levels scenario. This comparison confirms the conservative nature of the analysis in the SPAS Draft EIR, which identified many more significant impacts than would have been identified had the Future (2025) Without Alternative scenario included the projected natural growth at LAX that would occur with or without any of the SPAS alternatives.

The analysis related to the Future (2025) Without Alternative With Future MAP Levels scenario does not identify new significant impacts, does not result in an increase in the severity of impacts, and does not trigger recirculation under any of the criteria provided in Section 15088.5 of the State CEQA Guidelines. This conclusion is consistent with the recent decision Merced Alliance for Responsible Growth v. City of Merced (2012, 5th App. Dist., Case F062602) [Publication Request Pending]. In Merced, petitioners alleged that "…the city's late-submitted information on traffic impacts triggered the requirement that the EIR be recirculated." (Slip Opinion at 65.) "[The Lead Agency] prepared a response that explained in detail why the methodologies used in its traffic study were sound. In addition, to allay [Plaintiff's] concern, [the Lead Agencies' consultants] conducted an analysis of the study intersections using the baseline [Plaintiffs] suggested - the existing condition plus project-generated trips. This analysis showed that 'there would be no new findings compared to the DEIR traffic analysis.' The challengers argue that, because the respondents cited [the Lead Agency's] analysis to defend the EIR before the superior court, this must have been significant new information that required recirculation. Once again, their recirculation argument fails. The [lead agency's] response letter and new analysis did not disclose a new significant impact, increase the severity of an impact, identify a feasible project alternative or mitigation measure, or 'deprive the public of a meaningful opportunity to comment upon a substantial adverse environmental effect…'. [Laurel Heights II, supra, 6 Cal.4th at p. 1129.] The letter and analysis were prepared especially to respond to [Plaintiff's] concerns, not to change any aspect of the project, mitigation measures, or findings and conclusions in the EIR." (Slip Opinion at 77-78.)

SPAS-AL00003-4

Comment:

Connections to Metro's Light Rail Lines (Crenshaw/LAX Line and the Metro Green Line) and Aviation/Century Station

LACMTA notes that all of the Alternatives that involve Ground Transportation improvements, especially the elevated busway between Aviation and Sepulveda Boulevards (Alternatives 1, 2, 4, and 8) and the Automated People Mover (Alternatives 3 and 9) connect to both light rail lines that will operate in the area - the Metro Green Line and the Crenshaw/LAX Line and a new station to be developed by LACMTA at Aviation/Century (to be constructed and in service by 2018). LACMTA supports plans by LAWA to extend any transit connection to serve both lines, thereby minimizing the number of transfers for passengers on their journey to and from LAX. When LAWA considers how connections are made at Aviation and Century Boulevards (near Manchester Square), we request that the evaluation of alternatives should consider the impacts upon the design of the Metro Rail Station, on the proposed bus facility on the west side of Aviation Boulevard and upon long-term use of LACMTA's property (currently in process for purchase).

Response:

Please see Topical Response TR-SPAS-T-1 regarding transit options into LAX. As indicated in the topical response, LAWA is committed to working collaboratively with Metro to create a robust connection between LAX and the Metro rail system. The SPAS Draft EIR is a programmatic document. Details regarding the dedicated busway under Alternatives 1, 2, and 8, and the APM system under Alternatives 3 and 9, have not been developed at this stage of planning for SPAS. Project-level impacts associated with the connectivity of the LAWA ground access facilities and Metro facilities, including impacts on the future Metro light rail station, proposed bus routes, and long-term use of Metro's property, would be analyzed during detailed engineering and project-specific CEQA review should a SPAS alternative be selected for implementation. Please see Responses to Comments SPAS-PC00130-235 and SPAS-PC00130-142 for a discussion of the appropriateness of the programmatic review conducted for the SPAS project.

SPAS-AL00003-5

Comment:

Rail Connection to LAX Terminals

LACMTA looks forward to working with LAWA to develop a connection between the regional rail system and LAX. Such a connection builds upon several initiatives already underway. We are already set to award contracts in early 2013 to construct the $1.7 billion Crenshaw/LAX Transit Corridor by 2018. The Crenshaw/LAX Line will create connections between the LAX airport district and both the Exposition Line and Metro Green Line light rail corridors. With this investment, passengers from many different parts of Los Angeles County (including downtown Los Angeles, the Westside, South Los Angeles, the South Bay, and the Gateway Cities) will have improved access to the LAX area at a new station near the intersection of Aviation and Century Boulevards. This new connection also brings the Metro Green Line to this station, giving LAWA savings in two ways. In the short term, the "G" shuttle operated by LAWA can have lower operating cost due to the fact that the rail system will be one mile closer. In the long-term, the distance to connect any airport transit system to the regional transit system is shortened by one mile, reducing the cost by several hundred million dollars for Automated People Mover connections contemplated in the LAX Master Plan.

Response:

The comment is noted and is consistent with the assumptions made in the SPAS Draft EIR regarding connections to regional rail. Please see Topical Response TR-SPAS-T-1 regarding transit options into LAX.

SPAS-AL00003-6

Comment:

The next step is to determine a solution that builds upon this foundation and the work you have developed through this SPAS. We have identified several alternatives through our Airport Metro Connector Study that potentially close the last gap to get to LAX terminals and provide viable alternatives to driving or being driven to the airport. We found that many of the air passengers and employees who would be attracted to more direct airport transit connections originate along corridors already served or planned to be served by the Metro Green Line and the Crenshaw/LAX Line or lines that connect to them (South Los Angeles, Inglewood and Hawthorne, the South Bay, and the Westside). We note that many of the Alternatives explored in SPAS have un-mitigable traffic impacts, including intersections several miles to the east of the airport. Improving transit connections could help to alleviate some of these traffic impacts.

Response:

The comment is noted and is hereby made part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. The SPAS Draft EIR includes several alternatives to improve transit connections to the airport. As discussed in the Project Description (Section 2.3.1.1.1), Alternative 1 would provide connectivity to public transit via the LAX dedicated busway, with a stop/connection at the new Metro transit station at Aviation/Century. (Similar improvements are included in Alternative 2.) Alternative 3 provides for the construction of the ITC, at the area referred to as Continental City, to serve as the primary connection point between the airport, the Metro Green Line, and regional bus service, as well as development of two APM systems to link the ITC, CONRAC, and CTA and link the GTC and CTA. Alternative 8 would provide connectivity to public transit via the LAX dedicated busway. Alternative 9 would include the construction of an elevated APM between Manchester Square and the CTA with stops at the future Metro LAX/Crenshaw Light Rail Transit Station at/near Century and Aviation Boulevards and the new ITF. The details of each alternative are provided in Section 2.3 of the SPAS Draft EIR.

Please see Response to Comment SPAS-PC00130-305 regarding the timing of the Airport Metro Connector Project.

SPAS-AL00003-7

Comment:

To complement the investment in the Crenshaw/LAX Line, we would recommend that LAWA investigate how soon it can make an investment in transit connections, especially if the reported performance of the roadway network relies upon an assumption of consolidation of shuttle services (Page 34 of the Appendix E2 - Ground Access Concept Development). As noted in the Preliminary SPAS Report (Table 8-1), the total investment in ground transportation envisioned in the Master Plan (as represented by Alternative 3) would exceed $8 billion (escalated costs), with more than $2.4 billion in costs for an Automated People Mover system alone. Any investment in transit considered in other alternatives presented in SPAS or considered as part of the Airport Metro Connector are significantly less in cost than the Master Plan scope of investments. This favorable cost comparison should hopefully make commitments to transit more financially feasible. Furthermore, the full cost of traffic mitigation should be calculated for another useful comparison to transit investments. Many intersections are deemed un-mitigable (Table 4.12.2-33 on Page 4-1318 to 4-1319), but it may nonetheless be useful to assign a cost to them for purposes of comparison with potential contributions to transit solutions. Doing so may help to highlight the value of transit to provide alternative access and alleviate traffic impacts.

Response:

The commentor has misunderstood and/or mischaracterized the discussion on page 34 of Appendix E2 of the Preliminary LAX SPAS Report. The discussion within Appendix E2 regarding consolidation of shuttle services pertains to the proposed Intermodal Transportation Facility (ITF) and is unrelated to transit. Please see Topical Response TR-SPAS-T-1 regarding transit options into LAX. Please also see Response to Comment SPAS-PC00130-730 regarding the treatment of economic impacts in an EIR, including costs of proposed improvements.

SPAS-AL00003-8

Comment:

Bus Connectivity to LAX Terminals

We also look forward to working with you to devise appropriate solutions to connect local buses to airport terminals. Possibilities may include enhancement to the existing bus terminal at Lot C, or a new bus terminal at Aviation and Century Boulevards. Both potential facilities can facilitate bus connections. The location of such a bus terminal shall coincide with the development of alternatives for the Airport Metro Connector as well as circulator systems contemplated within the SPAS Program. The location of such a facility should also consider potential opportunities to complement and avoid conflict with other consolidated transportation facilities. Particularly, whether at this level or at project-level environmental reviews, it will be important to devise strategies to limit the impact of concentrated traffic on the reliable operation of bus lines operating in the airport area. Finally, it will also be worthwhile to confirm how LAWA will connect the bus facilities to the terminals within the ultimate SPAS Program.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Topical Response TR-SPAS-T-1 regarding transit options into LAX, including LAWA's commitment to working collaboratively with Metro to create a robust connection between LAX and the Metro transit system.

The evaluation of the SPAS ground access system in the Preliminary LAX SPAS Report and the SPAS Draft EIR assumed that, by the SPAS horizon year (2025), Metro will relocate the current 96th Street Metro Bus Station, which is located between Vicksburg Avenue and Jenny Street, to a new bus center located adjacent to the planned Aviation/Century Station (see Section 1.8 of Appendix E2-2 of the Preliminary LAX SPAS Report). Access to the CTA from the relocated bus center would be provided by the SPAS APM or dedicated busway. LAWA would coordinate with Metro regarding connections to Metro bus terminals, either at Lot C or in a new location.

In addition, the potential for concentrated vehicular traffic impact surrounding the planned Aviation/Century Station would be reduced through increased service levels of airport employee Transportation Demand Management (TDM)/Vanpool program (which is part of the intersection mitigation program for the Aviation Boulevard and Century Boulevard intersection as stated on page 4-1292 and page 4-1307 of the SPAS Draft EIR). The combination of the APM or dedicated busway and the expansion of the TDM/Vanpool program would reduce vehicular trips and improve the operations of the bus lines on the major roadways that provide access to and from the planned Aviation/Century Station.

Detailed information on connections to Metro bus terminals would be developed during project-specific design and CEQA reviews, should a SPAS alternative be selected for implementation. It is appropriate for a first-tier program level EIR to defer detailed descriptions and impact analysis of individual projects in the program to future project-level CEQA documents. (State CEQA Guidelines Section 15383; Koster v. County of San Joaquin (1996) 47 Cal.App.4th 29,37.)

SPAS-AL00003-9

Comment:

Congestion Management Program Statutory Requirements

In accordance with the State of California Congestion Management Program (CMP) statute, the Traffic Impact Analysis (TIA) contained in the LAX SPAS Draft EIR identified several CMP arterial and highway monitoring stations which would be significantly impacted by the proposed project. Per the CMP TIA Guidelines published in the "2010 Congestion Management Program for Los Angeles County", Appendix D, section D.9, the following should be included in relation to CMP arterial and highway monitoring stations and associated mitigation measures as identified in the Draft EIR:

1) Criteria for Determining a Significant Impact. For purposes of the CMP, a significant impact occurs when the proposed project increases traffic demand on a CMP facility by 2% of capacity (V/C ≥ 0.02), causing LOS F (V/C > 1.00); if the facility is already at LOS F, a significant impact occurs when the proposed project increases traffic demand on a CMP facility by 2% of capacity (V/C ≥ 0.02). The lead agency may apply a more stringent criteria, if desired.

Response:

The commentor's summary of, and citation to, CMP TIA Guidelines, are essentially the same as presented in Section 4.12.2.4.1, CMP Thresholds of Significance, of the SPAS Draft EIR. The subject CMP thresholds were used in the assessment and determination of CMP impacts associated with the SPAS alternatives.

SPAS-AL00003-10

Comment:

2) Identification of Mitigation. Once the project has been determined to cause a significant impact, the lead agency must investigate measures which will mitigate the impact of the project. Mitigation measures proposed must clearly indicate the following:

- Cost estimates, indicating fair share costs to mitigate the impact of the proposed project. If the improvements from a proposed mitigation measure will exceed the impact of the project, the TIA must indicate the proportion of total mitigation costs which is attributable to the project. This fulfills the statutory requirement to exclude the costs of mitigating inter-regional trips;

- Implementation responsibilities. Where the agency responsible for implementing mitigation is not the lead agency, the TIA must document consultation with the implementing agency regarding project impacts, mitigation feasibility and responsibility.

Final selection of mitigation measures remains at the discretion of the lead agency. The TIA must, however, provide a summary of impacts and mitigation measures. Once a mitigation program is

selected, the jurisdiction self-monitors implementation through the mitigation monitoring requirements contained in CEQA.

Response:

The comment recites the requirement stated in the October 2010 "Congestion Management Program for Los Angeles County" to investigate mitigation for significant project impacts on the CMP arterial and freeway monitoring network. As stated in Table 4.12.2-26 on page 4-1284 of the SPAS Draft EIR, the SPAS alternatives would result in significant and unavoidable impacts at zero or one CMP freeway monitoring station relative to the Baseline (2010) Without Alternative Conditions, and at three CMP freeway monitoring stations and at one or two CMP arterial monitoring stations, relative to the Future (2025) Conditions. As discussed in Section 4.12.2.7 of the SPAS Draft EIR, no feasible mitigation for the impacts at the three CMP freeway monitoring stations and one CMP arterial monitoring station (study intersection 164, Manchester Avenue and Crenshaw Boulevard (CMP ID #24)) was identified. As discussed on pages 4-1286 and 4-1293 of the SPAS Draft EIR, the project impact at one CMP arterial monitoring station (study intersection 26, La Cienega Boulevard and Centinela Avenue (CMP ID #47) can be fully mitigated by reconfiguring the southbound approach to provide dual left-turn lanes relative to Baseline (2010) conditions under Alternative 3 and relative to Future (2025) conditions under Alternatives 1-2, 4, 8, and 9 but not under Alternative 3. This intersection is under the joint jurisdiction of the Cities of Los Angeles and Inglewood. LAWA would fund 100 percent of this improvement.

SPAS-AL00003-11

Comment:

3) Project Contribution to the Planned Regional Improvements. If the TIA concludes that project impacts will be mitigated by anticipated regional transportation improvements, such as rail transit or high occupancy vehicle facilities, the TIA must document:

- Any project contribution to the improvement, and

- The means by which trips generated at the site will access the regional facility.

Response:

The comment states that if the project relies on regional transportation improvements to mitigate its impact, then the traffic analysis must document any project contribution to those improvements and the means by which project trips will access the regional facility. The programmed transportation improvements assumed to be in place in the analysis of Future (2025) conditions are listed in Appendix K2-1 of the SPAS Draft EIR. Based on coordination with local jurisdictions and a review of regional transportation planning documents, funding for those improvements is currently in place and they will be implemented whether or not the SPAS project is adopted. No unfunded regional transportation improvements were relied on to mitigate the impacts identified with the SPAS alternatives. As discussed on page 4-1200 and shown in Table 4.12.2-6 on page 4-1201 of the SPAS Draft EIR, five percent of LAX trips were assumed to travel by public transit.

SPAS-AL00003-12

Comment:

LACMTA looks forward to reviewing the Final EIR. If you have any questions regarding this response, please contact Scott Hartwell at 213-922-2836 or by email at hartwells@metro.net.

Please send the Final EIR to the following address:

LACMTA CEQA Review Coordination
One Gateway Plaza MS 99-23-2
Los Angeles, CA 90012-2952
Attn: Scott Hartwell

Response:

The comment is noted. A copy of the Final EIR will be sent to the Los Angeles County Metropolitan Transportation Authority at least 10 days prior to certification of the Final EIR. The Final EIR will also be available at www.laxspas.org.

SPAS-AL00004 Prange, Jaclyn H Shute, Mihaly & Weinberger LLP 10/9/2012

SPAS-AL00004-1

Comment:

We submit this letter on behalf of our client, the City of El Segundo, to comment on the Draft Environmental Impact Report ("DEIR") recently released by Los Angeles World Airports ("LAWA") for the Specific Plan Amendment Study ("SPAS") at Los Angeles International Airport ("LAX"). The City of El Segundo has been an active participant in the LAX Master Plan process since its inception. In February of 2006, El Segundo, together with other petitioners, entered into a Stipulated Settlement Agreement with LAWA. El Segundo continues to monitor LAWA's efforts to implement the LAX Master Plan in order to ensure those efforts comply with the terms of the Master Plan and Stipulated Settlement. In keeping with that approach, and in the spirit of continued cooperation, we submit this comment letter on behalf of the City of El Segundo.

Response:

The comment is noted. Please see Responses to Comments SPAS-AL00004-2 through SPAS-AL00004-31 below.

SPAS-AL00004-2

Comment:

El Segundo is pleased to finally have the opportunity to submit comments on LAWA's SPAS. Although the SPAS process has been exceedingly slow, and we have raised concerns in the past regarding that slow pace,1 it is apparent from the documents released by LAWA that the delay was due in part to LAWA taking seriously its obligation to engage in meaningful reconsideration of certain previously adopted LAX Master Plan elements. LAWA has, for the most part, produced documents that clearly explain the available options and fairly describe their potential benefits and impacts.

1 The Stipulated Settlement provided clear timelines for expedient progress in the SPAS process, but that process has suffered significant delay all along the way. See Settlement Agreement § V(A) (commence study process within 60 days), § V(B) (good faith effort to select a contractor and prepare budget/scope of work for study within 6 months), § V(C) (good faith effort to complete study within 24 months). In light of the fact that more than six years have already passed since the Stipulated Settlement was approved, it is more important than ever that LAWA proceed expeditiously to complete the SPAS process.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-AL00004-3

Comment:

This letter, which is based on our review of those documents, will: (1) advocate for LAWA adoption of El Segundo's preferred "100' north" alternative (Alternative 6); (2) underscore the importance of limiting

aircraft gates to 153 and planning for a maximum of 78.9 million annual passengers ("MAP"), as LAWA has itself proposed in the SPAS; (3) request certain clarifications and commitments relating to El Segundo's residential sound insulation program funding and flexibility; and (4) point out problems with the SPAS and DEIR analysis that LAWA should address in the Final EIR.

Response:

The comment is noted. Please see Responses to Comments SPAS-AL00004-4 through SPAS-AL00004-31 below.

SPAS-AL00004-4

Comment:

In addition, as LAWA is aware, outside of the SPAS process, El Segundo has a number of long-standing concerns related to LAX. Those concerns include the adverse noise impacts that result when aircraft: (1) make "early turns" over/toward El Segundo; and (2) violate the adopted preferential runway policy by departing from the outboard runway closest to El Segundo (violators are typically cargo freighters). El Segundo anticipates LAWA's continued cooperation with respect to these and other concerns regardless of how the SPAS process is resolved.

Response:

Please refer to Response to Comment SPAS-PC00112-1 and Section 4.10.1.5 of the SPAS Draft EIR regarding "early turn" operations and the preferential runway use policy.

The commentor discusses the violation of the current Preferential Runway Use Policy. LAWA's Preferential Runway Use policy establishes a preference for arrivals on the outboard runways and departures on the inboard runways during the day and, at night (10:00 p.m. to 7:00 a.m.), the use of only inboard runways for arrivals and departures whether during Over Ocean or Westerly Operations. To clarify, the FAA has the ability and authorization to utilize any runway when they deem necessary; using an outboard runway for a departure is not a "violation" of any kind. This policy is for a "preferential" runway. Based on the radar data of the aircraft flights in the last three years, the outboard runways were used for approximately 5 percent of the operations.

SPAS-AL00004-5

Comment:

Constraining Passenger Gates. El Segundo was gratified to see that LAWA's SPAS document clearly acknowledges the importance of limiting the number of gates at LAX as a means of limiting the airport's capacity (i.e., increased operations). Maintaining this limit indefinitely, even after the 2020 expiration of the gate cap contained in the Stipulated Settlement, is critically important. The gate cap is important because it: (1) provides some much-needed assurance to airport neighbors like El Segundo that LAX operations will not increase without limit; and (2) sends a clear message that LAWA is committed to regionalization of aviation (e.g., promoting Ontario International Airport). The FAA recognized the LAX gate cap as legitimate in its May 20, 2005 Record of Decision ("ROD") for the LAX Master Plan, in which it noted that one objective of the LAX Master Plan is to improve the efficiency of passenger operations while also "encouraging, but not requiring, other airports in the Los Angeles Basin to increase capacity." ROD at 17. As noted in the ROD, "[t]his is accomplished by restricting the overall availability of gates where passengers will board and exit an aircraft." Id.

LAWA has already recognized the importance of extending the gate cap throughout its SPAS documents by applying that number of gates to each of the alternatives studied. El Segundo encourages LAWA to strengthen that commitment in a number of ways as described below.

Continued El Segundo Gate Counts. LAWA should underscore its commitment to 153 gates by memorializing and extending El Segundo's continued authority to periodically tour the airport and count passenger gates. Section IV(F) of the Stipulated Settlement (entitled "PASSENGER GATE PROVISION") states, in relevant part: "No more than four times per year total, Petitioners shall have the

right to conduct physical inspections at LAX to verify LAWA compliance with [the LAX gate limit provision]. Petitioners shall provide LAWA with reasonable written notice of their intent to inspect, no less than 24 hours prior to the proposed inspection, to the office of the Deputy Executive Director of the Office of Quality and Compliance. LAWA shall provide Petitioners' representative with the appropriate security clearance and on-airport transportation to conduct such physical inspections."

El Segundo has conducted seven "gate counts" at LAX since the 2006 approval of the Stipulated Settlement, and anticipates continuing to conduct counts approximately annually. These counts have proved exceedingly helpful to El Segundo and have required only a limited amount of effort by LAWA (i.e., provision of a vehicle and driver for approximately an hour for each visit). Because the LAX gate limit provision of the Stipulated Settlement is currently set to expire at the end of 2020 (unless extended by the parties), it is theoretically possible that LAWA could withdraw its support for El Segundo's counts beginning in 2021. As part of the SPAS process, El Segundo is therefore seeking assurances from LAWA that it will continue to allow El Segundo to confirm LAWA's compliance with the applicable gate limit. This commitment by LAWA could be memorialized in a SPAS mitigation measure and/or in an extension of the Stipulated Settlement.

Response:

The comment requests that LAWA commit, as either a mitigation measure or an extension of the Stipulated Settlement, to allowing designated representatives of the City of El Segundo the right to conduct, no more than four times per year, physical inspections at LAX to confirm the number of passenger gates in use beyond the year 2020, which is the current date for expiration of the gate count provisions set forth in Section IV.F of the Stipulated Settlement. The comment also requests that LAWA produce a gate position report for the public at least annually, as well as reports tied to approval/implementation of those Master Plan elements that include/impact passenger gates through 2020 and beyond.

Attempts to negotiate extensions of the Stipulated Settlement provisions are beyond the scope of what is required by CEQA and no response is required to the commentor's request to extend the Stipulated Settlement provisions. CEQA requires mitigation measures to minimize significant adverse impact of a proposed project. (State CEQA Guidelines Section 15126.6.) It is not clear what significant impact would be minimized by the commitment to allow periodic gate counts proposed in the comment. As LAWA proceeds to implement any approved SPAS alternative, it would do so in compliance with all approvals issued, which limit the number of gates at LAX to 153. Note that in addition to limiting the gate count to 153, the SPAS project includes an amendment to Section 7.H of the Specific Plan (applicable to all alternatives, including the existing LAX Master Plan) that would provide opportunities for adjustments if LAX reaches 75 or 78.9 MAP earlier than expected. This amendment, set forth in detail in Chapter 7 of the Preliminary LAX SPAS Report, would address potential variations in passenger projections over time, first by requiring action to encourage further shifts in passenger and airline activity to other regional airports if the annual aviation activity analysis forecasts that the annual passengers for that year at LAX are anticipated to exceed 75 MAP, and, second, by requiring a Specific Plan Amendment Study if the annual aviation activity analysis forecasts that LAX annual passengers for that year are anticipated to exceed 79.9 MAP. Therefore, it is not necessary under CEQA to implement the measures suggested in the comment.

SPAS-AL00004-6

Comment:

LAWA Gate Plans & Reports. In order for the 153 gate limit to be meaningful, it is important that LAWA at all times makes clear its current gate inventory and future intentions with regard to gates. We note LAWA's SPAS documentation includes maps of where the 153 gates would be located and how they would be configured under various alternatives (Appendix F-1, Attach. A, Figures A-D). We also note, however, that the gate position maps include a note stating that "[a]ircraft parking positions are shown for illustrative purposes only." This is understandable to some degree because the SPAS is conceptual and programmatic in nature, so further refinement and environmental review will follow at the project level. However, as LAWA proceeds to implement Master Plan elements, including one of the SPAS alternatives, it must provide ongoing public disclosure regarding how LAX's gate configuration measures up against the applicable limit of 153 gates. To do this, LAWA should produce a gate position

report for the public at least annually,2 as well as reports tied to approval/implementation of those Master Plan elements that include/impact passenger gates. This commitment by LAWA should be memorialized in a SPAS mitigation measure and in the Specific Plan as discussed below.

2 LAWA staff have periodically produced a drawing/inventory of existing LAX gate positions in connection with El Segundo's gate counts. That drawing/inventory could be used as a starting point and model for the annual report El Segundo is requesting.

Response:

The comment requests that LAWA commit, as a mitigation measure, to produce a gate position report for the public at least annually, as well as reports tied to approval/implementation of those Master Plan elements that include/impact passenger gates.

CEQA requires mitigation measures to minimize significant adverse impact of a proposed project. (State CEQA Guidelines Section 15126.6.) It is not clear what significant impact would be minimized by the commitment to annual reporting proposed in the comment. As LAWA proceeds to implement the LAX Master Plan, it would do so in compliance with all approvals issued, including FAA approvals, all of which would limit the number of gates at LAX to 153. The gate configurations would be consistent with those depicted in Figures A through D in Attachment A to Appendix F-1 of the Preliminary LAX SPAS Report. The complete footnote to these figures reads "Aircraft parking positions are shown for illustrative purposes only, assuming flexibility in passenger loading bridge, fuel pit, and terminal access and location, and including some tow in/tow out and segmented pushback operations." In other words, there may be minor adjustments to the parking positions shown in the figures, but it is anticipated that they would generally remain as depicted. It is not necessary to take additional steps to verify consistency with the 153 gate count on an annual basis.

SPAS-AL00004-7

Comment:

Longer Planning Horizon. In addition to being interested in the number of passenger gates at LAX, El Segundo is concerned about the related issue of ensuring that the airport's overall passenger activity level stays within the long established planning level of 78.9 MAP. We were therefore pleased to see that the SPAS documents point to LAWA's continued commitment to that figure. See SPAS Report Appendix F (Operational Analysis) at 11 (section 2.5). LAWA should, however, adopt a longer planning horizon of at least 2035 and plan for 78.9 MAP out to that date. Doing so would be more consistent with the most recent planning projections from SCAG. See Id. at 8-9.

Response:

The SPAS Draft EIR uses 2025 as the horizon year because that is the estimated year that buildout of any of the SPAS alternatives would be anticipated to occur. (see discussion on pages 4-3 through 4-5 at the beginning of Chapter 4 of the SPAS Draft EIR) Accordingly, the LAX Passenger Forecast prepared for the Preliminary LAX SPAS Report forecasts passengers levels to 2025. Notably, the Stipulated Settlement expires in December 2015 and the Gate Reduction provisions expire in December 2020. (Stipulated Settlement, Section I.D.) Neither CEQA nor the Stipulated Settlement requires LAWA to speculate about passenger activity levels beyond 2025. Nor is there any requirement for the SPAS EIR to plan to the same horizon year as the Southern California Association of Governments (SCAG) Regional Transportation Plan (RTP). However, the 78.9 MAP forecast reflects that fact that all of the SPAS alternatives include (i) no more than 153 gates and (ii) the amendment of the LAX Specific Plan Section 7.H requiring action to encourage further shifts in passenger and airline activity to other regional airports if the annual aviation activity analysis forecasts that the annual passengers for that year at LAX are anticipated to exceed 75 MAP, and, by requiring a Specific Plan Amendment Study if the annual aviation activity analysis forecasts that LAX annual passengers for that year are anticipated to exceed 78.9 MAP. Both this physical gate limit and the proposed amendment to the LAX Specific Plan reflect the fact that the practical capacity of LAX is based on market assumptions, as well as the expected physical characteristics of the various functional elements of the airport and how they are planned and expected to work together, given how the market is likely to respond and use LAX. (See Preliminary LAX SPAS Report, Section 6.2.) As history has demonstrated, it is possible that

over the next ten to twelve years, and certainly beyond 2025, that currently unexpected fluctuations in the economy, aviation industry practices, passenger demand, and other known and unknown factors may result in LAX annual passengers increasing (or decreasing) at a different rate than expected. The proposed amendments to Section 7.H of the Specific Plan are designed to respond to this possibility. To make specific planning assumptions beyond 2025, however, as requested by this comment, would be speculative. (See State CEQA Guidelines Sections 15144 and 15145.)

SPAS-AL00004-8

Comment:

Revisions to Specific Plan Section 7.H. The LAX Specific Plan (dated September 29, 2004 and amended 2007) is an important guiding document for LAX because it prohibits proposed development unless LAWA staff clearly establish that development is consistent with the adopted Master Plan and other applicable requirements, including mitigation obligations under CEQA. The "yellow light" projects are listed in Section 7.H of the Specific Plan, and LAWA appropriately proposes to amend Section 7.H at the conclusion of the SPAS process to delete that list. LAWA's SPAS documents also propose other revisions to Section 7.H of the previously adopted LAX Specific Plan. See SPAS Report Chapter 7. We understand the need to amend Section 7.H at the conclusion of the SPAS process, but would recommend it be amended to read as follows, rather than as LAWA proposes:

"H. Additional Study Requirements.

1. Specific Plan Amendment Study. LAWA shall immediately initiate a complete LAX Specific Plan Amendment Study (SPAS) comprehensively addressing security, traffic, aviation activity and corresponding environmental analysis consistent with CEQA, in the three circumstances listed below. LAWA shall complete that study prior to commencing construction of any Master Plan Project that is not already under construction when this obligation to commence a SPAS is triggered.

(a) If the annual traffic generation report required in Subsection G.1 above, and/or the annual traffic generation report considered together with any Project-specific traffic study, shows that any Master Plan Projects will be generating net new airport peak hour Trips in excess of 8236 (unless the total Trips for that year are related to construction or phasing impacts).

(b) If the annual aviation activity analysis required in Subsection G.1 above forecasts that the annual passengers for that year are anticipated to exceed 75 million.

(c) If LAWA seeks to approve, install and/or operate more than 153 passenger boarding gates."

This language is similar to the language proposed by LAWA, but preferable because it contains a more meaningful commitment to 78.9 MAP and 153 gates. For example, El Segundo's language makes express LAWA's commitment to conduct further public review and analysis before ever exceeding the clear cap of 153 gates. El Segundo's language also calls for LAWA to commence a Specific Plan Amendment Study when annual passenger levels reach 75 MAP, rather than waiting for them to reach 78.9 MAP. This earlier SPAS trigger is designed to ensure LAWA has enough lead time to plan and act appropriately (e.g., promoting regionalization, adding capacity constraints at LAX) before LAX reaches 78.9 MAP. Once levels reach 78.9 MAP, it will be too late to plan, particularly in light of the long lead time involved (see comments above regarding delay in the current SPAS process).

In addition to the above amendments to Section 7.H, El Segundo recommends Section 7G.1(b) be amended to require LAWA's annual aviation activity analysis to report on the number and location of passenger gates at LAX. Including that information in the annual report already required will help ensure LAX does not exceed the number of approved gates authorized under the Master Plan and current SPAS.

Response:

The amendment proposed in the Preliminary LAX SPAS Report to Section 7.H of the LAX Specific Plan would provide opportunities for adjustments if LAX reaches 75 or 78.9 MAP earlier than predicted in the current passenger forecasts (i.e., if unexpected fluctuations in the economy, aviation industry practices,

passenger demand, and other known and unknown factors result in LAX annual passengers increasing more quickly than expected). This amendment would address potential variations over time, first, by requiring action to encourage further shifts in passenger and airline activity to other regional airports if the annual aviation activity analysis forecasts that passengers for that year at LAX are anticipated to exceed 75 MAP, and, second, by requiring a Specific Plan Amendment Study if the annual aviation activity analysis forecasts that LAX annual passengers for that year are anticipated to exceed 78.9 MAP. These amendments are consistent with a practical capacity for LAX at 78.9 MAP in 2025 and are also designed to maintain LAWA's acknowledged unique and important role as an International Gateway, while encouraging domestic passengers and the airlines that serve them to increase their use of other airports in the region. (See Preliminary LAX SPAS Report, Section 6.2.)

The commentor's recommended revisions to Section 7.H will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

However, inclusion of the language proposed by the commentor to require a Specific Plan Amendment Study if annual passengers are anticipated to exceed 75 million and to require that LAWA complete such study "prior to commencing construction of any Master Plan Project that is not already under construction when this obligation to commence a SPAS is triggered" is not feasible. LAWA cannot be prohibited from implementing LAX Master Plan projects simply because traffic generation, aviation activity, or passenger activity levels increase to certain levels. LAWA's control over these activities is extremely limited. Under FAA rules, LAWA may not restrict access to the airport and may not impose any "cap" on aircraft operations, nor regulate or legally control in any way what operations the airlines might wish to undertake at any particular airport.1 Prohibiting implementation of LAX Master Plan projects if traffic generation, aviation activity, or passenger activity levels increase to certain levels until another Specific Plan Amendment Study is complete would unnecessarily limit improvement and modernization of LAX without guaranteeing identification of any factor over which LAWA has control beyond the gate provisions (i.e., no more than 153 gates) already included in all of the SPAS alternatives. By designing all of the SPAS alternatives with no more than 153 gates, in combination with the amendment proposed in the Preliminary LAX SPAS Report to Section 7.H of the LAX Specific Plan, LAWA has identified Specific Plan amendments that plan for modernization and improvement of LAX in a manner that is designed for a practical capacity of 78.9 MAP, as required by the Stipulated Settlement. Amending the Specific Plan as recommended by the commentor is not feasible and would not reduce any significant impacts of the SPAS alternatives.

Regarding the recommendation to require a Specific Plan Amendment Study "if LAWA seeks to approve, install and/or operate more than 153 passenger boarding gates," please see Response to Comment SPAS-AL00004-6.

It is not clear from the comment whether the commentor recommends omitting the amendment to Subsection 7.H.2 of the LAX Specific Plan proposed in the Preliminary LAX SPAS Report. However, LAWA believes this proposed subsection provides an important opportunity to act to encourage further shifts in passenger and airline activity to other regional airports if the annual aviation activity analysis forecasts that passengers for that year at LAX are anticipated to exceed 75 MAP.

Regarding the recommendation to amend Section 7.G.1(b) of the LAX Specific Plan to require LAWA's annual aviation activity analysis to report on the number and location of passenger gates at LAX, please see Response to Comment SPAS-AL00004-6.

1. Under the Airport Noise and Capacity Act of 1990 (commonly called "ANCA") (49 USC Sections 47521-33), and its implementing regulations (14 C.F.R. Part 161), federal law prohibits an airport proprietor from unilaterally imposing any restrictions on "access" to the airport by Stage 3 aircraft. Following the phase-out of most noisy Stage 2 aircraft during the 1990s, Stage 3 aircraft comprise essentially all commercial aircraft landing at any U.S. airport. Any Stage 3 restriction is subject to review and approval by the FAA. The FAA strongly discourages any operational limits imposed under Part 161 and prefers and promotes permanent solutions to operational concerns and inefficiencies

through capacity improvements. Further, the federal Airline Deregulation Act of 1978 expressly preempted the ability of airport proprietors to control the "price, route or service of an air carrier." (49 USC Section 41713(b)(1)). The United States Supreme Court has interpreted this prohibition broadly to mean that airports "may not seek to impose their own public policies or theories of ... regulation on the operations of an air carrier." (Morales v. Trans World Airlines, Inc. (1992) 504 US 374, 384.)

SPAS-AL00004-9

Comment:

Runway Balance/Alternatives. El Segundo appreciates the DEIR's inclusion of a wide range of alternative versions of the SPAS Project. We are concerned, however, about its failure to select a single "proposed" or "preferred" project. This approach appears to contradict the CEQA Guidelines' frequent references to "the project." E.g., CEQA Guidelines § 15126.2(a) ("An EIR shall identify and focus on the significant environmental impacts of the proposed project.") (emphasis added). Moreover, the lack of a single proposed project makes reviewing the document difficult for readers, and may hamper LAWA in the identification of appropriately-tailored mitigation measures.

Response:

The SPAS Draft EIR's approach to the project description and alternatives are consistent with CEQA's requirements. Please see Response to Comment SPAS-AL00007-6, which explains why the analysis of nine alternatives in the SPAS Draft EIR instead of a single proposed project was consistent with CEQA's requirements and facilitated public review of the alternatives.

Subsequent to publication of the SPAS Draft EIR, LAWA staff recommended an alternative that couples the airfield and terminal improvements associated with Alternative 1 with the ground access components associated with Alternative 9. The environmental impacts and recommended mitigation measures associated with the LAWA Staff-Recommended Alternative are identified in Chapter 2 of this Final EIR. As indicated in that chapter, the environmental impacts and mitigation measures of the components that make up the LAWA Staff-Recommended Alternative were fully analyzed and disclosed in the SPAS Draft EIR.

SPAS-AL00004-10

Comment:

Despite the difficulties posed by the DEIR's approach, several of LAWA's fundamental choices reflect an accurate view of the burden that the current airfield design places on El Segundo. The north airfield's current limitations and the south-side location of several cargo carriers' facilities combine to impose noise impacts on El Segundo that are disproportionate to the airport's northerly impacts. El Segundo was glad to see that resolving this imbalance is among the Project's stated objectives, and that LAWA accordingly rejected alternatives, such as the three-runway airfield, that would worsen it. See DEIR at 2-2, 2-72. Similarly, the presence in several alternatives of the new Terminal 0 and the aircraft capacity improvements to the existing terminals on the north side of the airport are heartening signs that LAWA is taking this problem seriously.

Appendix E1-05 to the SPAS Report (June 2010) points the way toward one of the key means by which the SPAS projects can advance the goal of ending the runway imbalance: lengthening Runway 6R/24L. This document shows that in its current state, the runway is incapable of supporting operations by many important classes of aircraft, while runway 7L/25R (the inboard runway on the southern field) can handle a much broader set of aircraft. This disparity inevitably adds to the excessive number of operations-particularly operations by heavier craft-on the southern airfield, which in turn adds to El Segundo's disproportionate noise burden. The alternative that LAWA ultimately selects must include lengthening Runway 6R/24L.

The north airfield is similarly constrained by its lack of sufficient separation between its two runways, which limits the classes of aircraft that can use the runways. The SPAS projects must provide enough separation to make the north and south airfields equally attractive to larger aircraft while avoiding

overburdening the airport's northern neighbors: El Segundo has no interest in inflicting noise burden on others.

The DEIR makes clear that Alternative 6, extending Runway 6R/24L and moving it 100 feet north, is the alternative that best balances the airport's commitments to ease the absolute and relative noise burdens on El Segundo by improving the capacity and efficiency of the north airfield with its responsibility to minimize overall impacts. We therefore urge LAWA to select Alternative 6.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

The LAWA Staff-Recommended Alternative presented in Chapter 2 of the SPAS Final EIR seeks to reduce the inequality between the capabilities of the north and south airfields in accommodating new large aircraft, and to improve safety and efficiency in the operation of the north airfield. The LAWA Staff-Recommended Alternative is a combination of SPAS Alternatives 1 and 9, which, similar to Alternative 6 noted by the commentor, would ease the noise burden on communities to the east and southeast of the airport as compared to alternatives that do not move the existing runways, or move Runway 6R/24L southward (see the aircraft noise analysis in Section 4.10.1 of the SPAS Draft EIR); however, compared to Alternative 6, Alternative 1 better responds to the project objectives of providing north airfield improvements that support safe and efficient movement of aircraft at LAX and maintaining LAX's position as the premier international gateway (see Table 1-2 in the SPAS Draft EIR).

SPAS-AL00004-11

Comment:

At the same time, El Segundo must express its great concern with those alternatives that leave the northern airfield in its current state and therefore do nothing to resolve the present operational imbalance (Alternatives 2, 3, and 4), or that make it even worse by shifting Runway 6R/24L, and therefore the airport's entire noise contour, southwards (Alternative 7). These alternatives are wholly unacceptable to El Segundo. Including these alternatives in this document for comparison purposes may have been appropriate as a matter of good CEQA practice, but LAWA should not select any of them.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-AL00004-12

Comment:

We would further note that the SPAS Report includes a chapter addressing the anticipated costs associated with the various SPAS alternatives (SPAS Report Chapter 8). That financial analysis provides considerable support for Alternative 6, as it would be among the least expensive options. The analysis also underscores the complete infeasibility of those alternatives that would be unacceptable to El Segundo. Alternative 3, for example, would involve astronomical costs, particularly in comparison with other options (see SPAS Report at Table 8-2). Of course, LAWA cannot and should not select a SPAS alternative based solely on cost. In this case, however, the financial analysis serves to reinforce the superiority of Alternative 6.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No response is required because this comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)). Nevertheless, it should be noted that, per Section 15131(a) of the State CEQA Guidelines, "[e]conomic or social effects of a project shall not be treated as significant effects on the environment." This section of the guidelines further states that "intermediate economic or social changes need not be analyzed in any greater detail than necessary" to identify a physical change caused by the economic or social changes. As outlined in Section 15002(a) of the State CEQA Guidelines, the basic purposes of CEQA are to inform decision-makers and the public about the potential significant environmental effect of proposed activities; to identify means to reduce, avoid, or mitigate environmental damage; and to disclose reasons why the decision-makers approved a project if significant environmental effects are involved. Although considerations other than environmental impacts have a role in the action taken by the decision-makers, the purpose of an EIR is to focus on environmental effects.

SPAS-AL00004-13

Comment:

Ground Transportation Alternatives and Traffic. As LAWA is aware, El Segundo's proximity to LAX means that LAX's traffic problems will significantly affect the quality of life for El Segundo residents. The list of intersection studied in the DEIR appears comprehensive and shows that LAWA has taken El Segundo's past comments about traffic impacts seriously. El Segundo submits these comments and questions to aid LAWA in further evaluating the traffic impacts of the Project.

Among the ground access improvements that can be paired with El Segundo's preferred alternative, Alternative 6, El Segundo prefers the ground access improvements in Alternatives 1 and 2. LAWA's analysis shows that Alternatives 8 and 9-the other two alternatives compatible with the airfield improvements in Alternative 6-would have a significant impact on the intersection of Sepulveda Boulevard and Imperial Highway compared to baseline conditions. DEIR at 4-1232. Given Sepulveda Boulevard's importance as a regional transportation artery, El Segundo requests that LAWA select alternatives that minimize traffic impacts on that street.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-AL00004-14

Comment:

However, should LAWA decide to adopt an alternative that includes the consolidated rental car facility ("CONRAC"), El Segundo requests that the CONRAC be located in Manchester Square rather than in Lot C, as this appears to impose fewer traffic impacts on Sepulveda Boulevard.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-AL00004-15

Comment:

The DEIR mentions that traffic counts were conducted for a majority of study intersections in July and August of 2010. DEIR at 4-1194. The DEIR also states that because July and August are peak traffic months, no seasonal adjustments were necessary. Id. The DEIR then states that traffic counts for an additional 36 intersections were collected in March 2012, but it does not say that any seasonal adjustments were made for those intersections. Id. If LAWA made seasonal adjustments for these 36 additional intersections, the DEIR should say so. If not, the DEIR should explain why no seasonal adjustments were necessary for counts conducted in March.

Response:

The comment requests an explanation of why no "seasonal adjustment" was made to the traffic counts collected at 36 intersections in March 2012, citing the explanation on page 4-1194 of the SPAS Draft EIR that baseline traffic counts were collected for use in this study during the peak activity months at LAX (July and August) in 2010.

The study area for the traffic impact analysis of the SPAS Alternatives was expanded during the course of the study to ensure that all potential significant impacts would be identified. Study intersections 1 through 164 were the intersections analyzed in the 2004 Master Plan EIR traffic analysis, and baseline traffic counts for the SPAS traffic analysis were collected in 2010. Following a review of the preliminary SPAS traffic impact analysis, additional locations were selected outside that area analyzed in the 2004 LAX Master Plan EIR and additional counts collected. Nearly all of the added study intersections (numbered 165 through 200) lie well to the east or north of LAX, while four of them lie south of LAX (i.e., the airport does not play a major role in determining the localized peak month of traffic for these intersections). None of the intersections with baseline traffic counts collected in March 2012 are in El Segundo. Because the effect of airport-related traffic on the overall volume of traffic in the surrounding area decreases with the distance from LAX, it was determined not to be necessary to make any special adjustments to the 2012 baseline counts to reflect peak month activity at LAX. It should be noted that project trip generation estimates were based on and reflect the peak months of activity at LAX, ensuring that the greatest potential impacts associated with project-generated traffic were analyzed.

SPAS-AL00004-16

Comment:

El Segundo would also like clarification regarding the 2025 traffic scenarios. In the 2025 Without Alternatives scenario (the 2025 baseline), LAWA did not include increases in airport-related traffic that it says will occur regardless of which alternative it approves. DEIR at 4-1208. Although we appreciate that this approach is conservative because it attributes all new trips to the alternatives when, in fact, LAWA's analysis assumes those new trips would occur regardless of the Project, we are concerned that this approach may obscure the impacts of the alternatives relative to each other. LAWA must explain whether this approach makes it more difficult to separate out the impacts of the alternatives from each other.

Response:

The comment correctly states that the cumulative traffic impact analysis in the SPAS Draft EIR was based on a comparison between the Future (2025) with Alternative scenarios and the Future (2025) without Alternatives scenario, which does not include the projected natural growth at LAX. The comment states that this approach may make it difficult to distinguish the effects of the alternatives relative to each other. As noted in the comment and discussed on page 4-1208 of the SPAS Draft EIR, future without alternative conditions were assessed without natural growth in order to provide a conservative analysis. The impacts of each alternative are thus assessed in the same way, and this consistency makes it possible to assess those impacts relative to each other. It is agreed that other comparisons may provide useful information to the public and to the decision-makers. The SPAS Final EIR presents a comparison of (1) Future (2025) with Alternative Scenario to (2) Future (2025) without Alternatives scenario that includes the natural growth at LAX (as well as other reasonably foreseeable improvements as described on page 4-1208), but does not include the physical changes proposed

under the analyzed SPAS alternatives. With the inclusion of projected natural growth at LAX in the Future (2025) without Alternative scenario, impacts would be reduced in comparison to the impacts disclosed in the Draft EIR. Please see Response to Comment SPAS-AL00003-3 for a description of an analysis where projected natural growth at LAX (i.e., 78.9 MAP in 2025) is included in the baseline to which the impacts of the SPAS improvements are compared.

SPAS-AL00004-17

Comment:

The DEIR states that it will mitigate significant traffic impacts at a variety of intersections. As an initial matter, the DEIR states that the SPAS-related mitigation measures will occur "with implementation of the SPAS alternatives." DEIR at 4-3. To mitigate a significant impact, LAWA must implement applicable mitigation measures before that impact is likely to occur (i.e., before building the improvements that will result in increased traffic).

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-AL00004-18

Comment:

El Segundo also has concerns about the following proposed mitigation measures:

Intersection 15 - Aviation Boulevard and El Segundo Boulevard

This mitigation measure proposes to restripe the northbound and southbound approaches of Aviation Boulevard to provide an additional through lane in each direction. DEIR at 4-1292. However, the measure fails to explain how the receiving side of the intersection would accommodate these additional lanes. The receiving side for each of these changes currently has only two lanes. Thus, as proposed, the mitigation measure would result in a new lane with nowhere to go once it crosses the intersection. Furthermore, Aviation Boulevard is bordered by development on the east and west sides, so widening of the street would be difficult. Accordingly, LAWA's proposed mitigation measure is flawed and will not reduce impacts to a less-than-significant level. LAWA should explain how it will mitigate the significant impacts at this intersection in light of these constraints.

Response:

The comment questions the feasibility of the proposed mitigation measure at Aviation Boulevard and El Segundo Boulevard (study intersection 15), which would involve widening and restriping of the intersection to provide additional capacity to the north-south approaches, resulting in an additional through lane in both the northbound and southbound directions. The project-related impact at this location was identified only under Alternative 3. This improvement would require the acquisition of right-of-way and is consistent with the overall widening of Aviation Boulevard between Manhattan Beach Boulevard and Arbor Vitae Street that has been planned for several years, as discussed below.

Aviation Boulevard currently is a four-lane facility with two through lanes in each direction. The widening of Aviation Boulevard project is included among the "Quick Start" projects being pursued by the South Bay Cities Council of Governments (SBCCOG) and its status was noted as "preliminary design complete" in a file dated January 8, 2009 (http://www.southbaycities.org/node/533) and is identified as a "high priority project" in another report published by the SBCCOG (http://www.southbaycities.org/node/650). The proposed mitigation measures include the widening of Aviation Boulevard from a four-lane facility to a six-lane facility between Manhattan Beach Boulevard and Arbor Vitae Street. While the commentor suggests that the mitigation measure would result in a

discrepancy between the intersection's through lanes and the receiving side's lanes, this is incorrect. As described in the mitigation measure, the resultant configuration would include the widening of Aviation Boulevard, which would be made possible by the acquisition of a right-of-way, and would be able to accommodate one additional through lane in each direction.

As shown in Table 4.12.2-22 and Table 4.12.2-35 of the SPAS Draft EIR for Alternative 3, the v/c ratio in the morning peak hour would improve from 0.972 (LOS E) prior to mitigation to 0.880 (LOS D) with the proposed mitigation measure in place. The proposed mitigation measure at Aviation Boulevard and El Segundo Boulevard (study intersection 15) is feasible and would reduce the traffic impact at this intersection, The "with mitigation" v/c values were calculated by changing the lane configuration (to match the mitigation measure described above) in the ICU calculation. For additional detail, please see the methodology discussion in Section 4.12.2.2 of the SPAS Draft EIR.

SPAS-AL00004-19

Comment:

Intersection 60 - Sepulveda and Grand Avenue

This mitigation measure proposes to improve right turn capacity from eastbound Grand Avenue to southbound Sepulveda Avenue by allowing vehicles in the middle lane to turn right. DEIR at 4-1296. This would result in the middle lane being a shared left-turn/through/right-turn lane. However, this proposed shared lane may interfere with the left turn and through movements from this lane because of queues from vehicles turning right. Furthermore, at times, queues from the left turn and through movements would interfere with the right turn movement.

In sum, this measure will not reduce the significant impact at this intersection, and will, in fact, create more significant impacts by reducing the eastbound through capacity. Therefore El Segundo requests that LAWA revise this mitigation measure so that it does not interfere with existing movements and better mitigates the impact identified in the DEIR.

Response:

The comment questions the effectiveness of the proposed mitigation measure at Sepulveda Boulevard and Grand Avenue (study intersection 60), which would reconfigure the eastbound approach to provide additional right-turn capacity. The comment states that changing the eastbound center lane from a shared left-turn/through lane to a shared left-turn/through/right-turn lane would reduce eastbound through capacity and could reduce the additional eastbound right-turn capacity because of stopped vehicles waiting to make through or left-turn movements. The comment requests that this mitigation measure be revised. While LAWA disagrees with the suggestion that the proposed mitigation measure would interfere with existing movements, in response to this comment, LAWA has further evaluated the improvements proposed for the intersection at Sepulveda Boulevard and Grand Avenue and has identified alternative improvements that provide a comparable level of mitigation.

The signal at this intersection currently operates with split phasing: that is, with the eastbound and westbound traffic moving at separate times. The intersection is projected to be significantly impacted during the weekday afternoon peak hour under future (2025) conditions under SPAS Alternatives 1-2, 8, and 9.

In response to the comment, an alternative mitigation measure for this intersection has been developed that would modify the westbound approach to provide additional left-turn capacity. The current westbound lane configuration is two left-turn lanes, two through lanes and one right-turn lane. Restriping the westbound center lane from a through-only lane to a shared through/right-turn lane would fully mitigate the identified PM peak hour project impact under Alternatives 1-2, 8, and 9. The resulting westbound lane configuration would be two left-turn lanes, one shared through/left-turn lane, one through lane and one right-turn lane. Minor signage changes would also be necessary to indicate the changed lane assignment to motorists. This mitigation would operate within the existing east-west split signal phase and the four existing southbound lanes would be adequate to receive the left-turning vehicles from westbound Grand Avenue. This improvement would result in a lane configuration that includes triple left-turn lanes, which is very similar to what exists at the nearby El Segundo intersection

of Hughes Way and Sepulveda Boulevard. The revised mitigation measure shown below will replace the one described on page 4-1301 of the SPAS Draft EIR. Tables 4.12.2-34, 4.12.2-37, and 4.12.2-38 will also be revised in the SPAS Final EIR. Please see Chapter 5, Corrections and Additions Related to the SPAS Draft EIR.

- MM-ST (SPAS)-19. Modify the Intersection of Sepulveda Boulevard and Grand Avenue (Intersection 60) (Alternatives 1-2, 8, and 9).
The mitigation measure for this location is to restripe the westbound approach to provide additional left-turn capacity by restriping a through lane to a shared through/left-turn lane. Minor changes to the lane assignment signage would also be necessary. The resulting westbound lane configuration would be two left-turn lanes, one shared through/left-turn lane, one through lane and one right-turn lane. This improvement would be a full mitigation for project impacts under the Future (2025) With Alternatives 1-2, 8, and 9 scenarios.

SPAS-AL00004-20

Comment:

Intersection 125 - Sepulveda Boulevard and Rosecrans Avenue

The DEIR claims that the proposed mitigation measure for this intersection-widening the northbound approach-is infeasible because it would require removal of existing businesses. DEIR at 4-1289, 1302. This statement is apparently referring to the Fry's Electronics building at the southeast corner of the intersection.

However, LAWA has failed to support this determination of infeasibility with substantial evidence, as required by CEQA. See CEQA Guidelines § 15091(b). In fact, in June 2012, the City of Manhattan Beach released a Draft EIR for its proposed Manhattan Village Shopping Center Enhancement Project. This project includes a proposal to demolish the Fry's building. See Manhattan Village Shopping Center Enhancement Project DEIR at page 1-7. Therefore, removal of this building is likely feasible. Furthermore, LAWA has not supported its conclusion that the additional environmental impacts associated with this widening would render the measure infeasible because LAWA could mitigate those impacts.

Response:

The comment questions the conclusion of the SPAS Draft EIR that there is no feasible mitigation measure available for the significant impact at Sepulveda Boulevard and Rosecrans Avenue (study intersection 125). The commentor raised the same issue regarding mitigation impacts at intersection 125 in their comments on the 2009 Bradley West Project Draft EIR. LAWA provided a Response in the Bradley West Project Final EIR (BWP-AL00001-13) in which LAWA noted that:

"…this improvement is considered infeasible due to right-of-way constraints north and south of the intersection along Sepulveda Boulevard. The right-of-way constraints include the presence of a gas station on the southwest corner of the intersection, a hotel immediately south of the gas station, a Fry's Electronics store on the southwest corner and two Manhattan Village residential buildings immediately south of Fry's Electronics. The provision of additional travel lane area would cost approximately $3.6 million, which includes the cost to reconfigure (widen) a bridge structure approximately 400 feet south of Rosecrans Avenue, construction costs to implement the travel lanes and signal modifications, and the cost to acquire approximately 21,000 square feet of land/right-of-way for the travel lanes. The provision of additional travel lane area would also require the demolition of the buildings mentioned above at an estimated cost of up to $46.4 million. This cost estimate was developed using the Caltrans CCI with inflation rates applied from the California Construction Cost Index. Land values were based on data from the Los Angeles County Assessor.1 Implementation of this mitigation measure would also have environmental impacts associated with major physical construction including disruption of traffic flows, generation of construction-related air pollutant emissions and noise impacts, loss of employment from removal of several commercial uses, and loss of housing. For the reasons noted above, the potential improvements to mitigate the significant impact at this intersection were determined to be infeasible to implement." (Bradley West Project Final EIR, Volume 8, Response to Comment BWP-AL00001-13, pages 2-27 and 2-28; Footnote 1, California Department of Transportation (Caltrans), Price Index for

Selected Highway Construction Items, Second Quarter ending June 30, 2009, Available: http://www.dot.ca.gov/hq/esc/oe/contract_progress/cost-index-summary.pdf; Los Angeles County Office of the Assessor, Property Assessment Information System, 2009.)

While the mitigation measure discussed in the Bradley West Project Draft EIR and the SPAS Draft EIR are not precisely the same, the same infeasibility factors still exist. The commentor suggests that the Manhattan Village Shopping Center Enhancement Project "includes a proposal to demolish the Fry's building…[t]herefore, removal of this building is likely feasible." At the time the comment was submitted and as of the date this written response was prepared (December 18, 2012), the referenced Draft EIR and project were unapproved and uncertified. The Manhattan Village Shopping Center Draft EIR which calls for demolition of the building, provides that additional structures may be constructed in place of the Fry's store. As discussed in the Draft EIR for that project, "the specific location and orientation of actual future buildings within the Development Area has not yet been determined." (Manhattan Village Shopping Center Enhancement Project DEIR, page II-13 through 14.) This developer sponsored demolition would not eliminate the financial factors described above, or the potential need to demolish any structures constructed in its location, or any of the other surrounding structures described above.

The secondary environmental impacts associated with such a mitigation measure were also described in the Bradley West Response to Comment BWP-AL00001-13 provided above. Furthermore, the continued expansion of roadways also leads to secondary impacts to alternate modes of transit, such as pedestrian access. As discussed in the recent Statement of Reasons for Regulatory Action which amended the State CEQA Guidelines, "evidence presented to the Natural Resources Agency indicates that 'mitigation' of traffic congestion may lead to even greater environmental impacts than might result from the congestion itself."1 Furthermore, such an expansion of the roadway would conflict with the project objectives for the Manhattan Beach project which include promoting pedestrian access: "promoting pedestrian friendly design…enhance spatial relationships that promote pedestrian access within the Shopping Center site…improve pedestrian access, mobility and ADA facilities on the project perimeter…provide new and enhanced landscaping in the Shopping Center and along borders of the site to improve and enhance the street appearance and revitalize the site frontage along Sepulveda Boulevard and Rosecrans Avenue." (Manhattan Village Shopping Center Enhancement Project Draft EIR, page II-9.)

The commentor also states, "Furthermore, LAWA has not supported its conclusion that the additional environmental impacts associated with this widening would render the measure infeasible because LAWA could mitigate those impacts." The commentor is essentially requesting that the programmatic EIR prepared for the SPAS alternatives provide site-specific construction level mitigation measures to mitigate the impacts associated with an infeasible mitigation measure. The commentor provides no specific suggested mitigation measures in their comment letter. As discussed in greater detail in Response to Comment SPAS-PC00130-235, the SPAS Draft EIR is prepared at a programmatic level. An EIR prepared for "program level" entitlements "need not be as detailed as an EIR on the specific construction projects that might follow." (State CEQA Guidelines Section 15146(b).) Construction level impacts in some instances, such as construction traffic (SPAS Draft EIR Section 4.12.2.6.3) were determined to be significant and unavoidable because "it cannot be concluded at this time that all construction-related traffic impacts would be reduced to a level that is less than significant." (SPAS Draft EIR, page 4-1282.) As also discussed in Section 4.12.2.6.3, "[t]he nine alternatives currently being considered for the SPAS project are only at a conceptual level of planning. No construction plans, programs, or schedules have been formulated for any of the alternatives. As such, it would be speculative to estimate construction-related vehicle trip generation and distribution onto the local roadway network in order to evaluate traffic impacts on specific streets and intersections during peak and non-peak traffic periods." State CEQA Guidelines Section 15126.4(a)(1)(D) states, "if mitigation measures would cause one or more significant effects in addition to those that would be cause by the project as proposed, the effects of the mitigation measure shall be discussed *but in less detail than the significant effects of the project as proposed*." (Emphasis added.)

1. California Natural Resources Agency, Final Statement of Reasons for Regulatory Action, Amendments to the State CEQA Guidelines Addressing Analysis and Mitigation of Greenhouse Gas Emissions Pursuant to SB97, December 2009, Available: http://ceres.ca.gov/ceqa/docs/Final_Statement_of_Reasons.pdf, accessed December 19, 2012.

SPAS-AL00004-21

Comment:

Intersection 55 - Sepulveda Boulevard and El Segundo Boulevard and Intersection 117 - Sepulveda Boulevard and Mariposa Ave

LAWA claims that the Project will not cause significant impacts at Intersections 55 and 117. Intersection 55 is currently operating at LOS C during the morning and midday periods and LOS E during the evening period. DEIR at 4-1220. Intersection 117 is currently operating at LOS C during the morning and evening periods. DEIR at 4-1222. In 2025, these intersections will be operating at LOS D and LOS F during certain periods, without the Project. DEIR 4-1262, 1263.

Given that Intersections 55 and 117 are already heavily impacted, it is difficult to see how the Project will not cause significant impacts at these intersections. Although LAWA's traffic model shows that the Project will not exceed El Segundo's thresholds of significance for these intersections, the Project will, in fact, significantly increase traffic impacts. Therefore, LAWA must treat the impacts on these intersections as significant and incorporate appropriate mitigation measures.

Response:

The comment cites the levels of service found in the SPAS Draft EIR for study intersections 55 and 117 under Baseline (2010) without Alternative conditions, Future (2025) without Alternative conditions, and Future (2010) with Alternative 1-2. The comment questions the SPAS Draft EIR analysis conclusion that implementation of the SPAS alternatives would not result in significant impacts to those intersections, indicating that such a conclusion is "difficult to see" given that the subject intersections are "already heavily impacted" and therefore "LAWA must treat the impacts on these intersections as significant and incorporate appropriate mitigation measures."

The accuracy of the data presented in the SPAS Draft EIR, including the characterization and quantification of baseline conditions at the intersections, is not disputed, nor is the application of the City's own impact significance criteria. While existing conditions are important issues, they are not impacts of any of the SPAS alternatives under CEQA. (See State CEQA Guidelines Sections 15125(a) and 15126.2(a); Watsonville Pilots Association v. City of Watsonville (2010) 183 Cal. App. 4th 1059 ["The FEIR was not required to resolve the [existing] overdraft problem, a feat that was far beyond its scope"].) The City of El Segundo applies its thresholds to determine the significance of a project's contribution to cumulative impacts.1 The incremental changes in V/C ratio that would occur under the various alternatives is therefore less than significant, when measured by the City's own threshold criteria.

1. The 2004 Plaza El Segundo Draft EIR Traffic analysis (Table IV.L-11 and IV.L-12) compares Cumulative Future With versus Without Project Traffic scenarios and notes that "a significant impact (increase of 0.02 or more at LOS E or F) prior to mitigation." Available at: http://www.elsegundo.org/civicax/filebank/blobdload.aspx?BlobID=2441; See also 540 E. Imperial Avenue Specific Plan Project Draft EIR (prepared by El Segundo in 2011) which applies the City's traffic thresholds to determine the significance of that project's contribution to cumulative impacts. As discussed in that document on page 4.5-26, "Under the Opening Year (2013) With Project, Option 1, all study intersections are forecasted to operate at acceptable LOS, with the exception of the intersection of Imperial Highway at Sepulveda Boulevard, which is forecasted to continue to operate at LOS F when analyzed with the ICU method, and LOS E when analyzed with the HCM method, consistent with Opening Year (2013) Without Project conditions. However, as shown in Table 4.5-7, the Option 1 project impact at this intersection would not be considered significant as it would not result in an increase in V/C greater than 0.020." (Available at: http://www.elsegundo.org/civicax/filebank/blobdload.aspx?BlobID=9174.)

SPAS-AL00004-22

Comment:

Construction Impacts

The DEIR chapter regarding traffic concludes that it would be speculative to estimate construction-related traffic impacts because no construction plans, programs, or schedules have been prepared for any alternatives. DEIR at 4-1281. The DEIR therefore discloses that construction-related traffic could, at times, result in significant and unavoidable traffic impacts. Id. at 4-1282. Because LAWA has deferred analysis of construction-related traffic impacts, it must study any such impacts in a project-level EIR when LAWA approves a specific project.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. As discussed in Section 2.3.1 of the SPAS Draft EIR, the SPAS Draft EIR is a programmatic document; thus, no design or engineering plans are currently available. Please see Responses to Comments SPAS-PC00130-142 and SPAS-PC00130-235 for a discussion of the appropriateness of the programmatic review conducted for the SPAS project. LAWA would prepare project-level CEQA documents before implementation of any of the specific projects identified in the SPAS alternatives.

SPAS-AL00004-23

Comment:

Furthermore, when LAWA does approve a specific project, we request that it locate construction staging areas away from El Segundo so as to minimize traffic and other impacts on El Segundo residents.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Section 2.3.1.12 of the SPAS Draft EIR describes the locations of potential construction staging areas. As the alternatives were formulated at a programmatic level, there are no planning, design, or construction plans for any of the alternatives. Nevertheless, the potential construction staging areas represent areas that are, or will be, generally vacant, are located outside of aircraft operations, and are generally suitable for the placement of construction trailers/offices, storage of construction materials, and staging of construction activities. (Section 2.3.1.12 of the SPAS Draft EIR.) All potential construction staging areas are considered to be equally available to all of the alternatives.

SPAS-AL00004-24

Comment:

Aircraft Noise and Land Use. The DEIR's discussion of aircraft noise, split between its Land Use and Aircraft Noise chapters, makes clear that the Project will have substantial impacts, regardless of which alternative is selected. As discussed above, the size and location of the affected areas and populations varies widely among the alternatives, but all of them will have serious impacts. Mitigation measures thus must be an essential part of LAWAs analysis and planning.

Response:

A discussion of project impacts resulting from aircraft noise under Alternatives 1 through 7 is provided in Sections 4.9.6 and 4.10.1.6 of the SPAS Draft EIR. As discussed in greater detail in Sections 4.9.8 and 4.10.1.8, the SPAS alternatives would result in some significant and unavoidable impacts associated with aircraft noise. LAX Master Plan commitments and mitigation measures that would address these

impacts are identified in Sections 4.9.7 and 4.10.8 of the SPAS Draft EIR, and include LAX Master Plan Mitigation Measures MM-LU-1, MM-LU-3, MM-LU-4, MM-N-4, and LAX Master Plan Commitment N-1.

SPAS-AL00004-25

Comment:

Inconsistent Significance Conclusions: El Segundo was disappointed to find that the DEIR does not present a clear view of the required mitigation. The document's brief consideration of noise mitigation understandably focuses on an existing measure, Master Plan MM-LU-1 (Implement Revised Aircraft Noise Mitigation), from the LAX Master Plan. This measure requires LAWA to continue to make improvements to its mandated Aircraft Noise Mitigation Program. The "ANMP" is a good starting point for mitigation of aircraft noise, as it includes the essential elements for reducing the effects of aircraft noise, including most importantly funding for residential sound insulation ("RSI") programs in El Segundo and other neighboring jurisdictions. The ANMP in its current form, however, is not sufficient, as the DEIR partially recognizes.

This recognition is only partial, however, thanks to a confusing inconsistency in the DEIR's analysis. The Aircraft Noise chapter concludes that the ANMP will "mitigate the significant noise impacts" related to residences and other facilities newly exposed to noise levels of 65 CNEL or higher. DEIR at 4-932. It does not state whether such mitigation would reduce the impact to a less-than-significant level, but implies that that it would do so. The Land Use chapter of the DEIR, however, reaches an inconsistent conclusion: Because RSI-based mitigation would take many years to implement, the ANMP "would reduce, but not eliminate, aircraft noise impacts on residential uses and non-residential facilities newly exposed to noise levels of 65 CNEL or higher." DEIR at 4-778. This implies, again without clearly concluding, that the impact would continue to be significant even after mitigation.

Response:

A discussion of LAX Master Plan Mitigation Measure MM-LU-1 is provided on pages 4-686 and 4-687 of the SPAS Draft EIR. As stated therein and incorporated as mitigation for the SPAS project, the ANMP would be expanded to include any noise-sensitive uses newly exposed to the 65 CNEL noise contour (under the selected SPAS alternative).

The commentor also suggests that the significance conclusion on page 4-932 of the SPAS Draft EIR is inconsistent with the conclusion on page 4-778 of the SPAS Draft EIR. Contrary to the suggestion in the comment, both of these sections reach the same significance conclusion.

As discussed on page 4-933 in Section 4.10.1.8 of the SPAS Draft EIR, "Because the land use mitigation measures would take several years to fully implement, it is possible that significant noise impacts would be experienced in the area after implementation of the selected SPAS alternative but before the mitigation measures are fully implemented. Thus, significant and unavoidable interim noise impacts would be experienced over an indeterminate period of time."

As stated on page 4-778 in Section 4.9.8 of the SPAS Draft EIR, "[C]ertain residential uses and non-residential noise-sensitive facilities affected by aircraft noise would still be exposed to high noise levels due to interim impacts prior to completion of noise insulation or land recycling… As such, residual aircraft noise impacts for Alternatives 1 through 7 are considered to be significant and unavoidable." In addition, Table 1-4 of the SPAS Draft EIR, which provides a summary of impacts by topic, identifies Land Use and Planning Impacts related to Aircraft Noise Exposure, as well as Aircraft Noise impacts, as significant and unavoidable for Alternatives 1 through 7.

SPAS-AL00004-26

Comment:

RSI Funding under the ANMP, the Settlement, and the Master Plan: As an initial matter, the DEIR should be revised to reconcile the inconsistency addressed above. The Land Use conclusion-that the ANMP is insufficient to fully mitigate the impacts of the various alternatives-is likely correct for a number of reasons. The ANMP achieves mitigation chiefly through funding RSI in the communities surrounding

the airport, including El Segundo. Each year, LAWA funding allows El Segundo and other jurisdictions to assist property owners in insulating their homes, thus reducing noise impacts. The program is incremental-many homes remain uninsulated; the Project will add to this overall backlog. The ANMP's effectiveness, and the pace of its progress, thus depends in large part on the amount of funding that LAWA provides each year. At present, as the Land Use discussion apparently acknowledges, the ANMP is effective, but may not be sufficient to mitigate the Project's impacts.

As LAWA is aware, the Stipulated Settlement strengthened the ANMP by providing much-needed predictability for RSI programs in El Segundo and other jurisdictions. The Settlement did this by: (1) describing LAWA's minimum annual funding commitments; and (2) eliminating LAWA's prior avigation easement requirement in favor of a more limited noise easement that is consistent with State law. These Stipulated Settlement provisions relating to RSI will expire in 2015 if they are not extended; the Project Project's impact will extend well past that date. In fact, it is unlikely that the Project will even be complete before the Settlement is set to expire. Extending the Settlement is thus a feasible mitigation measure (or, rather, a feasible improvement to an existing measure) that will help reduce the Project's impacts.3 We urge LAWA to commit now, via this DEIR, to moving forward on such an extension.

3 Please note that a stronger ANMP will improve the mitigation of all noise impacts, including single-event noise impacts, which the DEIR's analysis indicates are significant (e.g., 4-838-4-841), but which are not discussed in the conclusion section of the Aircraft Noise chapter (4-932-4-933).

Response:

Regarding the commentor's statement that there are inconsistencies between the Aircraft Noise section (Section 4.10.1 of the SPAS Draft EIR) and the Land Use section (Section 4.9 of the SPAS Draft EIR), refer to Response to Comment SPAS-AL00004-25 above.

The comment also states that "single-event noise impacts, which the DEIR's analysis indicates are significant (e.g., 4-838 - 4-841), are not discussed in the conclusion section of the Aircraft Noise chapter (4-932 - 4-933)." Two different analyses were included in the referenced pages (1) "Nighttime Awakenings" (Section 4.10.1.6.1.2.1) and (2) "Classroom Disruption" (Section 4.10.1.6.1.2). Impacts associated with Nighttime Awakenings were determined to be less than significant. Impacts associated with Classroom Disruption were determined to be significant under Alternative 1. The significant impacts associated with "Classroom Disruption" from Section 4.10.1.6.1.2 were summarized on page 4-932 in Table 4.10.1-60. The following discussion on SPAS Draft EIR page 4-933 notes that "LAX Master Plan Mitigation Measures MM-LU-3, Conduct Study of the relationship between Aircraft Noise Levels and the Ability of Children to Learn, and MM-LU-4, Provide Additional Sound Insulation for Schools Shown by MM-LU-3 to be Significantly Impacted by Aircraft Noise, would ultimately serve to mitigate adverse noise impacts on schools presented in Table 4.10.1-60." For clarification, revisions have been made to Section 4.9.5 of the SPAS Draft EIR to list LAX Master Plan MM-LU-3 and MM-LU-4 as applicable LAX Master Plan mitigation measures. Please see Chapter 5, Corrections and Additions Related to the SPAS Draft EIR.

The following paragraph on page 4-933 of the SPAS Draft EIR notes, however, that "because the land use mitigation measures would take several years to fully implement, it is possible that significant noise impacts would be experienced in the area after implementation of the selected SPAS alternative but before the mitigation measures are fully implemented. Thus, significant and unavoidable interim noise impacts would be experienced over an indeterminate period of time." This conclusion regarding interim impacts is also applicable to school facilities significantly impacted under the "Classroom Disruption" impact analysis. For clarification, revisions have been made to Section 4.10.1.8; please see Chapter 5, Corrections and Additions Related to the SPAS Draft EIR.

The comment also suggests that "the Stipulated Settlement strengthened the ANMP by providing much-needed predictability for RSI [Residential Sound Insulation] programs in El Segundo and other jurisdictions. The Settlement did this by: (1) describing LAWA's minimum annual funding commitments; and (2) eliminating LAWA's prior avigation easement requirement in favor of a more limited noise easement that is consistent with State law…Extending the Settlement is thus a feasible mitigation measure…" As discussed in Section 4.9.3.3 on page 4-664 of the Draft EIR, LAWA will continue to implement its ANMP, with the assistance of the affected jurisdictions, and shall update the entire ANMP

from time to time to ensure it reasonably represents the mitigation and funding programs that are in place, being implemented, or proposed for future implementation.

In addition, LAWA is committed to implementing the mitigation measures described in the SPAS Draft EIR, including the Aircraft Noise Mitigation Program, the LAX Master Plan Commitments and Mitigation Measures described in SPAS Draft EIR Sections 4.9.3.3 and 4.10.1.5. As recognized in the subsequent paragraph by the commenter, the ANMP described in SPAS Draft EIR Section 4.9.3.3, is being implemented pursuant to California Code of Regulations, Title 21, Subchapter 6, Section 5000 et seq. Other programs such as the LAX Master Plan Commitments and Mitigation Measures are being implemented consistent with the mitigation monitoring and reporting program (MMRP) adopted for the LAX Master Plan (see CEQA Guidelines Section 15097; see also Board Resolution No. 21481.) The Stipulated Settlement further notes that "This funding cap under this Settlement will not affect the ability of each jurisdiction to demonstrate its ability to effectively use additional ANMP funding. LAWA will consider each of these requests on a case-by-case basis through the existing ANMP process." (Stipulated Settlement, Section VI and Exhibit A.) The suggestion in the comment would therefore be repetitive of existing requirements and would not reduce or avoid a significant impact.

SPAS-AL00004-27

Comment:

Beyond the Stipulated Settlement, LAWA also has significant continuing obligations with respect to RSI in El Segundo under its adopted Master Plan and State law. Under State law, LAWA is required to work to sound insulate noise-impacted residences in El Segundo. See California Airport Noise Standards (California Code of Regulations, Title 21, Subchapter 6). Under its adopted Master Plan, LAWA also committed to:

- "[E]xpand and revise [its] existing Aircraft Noise Mitigation Program (ANMP) in coordination with affected neighboring jurisdictions [such as El Segundo], the State, and the FAA,"
-"[A]ccelerate the ANMP's timetable for achieving full compatibility of all land uses within the existing noise impact area,"
- "Continue[] implementation of successful programs to convert existing incompatible land uses to compatible land uses through sound insulation of structures,"
- "Increase[] annual funding by LAWA for land use mitigation,"
- Reevaluate "avigation easements requirements with sound insulation mitigation,"4 and
- Provide "additional technical assistance, where needed, to local jurisdictions to support more rapid and efficient implementation of their land use mitigation programs."

Master Plan MM-LU-1 (Implement Revised Aircraft Noise Mitigation).

In light of these commitments, El Segundo expects LAWA to maximize RSI grant funding and continue accepting/acquiring noise (not avigation) easements even if the Stipulated Settlement is allowed to expire. Making such commitments clear and binding in the present DEIR would strengthen the ANMP further and is another feasible mitigation that could reduce the Project's noise impacts. Specifically, LAWA should add mitigation measure commitments to: (1) "continue to accept/acquire noise (not avigation) easements," and (2) "Maximize RSI funding at levels equal to or greater than those contained in the Stipulated Settlement."

4 As LAWA's reports on MMRP implementation have indicated, "[a]vigation easements are no longer required for sound insulation." See LAX MMRP 2010 Annual Report at 18.

Response:

Please see Response to Comment SPAS-AL00004-26 concerning provisions related to residential grant funding and noise easements.

SPAS-AL00004-28

Comment:

We also noted with interest that LAWA's financial analysis for the SPAS includes a recognition that LAWA will have significant ongoing expenses related to RSI. See SPAS Report, Chapter 8, fns. 1 and 4 in Tables 8-1, which references "continued sound proofing" as a "LAX Base Development Project." We urge LAWA to include in the next version of this document additional detail regarding how much grant funding it expects to provide annually for RSI programs in El Segundo and elsewhere. This information is not only key to understanding the efficacy of mitigation, it is critically important in that it would let El Segundo know how much funding is available annually. This data, in turn, allows El Segundo to maximize the number of homes treated and do so efficiently, improving El Segundo's service to its residents and LAWA's mitigation of the Project's impacts.

Response:

The purpose of Chapter 8 of the Preliminary LAX SPAS Report is to provide estimated costs and an approximation of funding sources for the SPAS alternatives. LAX Base Development Projects, which include continued residential soundproofing, are included in the financial projection model in order to account for other major capital improvement programs that would be undertaken at LAX within the same general timeframe as SPAS. It is not the purpose of Chapter 8, nor a requirement of CEQA, to provide detailed information regarding funding associated with individual LAX Base Development Projects, such as continued soundproofing, to support planning related to the implementation of mitigation.

Similar arguments were also raised by the petitioners in Schenck v. County of Sonoma (2011) 198 Cal.App.4th 949 [Section V(A); Unpublished portion of the opinion]. As discussed in Schenck, "[a]lthough plaintiff's expert suggested that the LOS at the intersections in the area of the project would be adversely impacted, and funds were not available to improve the intersections, substantial evidence of effective mitigation measures was presented. Approval of the project was conditioned on payment by Mesa of traffic impact mitigation fees targeted for the County's Capital Improvement Plan for the airport industrial area. According to the conditions of approval, the final amount of the mitigation fees would be determined by the Sonoma County Department of Transportation and Public Works from an engineer‘s estimate. …The imposition of fees on Mesa to mitigate traffic impacts is not an unreasonably indefinite or nebulous mitigation measure… The County did not abuse its discretion by concluding that the payment of traffic impact fees constituted a reasonable mitigation program. The County identified specific plans for improvements designed to mitigate traffic impacts, and offered a commitment to allocating the mitigation fees to those projects. The precise timetables for the completion of the improvements were neither known nor delineated, but the County was not required to set forth with certainty the schedules for implementation of the identified roadway improvements."

The funding for the noise mitigation programs described in the SPAS Draft EIR is not nebulous, and will be implemented consistent with the existing requirements described in Response to Comment SPAS-AL00004-26.

SPAS-AL00004-29

Comment:

Construction-Related Aircraft Noise Impacts: We would also note a serious omission in the DEIR's analysis of aircraft noise impacts: it does not consider temporary changes in the airport's noise contours during construction of the northern airfield modifications. Any runway closures or other limitations on capacity will necessarily increase operations on the southern runway. This will shift the noise contours southward and significantly increase impacts on El Segundo. New homes will be exposed, and the currently-exposed population will face more intense noise. Similar noise shifts during the relatively recent modification to the southern airfield should give LAWA a useful guide to projecting this temporary, but potentially significant impact. Disclosing these temporary effects is not only essential under CEQA, but is also important to the process of selecting and planning the SPAS Project: any version of the Project (whether or not currently among the analyzed alternatives) that would minimize construction time should receive serious consideration.

Response:

Potential aircraft noise impacts resulting from temporary changes in the airport's noise contours during construction of the north airfield improvements would be determined and characterized primarily by the construction approach and construction phasing for those improvements. As indicated on page 2-57 of the SPAS Draft EIR, the nine SPAS alternatives were formulated at a conceptual level only and there are no specific planning, design, or engineering studies or construction plans for any of the alternatives. In conjunction with the preparation of more detailed design and engineering plans for airfield improvements, it is anticipated that several potential options for construction approaches and phasing will be explored, each having different ramifications relative to runway closures. For example, relocation of Runway 6L/24R 350 feet northward under Alternative 5 could involve constructing much or all of the new runway while the existing runway is kept operating, given the substantial distance between the existing and proposed runway. Following completion of the new runway, removal of the old runway and construction of the centerfield parallel taxiway might occur while the new runway is operating. To the extent that runway closures are needed, it is unknown whether closures would occur as a single continuous period or would occur incrementally, with each option having different implications relative to temporary changes in airport noise contours. The nature, timing, and duration of potential runway closures would need to take into consideration the time of year when such closures occur and the associated level of activity at LAX. To minimize the impacts on operations and passengers, any runway closures would need to be avoided around the busy summer months (July and August) and around the holiday season (from Thanksgiving through Christmas). LAWA and the FAA would need to carefully evaluate different runway closure options during such periods. For example, it is possible that some runway and taxiway improvements would be constructed during the nighttime hours, in which case runway closures would be relatively limited, and the number and nature of affected flights would also be limited, especially if the closure hours occur during over-ocean nighttime operations when both arriving flights and departing flights are primarily over the ocean. This type of detail regarding when and how the north runway improvements contemplated under the various SPAS alternative is not currently known, but can and would be more appropriately determined during more detailed levels of project planning and engineering and development of a suitable construction approach.

As discussed on page 4-3 of the SPAS Draft EIR, the SPAS Draft EIR is a program-level document prepared pursuant to the State CEQA Guidelines. State CEQA Guidelines Section 15168(a) states that a program EIR "may be prepared on a series of actions that can be characterized as one large project" and applies to projects that are related either geographically or as logical parts in the chain of contemplated actions. A program EIR is prepared at a more general level of planning than a project-level EIR and allows a lead agency to "consider broad policy alternatives and program-wide mitigation measures at an early time when the agency has greater flexibility to deal with basic problems or cumulative impacts" (State CEQA Guidelines Section 15168(b)(4)).

Program EIRs are commonly used in conjunction with the tiering process, which is "the coverage of general matters in broader EIRs (such as on general plans or policy statements) with subsequent narrower EIRs or ultimately site-specific EIRs…concentrating solely on the issues specific to the EIR subsequently prepared." (State CEQA Guidelines Section 15385.) Under CEQA's tiering principles, it is proper for a lead agency to focus a first-tier EIR on only the program's general impacts, "leaving project-level details to subsequent EIRs when specific projects are being considered." (State CEQA Guidelines Section 15152(c); In re Bay-Delta (2008) 43 Cal.4th 1143, 1174-1175.)

The aforementioned tiered approach of first providing program-level analysis of the overall proposal followed by a project-level analysis of specific components, pursuant to CEQA, is the same approach used for the LAX South Airfield Improvement Project (SAIP). The overall impacts of those improvements, along with the other improvements proposed under the LAX Master Plan were addressed at a program level in the LAX Master Plan Final EIR, and were then followed by a more detailed analysis, including construction impacts such as, but not limited to, temporary changes in airport noise contours, within a project-level EIR. The impacts analysis in the project-level EIR was based on the construction approach and phasing program formulated in light of detailed design, engineering, and construction plans specific to the SAIP, thereby providing a more accurate and meaningful analysis that what could have been otherwise speculated upon at the program level.

SPAS-AL00004-30

Comment:

Ground Run Up Enclosures: Finally, the previously approved LAX Master Plan commits LAWA to construct two ground run-up enclosures (GREs) to shield airport neighbors from the noise associated with engine run-ups during maintenance activities at LAX. See 2003 Master Plan Addendum at 2-95. Moreover, the 2010 Stipulated Variance approved by LAWA, El Segundo and others provides that LAWA will design two GREs by 2015.

The DEIR notes that LAWA may at some point construct a new GRE at the west end of LAX as part of a larger aircraft maintenance area. See DEIR at 5-17, 5-19, Figure 5-2. This is the only GRE we found mentioned in the SPAS document. To comply with its Master Plan and Variance commitments, LAWA should ensure it plans for a second GRE and proceed expeditiously with design of both GREs so they can be constructed and operated as soon as possible.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Please see Response to Comment SPAS-PC00130-132 for a discussion of the construction of future ground run-up enclosures at LAX and the requirements of the California Department of Transportation noise variance for LAX (i.e., the "2010 Stipulated Variance" referenced by the commentor).

SPAS-AL00004-31

Comment:

Conclusion: In sum, LAWA should move forward expeditiously to correct the deficiencies discussed in this letter, and should take no action to adopt any alternative until it has made such corrections. Once it has done so, El Segundo encourages LAWA to ultimately select SPAS Alternative 6 (100' North).

Response:

The commentor's preference for Alternative 6 is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Responses to Comments SPAS-AL00004-1 through SPAS-AL00004-30 above for responses to comments by the commentor, including responses alleging deficiencies in the SPAS Draft EIR.

SPAS-AL00005 Feger, Dan Burbank-Glendale-Pasadena Airport Authority 10/10/2012

SPAS-AL00005-1

Comment:

The Burbank-Glendale-Pasadena Airport Authority ("Authority") has reviewed the July 2012 Los Angeles International Airport ("LAX") Specific Plan Amendment Study ("SPAS") Draft Environmental Impact Report ("DEIR") released by Los Angeles World Airports ("LAWA"). The Authority's interest in the LAX SPAS primarily arises from the contemplated regionalization of air traffic. Specifically, the Authority is concerned about the proposed LAX Specific Plan amendment to require that, upon a forecast of more than 75 million annual passengers, LAWA shall conduct a domestic passenger survey/study and an airline survey/study with the goal of creating conditions that encourage passengers and airlines to utilize other airports in the region.

The Authority believes that the DEIR fails to comply with the requirements of the California Environmental Quality Act ("CEQA") and the State CEQA Guidelines. Accordingly, the Authority respectfully requests that LAWA suspend any further consideration of the LAX SPAS until a DEIR that fully discloses and analyzes the potential impacts of air traffic regionalization has been prepared and recirculated for public review and comment. The Authority objects to any further action by LAWA on the LAX SPAS until the necessary and proper environmental review has been completed.

The DEIR exceeds 1,800 pages, yet barely seven of them (pp. 6-5 to 6-11) are devoted to an analysis of the environmental impacts of LAWA's proposed air traffic regionalization. Moreover, those seven pages essentially defer meaningful assessment of every environmental impact category by repeatedly asserting that "it would be speculative at this point to estimate" how affected airports would be impacted. This cursory discussion violates CEQA, particularly Slate CEQA Guidelines Sections 15144 and 15145. The former provision mandates that a lead agency "must use its best efforts to find out and disclose all that it reasonably can." The latter requires a lead agency to conduct a "thorough investigation" prior to making a finding that an impact is "too speculative for evaluation" and terminating discussion of that impact.

Although LAWA may not know right now exactly how many passengers and airlines it will be able to shift to other airports in the region, LAWA certainly can make a good faith effort at evaluating whether those airports (at existing and planned capacity) and their surrounding environs (including existing and planned land uses and infrastructure) can accommodate any shifting without unmitigated environmental impacts. To comply with CEQA, the DEIR must be revised to address matters such as noise, traffic, and air quality impacts that inevitably will result if LAWA were to achieve its goal of redistributing passenger and airline activity in the region.

The Authority appreciates the opportunity to submit these comments and hopes that they will result in a productive dialog between our agencies, and will lead to an air traffic regionalization solution that benefits all airport operators without adversely affecting the regional environment.

Response:

As stated in Section 6.2 of the SPAS Draft EIR, any attempt at this time to estimate the nature, volume, and timing of shifting aviation activity from LAX to any one or combination of the other five major commercial airports in Southern California would itself be highly speculative. Therefore, forecasting the resultant environmental impacts at each affected airport would also be highly speculative.

Section 6.2 does disclose the types of environmental impacts that could occur at the affected airports, to the extent they are reasonably foreseeable. Less detail is required in an EIR's impact analysis when the impacts are outside the project area, indirect, and difficult to predict. (Napa Citizens for Honest Government vs. Board of Supervisors (2001) 91 Cal.App.4th 342, 369.) The approach taken in Section 6.2 of the SPAS Draft EIR is consistent with Section 15145 of the State CEQA Guidelines which provides that if "after thorough investigation, a lead agency finds that a particular impact is too speculative for evaluation, the agency should note its conclusion and terminate discussion of the impact." CEQA does not require a lead agency to foresee the unforeseeable. (State CEQA Guidelines Section 15144.)

The commentor suggests that the SPAS Draft EIR should have evaluated whether the other five airports (at existing and planned capacity) and their surrounding environs (including existing and planned land uses and infrastructure) can accommodate any shifting of aviation activity without unmitigated environmental impacts. However, this environmental setting information would be relevant only if it were feasible to forecast the nature, volume, and timing of shifting aviation activity from LAX to each airport so that impacts at each airport could then be assessed. In the absence of the ability to forecast such impacts, there is no reason to present environmental setting information for each of the five airports. An EIR's description of the environmental setting shall be no longer than is necessary to an understanding of the significant effects of the proposed project and its alternatives. (State CEQA Guidelines Section 15125(a).)

SPAS-AL00006 Calzada, Michael F City of Inglewood Residential Sound Insulation Department 10/10/2012

SPAS-AL00006-1

Comment:

Please accept this transmission of the RSI Department comments re: the LAX SPAS DEIR. This letter is to augment the submittal of BuchalterNemer submitted earlier today.

These comments are intended to augment the City of Inglewood's comments prepared on the City's behalf by the firm of BuchalterNemer regarding the LAX Specific Plan Amendment DEIR.

Response:

The comment is noted. Please see Responses to Comments SPAS-AL00006-2 through SPAS-AL00006-12 below. The comment letter prepared by BuchalterNemer that is referred to in this comment, which was prepared on behalf of the City of Inglewood, City of Culver City, City of Ontario, and County of San Bernardino, has been assigned letter number SPAS-AL00007; please see responses to comment letter SPAS-AL00007.

SPAS-AL00006-2

Comment:

The City of Inglewood as a neighboring community has been engaged in collaborative efforts with LAWA in mitigating noise impacts of LAX for over a generation.

From early legal wrangling to the creation of stakeholder discussions resulting in the adoption of Airport Noise Contour and Land Use Compatibility study findings in the 1970's to 1984, to the resolution of lawsuits in respect to the 2004 Master Plan, the City has constructively engaged a succession of administrations in defining and then dealing with the affects of aircraft noise at minimum.

The Stipulated Agreement which followed the Master Plan in 2006, in addition to the adopted Mitigation Monitoring and Reporting Program for the Master Plan's Specific Plan, has enabled a mutually beneficial framework from which results can be measured.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-AL00006-3

Comment:

It is with this historical framework in mind that these comments on the LAX Specific Plan Amendment (SPA) and Draft Environmental Impact Report (DEIR). Fundamentally it appears that the LAX proposed alternatives will accommodate an increase of operations while attempting to achieve efficiencies in operational safety and transportation systems. Increasing operations will have an ongoing adverse impact on the community of Inglewood.

Response:

LAWA is proceeding with the LAX SPAS process to identify LAX Specific Plan amendments that plan for the modernization and improvement of LAX in a manner that is designed for a practical capacity of 78.9 MAP while enhancing safety and security, and, among other things, minimizing environmental impacts on the surrounding communities (see Chapter 1 of the SPAS Draft EIR.) However, none of the

SPAS alternatives will increase passenger activity at LAX; such growth will occur with or without implementation of any of the SPAS alternatives, as stated on page 1-13 of the SPAS Draft EIR. The SPAS Draft EIR analysis of impacts in all environmental categories, including aircraft noise, as may be of particular interest to the commentor, account for the increase in airport operations that is projected to occur between the baseline year (2009) and the future horizon year (2025).

As provided in Section 1.2.1 of the SPAS Draft EIR, a SPAS project objective is to minimize environmental impacts on surrounding communities. LAWA seeks to identify and apply ways to avoid, reduce, or minimize environmental impacts on surrounding communities. Please see the various sections of the SPAS Draft EIR for discussions of potential environmental impacts as well as Table 1-6 for a listing of the applicable LAX Master Plan mitigation measures and SPAS-specific mitigation measures.

SPAS-AL00006-4

Comment:

The City of Inglewood continues to be concerned with the long term impacts to health due to noise (sleep interruption and deprivation, and interruptions to learning and educational study) and air quality from airfield operations, aircraft exhaust and increased traffic; impacts to the traffic circulation to and from the airport along with congestion within and through the community.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project.

An overview of the effects of noise on humans, including hearing loss, communication interference, sleep disturbance, physiological responses, and annoyance, is provided in Section 4.10.1.1.3 of the SPAS Draft EIR. In addition to potential effects related to hearing loss and annoyance, as described in Section 4.10.1.2.3, the aircraft noise analysis completed for the SPAS Draft EIR includes an evaluation of the effects of single event aircraft noise relative to the potential for increased aircraft activity (i.e., number of arriving or departing flights) occurring at night to result in increased nighttime awakenings (sleep disturbance), and relative to potential disruption of classrooms and the educational process from overflights of additional aircraft during school hours. The aircraft noise impacts, including single event noise impacts, associated with the SPAS alternatives are discussed in Section 4.10.1.6 of the SPAS Draft EIR. As indicated therein, none of the alternatives would result in a significant impact relative to sleep awakenings. Under Alternatives 1 through 7, significant impacts would occur with an additional school being newly exposed to the 55 dBA Lmax. Each alternative would also result in significant impacts due to sustained interruption of classroom teaching at newly exposed schools through interior noise levels in excess of 35 dBA Leq(h). Implementation of LAX Master Plan mitigation measures would ultimately reduce impacts to these schools to a level that is less than significant. However, interim impacts prior to completion of mitigation measures would remain significant and unavoidable.

It should be noted that, while it is true that those alternatives involving the relocation of Runway 6L/24R northward (i.e., Alternatives 1, 5, and 6) would result in increased aircraft noise impacts to areas immediately north and northeast of the airport, there would be an accompanying decrease in aircraft noise impacts to areas east, southeast, and south of the airport. As indicated in Sections 4.9, Land Use and Planning, and 4.10.1, Aircraft Noise, and summarized in Tables 1-16 and 1-17 of the SPAS Draft EIR, there would, in general, be fewer residential units exposed to 65 CNEL by moving Runway 6L/24R northward (Alternatives 1, 5, and 6) than would occur in moving 6R/24L southward (Alternatives 3 and 7) or not moving either runway (Alternatives 2 and 4), and the total residential population newly exposed to 65 CNEL would be lowest under Alternative 5 (i.e., relocate Runway 6L/24R 350 feet northward) than under any other alternative. Relative to a 1.5 CNEL increase above 65 CNEL, which includes areas currently exposed to >65 CNEL, the total residential units and residential population exposed to such an increase is consistently higher for alternatives that move Runway 6R/24L southward (Alternatives 3 and 7) or do not move the runways (Alternatives 2 and 4). These differences in the numbers of homes and people being exposed to aircraft noise impacts--specifically, that total overall aircraft noise impacts would be lower with alternatives that move Runway 6L/24R northward--are due to the fact that the land use/development intensities in areas to the east, southeast, and south are higher than in the areas

north of the airport. That is, although more homes to the north of the airport would be impacted by noise with a northward move of Runway 6L/24R, an even greater number of homes to the east, southeast, and south of the airport would no longer be impacted by noise, resulting in an overall decrease in the numbers of homes and people exposed to aircraft noise impacts.

Regarding air quality, as indicated in Section 4.2 of the SPAS Draft EIR, even after mitigation, construction activities would result in significant and unavoidable air quality impacts under all of the alternatives. Specifically, under all of the alternatives except for Alternative 4, construction emissions of carbon monoxide (CO), volatile organic compounds (VOC), oxides of nitrogen (NOx), particulate matter with an equivalent aerodynamic diameter of 10 micrometers (PM10), and particulate matter with an equivalent aerodynamic diameter of 2.5 micrometers (PM2.5) would be significant and unavoidable. Under Alternative 4, significant and unavoidable construction emissions would occur for NOx and PM10. Under all of the alternatives, even after mitigation, construction-related concentrations of nitrogen dioxide (NO2) and PM10 would be significant and unavoidable.

Operation of the airport would also result in significant and unavoidable impacts to air quality. Even after mitigation, operational emissions of sulfur dioxide (SO2), PM10, and PM2.5 would be significant and unavoidable under all of the alternatives. Operational concentrations of NO2, PM10, and PM2.5 would also be significant and unavoidable under all of the alternatives.

As indicated in Section 4.7.1 of the SPAS Draft EIR, incremental cancer risks and incremental chronic non-cancer health hazards within the study area under all the alternatives would be less than significant for all receptor types (i.e., child resident, school child, adult resident, adult worker). Additionally, under all the alternatives, health effects to on-airport workers would be less than significant. Incremental acute non-cancer health hazards at small areas at or near the LAX fence-line under all the alternatives would be slightly above the threshold of significance and are considered to be significant and unavoidable for all analyzed receptor types (i.e., residents, recreational users, school child, off-site adult workers). The primary toxic air contaminant of concern contributing to this impact is associated with emissions of acrolein from aircraft operations, which would occur in 2025 even in the absence of SPAS. It should be noted that, with the exception of Alternative 3, acute non-cancer health hazard impacts in 2025 would be lower under the SPAS alternatives than if no airfield improvements were implemented. Moreover, these significant impacts would occur at or near the fence-line; it is expected that actual impacts in the community would be less than significant.

Relative to off-airport traffic impacts, as addressed in Section 4.12.2 of the SPAS Draft EIR, the majority of the 200 intersections evaluated within the SPAS off-airport transportation study area would not be significantly impacted under Alternatives 1, 2, 3, 4, 8, and 9; however, significant impacts to some off-airport intersections and/or Congestion Management Plan (CMP) facilities would occur under each of these alternatives. The total number of significantly-impacted intersections and/or CMP facilities would vary slightly among those alternatives. Alternatives 5, 6, and 7 focus on airfield and terminal improvements that, in themselves, would not affect off-airport traffic, but would be coupled with the ground transportation improvements proposed under Alternatives 1, 2, 8, or 9, the impacts of which are summarized above.

SPAS-AL00006-5

Comment:

The SPAS proposed alternatives and in turn the proposed north airfield operations will alter the present noise contours.

Response:

A discussion of project impacts resulting from aircraft noise and alteration of the noise contours is provided in Sections 4.9.6 and 4.10.1.6 of the SPAS Draft EIR. As shown in Figures 4.9-7, 4.9-8, 4.9-9, 4.9-10, 4.9-11, 4.9-12, and 4.9-13, in Section 4.9.6 of the SPAS Draft EIR, alterations to the 65 CNEL noise contour under Alternatives 1 through 7 would result in some residential and non-residential noise-sensitive uses being newly exposed to noise levels of 65 CNEL or higher. As also shown in Figures 4.10.1-15, 4.10.1-18, 4.10.1-21, 4.10.1-24, 4.10.1-26, 4.10.1-29, and 4.10.1-32, some noise-sensitive uses would be exposed to increases of 1.5 CNEL or higher within the 65 CNEL or higher noise

contours. LAX Master Plan commitments and mitigation measures that would address these impacts are identified in Sections 4.9.7 and 4.10.1.8 of the SPAS Draft EIR, and include LAX Master Plan Mitigation Measures MM-LU-1, MM-LU-3, MM-LU-4, MM-N-4, and LAX Master Plan Commitment N-1. As concluded in Sections 4.9.7, 4.9.8, and 4.10.1.8 of the SPAS Draft EIR, interim impacts, prior to implementation of these LAX Master Plan Mitigation Measures, and LAX Master Plan Commitment N-1 would be significant and unavoidable. In addition, impacts on parks and certain residential uses with outside private habitable areas newly exposed to noise levels of 75 CNEL or higher would be significant and unavoidable.

SPAS-AL00006-6

Comment:

The introduction of multi-modal integration with regional transit, and a consolidated rental/parking area(s) will all have an impact on local circulation patterns.

Response:

The changes to the on-airport and off-airport transportation systems associated with changes in transit activity, the development of a CONRAC and relocated parking facilities are discussed in the transportation impacts analyses included in Section 4.12.1, On-Airport Transportation, and Section 4.12.2, Off-Airport Transportation, of the SPAS Draft EIR. Consolidation of the existing rental car operations dispersed around the airport into a single location will support the utilization of a single consolidated rental car shuttle system, thereby reducing the number of individual company shuttles currently traveling on local streets. The approved Metro Crenshaw/LAX Transit Line and Station will promote the use of transit to and from the airport, thereby reducing individual car trips. The proposed elevated/dedicated bus system (Alternatives 1, 2, and 8) and APM systems (Alternatives 3 and 9), which include a stop at the Metro facility noted above, will also help reduce vehicle trips on surface streets at and near the airport. The comment is noted and is hereby made part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091 (d); State CEQA Guidelines Section 15204 (a)).

SPAS-AL00006-7

Comment:

The following are comments concerning potential areas of impact and areas which require consideration in the preparation of the final DEIR.

1. Incorporated as reference are comments made November 29, 2010 concerning the preparation of the LAX Specific Plan Amendment DEIR.

Response:

The comment is noted. Please see Responses to Comments SPAS-AL00006-8 through SPAS-AL00006-12 below. The City of Inglewood submitted two comment letters dated November 29, 2010 in response to the 2010 NOP for the SPAS Draft EIR: one comment letter from the City of Inglewood's Residential Sound Insulation Department, and one comment letter prepared by Chevalier, Allen & Lichman LLP on behalf of the Cities of Inglewood and Culver City. Copies of both of these comment letters on the 2010 SPAS Draft EIR NOP are provided in the second part of Appendix A of the SPAS Draft EIR (see pages 14 through 30 and 33 through 37, respectively). The comments in both comment letters were considered and addressed in the SPAS Draft EIR and elaborated upon in responses to this comment letter (i.e., SPAS-AL00006) and SPAS-AL00007. In particular, a copy of the November 29, 2010 comment letter on the 2010 SPAS Draft EIR NOP from Chevalier, Allen & Lichman LLP on behalf of the Cities of Inglewood and Culver City is included as an attachment to, and is considered part of, comment letter SPAS-AL00007; please see Responses to Comments SPAS-AL00007-60 through SPAS-AL00007-75 which address each separate comment provided in the November 29, 2010 Chevalier, Allen & Lichman LLP comment letter.

SPAS-AL00006-8

Comment:

2. The data source for the Population and Population per Household for Table 4.9-2 and Table 4.9-4 at page 4-633 should be re-examined.

a. At Table 4.9-2 a total of 12,596 people are shown for living within both single-family and multi-family units. This averages to 2.76 persons per household. As the City of Inglewood has aged and become relatively younger, the family size has decreased nominally over ten years according to the 2010 Census. However, the basis for utilizing a factor less than 3.0 persons per household requires scrutiny.

Response:

The population and dwelling unit totals presented in Table 4.9-2, in Section 4.9.3.3 of the SPAS Draft EIR, were estimated based on GIS data for each parcel within the land use study area and 2010 U.S. Census data, rather than an average of 2.76 persons per household.

The parcel-based database provided by LAWA included a numerical value for the amount of dwelling units (i.e., dwelling unit value) within each residential parcel, which was derived from the Los Angeles County Assessor's GIS database. The majority of dwelling unit values per parcel range between 1 and 4, while some parcels containing high density residential uses range up to 444 dwelling units per parcel.

PCR Services Corporation, as part of their update to the LAWA database, then added the census tract number to the database that each parcel was located within, as well as the total population amount recorded for that census tract.

Subsequently, PCR calculated a population factor for each census tract by dividing the total population within a census tract by the sum of all dwelling units within all parcels within the same census tract (based on LAWA's dwelling unit value assigned to each residential parcel). This population factor is, therefore, applicable to all parcels within that census tract. Finally, each parcel's individual dwelling unit value was multiplied by that parcel's respective population factor in order to establish a population by parcel value.

Both the parcel-level dwelling unit value and the population by parcel value were the basis for all calculations pertaining to the existing (2009 baseline) population and dwelling unit values provided in Sections 4.9 and 4.10.1 of the SPAS Draft EIR.

SPAS-AL00006-9

Comment:

b. Examining Table 4.9-4 reveals a person per household factor of 2.59 for single-family and 2.80 for multi-family. As a result there are possibly greater than 5,000 more persons in Inglewood within the Study Area than are shown. Therefore Table 4.9-2 may under count the affected population as well.

Response:

The population and dwelling unit totals presented in Table 4.9-4, in Section 4.9.3.3 of the SPAS Draft EIR, were estimated based on GIS data for each parcel within the land use study area and 2010 U.S. Census data, rather than the average person per household factors suggested by the commentor. Please see Response to Comments SPAS-AL00006-8, regarding the methodology used to derive the population and dwelling units presented in Table 4.9-4.

SPAS-AL00006-10

Comment:

3. The discussion of the present status of the adopted Mitigation Monitoring and Reporting Program at page 4-686 states support of increased funding for and more expeditious implementation of noise mitigation measures. This would include funding for Land Use Mitigation and Noise Mitigation for residential uses. This is welcomed. In light of recent federal prerogatives, the standing of the State of California regulations and policies affecting airport operations must take precedence.

Response:

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-AL00006-11

Comment:

4. Within Appendix J1-1 Aircraft Performance, the methodology for noise measurements was described at 3.1.1.3, page 11.

i. Assumptions for relative humidity and temperature which affect the perception and tolerance of noise were detailed. These assumptions are considerations and factors affecting the modeling and noise sensitivity.

ii. In light of increasing climatic temperatures and growing fluctuations in climatic conditions in North America, what is the potential affect of a 2009 baseline when temperatures may increase on average or humidity decreases or increases significantly through 2025 and how might this affect the noise modeling? How significantly if at all will this affect the ensuing impact area?

Response:

The assumptions for relative humidity and temperature for evaluating aircraft noise impacts are described in Section 3.1.1.3 in Appendix J1-1 of the Draft EIR. Section 15130(b) of the State CEQA Guidelines recognizes that the discussion of cumulative impacts "need not provide as great detail as is provided for the effects attributable to the project alone." The SPAS Draft EIR addresses climate change in Section 4.6, which acknowledges that "global average temperature and mean sea level are expected to rise…" over the next 100 years (SPAS Draft EIR Section 4.6.1.1.) While the SPAS Draft EIR qualitatively acknowledges temperature increase at a state wide general level, it is speculative at this time to predict parcel specific temperature changes at the 2025 horizon year at specific enough level to incorporate into the quantitative cumulative aircraft noise analysis. Furthermore, potential temperature changes associated with climate changes are not expected to substantively affect the significance of the conclusions or analysis presented in the noise section (Section 4.10) of the SPAS Draft EIR.

This is the same issue which was raised in a CEQA Superior Court decision in which the petitioners alleged "that the EIR should have assessed how the environmental effects of the Project would change as the climate changes." The Court upheld the validity of the EIR and held that "an EIR should not be based on speculation, and in this case [respondent] concluded that the local effects of climate change are not sufficiently known to allow quantitative modeling or analysis…[Respondent] is not claiming that climate change is speculative, but instead it concluded that the particular effects on this locale and this Project are not sufficiently known to allow modeling and quantitative analysis." (County of Butte v. Department of Water Resources (2012) Case No. CV 09-1258 [Statement of Decision].) A similar issue was raised in 2009 by the City of Inglewood on the Bradley West Project Draft EIR, in which LAWA similarly explained that "To provide an analysis of potential climate change-related impacts associated with the eight topics listed by the commentor would be speculative at best." (Bradley West Project Final EIR, Response to Comment BWP-AL00003-8.)

SPAS-AL00006-12

Comment:

iii. If there are measurable or discernible affects, then how the Air Quality impacts might be interpreted as well?

Response:

As discussed in Response to Comment SPAS-AL00006-11, the potential effect of climate change on parcel specific temperature and relative humidity by 2025 would be highly speculative. In a recent study, six different global climate models were used to estimate future temperatures in California under two different future greenhouse gas emission scenarios.1 The results indicated that ambient temperature changes in Southern California might roughly range from 0 to 3.6 degrees F (0 to 2 degrees C), with an average of approximately 1.8 degrees F (1 degree C). Even assuming the worst case regional scenario, this level of change in ambient temperature would not substantively change the estimated air quality impacts presented in Section 4.2 of the SPAS Draft EIR.

1. Cayan, D., M. Tyree, D. Pierce, T. Das (Scripps Institute of Oceanography). 2012. Climate Change and Sea Level Rise Scenarios for California Vulnerability and Adaptation Assessment. California Energy Commission. Publication No.: CEC-500-2012-008.

SPAS-AL00007 Lichman, Barbara E Buchalter Nemer, A Professional Law Corporation (City of Inglewood, Culver City, Ontario, and County of San Bernardino) 10/10/2012

SPAS-AL00007-1

Comment:

The following are the comments of the City of Inglewood, City of Culver City, City of Ontario and County of San Bernardino (collectively "Cities/County") concerning the Draft Environmental Impact Report for the Los Angeles International Airport Specific Plan Amendment Study ("DEIR"). From a global perspective, Cities/County view the DEIR as just the latest illustration of the ancient adage - "The more things change, the more they stay the same," where the DEIR reflects the same analytic deficiencies as Cities brought to the attention of Los Angeles World Airports ("LAWA") in their comments on the environmental review of the Draft and Supplemental Draft Environmental Impact Report/Environmental Impact Statement, Los Angeles International Airport Proposed Master Plan and Master Plan Addendum in 2003 and comments on the Notice of Preparation of Draft Environmental Impact Report (SCH No. 1997061047) - Los Angeles International Airport Specific Plan Study on June 17, 2008 and Revised Notice of Preparation of Draft Environmental Impact Report (SCH No. 1997061047) -Los Angeles International Airport Specific Plan Study on November 29, 2010, which are attached to this letter as Exhibits 1, 2 and 3 respectively, and incorporated in it by reference.

Response:

The comment is noted. Please see Responses to Comments SPAS-AL00007-2 through SPAS-AL00007-36 below.

It should be noted that the SPAS Draft EIR is not tiered off of the LAX Master Plan EIS/EIR, although portions of the LAX Master Plan Final EIR are incorporated by reference (see page 1-105 in Section 1.7 of the SPAS Draft EIR). Please note that responses to "the Cities'/County's" previous comments on the LAX Master Plan EIS/EIR are provided in responses to comment letters AL00044 (City of Ontario); AL00007 (County of San Bernardino); AR00006, AL00009, AL00010, AL00011, AL00012, AL00018, and SAL00020 (City of Culver City); and AR00006, AL00017, AL00023, AL00039, AL00049, SAL00007, SAL00009, and SAL00016 (City of Inglewood) included in Part II of the LAX Master Plan Final EIR; as

well as FAL00001 (City of Inglewood, City of Culver City) included in FAA's Record of Decision on the LAX Master Plan. The previously submitted comments identified above, including SAL00016, a copy of which is attached as Exhibit 1 of this comment letter (i.e., SPAS-AL00007), regarding the LAX Master Plan EIR/EIS do not raise any new significant environmental issues or address the adequacy of the SPAS Draft EIR and no detailed responses will be provided here. (CEQA Section 21091 (d); State CEQA Guidelines, Section 15204 (a).)

It is acknowledged that copies of the City of Inglewood's and City of Culver City's comment letters on the 2008 and 2010 NOPs for the SPAS Draft EIR are attached as Exhibits 2 and 3 of this comment letter, respectively. Copies of these comment letters on the 2008 and 2010 SPAS Draft EIR NOPs are provided in the first part of Appendix A (pages 10 through 14) and the second part of Appendix A of the SPAS Draft EIR (see pages 14 through 30 and 33 through 37), respectively. The comments in both comment letters were considered and addressed in the SPAS Draft EIR and elaborated upon in responses to this comment letter and to comment letter SPAS-AL00006. In addition, please see Responses to Comments SPAS-AL00007-37 through SPAS-AL00007-59 and SPAS-AL00007-60 through SPAS-AL00007-75 which address each separate comment provided in the Cities' comment letters on the 2008 and 2010 NOPs for the SPAS Draft EIR, respectively.

SPAS-AL00007-2

Comment:

Specifically, the DEIR continues LAWA' s long tradition of:

(1) Failing to designate a "project," substituting instead an array of project components, leaving it up to the reviewer to aggregate and analyze the collective impacts of the various ground and air components, in defiance of the mandate of the California Environmental Quality Act, Cal. Pub. Res. Code § 21000 et seq., ("CEQA") for an "accurate, stable and finite description." See, e.g., Planning and Conservation League v. Castaic Lake Water Agency, 180 Cal.App.4th 210, 234 (2010);

Response:

The SPAS Draft EIR's approach to the project description and alternatives is consistent with CEQA's requirements. Please see Response to Comment SPAS-AL00007-6, which explains why the analysis of nine alternatives in the SPAS Draft EIR instead of a single proposed project was consistent with CEQA's requirements and facilitated public review of the alternatives.

SPAS-AL00007-3

Comment:

(2) Failing to designate a proper "No Project" Alternative where Alternative 3, the existing, approved Master Plan, still includes the "Yellow Light" projects that were required by a settlement of the case of City of El Segundo, et al. v. City of Los Angeles, et al., Riverside County Superior Court Case No. RIC426822 ("Settlement") to be replaced by other projects that serve the same purposes, and over which Settlement the Court still retains jurisdiction;

Response:

The Stipulated Settlement does not require the Yellow Light Projects to be replaced by other projects that serve the same purposes. Rather, as stated in Section V.C of the Stipulated Settlement, LAWA is required to "identify Specific Plan amendments that plan for the modernization and improvement of LAX in a manner that is designed for a practical capacity of 78.9 million annual passengers while enhancing safety and security, minimizing environmental impacts on the surrounding communities, and creating conditions that encourage airlines to go to other airports in the region, particularly those owned and operated by LAWA." LAWA is further required in Section V.D. to focus the LAX Specific Plan Amendment Study on, among other things, "Potential alternative designs, technologies, and configurations for the LAX Master Plan Program that would provide solutions to the problems that the Yellow Light Projects were designed to address, consistent with a practical capacity of LAX at 78.9 million annual passengers (the Alternative Projects)." However, nothing in the Stipulated Settlement

requires LAWA to adopt such Alternative Projects, any amendments to the LAX Specific Plan are subject to approval by the Los Angeles City Council, and, pursuant to Section V.H of the Stipulated Settlement, should the Los Angeles City Council approve an LAX Specific Plan amendment, LAWA would be required to seek review and approval of, at a minimum, changes to the LAX Airport Layout Plan, as well as FAA review of any proposed changes to the LAX Master Plan. In the absence of such approvals, the LAX Specific Plan would not be amended and the LAX Specific Plan would continue to exist in its present format.

The LAX Specific Plan currently reflects the approved LAX Master Plan (i.e., Alternative D (identified as Alternative 3 in the SPAS Draft EIR). As stated in Section 1.2 of the SPAS Draft EIR, the proposed project is the LAX Specific Plan Amendment Study. In the absence of an amendment to the LAX Specific Plan, the CEQA "No Project" Alternative would be implementation of the existing LAX Specific Plan (i.e., LAX Master Plan Alternative D, which is also SPAS Alternative 3). When a proposed project is the revision of a plan, the State CEQA Guidelines (Section 15126,6(e)(3)(A)) specifically provide that the no project alternative shall be the continuation of the existing plan into the future. Therefore, the SPAS Draft EIR properly designated the CEQA "No Project" Alternative.

Also, please see Responses to Comments SPAS-AL00007-7 and SPAS PC00130-749 regarding the CEQA "No Project" Alternative.

SPAS-AL00007-4

Comment:

(3) Disclaiming the manifest capacity enhancing impacts, both on and off-airport, of the project, including potential shifting of flight paths over the proximate communities of Inglewood and Culver City, despite FAA's definition of capacity as "throughput rate, i.e., the maximum number of operations that can take place in an hour," FAA Advisory Circular 150/5060-5, § 3, and despite the DEIR's long discussion of the way in which greater runway separation will facilitate greater efficiency, and, thus, "throughput" by, among other things, providing an airfield "consistent with FAA design standards for the largest aircraft types currently in service . . . for all weather conditions," and "[m]inimize modifications of standards, waivers, or operational restrictions, all of which reduce airfield efficiency and level of service." DEIR, § 1.2.1.1, p. 1-11; and

Response:

Appendix F-2 of the Preliminary LAX SPAS Report addresses peak hour throughput for Alternatives 1, 2, 3, and 4 in Tables 10, 12, 14 and 16, respectively.

As discussed and illustrated, beginning on page 1-18 in Section 1.2.2 of the SPAS Draft EIR, Alternative 4 represents the existing north airfield configuration with no improvements, except for RSA improvements that do not affect daily operations, while Alternatives 1, 2, and 3, represent materially different airfield improvement configurations for future conditions. Alternative 1 moves Runway 6L/24R northward, lengthens the runways, adds a centerfield parallel taxiway, and makes various taxiway improvements. Alternative 2 does not move any runways or add a centerfield parallel taxiway, but does lengthen Runway 6R/24L and provides various taxiway improvements. Alternative 3 moves Runway 6R/24L southward, lengthens the runways, adds a centerfield parallel taxiway, and makes various taxiway improvements.

As shown in Tables 10, 12, 14, and 16 beginning on page 63 of Appendix F-2 of the Preliminary LAX SPAS Report, the peak hour throughput of Alternatives 1, 2, and 3 is only one operation per hour higher than Alternative 4.

As discussed and illustrated, beginning on page 1-25 in Section 1.2.2 of the SPAS Draft EIR, the airfield improvements associated with Alternatives 5, 6, and 7 are generally comparable to those of Alternatives 1 and 3, with the main differences being the lateral movement of runways and such differences would not result in substantially different peak hour throughput changes than those of Alternatives 1 and 3 compared to Alternative 4. Therefore, these Alternatives do not have "manifest capacity enhancing impacts."

SPAS-AL00007-5

Comment:

(4) Failing to adequately analyze the project's air quality, greenhouse gas, noise, land use and planning, and surface transportation impacts.

Response:

The comment introduces more detailed comments that follow. Detailed responses have been prepared and are provided herein for those other comments. Relative to air quality and greenhouse gas, please see Responses to Comments SPAS-AL00007-9 through SPAS-AL00007-18. Relative to noise, please see Responses to Comments SPAS-AL00007-19 through SPAS-AL00007-23. Relative to land use and planning, please see Responses to Comments SPAS-AL00007-24 through SPAS-AL00007-30. Relative to surface transportation, please see Responses to Comments SPAS-AL00007-32 through SPAS-AL00007-35.

SPAS-AL00007-6

Comment:

I. THE DEIR DOES NOT COMPORT WITH CEQA'S MANDATE TO DESIGNATE AN ACCURATE, STABLE AND FINITE PROJECT DESCRIPTION

In a new twist on the same old theme, the DEIR fails to designate a project at all. Rather, it states that LAWA will choose a "project" at the conclusion of public comments and in the Final EIR ("FEIR"), see, e.g., § 1-26, 1.2.3 ["more detailed evaluation of that relationship [between each project objective and each SPAS alternative] will be completed in conjunction with further evaluation of the alternatives through preparation of the Final ER and during the public hearings process."].

In lieu of a "project," the DEIR provides an array of airfield and surface traffic choices from which the public can choose "one from Column A and two from Column B" and, thereby, purportedly, compute the environmental impacts of each. In taking this approach, the DEIR flies in the face of judicial authority which unanimously requires not only that a project include "the whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change . . ." CEQA Guidelines § 15378(a); Tuolumne County Citizens for Responsible Growth, Inc. v. City of Sonora, 155 Cal.App.4th 1214, 1222 (2007), but also that the scope of the environmental review conducted, even for the Initial Study, "must include the entire project. Specifically, 'all phases of project planning, implementation, and operation must be considered' as early as in the Initial Study of the project." CEQA Guidelines § 15063(a)(1); Tuolumne, supra, 155 Cal.App.4th at 1222. Therefore, whether a program or project ER is contemplated, by the time the DEIR stage is reached, a coherent whole must be presented to the public, not interchangeable parts in as yet indeterminate combination.

Here, in direct contravention of these unequivocal requirements, the DEIR presents nine options from which the public may choose. The options are not "alternatives" to one another in the standard sense, because only options 1 through 4 are complete projects, i.e., include both airfield components and off-airfield surface traffic components. Alternatives 5 through 7 omit any mention of associated surface traffic or its impacts. Conversely, options 8 through 9 evaluate only surface traffic, and omit any mention of airfield improvements. Apparently, this approach was chosen on the assumption that the impacts of various components are additive, e.g., the air quality and noise impacts of Alternative 5 can simply be added to those of Alternatives 8 or 9 as assumed in the EIR. Certain impacts, however, such as noise are evaluated logarithmically. That means the noise impacts from the surface traffic discussed in Alternatives 8 and 9 may be subsumed within the far greater noise impacts calculated from airfield operations when the two are added together, masking the true impacts of both.

Nor can the DEIR's approach be justified on the ground that the airfield and surface traffic options have "independent utility," see, e.g., Planning and Conservation League, supra, 180 Cal.App.4th at 237, and would occur with or without the project. It is clear from the DEIR that surface traffic improvements are critical to the stated purpose of the project as a whole, the replacement of the "Yellow Light" projects, as

defined in the Settlement, which includes both airfield and surface traffic projects. See, e.g., DEIR, Project Description, § 2.2, Objective No. 2, "Improve the Ground Access System at LAX to Better Accommodate Airport-Related Traffic, Especially as Related to the Central Terminal Area." [Emphasis added.]

In short, the DEIR fails to designate a "project" or preferred alternative at all. Rather, it confronts the public with four "projects" and five components of a single project, and asks it to evaluate several in combination, all with the same level of specificity, as any one or more may be chosen to be implemented. The same sort of obfuscation was summarily rejected by the court in Woodward Park Homeowners Association, Inc. v. City of Fresno, 150 Cal.App.4th 683, 711 (2007). In that case, the court rejected the use of a baseline predicated on a previously approved project, rather than the existing physical condition of the property, which would have required the public to research prior published documents to create a relevant comparison with project impacts. Its holding applies to the complex conglomeration of options at issue here including the synergistic impacts of each of those options with those projects of Alt. D, the current Master Plan, which are still being implemented. "The sum of the earlier identified impacts and those identified now would be the actual impacts of the present project. . . Even assuming this [addition] would have been possible, an agency cannot satisfy its CEQA obligations by imposing a burden of that kind on the public." Id. at 711.

Response:

The SPAS Draft EIR's approach to the project description and alternatives is consistent with CEQA's requirements and facilitated public review of the alternatives. The SPAS Draft EIR's "component approach" to the project description and "mix and match" approach to the alternatives were specifically upheld as complying with CEQA's requirements in California Oak Foundation v. Regents of the University of California (2010) 188 Cal.App.4th 227. In that case, the court upheld a project description for proposed UC Berkeley campus improvements consisting of four "integrated projects." (Id., at 269-275.) It also upheld a "mix and match approach" to the project alternatives, wherein the EIR stated that: "[r]ather than an 'all-or-nothing' situation, the consideration of alternatives allows for a 'mix-and-match' approach, in which components from different alternatives may be substituted for one another." (Id., at 275-277.)

The SPAS Draft EIR was prepared to specifically respond to the requirements outlined in Section 7.H of the LAX Specific Plan, as amended, as well as Section V of the Stipulated Settlement. These documents identify specific requirements that must be met by SPAS. Section 7.H of the LAX Specific Plan, as amended, requires LAWA to "initiate a complete LAX Specific Plan Amendment Study comprehensively addressing security, traffic, aviation activity, and corresponding environmental analysis consistent with CEQA" prior to seeking an LAX Plan Compliance determination for any one of the projects referred to as the Yellow Light Projects. Section V.C of the Stipulated Settlement requires LAWA to "prepare a proposed LAX Specific Plan Amendment Study and prepare all necessary environmental documents." Section V.D of the Stipulated Settlement further requires LAWA to focus SPAS on "potential alternative designs, technologies, and configurations for the LAX Master Plan Program that would provide solutions to the problems that the Yellow Light Projects were designed to address consistent with a practical capacity of LAX at 78.9 million annual passengers," and refers to these potential alternative designs, technologies, and configurations as the "Alternative Projects". Therefore, per the requirements of the LAX Specific Plan, as amended, and the provisions of the Stipulated Settlement, the project that LAWA is required to undertake is an LAX Specific Plan Amendment Study.

Moreover, the LAX SPAS is required to focus on "Alternative Projects," not a single proposed project. In fact, the analysis of multiple alternatives in the SPAS Draft EIR was consistent with the stated request of the petitioners during the scoping process for SPAS. The document titled "Petitioner's Overview of Guiding Principles for Environmental Analysis: LAX Specific Plan Amendment Study EIR," which was submitted to LAWA by the City of El Segundo, City of Inglewood, City of Culver City, County of Los Angeles, and ARSAC states: "All alternatives should be subject to a full and fair evaluation in the SPAS DEIR and LAWA should remain open to options that would avoid or mitigate impacts to its neighbors, taking care not to prematurely select a preferred alternative." All five of the petitioners included these Guiding Principles in their comments on the 2008 SPAS NOP and three of the petitioners, the City of Inglewood, City of Culver City, and ARSAC, included the Overview of Guiding

Principles as part of their comments on the SPAS Draft EIR (see Comments SPAS-AL00007-53 through SPAS-AL00007-59 and SPAS-PC00130-962 through SPAS-PC00130-968).

Although LAWA did not identify a single proposed project in the SPAS Draft EIR, LAWA complied with CEQA in the description and analysis of each alternative. CEQA does not require that a Draft EIR disclose a single proposed project or preferred alternative. When CEQA is silent on a topic, NEPA is often used to help interpret CEQA. (See, e.g., No Oil Inc. V City of Los Angeles (1974) 13 Cal.3d 68, 118.) NEPA regulations specifically provide that a lead agency may omit selection of a preferred alternative in a Draft EIS, but do require that the preferred alternative be disclosed in the Final EIS. (40 CFR Section 1502.14(e).) The SPAS Draft EIR identifies the "whole of an action" that would be associated with each alternative analyzed as well as the "direct physical change in the environment, or reasonably foreseeable indirect physical change" under each alternative. (State CEQA Guidelines Section 15378(a)). Section 2.3.1 of the SPAS Draft EIR provides a thorough description of each alternative, including details regarding the physical configuration, dimensions of airfield improvements, and square footages of new building area. Existing facilities that would require modification or relocation under each alternative are identified in Section 2.3.1.10, and land that would need to be acquired under each alternative is identified in Section 2.3.1.11. The function of each of the new ground access facilities is further detailed in Appendix E2-2 of the Preliminary LAX SPAS Report. Despite the fact that the SPAS Draft EIR does not identify a single preferred alternative, the project description provided in the SPAS Draft EIR for each alternative analyzed is accurate, stable, and finite.

The interchangeability among different project components is detailed on page 2-8 of the SPAS Draft EIR. Contrary to the statement by the commentor that only Alternatives 1 through 4 are complete projects, and that Alternatives 5 through 7 omit any mention of surface traffic or that Alternatives 8 and 9 omit any mention of airfield improvements, page 2-8 clearly states that Alternatives 5 through 9 "would only address all of the problems that the Yellow Light Projects were designed to address in conjunction with another alternative… or portion thereof." Moreover, the SPAS Draft EIR does not suggest that the airfield/terminal improvements or the ground access improvements have independent utility from one another, or that one set of improvements would be advanced in the absence of the other.

Contrary to the statements of the commentor, the public is not asked to "aggregate and analyze the collective impacts of the various ground and air components" (Comment SPAS-AL00007-2) or to evaluate any of the alternatives in combination (Comment SPAS-AL00007-6). Rather, the impacts of each alternative are evaluated in their entirety and presented specifically so that the decision-makers, public agencies, and members of the public are able to discern the impacts of the airfield and terminal components versus the impacts of the ground access components so that the impacts of these components in combination can be easily determined without placing an undue burden on decision-makers or the public to determine these impacts. Nor is the public required to research prior published documents to determine the impacts of the various alternatives evaluated in the SPAS Draft EIR. The Woodward Park Homeowners Association case is not relevant to the SPAS Draft EIR because it dealt with missing information in an EIR's description of baseline conditions. By contrast, all of the impacts of the SPAS alternatives are presented in the SPAS Draft EIR, including "synergistic" impacts, and summary tables are provided that compare the impacts among the alternatives, with specific explanations regarding impacts associated with the combination of airside/terminal and ground access components (see Tables 1-4 and 1-5 of the SPAS Draft EIR). All phases of the each alternative are evaluated in the SPAS Draft EIR, including construction and operation. In addition, the cumulative impacts of each alternative, in combination with other past, present, and reasonably foreseeable future projects, including continued implementation of the LAX Master Plan, are evaluated in Chapter 5 of the SPAS Draft EIR. The SPAS Draft EIR was prepared with a sufficient degree of analysis to provide the decision-makers with information which enables them to make a decision which intelligently takes account of environmental consequences. (State CEQA Guidelines Section 15151.)

The commentor is incorrect in stating that the inclusion of alternatives whose components are interchangeable precludes the ability to evaluate the "synergistic" impacts of the alternatives. For example, as described in Section 4.2.6 of the SPAS Draft EIR, in order to provide a complete evaluation of air quality impacts, "the emissions of those alternatives that focus solely on airfield and related terminal improvements (Alternatives 5, 6, and 7) were combined with the range of emissions that could occur under various ground improvements scenarios. Similarly, the emissions of those alternatives that focus solely on ground access improvements (i.e., Alternatives 8 and 9) were combined with the range

of emissions that could occur under various airfield/terminal improvements scenarios… In doing so, the total potential emissions associated with these focused alternatives can be better compared to the emissions associated with the "fully integrated" alternatives (i.e., Alternatives 1 through 4…)." Similarly, in order to fully account for the combined impacts of noise from various sources (i.e., aircraft, road traffic, construction traffic and equipment, and transit), Section 5.5.10.5 of the SPAS Draft EIR evaluated the combined noise impacts associated with each SPAS alternative.

Finally, subsequent to publication of the SPAS Draft EIR, LAWA staff recommended an alternative that couples the airfield and terminal improvements associated with Alternative 1 with the ground access components associated with Alternative 9. The environmental impacts and recommended mitigation measures associated with the LAWA Staff-Recommended Alternative are identified in Chapter 2 of this Final EIR. As indicated in that chapter, the environmental impacts and mitigation measures of the components that make up the LAWA Staff-Recommended Alternative were fully analyzed and disclosed in the SPAS Draft EIR. Given that the SPAS Draft EIR clearly explains the potential for interchangeability between the SPAS alternatives, and explains that the ground access improvements in Alternative 9 are compatible with the airfield and terminal improvements in Alternative 1, the LAWA Staff-Recommended Alternative is within the range of alternatives that the public could reasonably have anticipated LAWA's decision-makers to consider.

SPAS-AL00007-7

Comment:

II. THE DEIR INCORRECTLY RELIES ON ALTERNATIVE 3 AS THE "NO PROJECT" ALTERNATIVE WHERE IT INCLUDES IMPLEMENTATION OF THE "YELLOW LIGHT" PROJECTS THAT WERE ELIMINATED BY THE SETTLEMENT

The purpose of the "no project" alternative is to allow a comparison of the environmental impacts of approving the proposed project with the effects of maintaining the status quo. CEQA Guidelines § 15126.6(e)(1). When the project involves revisions of an existing plan, policy, or ongoing operation, the "projected impacts of the proposed plan or alternative plans would be compared to the impacts that would occur under the existing plan." CEQA Guidelines § 15126.6(e)(3)(A). See also, Woodward Park Homeowners, supra, 150 Cal.App.4th at 711. CEQA Guidelines § 15126.6(e)(3)(C) further provides that the lead agency "should proceed to analyze the impacts of the no project alternative by projecting what would reasonably be expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services." In addition, an EIR's analysis of the no project alternative must also include a discussion of conditions existing at the time the notice of preparation is published, or, in the alternative, upon commencement of the environmental analysis. CEQA Guidelines § 15126.6(e)(2).

In this case, Alternative 3 does seem to meet the basic definition, i.e., the situation on the ground including all previously approved projects. However, this is not a conventional case. Alternative 3 here includes "Yellow Light" projects which, according to the Settlement, are to be replaced with other projects which serve the same purpose. Therefore, Alternative 3 actually includes more components than are currently permitted or can be expected to be implemented.

In this unique situation, Alternative 4 would seem to be the appropriate "No Project" Alternative. That is because Alternative 4 represents the "project" with "Yellow Light" projects, i.e., those that cannot "reasonably be expected to occur in the foreseeable future if the project were not approved," CEQA Guidelines § 15126.6(e)(3)(C), eliminated.

It is also notable that Alternative 4 is used as the benchmark of analysis in the air quality analysis, Table 4.2-14, as the closest to the "no Yellow Light" condition. ["Of the nine alternatives, Alternative 4 has the least amount of improvements and most closely represents a future (2025) 'no Yellow Light Projects' scenario. . ."]. DEIR, p. 4-121. In summary, the existing Master Plan represented by Alternative 3 is not, in this peculiar case, the proper No Project Alternative against which to benchmark the impacts of the project.

Response:

Please see Responses to Comments SPAS-AL00007-3, SPAS PC00130-749, and SPAS-PC00130-873 regarding the CEQA "No Project" Alternative. As explained in Response to Comment SPAS-AL00007-3, the Stipulated Settlement does not require the Yellow Light Projects to be replaced by other projects that serve the same purposes. Therefore, Alternative 3 represents "what would reasonably be expected to occur in the foreseeable future if the project were not approved, based on current plans...." (State CEQA Guidelines Section 15126.6(e)(3)(C)).

As stated on page 2-22 in Section 2.3.1.4 of the SPAS Draft EIR, "Alternative 4 represents what would reasonably be expected to occur if all ongoing and reasonably foreseeable non-Yellow Light improvements identified in the LAX Master Plan (i.e., "Alternative D") were implemented, and none of the Yellow Light Projects or any of the identified alternatives to the LAX Master Plan Program were constructed or implemented. Analysis of Alternative 4 will allow decision-makers and the public to evaluate the impacts of simply eliminating the Yellow Light Projects from the LAX Master Plan Program." Alternative 4 is not an appropriate No Project alternative, however, because it does not include the Yellow Light Projects, which are included in the existing LAX Specific Plan and reasonably expected to occur in the absence of the project. Further, Alternative 4 is not an appropriate No Project alternative because its implementation would require formal adoption by BOAC and the Los Angeles City Council to amend the LAX Specific Plan, as outlined in Chapter 6 of the SPAS Draft EIR.

As discussed on page 4-121 in Section 4.2.6.3 of the SPAS Draft EIR, in the discussion of air quality impacts, in addition to comparing results to 2009 baseline conditions, comparisons were provided to Alternative 4 in order to identify changes in emissions that are primarily attributable to the specific characteristics of each alternative, while controlling for effects of emissions standards common to all alternatives. As noted by the commentor, and stated in the SPAS Draft EIR, of the nine alternatives, Alternative 4 has the least amount of improvements and most closely represents a future (2025) "no Yellow Light Projects" scenario, from which to measure the differences in emissions that would occur with implementation of the improvements associated with each other alternative. In addition, using Alternative 4 as one basis of comparison among alternatives better captures the differences in aircraft emissions that are directly attributable to the different airfield configurations currently being considered, whereas comparisons to 2009 baseline conditions include emissions associated with both the growth in aircraft activity anticipated to occur between 2009 and 2025, which is common to all alternatives, and the changes in aircraft emissions that are attributable to the proposed airfield configuration under each alternative. Notwithstanding the use of Alternative 4 to compare air quality impacts of the alternatives for informational purposes, the SPAS Draft EIR clearly identifies that existing conditions or, in the case of some disciplines, 2009 baseline conditions, are the baseline or benchmark against which project impacts are determined. (See pages 4-4 and 4-5 of the SPAS Draft EIR for a discussion of the baseline year analyzed in the SPAS Draft EIR. The baseline year that was evaluated for each environmental discipline is identified in the subsections of Chapter 4 of the SPAS Draft EIR.) The SPAS Draft EIR also clearly and appropriately identifies Alternative 3, not Alternative 4, as the No Project alternative, as explained above.

SPAS-AL00007-8

Comment:

III. THE DEIR IMPROPERLY DISCOUNTS THE CAPACITY ENHANCING POTENTIAL OF THE PROJECT

As was true with respect to the 2003 Master Plan EIR, the DEIR here strongly emphasizes the safety enhancing purposes of the project, and downplays its capacity enhancing potential. In fact, the DEIR emphasizes that a 30-40% increase in aircraft and passenger activity is projected to occur regardless of the project (i.e., would occur if none of the SPAS alternatives was implemented). DEIR, p. 1-47, § 1.4. Nevertheless, the proposed "safety" improvements, including increased runway separations and extension eastward for the north runways, the addition of centerline taxiways, and high speed runway exits, to accommodate departures of the New Large Aircraft ("NLA") and other aircraft that cannot currently access the North Airfield without delay, are inextricably linked to capacity, defined by FAA as "throughput rate, i.e., the maximum number of operations that can take place in an hour." FAA Advisory Circular 150/5060-5, § 3.

The DEIR itself does not disclaim this link to capacity enhancement. It makes clear that the further separation of the north runways is necessary to efficiently accommodate NLAs, and to allow for some larger aircraft currently using the South Complex to use the North Complex as well. See, e.g., DEIR, pp. 1-10, 2-2. Nevertheless, aircraft activity is held constant across all evaluated runway alternatives. In other words, the number of flights into and out of LAX is identical (2053 operations per peak day), as is the aircraft fleet mix through which those flights are conducted. By assuming constant aircraft activity in 2025 under all four runway "integrated" alternatives, the DEIR is implying that LAX can handle the forecasted aircraft demand - even that related to the new generation of NLA - regardless of whether any redesign of the northernmost runways is implemented. That is, the DEIR assumes that the same aircraft, in the same numbers, will fly into and out of LAX whether the runways are moved or left as is, whether or not more efficient runway exits are constructed, and whether or not taxiways are or are not reconfigured. The explicit assumption is that the potential improvements will enhance the safety of these aircraft operations. However, in this case the improvements made to enhance safety also enhance effective runway capacity. It is this additional capacity that should allow for differential levels of activity under the various alternatives.

However, and despite the DEIR's admission that the various airfield alternatives will have differential operational effects, depending on the type of aircraft, time of day and weather, the capacity enhancing impacts of these differential operational effects remain stubbornly unanalyzed because of "budget considerations."1 Neither the CEQA Guidelines nor the courts recognize such budget constraints on reasonable analyses, fundamental to a complete picture of project impacts. Until such analyses are conducted and their results reported, including an analysis of the differential operational characteristics of options 1 through 7, and their resulting capacity enhancing characteristics, including the potential for more divergent flight paths taking additional aircraft over proximate communities such as Culver City and Inglewood than currently exist, the DEIR will remain fatally defective.

1 See LAX Specific Plan Amendment Study Report, Appendix F-2, p. 1: "For the purposes of developing detailed airside design assumptions that could be utilized in modeling a reasonable range of airfield configuration options, and do so in an efficient and cost-effective manner taking into account contract scope and budget considerations, the simulation analysis focused on only Alternatives 1 through 4. Based on the detailed information developed for those alternatives, the SPAS Environmental Team was able to estimate performance assumptions and projections for Alternatives 5 through 7, as utilized in the aircraft noise and air quality analyses."

Response:

As required by the Stipulated Settlement, the formulation and evaluation of alternatives to the LAX Master Plan Yellow Light Projects are consistent with a practical capacity of 78.9 MAP. As described in Appendix F-1 of the Preliminary LAX SPAS Report, passenger activity levels at LAX are not expected to reach 78.9 MAP until 2024. The 78.9 MAP forecast reflects the fact that all of the SPAS alternatives include (i) no more than 153 gates and (ii) amendment of the LAX Specific Plan Section 7.H, requiring action to encourage further shifts in passenger and airline activity to other regional airports if the annual aviation activity analysis forecasts that the annual passengers for that year at LAX are anticipated to exceed 75 MAP, and, requiring a Specific Plan Amendment Study if the annual aviation activity analysis forecasts that LAX annual passengers for that year are anticipated to exceed 78.9 MAP. Both this physical gate limit and the proposed amendment to the LAX Specific Plan reflect the fact that the practical capacity of LAX is based on market assumptions, as well as the expected physical characteristics of the various functional elements of the airport and how they are planned and expected to work together, given how the market is likely to respond and use LAX. (See Preliminary LAX SPAS Report, Section 6.2.) Based on the Design Day Flight Schedule (DDFS), including aircraft fleet mix and aircraft gating, associated with that projection, detailed airfield simulation modeling (i.e., SIMMOD) was conducted for SPAS Alternatives 1 through 4, which is presented in Appendix F-2 of the Preliminary LAX SPAS Report. As indicated in Appendix F-2, the modeling demonstrated that there was not a substantial difference between the alternatives relative to average delay times and unimpeded taxi times. Additionally, relative to the commentor's indication that airfield capacity is represented by "throughput rate i.e., the maximum number of operations that can take place in an hour," the modeling demonstrated that the number of peak hour throughput operations is not materially different between SPAS Alternatives 1 through 4. The similarities between alternatives relative to peak hour throughput is

evident in comparing Tables 10, 12, 14, and 16 in Appendix F-2 for Alternatives 1, 2, 3, and 4, respectively.

Please note that upon review of Appendix F-2 of the Preliminary LAX SPAS Report, typographical errors were found in Table 14 on page 91 and Table 16 on page 107. Regarding Table 14 for Alternative 3, the Peak Operations Hour Volumes were underestimated. The corrected values for Alternative 3 Peak Operations are as follows:

2025 SPAS Alternative 3 Peak Operations

Configuration	Daily Total	Peak Throughput Hour
VFR Visual West Flow	2,053	135
VFR ILS West Flow	2,053	136
VFR ILS East Flow	2,053	133
IFR West Flow	2,053	125
Average All-Weather Throughput	2,053	135

This typographical error does not effect, invalidate, or undermine the results and conclusions of the SPAS Draft EIR SIMMOD simulation analyses or the public reviews of the SPAS Draft EIR, because the peak throughput hour values erroneously presented in the SPAS Draft EIR were only marginally different from the correct peak throughput hour values (presented above) with, at most, a difference of 4 operations (VFR ILS East Flow, 137 vs. 133). In addition, this typographical error does not have any effect on the conclusions presented in Section 4 of Appendix F-2 of the Preliminary LAX SPAS Report or on the average all weather delay and unimpeded taxi time values presented in Table 17 on page 108 of Appendix F-2 of the Preliminary LAX SPAS Report. As shown in the revised text, the average all-weather throughput number of operations is 135 compared to 133, as originally shown in Appendix F-2 of the Preliminary LAX SPAS Report. In response, page 91 of Appendix F-2 of the Preliminary LAX SPAS Report has been revised. Please see Chapter 4, of the Final LAX SPAS Report.

Regarding Table 16 for Alternative 4, as indicated near the top of the table, the number of daily operations projected for the year 2025 is 2,053; however, the Daily Totals listed for the VFR and IFR operations were inadvertently listed as "2,285" and the associated Peak Throughput Hour volumes were overestimated. The corrected values for Alternative 4 Peak Operations are as follows:

2025 SPAS Alternative 4 Peak Operations

Configuration	Daily Total	Peak Throughput Hour
VFR Visual West Flow	2,053	134
VFR ILS West Flow	2,053	133
VFR ILS East Flow	2,053	137
IFR West Flow	2,053	122
Average All-Weather Throughput	2,053	133

The above typographical error does not effect, invalidate, or undermine the results and conclusions of the SPAS Draft EIR SIMMOD simulation analyses, because the SPAS Draft EIR simulation analyses assumed 2,053 total daily operations, and not 2,285. All Alternative 4 simulation results presented in Sections 3.4 and 4 of Appendix F-2 of the Preliminary LAX SPAS Report are therefore correct. In response, page 107 of Appendix F-2 of the Preliminary LAX SPAS Report has been revised. Please see Chapter 4 of the Final LAX SPAS Report.

A comparison of the peak hour throughput values between the alternatives indicates that the range of airfield improvements associated with these alternatives, such as moving Runway 6L/24R 260 feet northward adding a centerfield taxiway, or moving Runway 6R/24L 340 feet south and adding a

centerfield taxiway, or not moving either runway and not adding a centerfield taxiway, does not substantially affect the peak hour operational capacity of the airfield based on the airport activity level projected for 2025 (i.e., 78.9 MAP). The similarities in the SIMMOD results for the various airfield configurations supports the assumption that the same aircraft fleet mix can be comparably accommodated under all the alternatives (i.e., there is not substantial variation in the SIMMOD results to suggest that certain airfield configurations would create substantial delays or operational problems for certain size and types of aircraft within the fleet mix).

The decision to complete SIMMOD modeling for Alternatives 1 through 4, but not for Alternatives 5 through 7, was made in light of the diverse range of airfield improvement configurations associated with Alternatives 1 through 4, which could yield substantially different airfield operation results, and the fact that the modeling results for Alternatives 5 through 7 would likely either fall within the range of, and/or be generally comparable to, the results for Alternatives 1 through 4. Specifically, Alternative 5 includes the relocation of Runway 6L/24R 350 feet northward and the addition of a centerfield taxiway, which would be generally comparable to Alternative 1, which proposes the relocation of Runway 6L/24R 260 feet northward and the addition of a centerfield taxiway - the main operational capability difference being that Alternative 5 could accommodate ADG VI aircraft during poor visibility conditions, which are relatively infrequent at LAX. Alternatives 6 and 7 include relocation of Runway 6L/24R northward by 100 feet or relocation of Runway 6R/24L southward by 100 feet, both with the addition of a centerfield taxiway. Both of these alternatives included runway and taxiway improvements that fall within the range of airfield improvements offered by Alternatives 1 and 3. Given these similarities, it was possible to draw reasonable conclusions about Alternatives 5, 6 and 7 based on the results of SIMMOD modeling for Alternatives 1 through 4. This analysis is consistent with CEQA, which requires that an "evaluation of the environmental effects of a proposed project need not be exhaustive," and "the sufficiency of an EIR is to be reviewed in light of what is reasonably feasible." (State CEQA Guidelines Section 15151.)

SPAS-AL00007-9

Comment:

IV. THE DEIR AIR QUALITY SECTION OMITS DATA AND ANALYSIS CRITICAL TO A DETERMINATION OF THE IMPACTS OF THE VARIOUS ALTERNATIVES

In another exercise in "déja vu all over again," the DEIR air quality analysis omits both the data and analysis necessary to fully and accurately disclose the air quality impacts of any of the potential alternatives.

Response:

All results from the air quality impact analysis necessary to allow the lead agency decision-makers and the public to see the differences between the alternatives with regard to air emissions and ambient concentrations, are provided in the SPAS Draft EIR. The methodology for the analysis is presented in Section 4.2.2, existing conditions are described in Section 4.2.3, thresholds of significance are listed in Section 4.2.4, the impacts from construction are presented in Section 4.2.6.1 and impacts from operations are presented in Section 4.2.6.2.

Table 4.2-10 summarizes peak daily construction emissions for each alternative and pollutant. Construction emissions for each of the project areas under each alternative are included in Appendix C, Attachment 1. Ambient concentrations associated with construction activity under each alternative are provided in Tables 4.2-11 and 4.2-12, and Appendix C, Attachment 1 provides the air pollutant concentrations at each receptor for each alternative around the airport in tabular format.

Incremental operational emissions relative to the existing conditions for each alternative under two different weather conditions (visual flight rule conditions and instrument flight rule conditions) are summarized in Table 4.2-13. Incremental operational emissions relative to Alternative 4 for the future alternatives under the same two weather conditions are summarized in Table 4.2-14. Total emissions for each alternative are included in Appendix C, Attachment 2.

The estimated concentrations of gas-phase pollutants (carbon monoxide, nitrogen dioxide, and sulfur dioxide) are presented in Table 4.2-15, and concentrations of particulate matter (PM10 and PM2.5) are

presented in Tables 4.2-16. Appendix C, Attachment 3 provides the ambient concentrations at each receptor for each pollutant under each alternative for each weather condition.

The emission calculation spreadsheets, as well as EDMS and AERMOD model input and output files on two CDs were provided to the SCAQMD on November 29, 2012.

The air quality impacts from each alternative originally developed have been fully disclosed in the SPAS Draft EIR. Since publication of the SPAS Draft EIR, the LAWA Staff-Recommended Alternative (SRA) was announced. The SRA combines the airside and terminal improvements from Alternative 1 with the ground access improvements from Alternative 9. Please see Chapter 2 of this Final EIR for evaluations of environmental impacts associated with the SRA.

Please see Responses to Comments SPAS-AL00007-10 through SPAS-AL00007-18 for additional information specific to the information and analysis the commentor believes has been omitted.

SPAS-AL00007-10

Comment:

A. The DEIR Presents Supporting Data Insufficient to Allow the Public to Verify the Accuracy of the DEIR's Analysis

As a threshold matter, the DEIR only reflects air quality modeling for options 1 through 4 (the integrated alternatives). For options 5 through 7, specific aircraft modeling (e.g., runway assignments, delay times, etc.) was not performed. Instead, results were apparently inferred from modeling data for Alternatives 1 through 4, again for "budget considerations." LAX Specific Plan Amendment Study Report, Appendix F-2, p. 1. Moreover, the "inferred" data are not presented in either the main body of the DEIR or the appendices, and, therefore, it is not possible to evaluate the purported "inferences," even if they had been documented with data. This is especially true for Alternative 5 which proposes to move Runway 24R 350 feet to the north, essentially requiring extrapolation of the data beyond the 260 foot northward movement of Runway 24R proposed in Alternative 1.

Response:

Please see Response to Comment SPAS-AL00007-8 for an explanation of the detailed airfield simulation modeling (i.e., SIMMOD) that was conducted for SPAS Alternatives 1 through 4 (as presented in Appendix F-2 of the Preliminary LAX SPAS Report) and why this modeling provided adequate information to make reasonable assumptions for Alternatives 5, 6, and 7.

The effect of weather conditions on taxi and delay time can be seen in the Average Delay and Unimpeded Taxi Time (Minutes per Operation) values shown in Tables 9 (Alternative 1) and 11 (Alternative 2) in Appendix F-2 (pages 61 and 71) of the Preliminary LAX SPAS Report. When the airport is operating under visual flight rules (VFR), the average delay and unimpeded taxi times for Alternative 1 are slightly greater than those for Alternative 2. The benefit of having access to the centerfield taxiway is overshadowed by the increased taxi time needed to get in from Runway 24R under Alternative 1 compared to Alternative 2 when the weather is good. However, under instrument flight rules (IFR), the average delay and unimpeded taxi time for Alternative 1 are slight less than those for Alternative 2. In the case of poor weather, the benefit of having access to the additional taxiway more than compensates for the increased taxi time to get into the terminal from the moved out runway.

The general effects of the changes in taxi and delay times can be seen in Table 4.2-13 of the SPAS Draft EIR (pages 4-122 through 4-125). Alternative 1 provides lower aircraft emissions under poor weather IFR conditions (these are the highest values in the emission ranges), while Alternative 2 provides lower aircraft emissions under good weather VFR conditions (these are the lowest values in the emission ranges). Note that the differences in aircraft emissions between Alternative 1 and Alternative 2 are the differences in taxi and ground delay emissions, since the other aircraft operating modes are essentially identical between Alternative 1 and Alternative 2.

The changes in taxi time, delay time, and associated emissions between Alternative 1 and Alternative 2 under VFR conditions were assumed to be linear. To save a step in the emissions calculations, the

taxi/delay emissions were directly adjusted for the distances to Runway 24R under Alternatives 5 and 6. Taxi time and emissions increased as Runway 24R is moved further north, thus the emissions for Alternatives 5 and 6 under VFR conditions were simply based on the ratios of the distances that Runway 24R is moved north relative to Alternative 1. In the case of Alternative 5, that ratio is 350 ft/260 ft; and for Alternative 6 the ratio is 100 ft/260 ft (SPAS Draft EIR, pages 1-5 and 1-6). It was also assumed that the changes in taxi time, delay time, and associated emissions between Alternatives 1 and 2 under IFR conditions was linear. The taxi/delay emissions for Alternatives 1 and 2 under IFR and VFR weather conditions were obtained from the EDMS aircraft emissions files.

Alternative 7 was addressed in a similar manner, except that the linear ratios were developed from the differences between Alternative 2 and Alternative 3, since both Alternative 3 and Alternative 7 move Runway 24L to the south. The average delay and unimpeded taxi times (minutes per operation) for Alternative 3 are found in Table 13 (page 89) in Appendix F-2 of the Preliminary LAX SPAS Report. The differences in aircraft emissions between Alternative 2 and Alternative 3 in Table 4.2-13 of the SPAS Draft EIR (pages 4-122 through 4-125) represent the differences in taxi/delay emissions between these two alternatives. Again, the high end of the emission range for aircraft represents IFR (poor) weather conditions, and the low end represents VFR Visual (good) weather conditions. The ratio to obtain Alternative 7 delay and taxi times was based on the distance that Runway 24L is moved south compared to the distance it is moved south for Alternative 3 (100 ft/340 ft, from the SPAS Draft EIR, pages 1-5 and 1-19). As noted above, the taxi/delay emissions for Alternatives 2 and 3 under IFR and VFR weather conditions were obtained from the EDMS aircraft emissions files.

The general effects of the changes in taxi and delay times can be seen in Table 4.2-13 of the SPAS Draft EIR (pages 4-122 through 4-125). Alternative 5 provides the lowest aircraft emissions under poor weather IFR conditions (these are the highest values in the emission ranges), while Alternative 2 provides the lowest aircraft emissions under good weather VFR conditions (these are the lowest values in the emission ranges).

SPAS-AL00007-11

Comment:

In addition, the data that is provided is inadequate to assess even the impacts of the "modeled" Alternatives 1 through 4. First, under the constant activity approach discussed in Section III above, the only variables that should affect airside emissions are taxi time and delay time. Aircraft approach, takeoff and climbout emissions should be identical across the evaluated alternatives, as should Ground Support Equipment ("GSE") and Auxiliary Power Unit ("APU") emissions. The DEIR, however, fails to present aircraft emissions by operating mode, making it impossible to confirm the expected consistency using presented data.

Specifically, the DEIR contains no comparative tables either listing or summarizing the way in which GSE and APU populations were estimated, the way in which those populations were assigned activity estimates, or the way emissions were calculated from the activity. Instead, there is the cursory discussion referencing:

(1) A purported survey of data on specific GSE types and their times in mode for servicing common aircraft types, although the discussion does not reveal how "common types" were chosen, why the analysis did not apply to all aircraft using GSE, and what times in mode are applicable to GSE;

(2) Use of the FAA's Emissions Dispersion Modeling System ("EDMS") to supplement site specific data, without complete disclosure of the "site specific" data supplemented and the analytic interaction between the site specific data and the EDMS assumptions;

(3) General use of emissions factors from the California Air Resources Board ("CARB") OFFROAD2007 Model and 2011 Inventory Model for In-Use Off-Road Equipment in the analysis of GSE emissions without revealing the way in which each was used and the specific emissions factors derived from either. This is in spite of the fact that the DEIR acknowledges that "future year inventories of alternative-fueled GSE were based on these evaluations and LAX environmental policies." DEIR, p. 4-92; and

(4) For APU emissions rates, use of emissions factors from EDMS without disclosing the way in which the assumption that all gates would be equipped with preconditioned air (making APU use less necessary) was reached, the numerical impacts of that assumption, or the data or analysis underlying the assumption. DEIR, p. 4-93.

Response:

Please see Response to Comment SPAS-AL00007-8 for a detailed response to the commentor's concerns regarding what it refers to as the "the constant activity approach." The commentor is correct in reaching a reasonable and logical conclusion that the only notable variables between the SPAS alternatives that affect airside emissions are taxi time and delay time, and that there are not material differences between the alternatives relative to aircraft approach, takeoff, and climbout emissions. The airspace similarities between alternatives are evident in the relevant data sets associated with the SPAS Draft EIR, including in Appendix J1-1 of the SPAS Draft EIR, which presents, in detail, the assumptions for average annual day operations, aircraft fleet mix, runway assignments, and specific flight track utilization percentages for arrivals and departures. This is not a flaw in the analysis. The information presented in Appendix J1-1 draws from the detailed airfield simulation modeling (SIMMOD) presented in Appendix F-2 of the Preliminary LAX SPAS Report, which was conducted for baseline (2009) conditions and for future (2025) conditions with various SPAS alternatives. As described in the methodology discussion for the air quality analysis in Section 4.2.2.2 of the SPAS Draft EIR, the estimates of aircraft emissions were based on the SIMMOD data. While the information provided within, and in conjunction with, the SPAS Draft EIR provides a reasonable basis for a reader and decision-makers to reach the conclusion that the most notable variables between alternatives that affect airfield emissions are taxi time and delay time, detailed input and output files from the FAA Emissions and Dispersion Modeling System (EDMS) runs completed for the SPAS alternatives are available, upon request, in electronic format and are also available for public review in hard-copy form at LAWA's Capital Programming and Planning Division, Room 208, One World Way, Los Angeles, California. Technical working files that delineate raw EDMS input/output data would be approximately 60,000 to 80,000 pages long if printed. Because of the sheer volume and the lack of added value they provide, the technical working files were not included within the SPAS Draft EIR air quality technical appendix. Instead, the summary EDMS output results for each alternative was included in the 400+ page Appendix C of the SPAS Draft EIR. The detailed input/output EDMS data were available upon request to LAWA (SPAS Contact Person: Diego Alvarez as indicated on SPAS public notices and SPAS website) during the 75-day public review period of the SPAS Draft EIR.

Regarding the commentor's discussion of GSE and APU emissions, the detailed emission inventories, by source types including GSE and APU categories, were included in Appendix C, Attachment 2 of the SPAS Draft EIR. Tables 1 through 8 of Attachment 2 provide the emissions for aircraft, GSE, APU for the Environmental Baseline and Alternatives 1 through 7 under instrument flight rule weather conditions. Tables 21 through 28 of Attachment 2 provide the emissions for aircraft, GSE, APU for the Environmental Baseline and Alternatives 1 through 7 under visual flight rule weather conditions. As noted in the comment, aircraft emissions during taxi and delay (idling) are the sources of differences in aircraft emissions between each alternative. Please see Response to Comment SPAS-AL00007-10 for a discussion of the differences in aircraft taxi and delay times by alternative. Please also see Response to Comment SPAS-PC00159-9 for a discussion of the prevalence of instrument versus visual flight rule weather conditions at the airport.

With regard to APU operational emissions, the EDMS default assignments of APU to aircraft, and associated emission rates, were used in the analysis. In addition, the EDMS default assumption of 26 minutes of APU operating time per landing and takeoff operation (LTO) was used in the analysis. This operating time assumption was applied to aircraft at all passenger gates and cargo ramps. No benefit from the use of preconditioned air and gate power was assumed in this analysis. See also, Response to Comment SPAS-AL00007-15 for a discussion of APU and greenhouse gas emissions.

With regard to GSE, the inventory of equipment collected in 2006 was used to determine the mix of equipment types and fuel types. The 2006 inventory included 3,047 pieces of equipment of which 27 percent was diesel, 32 percent was gasoline, 24 percent was electric, and 17 percent was natural gas or liquefied petroleum gas (LPG). The same ratio of diesel, gasoline, electric, and natural gas/LPG use

by equipment type was applied to the 2009 and 2025 inventories. The 2009 and 2025 GSE inventories have not taken credit for anticipated conversion of convention-fueled equipment to alternative fuels or electric power. The annual activities (operating hours per year) and emission factors for GSE in 2006 were obtained from the ARB OFFROAD2011 model for most equipment and pollutants. For any equipment or pollutant that was not included in OFFROAD2011, the OFFROAD2007 model was used instead. The annual activity of GSE was varied to account for the changes in total operations between 2006, 2009 and forecasted 2025. Since 2009 operations were lower than 2006, the GSE total annual activity in 2009 is also lower than in 2006. The 2025 GSE activity is much higher than either 2006 or 2009. The OFFROAD emission factors for calendar year 2009 were used in the 2009 baseline calculations, and the OFFROAD emission factors for calendar year 2025 were used in each of the 2025 alternative calculations.

SPAS-AL00007-12

Comment:

Finally, the aircraft emissions data that is presented in the DEIR reveals a fundamental inconsistency between Alternatives 3, Master Plan Alternative D, and Alternative 4, the "No Project" Alternative for air quality purposes (see, e.g., Table 4.2-14). Presented data for Alternative 4 indicates 27.72 minutes per landing/takeoff cycle ("LTO"), and for Alternative 3, Alt. D, 29.56 minutes, i.e., more aircraft emissions for the same total traffic. The 2003 Master Plan EIR, however, reached precisely the opposite conclusion with the taxi and delay times for the "No Action" Alternative exceeding that of Alt. D by 3%, and Alt. D exhibiting airside emissions generally 5% lower than those of the "No Action" Alternative.2

2 The total taxi and delay times for Alternative D (in the 2003 Master Plan EIR (then the Preferred Alternative)) was 31 minutes per LTO cycle, compared to 29.6 minutes per LTO cycle in the current DEIR.

Response:

The attempt to compare Alternative 4 in the SPAS Draft EIR with the No Action Alternative from the LAX Master Plan EIR is inappropriate. These two scenarios are not the same, and the airport simulation modeling assumptions used in the current analysis was updated relative to the modeling conducted for the LAX Master Plan EIR 10 years ago.

The No Action Alternative under the LAX Master Plan EIR represented the physical layout and facilities at the airport as it existed in 1996, with estimated operational levels for 2015. Alternative 4 under the SPAS Draft EIR starts with the physical layout and facilities at the airport as it existed in 2009; therefore, it is not the same as the No Action Alternative in the LAX Master Plan Final EIR. By 2009, several non-yellow light projects had been completed, most notably the South Airfield Improvement Project (SAIP) and the Crossfield Taxiway Project (CFTP). The SAIP included the construction of a center taxiway between the south airfield runways (Runway 25L and Runway 25R). This improvement alone would be expected to change taxi and delay times since an aircraft that just landed could move back towards the gates along the new taxiway while waiting for an inboard aircraft to depart, and thus would not have to sit at the end of the runway waiting for the departing aircraft to pass. Alternative 4 in 2025 would also include airport improvements that are currently underway, including the Bradley West Project. Thus, it is not surprising that Alternative 4 has slightly better average taxi and delay times as Alternative 3. The airport simulation modeling conducted for the SPAS Draft EIR was expected to be different than the modeling completed for the LAX Master Plan EIR 10 years ago.

SPAS-AL00007-13

Comment:

B. Reverse Thrust Emissions are Omitted from the Air Quality Analysis

Just as in the 2003 Master Plan EIR, and as addressed in Inglewood's comments on that document attached, emissions associated with reverse thrust operations are not considered in the current DEIR. The bottom line then, as now, is that reverse thrust operations are common at LAX under all alternatives (see, e.g., DEIR, p. 4-829), and there is an accepted procedure for estimating them. They

are, moreover, a high thrust, high nitrogen oxide ("NOx") mode of operation. Thus, even though short in duration (normally 15 to 20 seconds per arrival), a high amount of NOx is produced, all of which is emitted at ground level. The absence of any analysis of reverse thrust, therefore, casts doubt on the aggregate analysis of NOx emissions from all project alternatives.

Response:

The current version of EDMS, EDMS v.5.1.3, was used to model aircraft emissions in the following six operational modes: engine startup, taxi out, takeoff, climb out, approach, and taxi in. As stated in the EDMS User's Manual (FAA 2010):

"EDMS models aircraft activity with 6 modes of operation corresponding to the following portions of a Landing-Takeoff (LTO) cycle. These modes of operation only apply to the aircraft main engines; APU emissions are calculated and presented separately.

1. Approach: The airborne segment of an aircraft's arrival extending from the start of the flight profile (or the mixing height, whichever is lower) to touchdown on the runway.

2. Taxi In: The landing ground roll segment (from touchdown to the runway exit) of an arriving aircraft, INCLUDING REVERSE THRUST [emphasis added], and the taxiing from the runway exit to a gate.

3. Startup: Aircraft main engine startup occurs at the gate. This methodology is only applied to aircraft with ICAO certified engines. All other aircraft will not have startup emissions. Aircraft main engine startup produces only THC, VOC, NMHC, and TOG emissions. A detailed speciated organic gases profile does not exist for main engine startup emissions.

4. Taxi Out: The taxiing from the gate to a runway end.

5. Takeoff: The portion from the start of the ground roll on the runway, through wheels off, and the airborne portion of the ascent up to cutback during which the aircraft operates at maximum thrust.

6. Climb Out: The portion from engine cutback to the end of the flight profile (or the mixing height, whichever is lower)."

Therefore, reverse thrust emissions have been included in the calculation of aircraft emissions for all alternatives.

SPAS-AL00007-14

Comment:

C. The DEIR Omits Critical Engine Assignments

The DEIR contains no information regarding the specific engine types used in the modeling of aircraft operations.3 As a result, it is impossible to evaluate whether the selection methodology and resulting emissions estimates are accurate. This omission is important because aircraft engines available and employed by different airlines for a given airframe can differ dramatically in their emissions profiles. Thus, the selection of specific engine types can have a significant bearing on the overall air quality impacts of any alternative that affects aircraft operations. As with the issue of reverse thrust emissions, aircraft engine selection was addressed in detail in Inglewood's comments on the 2003 Master Plan EIR. At minimum, the DEIR should provide a list of the engine assignments utilized in the air quality modeling so that the potential significance of the engine differentials can be determined. The omission of that data renders the DEIR air quality analysis deficient.

3 See also comments on noise analysis which suffers from the same omission.

Response:

The data were not omitted from the analysis; full information and data were presented. The engine types used in the air quality impact analysis are directly tied to the aircraft fleet mixes. The detailed

aircraft fleet mixes used in the air quality analysis are the same as those used in the noise analysis, and are presented in Table 3 (2009 Baseline fleet mix) and Table 8 (2025 fleet mix) in Appendix J1-1 of the SPAS Draft EIR. Each fleet mix is also summarized in Table 8 (2009) and Table 12 (2025) in Appendix F-1 of the Preliminary LAX SPAS Report. The EDMS model used to calculate aircraft emissions provides default engine selections for most of the aircraft types, and these defaults were used in the air quality impact analysis.

Please see Response to Comment SPAS-AL00007-11 regarding the availability of detailed input and output files from the FAA Emissions and Dispersion Modeling System (EDMS) runs completed for the SPAS alternatives.

Please refer to Response to Comment SPAS-AL00007-13 regarding reverse thrust emissions.

SPAS-AL00007-15

Comment:

D. The DEIR Lacks Any Evaluation of the Project's Greenhouse Gas Impacts

Greenhouse gas ("GHG") emissions from APU are not estimated in the DEIR, on the premise that "[a]lthough operations of APUs are expected to contribute to GHG emissions, EDMS does not estimate CO2 emissions or fuel consumption; therefore, APUs are not included in the emissions inventory," DEIR, p. 4-390. It is true that EDMS does not provide such capability, but that does not lead to the conclusion that GHG emissions cannot be estimated. While no formal model may be available, there are brake specific fuel consumption data available for APU engines. These data, combined with APU design and operational characteristics, and the carbon content of jet fuel, can be used to generate CO2 emissions estimates for APU engines. Methane and nitrous oxide emissions may be less certain, but "typical" emissions factors for similarly operating engines can be applied without inordinate error (as methane and nitrous oxide emissions constitute only a few percent of total GHG emissions for typical mobile sources). In reality, the use of zero as a "default" emission rate for GHGs (an assumption implicit in cases where non-zero emissions are not estimated) reflects an analytic error that is grossly more significant than the error that might be associated with an imprecise, but non-zero, GHG emission estimation methodology.

The failure to analyze GHG emissions is legally insupportable as well. In Communities for a Better Environment v. City of Richmond, 184 Cal.App.4 70 (2010), the court found the City of Richmond's initial failure to conduct any GHG analysis on a proposed refinery, as well as its ultimate failure, once analysis was conducted, to prescribe mitigation measures, rendered the EIR defective. Id. at 93.

Response:

The commentor is incorrect in stating that "The DEIR Lacks Any Evaluation of the Project's Greenhouse Gas Impacts." Section 4.6 and Appendix F of the SPAS Draft EIR provide over 100 pages of information and analysis related to greenhouse gas (GHG) emissions associated with the SPAS alternatives. As evidenced by, and summarized in, Tables 4.6-5 and 4.6-6 of the SPAS Draft EIR, the analysis includes GHG emissions estimates for the construction and operation of each of the nine SPAS alternatives. Potential sources of GHG emissions addressed in the analysis include construction equipment, aircraft engines, aircraft ground support equipment, motor vehicles in parking areas and on roadways, electricity consumption (i.e., GHG emissions associated with the generation of electricity), solid waste disposal, and indoor/outdoor water usage (i.e., GHG emissions associated with the energy required to pump water). As acknowledged by the commentor, the emissions dispersion modeling system (EDMS), which is the industry-accepted standard, estimating emissions associated with aircraft operations, does not have the capability of estimating GHG emissions from aircraft auxiliary power units (APUs), and, for that matter, nor do other industry-accepted emission estimates models commonly used for EIRs, such as the California Emissions Estimate Model (CalEEMod) developed by air districts (including the South Coast Air Quality Management District) and the California Air Resources Board. In the absence of industry- and air resources agency-recognized models and methods for estimating GHG emissions from APU operations, the SPAS Draft EIR did not include such estimates for the SPAS alternatives. An additional consideration for why the SPAS Draft EIR did not speculate on the GHG emissions associated with APU operations is that the emissions would be essentially the same for all of

the SPAS alternatives. This is because all of the SPAS alternatives would have the same aircraft fleet mix and the same number of aircraft gates where the APUs would operate (i.e., APUs are typically used for temporary power and cabin cooling while an aircraft is at a gate and the main engines are turned off and ground power/cooling are not connected to the aircraft).

Notwithstanding the above, the commentor describes one possible means of estimating GHG emissions from APU operation, which LAWA's air quality experts have carefully reviewed and offer the following comparable means of developing an estimate:

GHG emissions were estimated from operation of APUs when an aircraft is on the ground with its engines shutdown. APUs burn Jet A fuel and create exhaust emissions like the engines that power flight. The Federal Aviation Administration's (FAA's) EDMS does not estimate GHG emissions from APUs, nor does it estimate fuel usage from APUs. As a result, it was necessary to estimate GHG emissions separately from EDMS.

EDMS assigns APUs to specific airframes; therefore, it was possible to decipher the types of APUs used by aircraft at the airport. A 1995 report entitled Technical Data to Support FAA's Advisory Circular on Reducing Emissions from Commercial Aviation1 contains fuel flow data that was used to translate an APU's minutes of operation per landing/takeoff operation (LTO) into fuel consumption data. Professional judgment was used to assign APUs from the 1995 report when there was not an exact match with the type of APU assigned in EDMS. Although the 1995 report was never finalized by the FAA and would therefore only contain draft fuel flow values, these values were used because APU fuel consumption data is otherwise not readily available.

Total annual fuel consumption was ultimately calculated from each aircraft's annual LTOs, the surrogate APU's fuel flow (pounds per hour), and the APU operating time per LTO. A density of 6.74 pounds per gallon was assumed, which is the average density from the ASTM International Standard for Jet A (Specification D1655-04a).2 The density was used to convert the fuel flow data from pounds to gallons.

Emissions were estimated for carbon dioxide (CO2), methane (CH4), and nitrous oxide (N2O). Emission factors for Jet A were obtained from The Climate Registry's 2012 Climate Registry Default Emission Factors.3 Global warming potentials from The Climate Registry's General Reporting Protocol4 were used to convert mass emissions of each GHG to carbon dioxide equivalent (CO2e) emissions.

Emissions were estimated for both baseline (existing) conditions and for future alternatives. Because the annual LTOs do not change between future alternatives, it was only necessary to estimate emissions for one future alternative. The following table summarizes GHG emissions from the APUs.

Table 1

LAX Auxiliary Power Unit GHG Emissions Inventory

	Emissions (CO2e, metric tons)			
Year	CO_2	CH_4	N_2O	Total[1]
2009	43,922	26	433	44,380
2025	59,915	35	591	60,540

Notes:

CH_4 = methane
CO_2 = carbon dioxide
CO_2e = carbon dioxide equivalent
N_2O = nitrous oxide

[1] Totals may not add due to rounding.

Source: CDM Smith, 2012.

With the addition of the APU emissions of GHG to the overall inventory of GHG estimates for baseline conditions and each of the SPAS alternatives, which is presented in Table 4.6-6 of the SPAS Draft EIR, the significance conclusions of the GHG impacts analysis would not change. The resultant change in impacts with the addition of APU emissions, measured in terms of the percent reduction in GHG emissions compared to baseline conditions, would be less than one-half percent for all of the alternatives compared to the percentages presented in the SPAS Draft EIR. This would not result in a new significant impact or a substantial increase in the severity of an impact for GHGs.

The subject table, as revised to include the APU emissions, has been revised. Please see Chapter 5, Corrections and Additions Related to the SPAS Draft EIR.

1. U.S. Environmental Protection Agency and U.S. Department of Transportation, Federal Aviation Administration, Technical Data to Support FAA's Advisory Circular on Reducing Emissions from Commercial Aviation, prepared by Energy and Environmental Analysis, Inc., September 29, 1995, Available: http://www.epa.gov/otaq/regs/nonroad/aviation/faa-ac.pdf, accessed December 17, 2012.
2. ExxonMobil Aviation, World Jet Fuel Specifications with Avgas Supplement, 2005, Available: http://www.exxonmobil.com/AviationGlobal/Files/WorldJetFuelSpecifications2005.pdf, accessed December 17, 2012.
3. The Climate Registry, 2012 Climate Registry Default Emission Factors, Released: January 6, 2012, Available http://www.theclimateregistry.org/downloads/2012/01/2012-Climate-Registry-Default-Emissions-Factors.pdf, accessed December 17, 2012.
4. The Climate Registry, General Reporting Protocol, Version 1.1, Appendix B: Global Warming Potentials, Available: http://www.theclimateregistry.org/downloads/GRP.pdf, accessed December 17, 2012.

SPAS-AL00007-16

Comment:

E. The DEIR Omits from its Evaluation of Construction Emissions the Realignment of Lincoln Boulevard

While the DEIR addresses construction impacts at some length, it appears to omit a significant component of those impacts, the reconstruction, including undergrounding, of portions of Lincoln Boulevard. Options 1, 5 and 6, which include relocation of Runway 6L/24R to the north, include, of necessity, the relocation of 6,080 feet of Lincoln Boulevard, and, to varying degrees, its depression into a tunnel.4

Nevertheless, and despite the substantial construction activity required to realign, and tunnel to accommodate, a major thoroughfare, the DEIR entirely omits to study, or report on, the construction related impacts of the reconstruction of more than a mile of proximate roadway. See, e.g., DEIR, p. 4-88.5 The remainder of the DEIR's discussion of construction emissions suffers from the same deficiencies. See also, DEIR, pp. 4-112 and 4-118 re: emissions for Alternative 5, which alternative involves in the most radical realignment of Lincoln Boulevard.

4 "Alternative" 1 requires 250 linear feet of tunnel; "Alternative" 5, 765 feet; and "Alternative" 6, 540 feet.
5 "Construction activities were assumed to be located on the north airfield and at the north terminals, in the Central Terminal Area (CTA), at Manchester Square, in the current Parking Lot C, at the proposed Intermodal Transportation Facility (ITF) site just south of Lot C, on the east side of Aviation Boulevard south of Century Boulevard, on the Automated People Mover (APM) routes along Century Boulevard and 98th Street, and on the west side where batch plant operations permitted by the SCAQMD and USEPA and project support activities could occur."

Response:

The construction emissions associated with the realignment of Lincoln Boulevard were included in the construction emissions estimates for Alternatives 1, 5, and 6 in Section 4.2.6.1 of the SPAS Draft EIR. As noted in Section 4.2.2.1, detailed construction schedules and phasing programs were not available

at the time SPAS Draft EIR was developed due to the conceptual nature of the alternatives. Therefore, the emissions were estimated, first, by updating the detailed construction emissions for Alternative 3 from the detailed air quality impacts analysis conducted for Alternative D in the LAX Master Plan Final EIR, taking into account the type of construction activity evaluated (i.e., airfield improvements, demolition, terminal construction, road work, etc.). The current costs for various construction activities to complete Alternative 3 were then estimated. Finally, the ratio of costs to complete the given alternative to the cost for Alternative 3 was used as the factor that was multiplied by the Alternative 3 emissions to estimate the construction emissions for the given alternative.

The total construction rough order of magnitude (ROM) cost estimates for the alternatives are summarized in the Preliminary LAX SPAS Report, Section 8, Table 8-1. The Lincoln Boulevard realignment costs are included under the "Airfield Improvements" line item for Alternatives 1, 5, and 6, since it will be those airfield improvements that require the roadway realignment. Detailed costs for the Lincoln Boulevard realignment under Alternatives 1, 5 and 6 are presented in the Preliminary LAX SPAS Report, Appendix G, Table AF-3. The construction emissions for airfield improvements are summarized in Section 4.2.6.1, Table 4.2-10, of the SPAS Draft EIR. The various construction activity emissions are broken out for each alternative in Appendix C, Attachment 1, Table 1 of the SPAS Draft EIR. To conclude, the Lincoln Boulevard realignment construction emissions were included in the air quality construction emission inventories for Alternatives 1, 5, and 6. Lincoln Boulevard would not require realignment under the other SPAS alternatives. As noted in the comment, Alternative 5 would require a greater amount of construction activity than Alternatives 1 and 6, as it would have comparatively a longer depressed ("tunnel") segment, even though the physical alignment of the re-routed roadway would be the same for all three subject alternatives. Based on the comparatively greater amount of construction cost (i.e., construction activity) for Alternative 5, its construction emissions for "Airfield/Terminal Construction" in Table 4.2-10 are the highest of any alternative.

SPAS-AL00007-17

Comment:

F. The DEIR Lacks Any Data or Analysis of Sulfur Dioxide Emissions

Finally, emissions of sulfur dioxide ("SO2") do not appear to have been estimated for GSE, motor vehicles, or stationary sources, based on the omission of any SO2 data from the "detailed" operational emissions tables included in DEIR Appendix C (see, e.g., Table 21, Operational Concentrations). SO2 emissions are exclusively a function of the sulfur content of fuel, which is relatively easily assessed, leaving no stated reason for their omission, but a gaping hole in the analysis.

Response:

Sulfur dioxide (SO2) emissions from aircraft and auxiliary power units (APUs) are summarized in Section 4.2.6.2 of the SPAS Draft EIR for all alternatives. These are the only two airport-related source types with SO2 emissions above 1 pound per day. Emissions of SO2 from all other airport sources are negligible since the fuel sulfur contents of mobile vehicle fuels (diesel and gasoline) are extremely low due to regulations that control the sulfur content of on-road and off-road fuels. The major fuel used in continuously operated stationary sources at the airport is natural gas, which also has very low fuel sulfur contents. Diesel fuel sulfur content has been limited to a maximum of 15 parts per million by weight (ppmw) since 2006. Prior to the requirement for this ultra-low sulfur diesel fuel, diesel fuel had a limit of 500 ppmw, and SO2 emissions from diesel trucks and equipment represented a substantial contributor to the region's SO2 emission inventory. Aside from aircraft, the only other sources in the South Coast Air Basin today with substantial SO2 emissions are ocean going vessels.

Note that the aircraft and APU daily emissions for all alternatives do exceed the operational significance threshold for SO2 set by the South Coast Air Quality Management District, as shown in Table 4.2-13 in Section 4.2.6.2 of the SPAS Draft EIR. Therefore, SO2 operational emission impacts were listed as significant and unavoidable in Table 1-7 of the SPAS Draft EIR.

SPAS-AL00007-18

Comment:

In summary, budget constraints are not a sufficient excuse for depriving the public of the requisite air quality analysis and complete disclosure under CEQA. Moreover, this project will eventually require FAA funding. In order to obtain it, the project must comply with the conformity requirements of 42 U.S.C. § 7506(c), and its implementing regulation, 40 C.F.R. 93.150, et seq. Compliance will require that the project not exceed the emissions thresholds set forth in that section. It is Cities/County' s position that LAWA will be unable to establish the requisite conformity absent the filling of the data void specified here. And any reliance on a previous finding of conformity, based on the 2003 Master Plan EIR and associated conformity analysis, is seriously misplaced. That analysis never established conformity methodologically, but relied on an "exemption" provided by Southern California Air Quality Management District ("SCAQMD"), which was not delegated the duty of granting such an "exemption" under the then existing statutory regime. Thus, Cities/County strongly recommend the DEIR be revised to provide a thorough disclosure of the various options' air quality impacts, in order to satisfy both Federal and State unequivocal mandates.

Response:

Please see Response to Comment SPAS-AL00007-8 for an explanation of the detailed airfield simulation modeling (i.e., SIMMOD) that was conducted for SPAS Alternatives 1 through 4 (as presented in Appendix F-2 of the Preliminary LAX SPAS Report) and why this modeling provided adequate information to make reasonable assumptions for Alternative 5, 6, and 7. Please refer to Responses to Comments SPAS-AL00007-9 through SPAS-AL00007-17 regarding data used in the air quality impact analysis, and its availability. The SPAS Draft EIR provides reasonable and appropriate information for, and analysis of, all nine alternatives, as presented in sufficient detail in Section 4.2 and Appendix C, to allow the lead agency to assess the differences between the alternatives and to determine the significant impacts associated with each alternative relative to air quality.

Regarding the comment on the conformity requirements of 42 U.S.C. Section 7506(c), approval of any of the SPAS alternatives would require further review by FAA, which would entail compliance with all applicable federal laws, including the National Environmental Policy Act and the conformity requirements under the federal Clean Air Act. The analysis of air quality in the SPAS Draft EIR complies with CEQA analysis and does not preclude a future conformity finding by the FAA.

SPAS-AL00007-19

Comment:

V. THE DEIR FAILS TO ADEQUATELY DISCLOSE THE PROJECT'S NOISE IMPACTS

The DEIR is dramatically deficient in its purported analysis of the noise impacts of the various alternatives. Notably, none of the noise contours depicted in the DEIR include the 1992 contour employed by LAWA for sound insulation purposes in Inglewood, see DEIR, p. 4-665.

Response:

Section 4.10 of the SPAS Draft EIR discusses in great details the SPAS Draft EIR noise analyses, including aircraft noise (Section 4.10.1), road traffic noise (Section 4.10.2), construction traffic and equipment noise (Section 4.10.3) and transit noise and vibration (Section 4.10.4).

Specifically, Section 4.10.1 of the SPAS Draft EIR presents the methodology, assumptions, and results of the SPAS Draft EIR aircraft noise analyses. Contrary to the commentor's suggestion, the aircraft noise impacts were fully analyzed. See Section 4.10.1.6, beginning on page 4-828, for a detailed analysis of aircraft noise impacts under each alternative.

As discussed on page 4-828, the aircraft noise impact analysis evaluated the aircraft noise levels associated with the completion of each SPAS alternative by 2025 to the aircraft noise levels associated

with the 2009 baseline conditions. The analysis of each alternative, starting with Alternative 1 in Section 4.10.1.6.1 on page 4-829, included the following: a narrative of the noise exposure patterns associated with the alternative; a comparison of the alternative aircraft noise contours with the 2009 baseline noise contours; results in terms of areas, total dwelling units, estimated population and non-residential noise-sensitive facilities; a list of significant noise impacts of the alternative compared with the baseline 2009 conditions and the 2025 "No Additional Improvements" conditions. In addition, an analysis of single event aircraft noise exposure including the analysis of nighttime awakenings and classroom disruption was undertaken for each alternative.

The comment also states that "Notably, none of the noise contours depicted in the DEIR include the 1992 contour employed by LAWA for sound insulation purposes in Inglewood…" The commentor does not explain why this information is relevant to the CEQA analysis. Section 4.9.3.3 on page 4-665 of the SPAS Draft EIR notes that all incompatible land uses within the 1992 fourth quarter 65 CNEL noise contour or within 65 CNEL areas extending beyond the 1992 contour based on the most recent quarterly report, are eligible for participation in the ANMP." As discussed in Section 4.9.3.3 on page 4-664 of the SPAS Draft EIR, LAWA will continue to implement its ANMP, with the assistance of the affected jurisdictions, and shall update the entire ANMP from time to time to ensure it reasonably represents the mitigation and funding programs that are in place, being implemented, or proposed for future implementation. The commentors have been provided with the 1992 contour on prior occasions. For example, the 1992 65 CNEL contour was provided in the LAX Master Plan EIS/EIR which the commentors previously reviewed and commented upon. The information is available in Section 4.2 of that document, See Figure F4.2-31, available online at: http://www.ourlax.org/docs/final_eir/part1/08_0402_LandUse.pdf.

SPAS-AL00007-20

Comment:

Perhaps most notably, the noise analysis does not appear to have been based on the Integrated Noise Model ("INM"), the model required for use by FAA. FAR Part 150, Appendix A, § A150.103(a); FAA Order 1050.1E, § 14.2b. Instead, the flight tracks depicted in the EIR and used in the noise analysis appear to be radar tracks, wholly independent of the INM protocol.

Response:

Contrary to the assertions in the comment, the SPAS Draft EIR noise analysis was based upon the Federal Aviation Administration's Integrated Noise Model (INM) version 7b, as discussed on page 4-797 of the SPAS Draft EIR. The INM input include runway coordinates, flight tracks, fleet mix, activity levels, runway and flight track use, average local temperatures, time of day, and departure trip length data.

Flight tracks are defined to represent the typical corridors used by aircraft approaching and departing the runways at an airport. The term "flight corridor" is used to represent a generalized route defined by a group of aircraft flight tracks that share similar direction. When using the INM, these flight tracks are specified to represent the actual flight patterns associated with an airport. INM generalized flight tracks are designed to represent the center of a specific flight corridor (the backbone), and dispersed tracks (sub-tracks or side-tracks) linked to the center track, accounting for the dispersion of aircraft approach and departure paths around the center track. While the comment suggests that the Draft EIR "lacks critical fundamental data concerning types of aircraft…," this information was included in the SPAS Draft EIR. The location and the utilization of the aircraft flight tracks modeled in the INM model were created based on the actual radar tracks for the arriving and departing aircraft at LAX. The INM flight track location and utilization by aircraft category is described in Section 3.1.1.2 in Appendix J1-1 of the Draft EIR.

SPAS-AL00007-21

Comment:

Moreover, the noise analysis lacks critical fundamental data concerning types of aircraft, numbers of each type of aircraft projected, the number of operations anticipated for each aircraft type, and the source of the data in the DEIR database. Instead, the DEIR substitutes percentages without revealing

the source or calculation of those percentages. Given the differential noise signatures of the various aircraft, the absence of such critical raw data alone renders the noise analysis entirely inadequate.

Response:

Please see Response to Comment SPAS-AL00007-20 regarding the data and methodology used for the aircraft noise analyses.

SPAS-AL00007-22

Comment:

Finally, the DEIR fails to explain why "Alternative" 5, with the greatest runway displacement of 350 feet, results in the least population exposed to the 65 CNEL contour, and the third least exposed to an increase of 1.5 decibels within the 65 CNEL contour, DEIR, p. 4-738, § 4.9.6.5, despite the fact that the "Alternative" 5 noise contour contains the second highest population newly exposed to the 75 decibel noise contour, DEIR, p. 1-83. Similarly, the DEIR concludes, without explanation, that "Alternative" 2, which does not contemplate any runway displacement, implicates more impacted land use than any other alternative, DEIR, p. 4-706, § 4.9.6.2.

Response:

A comparison of noise exposure effects under Alternatives 1 through 7 is presented in Table 1-16 of the SPAS Draft EIR. As shown on this table, Alternative 5 would result in the least population newly exposed to the 65 CNEL noise contour and the third least population exposed to an increase of 1.5 CNEL or higher within the 65 CNEL or higher noise contours. As also depicted on this table, Alternative 5 contains the second highest residential units and acres newly exposed to the 75 CNEL. This table does not indicate that Alternative 2 would result in the greatest impact compared to the other SPAS alternatives.

While it is true that the relocation of Runway 6L/24R northward under Alternative 5 would result in increased aircraft noise impacts to areas immediately north and northeast of the airport, there would be an accompanying decrease in aircraft noise impacts to areas east, southeast, and south of the airport. As summarized on the top of EIR page 1-84 of the SPAS Draft EIR "[t]he density of the population is not constant across the area exposed to noise above 65 CNEL or higher, consequently while the area of exposure may be similar among alternatives, the numbers of persons, dwellings or non-residential noise-sensitive facilities varies among the alternatives." Similar discussion was also provided in Section 4.10.1.6.8 of the SPAS Draft EIR.

As indicated in Sections 4.9 and 4.10.1, and summarized in Tables 1-16 and 1-17 of the SPAS Draft EIR, there would, in general, be fewer residential units exposed to 65 CNEL by moving Runway 6L/24R northward under Alternative 5 than would occur by not moving either runway under Alternative 2, resulting in the total residential population newly exposed to 65 CNEL being lowest under Alternative 5 than under any other alternative. Relative to a 1.5 CNEL increase above 65 CNEL, which includes areas currently exposed to noise levels greater than 65 CNEL, the total residential units and residential population exposed to such an increase is consistently higher for alternatives that do not move the runways (such as Alternative 2). These differences in the numbers of homes and people being exposed to aircraft noise impacts--specifically, that total overall aircraft noise impacts would be lower under Alternative 5--are due to the fact that the land use/development intensities in areas to the east, southeast, and south are higher than in the areas north of the airport. That is, although more homes to the north of the airport would be impacted by noise with a northward move of Runway 6L/24R under Alternative 5, an even greater number of homes to the east, southeast, and south of the airport would no longer be impacted by noise, resulting in an overall decrease in the numbers of homes and people exposed to aircraft noise impacts. Regarding the 75 CNEL noise contour, under Alternative 5 the 75 CNEL contour from the south airfield would extend slightly east and north compared to Alternative 2 due to differences in aircraft operations, runway use patterns, and other assumptions under these alternatives.

SPAS-AL00007-23

Comment:

These apparent, but unexplained inconsistencies, are merely systematic of a larger issue within the DEIR. While the DEIR cavalierly reaches numerous conclusions, not merely about noise, but also about air quality and other impacts, those conclusions are never fully explained either in the body of the DEIR or in its associated appendices. Thus, while the DEIR's noise analysis is notable for its lack of underlying data and coherent analysis, its failure to explain its conclusions in such a way as to allow the public to adequately evaluate them is endemic to the entire DEIR.

Response:

Please see Responses to Comments SPAS-AL00007-19 through SPAS-AL00007-22 regarding the commentor's concerns about noise impacts. The SPAS Draft EIR thoroughly analyzes all relevant environmental impacts of the SPAS alternatives, using data, evidence, and reasoning to support conclusions. Detailed modeling was conducted in order to determine environmental effects, including preparation of an activity forecast and design day flight schedule, airfield simulation modeling, and modeling of impacts related to noise, air quality, greenhouse gas emissions, human health risk, on-airport transportation, off-airport transportation, and hydrology and water quality. For some disciplines, including biological resources and cultural resources, fieldwork was conducted to identify resources that may be affected by the SPAS alternatives. The findings of the analysis are documented in the SPAS Draft EIR, which is approximately 1,800 pages in length. Printed and electronic appendices total approximately 6,000 pages, and provide underlying data generated in support of the impact analyses.

The comment does not identify any specific impact conclusions in the SPAS Draft EIR that allegedly are unsupported by explanations. Therefore, it is not possible or necessary to respond to this comment in greater detail. (See State CEQA Guidelines Sections 15088 and 15204.)

SPAS-AL00007-24

Comment:

VI. THE DEIR'S LAND USE AND PLANNING ANALYSIS SIGNIFICANTLY MISSTATES THE IMPACTS OF, AND MITIGATION POTENTIAL FOR, THE PROJECT

The DEIR relies on its land use and planning analysis as the bulk of its mitigation for the yet to be fully analyzed noise impacts of the various project options. That reliance is misplaced, not only from a substantive perspective, because the noise impacts still remain to be accurately analyzed, but also from a procedural perspective, as implementation of the FAA purchase and sound insulation programs upon which LAWA relies for mitigation, are years, even decades in the future, and, under recently published FAA policies, may never be applicable at all for a substantial portion of the impacted population.

Response:

See Response to Comment SPAS-AL00007-19 regarding a discussion of the extensive analysis of aircraft noise impacts contained in the SPAS Draft EIR. The comment also suggests that "sound insulation programs upon which LAWA relies for mitigation, are years, even decades in the future…" (See also Section 4.9.8 of the SPAS Draft EIR.) As acknowledged in Section 4.10.1.8 of the SPAS Draft EIR, because these programs will take time to implement "…significant noise impacts would be experience in the area after implementation of the selected SPAS alternative but before the mitigation measures are fully implemented. Thus, significant and unavoidable interim noise impacts would be experienced over an indeterminate period of time."

SPAS-AL00007-25

Comment:

The DEIR's land use impacts analysis, § 4.9.6, p. 4-689, is procedurally flawed in several ways. First, it benchmarks the consistency of its alternatives to the existing LAX Specific Plan, recognizing at the same time that it is the fundamental purpose of the DEIR to document the amendment of the existing Specific Plan. Thus, the DEIR creates a moving target as a benchmark for analysis.

Response:

With the exception of Alternative 3, the SPAS alternatives, if adopted, would require an amendment to the existing LAX Specific Plan. The nature of these amendments is outlined in Section 6.1 of the SPAS Draft EIR. However, unless and until the LAX Specific Plan is amended as a result of the SPAS process, the existing LAX Specific Plan, as previously amended by Ordinance No. 179,148, is the applicable, adopted plan. Analysis in the SPAS Draft EIR appropriately evaluates plan consistency with existing, adopted plans. This approach is consistent with the State CEQA Guidelines (See e.g., State CEQA Guidelines Appendix G, IX.b.). The point raised by the commentor (i.e., that the purpose of SPAS is to consider future amendments to the LAX Specific Plan) is acknowledged on page 4-689 of the SPAS Draft EIR, which states "As part of this analysis, the discussion below evaluates the consistency of each alternative with the existing LAX Specific Plan, as amended, recognizing that as part of SPAS, the LAX Specific Plan may be amended depending on the alternative selected for implementation." The subsequent analysis of each SPAS alternative identifies the types of amendments to the LAX Specific Plan that would be required were the alternative adopted. The SPAS Draft EIR does not create a moving target as a benchmark for analysis, as stated by the commentor. Rather, as stated above and in the SPAS Draft EIR, each alternative is evaluated against the applicable, adopted plan, (i.e., the existing LAX Specific Plan).

SPAS-AL00007-26

Comment:

Second, with respect to the potential acquisition of property as mitigation for noise impacts, the DEIR indefinitely and impermissibly defers evaluation of the need for acquisition associated with changes in Runway 6L/24R's Runway Protection Zone ("RPZ"), brought about by the runway's movement north, despite the identification in § 4.7.2 of land uses in the RPZs for all options, thus leaving potential mitigation requirements unsatisfied. Communities for a Better Environment, supra, 184 Cal.App.4th at 92, citing CEQA Guidelines § 15126.4(a)(1)(b) ["Formulation of mitigation measures should not be deferred until some future time."].

In doing so, the DEIR may be incorrectly relying on the claim that, in gaining compliance with the "clear zone" requirements for the RPZ, and included Runway Safety Area ("RSA"), FAA has the option of redirecting or removing an object. Page 4-512, § 4.7.2.6.1. FAA has no such option, because only the local land use jurisdiction possesses such power.

Response:

Section 2.3.1.11 of the SPAS Draft EIR identifies and describes the parcels that are proposed for acquisition under each alternative, as necessary to accommodate SPAS-related improvements such as those associated with the ground transportation system improvements. The impacts associated with the proposed property acquisitions are addressed in Section 4.9, along with a discussion of measures to reduce the impacts, such as LAX Master Plan Commitment RBR-1, Residential and Business Relocation Program. No acquisition of property located within RPZ areas is proposed as part of the SPAS project nor is it certain that acquisition of such property would be required in the future.

Section 4.7.2 of the Draft EIR addresses changes in the runway RPZs for each of the seven airfield improvement alternatives (SPAS Alternatives 1 through 7), delineates the types of existing uses that would fall within the RPZ areas, and discloses the possibility that incompatible structures or uses within RPZ areas may need to be modified or removed. As indicated in the subject section, such action is a

possibility and not a certainty, as the nature and extent to which existing structures and uses pose a substantial safety risk, and, if so, what appropriate measures should be implemented, would be assessed in consultation with the FAA as part of detailed project planning and processing of an Airport Layout Plan (ALP) amendment for the selected alternative, if any. It should be noted that much of the area that would be located in the RPZ for each alternative is already within the existing RPZ for the existing north runway complex, which has been in place for several decades (i.e., the presence of incompatible structures and uses within the north airfield RPZ is not new or unique to the SPAS alternatives, nor has their presence been determined by the FAA or others to be such a hazard as to require removal). This can be seen in comparing Figure 4.7.2-4 of the SPAS Draft EIR, which identifies the parcels currently within the RPZ areas for baseline (2010) conditions, with the RPZ parcel maps for the various SPAS alternatives (i.e., Alternatives 1 through 7 as presented in Figures 4.7.2-7, 4.7.2-9, 4.7.2-11, 4.7.2-13, 4.7.2-15, 4.7.2-17, and 4.7.2-19).

Section 4.7.2 of the SPAS Draft EIR, specifically pages 4-522 through 4-526, addresses changes in the potential secondary or indirect impacts associated with the modification or removal of structures or uses within the RPZ, if required in the future. The subject analysis includes discussion of potential measures to reduce impacts. Given that neither the need for, or nature of, actions to modify or remove existing structures or uses have been determined and will not be known until sometime in the future, it would be premature and speculative to reach a final significance conclusion at this time. That is also the case relative to delineating specific mitigation measures for impacts that are unknown at this time. While CEQA requires a lead agency to use its best efforts to find out and disclose all that it reasonably can, if, after thorough investigation, a lead agency finds that a particular impact is too speculative for evaluation, it should note its conclusion and terminate discussion of the impact. (State CEQA Guidelines Sections 15144-15145.) Additionally, it is unknown whether actions to modify or remove existing structures or uses, if needed, would require property acquisition. In the event acquisition is required, implementation of LAX Master Plan Commitment RBR-1 would serve to reduce impacts. If and when removal, modification or acquisition actions were required, the discretionary approvals associated with such actions would be subject to environmental review under CEQA, at which time feasible mitigation measures to reduce potential impacts to a less than significant level would be required.

Regarding the latter part of the comment, the commentor does not accurately reflect the text of the LAX Draft EIR in suggesting that Section 4.7.2.6.1 states or implies "FAA has the option of redirecting or removing an object." The relevant text in the last paragraph on page 4-512 reads as follows: "…options for addressing potential safety hazards associated with objects located within controlled airspace areas can range widely and can include (1) doing nothing (i.e., for low-risk objects); (2) placing high-visibility markings and lighting on the object to make it highly visible to pilots and indicating such objects on avigation maps; (3) lowering, reducing, or removing the object, and; (4) modifying an approach or departure procedure to allow aircraft to safely navigate around or above an object that penetrates a Part 77 surface. The most appropriate option(s) would be determined in conjunction with detailed airfield improvement engineering and would be subject to FAA review and concurrence prior to FAA approval of an ALP amendment for such an airfield modification." As described above, LAWA would consult and coordinate with the FAA in determining what, if any, measures related to the RPZ should be pursued, but that does not give the FAA local land use authority.

SPAS-AL00007-27

Comment:

Moreover, the DEIR disclaims the need for any acquisition under options 5 through 7, purportedly because only airfield projects are at issue in those options, not the "integrated" options 1 through 4, thus disavowing the need for mitigation. The basis for this disclaimer is not discernible, in that the DEIR makes clear that it is the movements of the runways under options 5 and 6, as well as 1 and 3, that create the need for acquisition of property in the RPZ in the first instance, not the surface traffic options that are "integrated" into options 1 through 4.

Response:

Section 2.3.1.11 of the SPAS Draft EIR identifies and describes the parcels that are proposed for acquisition due to SPAS-related improvements. As can be seen in Figures 2-11 through 2-14, most of

the parcels proposed for acquisition are located to the east and northeast of the CTA, where ground access improvements would occur. While Alternatives 5 through 7 focus on airfield and terminal improvements and do not, in themselves, propose any ground transportation system improvements, selection of any one of those alternatives would be paired with the ground transportation system improvements proposed under either Alternative 1, Alternative 2, Alternative 8, or Alternative 9, and acquisition would occur accordingly. As described above in Response to Comment SPAS-AL00007-26, it is unknown whether acquisition would be necessary for addressing the presence of incompatible structures or uses within RPZ areas under any alternative. While CEQA requires a lead agency to use its best efforts to find out and disclose all that it reasonably can, if, after thorough investigation, a lead agency finds that a particular impact is too speculative for evaluation, it should note its conclusion and terminate discussion of the impact. (State CEQA Guidelines Sections 15144-15145.)

SPAS-AL00007-28

Comment:

From a substantive perspective, the DEIR omits relevant factors in the calculation of land use impacts resulting from the project. First, it entirely omits from its land use impacts analysis the Westchester Business District, part of which may be affected by the RPZ for one or more of the alternatives, without accompanying explanation.

Response:

Regarding analysis of property acquisition impacts on the Westchester Business District associated with the RPZ, please see Responses to Comments SPAS-AL00007-26 and SPAS-PC00130-931. As shown in Figure 2-11 in Section 2.3.1.11 of the SPAS Draft EIR, no acquisition is proposed within the Westchester Business District. As explained on page 4-690 in Section 4.9.6.1 of the SPAS Draft EIR, "The need, if any, for acquisition associated with changes in the Runway 6L/24R RPZ would be determined by FAA in later stages of planning and therefore, is not addressed in this EIR. However, Section 4.7.2, Safety, identifies land uses within the RPZ under each alternative."

Furthermore, as described in Response to Comment SPAS-AL00007-26, it is unknown whether acquisition of areas within the RPZ, including portions of the Westchester Business District, would be necessary for addressing the presence of incompatible structures or uses under any alternative. Such information would be developed during project-specific CEQA review should an alternative calling for shifting Runway 6L/24R northward be selected. It is appropriate for a first-tier program level EIR to defer detailed descriptions and impact analysis of individual projects in the program to future project-level CEQA documents. (State CEQA Guidelines Section 15383; Koster v. County of San Joaquin (1996) 47 Cal.App.4th 29, 37.)

SPAS-AL00007-29

Comment:

Second, it deceptively portrays the City of Los Angeles as the jurisdiction with the greatest existing impacted total land area, DEIR, p. 4-668, see also Table 4.9-4, by including the land mass of the airport in the calculation. If the calculation were not arbitrarily skewed by including the land area of the airport, the origin of the impact, in the determination of the impact's scope, it is the City of Inglewood that would have, by far, the greatest land area impacted.6 The analysis, as well as the planning, should be predicated on that assumption alone.

6 Table 4.9-2 seems to indicate that Inglewood has the greatest existing land area of noise impacted uses, in direct contradiction to the statement that "[t]he jurisdiction with the greatest total area (on- and off-airport) within the 65 CNEL, or higher noise contour is the City of Los Angeles ...," DEIR, p. 4-668.

Response:

Table 4.9-2, on page 4-668, and Table 4.9-4, on page 4-673 in Section 4.9.3.4 of the SPAS Draft EIR present two different land use summaries, neither of which includes on-airport property. Table 4.9-2

discusses areas within the "65 CNEL and higher" contour, whereas Table 4.9-4 discusses the aircraft noise "Study Area."

Table 4.9-4 is a summary of all land uses, including residential, noise-sensitive, industrial, commercial, government, and other uses within the land use study area (shown in Figure 4.9-6) and, contrary to the comment, it does not include on-airport property and does not present impacted land area. As presented in Table 4.9-4 and shown in Figure 4.9-6 of the SPAS Draft EIR, the 5,265.77 acres within the City of Los Angeles does not include airport property and the largest portion of the land use study area is located in the City of Los Angeles.

Table 4.9-2 of the SPAS Draft EIR is a summary of existing impacted land uses within the 65 CNEL or higher noise contours under 2009 baseline conditions and is graphically represented in Figure 4.10.1-12 of the SPAS Draft EIR. As shown in Table 4.9-2, the greatest number of acres within the 65 CNEL and higher noise contours (985.81 acres) is in the City of Inglewood. As discussed in the accompanying text on page 4-668 this does not include on-airport property ["As indicated in Table 4.9-2, approximately 2,674 acres (off-airport) are within the 65 CNEL or higher noise contours"].

SPAS-AL00007-30

Comment:

Finally, the DEIR asserts that the impacts of noise can be mitigated to insignificance by sound insulation, as set forth in MM-LU-1. The DEIR ignores the fact that a sound insulation program encompassing the vast area already exposed to LAX's noise impacts, as well as new areas in surrounding communities, will take decades to implement, if it is funded by FAA at all. And the totality of that funding is now in question. FAA recently published Program Guidance Letter 12-09, "AIP Eligibility and Justification Requirements for Noise Insulation Projects," August 17, 2012 ("PGL") which will limit the access of populations newly brought into the 65 CNEL contour, or affected by an increase of 1.5 dB or more, to sound insulation of all but a small percentage of homes with an average, across all habitable rooms, of less than 45 dB interior noise levels (see, September 17, 2012 letter to FAA regarding "Program Guidance Letter - 12-09 - AIP Eligibility and Justification Requirements for Noise Insulation Projects," attached to this letter as Exhibit 4). This means, among other things, that those who are newly impacted by the project, but also who, in good faith, installed sound insulation with their own funds in some rooms; or who could afford to sound insulate bedrooms but not public spaces; or whose dwellings were below the 45 dB interior noise standard under the former operational configuration but will be changed under the new regimen, may be left without mitigation, at least for the foreseeable future, a salient fact that is not acknowledged, let alone discussed or analyzed in the DEIR.

Response:

The comment states that the "DEIR asserts that the impacts of noise can be mitigated to insignificant by sound insulation, as set forth in MM-LU-1. The DEIR ignores the fact that a sound insulation program encompassing the vast area already exposed to LAX's noise impacts, as well as new areas in surrounding communities, will take decades to implement, if it is funded by the FAA at all.". Contrary to the suggestion in the comment, the SPAS Draft EIR provides more than just MM-LU-1 to mitigate impacts. The SPAS Draft EIR also recognizes that there may be interim aircraft noise impacts prior to implementation of noise insulation programs.

Additional land use measures are proposed under the SPAS alternatives as discussed on page 4-777 in Section 4.9.7 of the SPAS Draft EIR. In addition, mitigation measures related to aircraft noise abatement techniques are proposed as discussed on pages 4-928 through 4-932 in Section 4.10.1.7 of the SPAS Draft EIR. Nevertheless, the SPAS Draft EIR acknowledges that some aircraft noise impacts would be significant and unavoidable. Specifically, as presented on page 4-933 in Section 4.10.1.8 of the SPAS Draft EIR, "Because the land use mitigation measures would take several years to fully implement, it is possible that significant noise impacts would be experienced in the area after implementation of the selected SPAS alternative but before the mitigation measures are fully implemented. Thus, significant and unavoidable interim noise impacts would be experienced over an indeterminate period of time." As stated on page 4-778 in Section 4.9.8 of the SPAS Draft EIR, "[C]ertain residential uses and non-residential noise-sensitive facilities affected by aircraft noise would

still be exposed to high noise levels due to interim impacts prior to completion of noise insulation or land recycling."

The comment also states "The FAA recently published Program Guidance Letter 12-09, 'AIP Eligibility and Justification Requirements for Noise Insulation Project,' August 17,2012 ('PGL') which will limit access of population newly brought into the 65 CNEL contour, or affected by an increase of 1.5 dB or more…This mean among other things, that those who are newly impacted by the project…may be left without mitigation a salient fact that is not acknowledged, let alone discussed or analyzed in the DEIR." As the commentor is aware, the SPAS Draft EIR was released in July 2012. The referenced FAA Guidance was released subsequent to this date on August 17, 2012.1. The FAA Guidance Letter 12-09 does not change the SPAS Draft EIR's significance conclusions.

The referenced letter states "the reason for this PGL is to reconfirm the two-step requirement for eligibility for residential and other noise insulation projects. The AIP Handbook interprets 14 CFR Part 150 to require that structures be located in the existing or forecast early day-night average (DNL) 65 decibel (db) noise contour (or, under limited circumstances, a lower dB noise contour formally approved by a local government to determine compatibility of residences, and that noise insulation project be designed to achieve interior noise levels of 45 dB to qualify for federal funding…FAA has become aware that there may be confusion and ambiguity in our guidance about the second step, that interior noise levels must be 45 dB or greater for a residence or other eligible structure, such as a school, to be eligible for AIP funding for noise insulation."

The performance standards for the ANMP and the LAX Master Plan Mitigation Measure MM-LU-1 is "the relevant performance standard to achieve compatibility for land uses that are incompatible due to aircraft noise…is adequate acoustic performance to ensure an interior noise level of 45 CNEL or less." (See Section 4.9.5 of the SPAS Draft EIR.) This is also the recognized goal for residential noise levels in the California Building Code. (See Title 24, California Code of Regulations (California Building Code or "CBC"), Part 2, Volume 1, Section 1207.11.2.) To ensure that interior noise levels have been reduced to 45 CNEL or less after soundproofing (in conformance with Title 21), post-construction noise tests are conducted to verify the efficacy of sound insulation. To date, all post-testing has confirmed that interior noise levels meet this requirement.

As described on page 4-933 in Section 4.10.1.8 of the SPAS Draft EIR, once implemented, "the LAX Master Plan noise and land use mitigation measures are intended to fully mitigate the significant noise impacts that would be caused by the SPAS alternatives." As also described on page 4-686 in Section 4.9.5 of the SPAS Draft EIR, the performance standard for this noise insulation measure is 45 CNEL; therefore, any homes that have achieved this interior noise level are considered less than significant under CEQA, contrary to the suggestion in the comment.

Furthermore, as acknowledged in the Stipulated Settlement, Section I.G, "Notwithstanding any provision of this Settlement, LAWA shall not be required to take any actions or to expend any funds (i) that are prohibited or disapproved by an FAA determination or any other regulatory agency…" (See also Stipulated Settlement, Sections III and VI.)

1. FAA Program Guidance Letter 12-09, Eligibility and Justification Requirements for Noise Insulation Projects, Available: http://www.faa.gov/airports/aip/guidance_letters/media/pgl_12_09_NoiseInsulation .pdf, accessed January 10, 2013.

SPAS-AL00007-31

Comment:

In summary, even though noise mitigation is alleged to be feasible, the DEIR is inadequate, both because necessary mitigation measures are entirely omitted with respect to the impacts of property acquisition; and because, in the alternative, even where mitigation measures are provided (although vague), "mandatory performance standards to ensure that the measures, as implemented, will be effective," Communities for a Better Environment, supra, 184 Cal.App.4th at 94, are similarly absent.

Response:

As discussed on page 4-667 of the SPAS Draft EIR, the residential acquisition program includes measures to hydroseed and landscape after demolition of any structures in the program. The commenter also suggests that unspecified mitigation measures are "vague." The ANMP program (Mitigation Measure MM-LU-1), discussed on pages 4-686 and 4-687 of the SPAS Draft EIR clearly identifies a performance standard for the measure, (i.e., "to ensure an interior noise level of 45 CNEL or less"). Please see Responses to Comments SPAS-AL00007-24 through SPAS-AL00007-30 for more detailed discussion of property acquisition and mitigation measures.

SPAS-AL00007-32

Comment:

VII. The DEIR Does Not Adequately Analyze or Mitigate the Project's Admittedly Significant Surface Traffic Impacts

In spite of the DEIR's acknowledgment of the significance of the project's direct and indirect impacts on various intersections within the study area, it relegates those impacts to the category of "significant but unavoidable." It is Cities/County' s position, however, that not only are those impacts, in fact, more extensive than reported in the DEIR, but also avoidable through the application of reasonable mitigation measures not offered in the DEIR.

Response:

The comment is noted. Please see Responses to Comments SPAS-AL00007-33 through SPAS-AL00007-35 below.

SPAS-AL00007-33

Comment:

A. The DEIR Does Not Fully Delineate or Mitigate the Surface Traffic Impacts of the Project on Culver City

First, the criteria used in the DEIR for calculating the project's intersection impacts on Culver City is inaccurate. More than five years ago, Culver City requested that LAWA and City of Los Angeles Department of Transportation ("LADOT") use "thresholds of significant transportation impact identified in LADOT's traffic impact analysis guidelines to analyze the impact on intersections and streets in Culver City." (See, letter of October 31, 2006 from Charles Herbertson, Culver City Director of Public Works and City Engineer to Jim Richie, LAWA, attached to this letter as Exhibit 5).

The rationale behind Culver City's request is directly related to the SPAS. "This will simplify the preparation and review of the LAX Specific Plan traffic study, since the City of Los Angeles and Culver City share jurisdiction of several intersections that will be analyzed as part of the study." (See also, letter to Gloria Jeff, General Manager, City of Los Angeles Department of Transportation, October 31, 2006, attached to this letter as Exhibit 6).

Nevertheless, the traffic study used Culver City's, not City of Los Angeles' traffic impact analysis criteria to assess the impact of the project on Culver City intersections. Use of Culver City criteria significantly understates the project's impacts on those intersections. For instance, using LADOT criteria, the intersections of Centinela/Washington Boulevard (Intersection No. 30), Overland/Culver (Intersection No. 43) and Sepulveda/Slauson (Intersection No. 130) would, in fact, be impacted, as would the non-signalized intersections of Overland/Sawtelle (Intersection No. 154) and Walgrove/Washington (Intersection No. 156) which are already revealed as impacted in the DEIR. Despite the acknowledged significance of the impacts on the latter intersections, however, the DEIR states that they already meet the Manual of Uniform Traffic Control Devices ("MUTCD") warrants for the installation of these traffic signals and, therefore, Culver City should be fully responsible for the installation of the traffic signals. In this instance, as the project contributes to the significant impacts on those intersections, it stands to reason that Los Angeles should be responsible for the installation of traffic signals to mitigate the impacts.

Response:

The comment states that the thresholds of significance used in the SPAS Draft EIR traffic impact analysis for Culver City differ from those that the City of Culver City requested LAWA use, referring to a letter dated October 31, 2006. The commentor also suggests that Intersections 30, 43, 130, 154, and 156 "would in fact, be impacted" with the application of LADOT's thresholds. The commentor does not provide any evidence or specific details regarding these impacts. For example: (1) comment does not specify whether the comment is in reference to the "Baseline (2010) With Alternative" analysis (Section 4.12.2.6.1) or the "Future (2025) With Alternative" analysis (Section 4.12.2.6.2); (2) the comment does not specify whether the comment is in reference to Alternative 1, 2, 3, 4, 5, 6, 7, 8, or 9; and, (3) the comment does not specify whether the comment is in reference to AM, MD, or PM peak hours.

Contrary to the assertions in the comment, the referenced letter from 2006 stated that "the City of Culver City is in the process of updating our guidelines for preparing traffic studies" and requested that "in the interim" LADOT's thresholds be used for development projects in the City of Los Angeles. Culver City's revised traffic study guidelines were considered by the Culver City Planning Commission in a public hearing on June 17, 2009, which was continued to June 30, 2009. The revisions proposed to change Culver City's thresholds of significance to conform to those used by the City of Los Angeles. Culver City's website does not include formal minutes for those two meetings, but it does include videos of them. In minute 181 of the June 30, 2009 hearing, a vote was taken to retain Culver City's existing thresholds of significance, rather than adopt the standards used by the City of Los Angeles.1

The methodology for assessing potential traffic impacts at the signalized and unsignalized intersections that were analyzed is described on pages 4-1194 through 4-1196 of the SPAS Draft EIR, including intersections in Inglewood and Culver City. Thresholds of significance used in the SPAS off-airport transportation analysis, including for intersections in Culver City, are stated on pages 4-1225 through 4-1228 in Section 4.12.2 of the SPAS Draft EIR. The letter referred to in the comment was written prior to the June 30, 2009 decision by the Culver City Planning Commission. The use of these thresholds was confirmed with Culver City's Traffic Engineer, Mr. Barry Kurtz in March 2011 (the same contact person referenced in Culver City's October 31, 2006 letter), as stated in Footnote 700 at the bottom of page 4-1225. Similarly, LAWA confirmed the same traffic thresholds of significance with Culver City's Traffic Engineering Manager, Mr. Max Paetzold, on April 17, 2009, for LAWA's Bradley West Project Draft EIR. (Bradley West Project Draft EIR, page 4-118, fn 62.)2 LAWA, as the lead agency, has the discretion to select and apply thresholds of significance for its projects. (CEQA Guidelines Section 15064(b); Mira Mar Mobile Community v. City of Oceanside (2004) 119 Cal.App.4th 477.) The thresholds of significance used in the SPAS Draft EIR for intersections in Culver City were appropriate, in light of the above facts.

The comment also suggests that use of LADOT thresholds would "simplify the preparation and review of the LAX Specific Plan traffic study, since the City of Los Angeles and Culver City share jurisdiction." As noted in Section 4.12.2.4 of the SPAS Draft EIR, "Intersections lying on the boundary of multiple jurisdictions were evaluated using the more conservative criteria."

The comment also states that the City of Los Angeles should be responsible for the installation of traffic signals at the intersections of Overland Avenue and Sawtelle Boulevard (study intersection 154) and Washington Boulevard and Walgrove Avenue (study intersection 156).

Based on application of the thresholds of significance and the analytical techniques described above, the SPAS off-airport transportation impacts analysis in Section 4.12.2 of the SPAS Draft EIR found that both of these unsignalized intersections would be significantly and unavoidably impacted under all SPAS alternatives under cumulative conditions in 2025 for certain times of day (see Table 4.12.2-19).

LAWA discussed potential mitigation measures for Intersections 154 and 156 on pages 4-1304 through 4-1305 of the SPAS Draft EIR. As explained therein, signalization of these intersections could fully mitigate the project's impacts, "[h]owever, installation of a traffic signal at this location would be the responsibility of Culver City. If installation of the signal becomes feasible, LAWA would provide a fair share contribution…" LAWA therefore did not take credit for these mitigation measures and concluded

that these impacts would remain significant and unavoidable. (See Table 4.12.2-33 of the SPAS Draft EIR.)

As discussed in this comment, Culver City has complete jurisdiction over these intersections (i.e., there is no shared jurisdiction with the City of Los Angeles, as shown in Table 4.12.2-11), and implementation of any improvements at these locations can only be implemented by Culver City. Culver City Municipal Code ("CCMC") § 7.02.010 provides "the City Engineer is authorized to regulate the timing of traffic signals so as to permit the movement of traffic in an orderly and safe manner…and shall erect appropriate signs giving notice thereof." Similarly, CCMC § 7.02.015 provides "[u]pon the request of the City Engineer, the Public Works Director is authorized to place official traffic control devices within or adjacent to intersections…" Similar restrictions are provided for the marking of crosswalks (CCMC § 7.02.055), and pavement (CCMC § 7.02.040). All of which would be required for the signalization of these intersections. Violations of these provisions can result in an infraction (CCMC § 7.02.220) or even a misdemeanor (CCMC § 7.02.040). Furthermore, LAWA is not a property owner at these intersections and cannot apply for permits associated with such signalization. (See CCMC § 17.500.015.) For all of the reasons described in this paragraph, LAWA cannot legally be "responsible for the installation of traffic signals" at these intersections.

The commentor also states that "the [intersections 154 and 156] already meet the Manual of Uniform Traffic Control Devices ('MUTCD') warrants for the installation of these traffic signals…" Contrary to the assertion in the comment, the SPAS Draft EIR concludes impacts at these intersections would be significant at the horizon year in 2025, not current conditions, as implied in the comment. Footnote 713 on page 4-1304 of the SPAS Draft EIR also provides that "this analysis [regarding fulfillment of the standards for traffic signal warrants] is intended to examine the general correlation between the planned level of future development and the need to install new traffic signals. It *estimates future development-generated traffic* compared against a *sub-set* of the standards traffic signal warrants recommended in the Federal Highway Administration Manual on Uniform Traffic Control Devices and associated State guidelines. *This analysis should not serve as the only basis for deciding whether and when to install a signal. To reach such a decision, the full set of warrants should be investigated based on field-measured, rather than forecast, traffic data…Furthermore, the decision to install a signal should not be based solely upon the warrants, since the installation of signals can lead to certain types of collisions*." (Emphasis added.)

As described above, LAWA does not have legal authority to implement the intersection improvements, and there are a number of planning considerations and policy choices regarding the signalization of these intersections which have not been made by Culver City. As discussed on page 4-1304 of the SPAS Draft EIR relative to Intersections 153 and 154, "LAWA would provide a fair share contribution, subject to FAA approval, to this improvement." This stipulation would also apply to the potential mitigation measure for Intersection 156; hence, the discussion at the top of page 4-1305 of the SPAS Draft EIR is hereby amended, for the SPAS Final EIR, to include a similar statement ("If installation of a signal becomes feasible at this location, LAWA is willing to provide a fair share contribution, subject to FAA approval, to this improvement, which would fully mitigate the project impact at this location."). Mitigation measures MM-ST (SPAS)-39 and MM-ST (SPAS)-40 have been included in the SPAS Final EIR for these intersections. Please see Chapter 5, Corrections and Additions Related to the SPAS Draft EIR.

While the commentor suggests that LAWA should be fully responsible for installation of this traffic improvement, this is a cumulative impact, much of which is created by ambient growth in the region, unrelated to the SPAS alternatives. For example, the Baseline (2010) Without Alternative delay for the PM peak hour is 27.2 (see Table 4.12.2-14); this delay increased to 45.9 under the Future (2025) Without Alternative scenario. The Future (2025) With Alternative 1-2 scenario, which includes ambient growth unrelated to the project (see page 4-1209 of the SPAS Draft EIR), only increases this value to 51.4. The majority of this cumulative impact is not caused by this SPAS alternative. Mitigation Measures are limited by constitutional nexus and rough proportionality requirements (State CEQA Guidelines Section 15041(a)), and similar limitations imposed by the FAA. LAWA is therefore willing to pay a fair share contribution; however, there is an insufficient nexus to require LAWA to pay for the entire improvement, nor would such payment be roughly proportional to the impact caused by the SPAS alternatives.

1. City of Culver City, City Council Meeting Webcast, June 30, 2009, Available: http://www.culvercity.org/Government/Misc/Webcast.aspx?id=063009, accessed November 8, 2012.
2. Bradley West DEIR, page 4-118 is available online at: http://ourlax.org/pdf/LAX%20Bradley%20West%20Project%20DEIR%20Volume%201.pdf.

SPAS-AL00007-34

Comment:

Further, the DEIR traffic study, DEIR, p. 4-1301, indicates the project would have a significant impact at the intersection of Lincoln Boulevard and Washington Boulevard (Intersection No. 110), which is not in Culver City, but in the City of Los Angeles. The DEIR indicates that the addition of a southbound through lane would fully mitigate the project at this location. However, adding a southbound lane would require widening of the southbound approach and departure and is not considered feasible. In addition, the DEIR finds that there are no other feasible improvements that could fully mitigate the project's impacts , and, thus, declines to mitigate, leaving the impact on that intersection significant and unavoidable.

With respect to the intersection of Lincoln Boulevard and Washington Boulevard, as with respect to other intersections within the project study area of which the DEIR deems the impacts "unavoidable," there are, in fact, feasible mitigation measures that would alleviate these impacts. For example, with respect to northbound Lincoln Boulevard to westbound Washington Boulevard, the County of Los Angeles' SR90 connector road to Admiralty Way would mitigate the project's impact at this intersection as it would reduce the left turn traffic demand. Similarly, the Costco project at the intersection of Lincoln Boulevard and Washington Boulevard was required to pay Culver City $1.5 million toward the SR90 connector road to Admiralty Way to mitigate Costco's impact at this intersection. In the same way, LAWA should be responsible for contributing toward the SR90 connector road to Admiralty Way to mitigate the SPAS project's significant impacts that, with the named mitigation, would be avoidable.

Response:

The content of this comment is similar to comment SPAS-AL00001-1; please refer to Response to Comment SPAS-AL00001-1.

SPAS-AL00007-35

Comment:

B. The DEIR Does Not Fully Delineate or Mitigate the Surface Traffic Impacts of the Project on Inglewood

The traffic analysis is flawed as it relates to Inglewood as well. First, although the Future (2025) with Alternative Impact Analysis Summary Table lists 25 of the 29 Inglewood intersections studied as having significant traffic impacts with one or more alternatives, the DEIR indicates that some potential intersection improvements such as those for the intersection of Arbor Vitae Street and Aviation Boulevard are not feasible (see, e.g., § 4.12.2.6.4, p. 4-1283; § 4.12.2.7, p. 4-1285; and § 4.12.2.7.1, p. 4-1291). The DEIR does not, however, set forth the specific criteria upon which that determination was based. This is despite the fact that lack of right of way was cited as one factor of concern, but the acquisition of right of way is common as an element of intersection capacity improvement. The inevitable conclusion is that, even though Inglewood is a significant, perhaps primary conduit, for airport directed traffic, the DEIR shortchanges the manifest traffic, as well as other, impacts on Inglewood as well as on Culver City.

Response:

The comment contends that the traffic analysis in the SPAS Draft EIR is flawed as it relates to Arbor Vitae Street and Aviation Boulevard (study intersection 10) because it does not set forth the rationale for finding the mitigation measures related to this intersection infeasible. The comment states that acquisition of right-of-way is "common as an element of intersection capacity improvement."

The language evaluating the potential feasibility of traffic improvements is from Section 4.12.2.7.1 of the SPAS Draft EIR. The level of detail provided for this evaluation is consistent with CEQA. As noted under State CEQA Guidelines Section 15126.4(a)(5), "If the Lead Agency determines that a mitigation measure cannot be legally imposed, the measure need not be proposed or analyzed. Instead, the EIR may simply reference that fact and briefly explain the reasons underlying the lead agency's decision." While the SPAS Draft EIR provided a substantial amount of information regarding infeasibility and feasibility of mitigation measures, this information is not required to be in the EIR, contrary to the suggestions in the commentor's letter. (See Flanders Foundation v. City of Carmel-by-the Sea (2012) 202 Cal.App.4th 603, 617-618; San Franciscans Upholding the Downtown Plan v. City and County of San Francisco (2002) 102 Cal.App. 4th 656, 696.)

The approach to developing mitigation measures is described on pages 4-1284 and 4-1285 of the SPAS Draft EIR. For each study intersection where a significant impact was identified, a specific discussion is provided which evaluated potential mitigation measures. The commentor also suggests that the only grounds for infeasibility were right-of-way constraints, which is incorrect. At the intersection of Arbor Vitae Street and Aviation Boulevard (study intersection 10), which is specifically mentioned in the comment, a potential improvement is discussed on page 4-1291 of the SPAS Draft EIR but found to be infeasible due to lack of right-of-way, impacts to existing businesses including a service station, an automobile repair shop and a multi-story charter school building, (economic, policy infeasibility, and inconsistency with the project objectives (i.e., inconsistent with the objective of advancing "economic growth and vitality of the Los Angeles region")), and potential environmental impacts associated with demolition and construction. While the comment is correct that acquisition of right-of-way is among the considerations when developing traffic improvements, it is often among the elements that limit the ability of cities to implement improvements. In the traffic study prepared for the City of Inglewood for the Hollywood Park Redevelopment Project, right-of-way acquisition at the six significantly impacted intersections (including Crenshaw Boulevard and Century Boulevard) was not considered; rather, the recommended mitigation measures were limited to contributions to develop and enhance the City of Inglewood ITS system.1 Thus, the analysis in the SPAS Draft EIR is consistent with earlier analysis done for a project in Inglewood in that it considered lack of right-of-way to be a reasonable basis for a finding of infeasibility.

The mitigation measure deemed infeasible in the SPAS Draft EIR entailed widening both the eastbound and westbound approaches, as well as the eastbound departure, at the intersection. In conjunction with development of the SPAS Final EIR, further evaluation of potential mitigation options for this impact was conducted by LAWA, resulting in a refinement to analysis provided in the SPAS Draft EIR and the identification of other potential intersection improvements that would address the significant impact at this intersection. Specifically, further investigation indicated that it is possible to modify only the eastbound approach to provide a separate right-turn lane (resulting in one left-turn lane, two through lanes and one right-turn lane). Based on this intersection improvement, the impacts at Intersection 10 identified under Alternatives 1-2, 4, 8 and 9 would be fully mitigated; however, this improvement would not be sufficient to fully mitigated the impact under Alternative 3. Based on the above, the text regarding Intersection 10 on page 4-1291 of the SPAS Draft EIR has been revised in the SPAS Final EIR and a corresponding mitigation measure added to Section 4.12.2.7.2 as MM-ST (SPAS)-37, both of which are shown below. Tables 4.12.2-33, 4.12.2-34, 4.12.2-36, 4.12.2-37, and 4.12.2-38 have also be revised in the SPAS Final EIR. Please see Chapter 5, Corrections and Additions Related to the SPAS Draft EIR.

- 10. Arbor Vitae Street and Aviation Boulevard (Alternatives 1-2, 3, 4, 8, and 9).
Widen the eastbound approach to the intersection of Arbor Vitae Street and Aviation Boulevard to provide a separate right-turn lane, resulting in one left-turn lane, two through lanes and one right-turn lane. Implementation of this improvement can be accomplished within the existing right of way and would fully mitigate the significant impacts under Alternatives 1-2, 4, 8, and 9. Under Alternative 3 this modification to the eastbound intersection approach would not provide effective mitigation and no other feasible improvements have been identified to mitigate the impact under Alternative 3. Therefore, this impact would remain significant and unavoidable under Alternative 3.

- MM-ST (SPAS)-37. Modify the Intersection of Arbor Vitae Street and Aviation Boulevard (Intersection 10) (Alternatives 1-2, 4, 8, and 9).

The mitigation measure for this location is to widen the eastbound approach to provide a separate right-turn lane, resulting in one left-turn lane, two through lanes, and one right-turn lane. This improvement would fully mitigate the project impact under the Future (2025) With Alternatives 1-2, 4, 8, and 9 scenarios.

1. Wilson Meany Sullivan, Traffic Impact Study Hollywood Park Redevelopment Project, City of Inglewood, CA, prepared by Linscott, Law & Greenspan, Engineers, August 1, 2008.

SPAS-AL00007-36

Comment:

In summary, the DEIR's inadequacies are no less substantial and significant for being, in many cases, repeats of old errors, because the public living and working in the project study area will be the ultimate victims of these analytic deficiencies. From a more global perspective, the DEIR represents not only a flawed attempt to implement an as-yet undesignated project with as-yet unanalyzed environmental impacts, but, insofar as LAWA's efforts go exclusively toward the expansion of capacity and associated improvements at LAX, also a patent abnegation of responsibility under the Settlement to regionalize air travel for the purpose of mitigating LAX' s impacts on close-in populations, while providing increased air travel opportunities to the rest of Southern California. Due to the DEIR's manifest inadequacies, Cities/County strongly recommend LAWA revise and recirculate the DEIR in strict compliance with CEQA's unequivocal mandates.

Response:

The SPAS Draft EIR is complete, adequate, and meets the requirements of CEQA. LAWA has carefully reviewed all of the comments submitted on the SPAS Draft EIR and prepared written responses, supported by substantial evidence, for all of those comments. Because no "significant new information" as defined in Section 15088.5 of the State CEQA Guidelines has been added to the SPAS Draft EIR, recirculation of the Draft EIR is not required.

Please see Topical Response TR-SPAS-REG-1 regarding the fact that LAWA, through the LAX Master Plan, of the SPAS process, and other efforts, supports a regional approach to accommodating air travel demands in Southern California. As also described therein, the LAX Specific Plan amendment proposed as part of SPAS further supports such regionalization.

SPAS-AL00007-37

Comment:

The following are the comments of the Cities of Inglewood and Culver City ("Cities") concerning the Notice of Preparation ("NOP") for the Los Angeles International Airport ("LAX") Specific Plan Amendment Study ("SPAS"). The NOP commences the environmental review of the implementation of five development activities at LAX, including construction of the Ground Transportation Center ("GTC"), Automated People Mover ("APM") from the GTC to the Central Terminal Area ("CTA"), and associated on-site road improvements; demolition of Terminals 1, 2 and 3; and reconfiguration and separation of Runways 6L/24R and 6R/24L on the North Runway Complex (these activities, taken together will be referred to as "Project"). Cities regard the Project as a component of a more comprehensive expansion plan, including, but not limited to, construction of Midfield Satellite Terminal, a Crossfield Taxiway, and additional gates at the Tom Bradley International Terminal ("TBIT").

Response:

Comments SPAS-AL00007-37 through SPAS-AL00007-59 provide comments on the 2008 NOP prepared for the LAX Specific Plan Amendment Study. All of these comments were considered prior to preparation of the 2010 NOP and the SPAS Draft EIR. Responses to specific comments are provided below. The five development activities summarized by the commentor reflect the LAX Master Plan Yellow Light Projects that are identified in the LAX Specific Plan and the LAX Master Plan Stipulated Settlement. Consistent with the requirements of the Stipulated Settlement, the SPAS identifies and

evaluates potential alternative designs, technologies, and configurations for the LAX Master Plan Program that would provide solutions to the problems that the Yellow Light Projects were designed to address, consistent with a practical capacity of LAX at 78.9 MAP. As indicated in Chapter 2 of the SPAS Draft EIR, the proposed project is the SPAS, for which nine alternatives have been identified and are evaluated. The SPAS alternatives, being based on the Yellow Light Projects, are designed to be consistent with the overall framework of the LAX Master Plan. As was demonstrated through the course of the LAX Master Plan approval process, Alternative D, the approved LAX Master Plan alternative, is not an expansion plan.

The commentor is incorrect in stating that the SPAS project is a "component of a more comprehensive expansion plan" including, but not limited to, "construction of Midfield Satellite Terminal, a Crossfield Taxiway, and additional gates at the Tom Bradley International Terminal ("TBIT")," and provides no rationale for that claim. While these projects were conceptually approved in connection with the LAX Master Plan in 2004, they have independent utility from the SPAS alternatives because they can be implemented with or without implementation of a SPAS alternative. Further, these three projects, and many other LAWA projects, were explicitly considered in the SPAS Draft EIR cumulative impact analysis; see Section 5.3 of the SPAS Draft EIR.

SPAS-AL00007-38

Comment:

As a threshold issue, please be advised that Cities respond to Question No. 2, NOP, p. 2, as follows: neither City falls within the category of "responsible agency" or "trustee agency," as those terms are defined in 14 Cal.Code Regs. §§ 15096, 15381, and 15386.1

1 CEQA's implementing regulations will be referred to throughout these comments as "CEQA Guidelines".

Response:

The comment is noted.

SPAS-AL00007-39

Comment:

Please be further advised that the following comments concerning significant environmental issues raised by the Project, alternatives and mitigation measures are necessarily preliminary, due to the attenuated character of the NOP. Cities therefore reserve their right to supplement these comments in response to future environmental documents.

Response:

The comment is noted. Please see Responses to Comments SPAS-AL00007-41 through SPAS-AL00007-52 below. Please also see Responses to Comments SPAS-AL00007-60 through SPAS-AL00007-75 for responses to comments submitted by the commentor on the 2010 SPAS Draft NOP.

SPAS-AL00007-40

Comment:

Finally, Cities attach to these comments as Exhibit A "Petitioners' Overview of Guiding Principles for Environmental Analysis: LAX Specific Plan Amendment Study EIR" ("Guiding Principles"). Exhibit A represents the general approach to evaluation of the proposed development offered jointly by Petitioners in the case of City of El Segundo, et al. v. City of Los Angeles, et al., Riverside County Superior Court Case No. RIC 426822, the settlement of which gave rise to the Project.

Response:

The comment is noted. Please see Responses to Comments SPAS-AL00007-53 through SPAS-AL00007-59 below.

SPAS-AL00007-41

Comment:

I. THE "TIERING" OF THE NOP ON THE "APPROVED MASTER PLAN" RESULTS IN IMPROPERLY ATTENUATED ENVIRONMENTAL REVIEW.

The NOP states that the SPAS EIR will be a Supplemental EIR, tiered from the LAX Master Plan EIR (NOP, p.4), "providing new or revised analyses of the environmental impacts specific to the alternatives associated with the SPAS EIR..." LAWA, in its NOP for the Crossfield Taxiway Project (which was almost contemporaneous with the publication of this NOP), justified expedited environmental review on the premise that adequate environmental review was already completed during the prior Master Plan environmental review.

While the Legislature has directed local agencies to "tier" EIR's whenever feasible..., the utility of tiering is limited to those situations where the individual projects are consistent with the larger project such as the approved Master Plan project which has already been environmentally reviewed. "Tiering is a process by which agencies can adopt programs, plans, policies, or ordinances with EIRs focusing on the 'big picture' and can then use streamlined CEQA review for individual projects that arc consistent with such...[first tier decisions]..." Koster v. County of San Joaquin, 47 Cal.App.4th 29, 36 (1996). [Emphasis added.]

Despite the fact that the "approved Master Plan" remains in place, many of its most salient features, such as off-site ticketing facility; closure of the. CTA to surface traffic; and movement of Runway 6R/24L 340 feet to the south, thus necessitating the restructuring of Terminals 1 through 3, have been replaced by the Project currently being evaluating under this NOP. These radical changes significantly differ from the projects and environmental impacts originally evaluated in conjunction with the approved Master Plan. As an example, the proposed movement of Runway 6R/24L 340 feet north is a radical departure from the movement contemplated in the Master Plan, possibly impacting, among other things, the size and location of the noise contours and the Runway Protection Zone ("RPZ"). This change in preference, including the City of Los Angeles' decision to effectively eliminate the options of moving Runway 6R/24L 340 feet south, demolition of Terminals 1 through 3, and movement of passenger check-in off site, severely attenuates the previous attributes of Alternative D. Thus, it is questionable that the original Master Plan project, characterized as Alternative D, actually exists as an alternative for purposes of the environmental and development process.

In short, the significant differences between Alternative D, the "No Project/No SPAS Alternative (Approved Master Plan)," and the actual "No Project Alternative" raises the question of what is left of the original Master Plan, in terms of viable project alternatives, to make tiering an appropriate option. Given these circumstances, the Cities question the appropriateness of the "tiering" of the NOP projects upon the Master Plan EIR.

Response:

The SPAS EIR is not tiered from the LAX Master Plan EIR, nor is it a Supplemental EIR. When the NOP was published, LAWA anticipated that the SPAS EIR would be a supplemental EIR tiered from the LAX Master Plan EIR, but ultimately determined that tiering was not appropriate because the overall analytical framework for the SPAS EIR would be entirely updated from that presented in the LAX Master Plan EIR. This includes updated baseline conditions (i.e., 1996/2000 in the LAX Master Plan EIR versus 2009/2010 for the SPAS EIR), new planning horizon year-future conditions (i.e., 2015 in the LAX Master Plan EIR versus 2025 for the SPAS EIR), new/recent biological surveys, new on-airport and off-airport traffic studies, new air quality analyses, new greenhouse gas emissions, which was not a recognized CEQA topic at the time the LAX Master Plan EIR was prepared, all new noise analyses including aircraft noise, roadway traffic noise, construction noise, and transit noise. Portions of the SPAS EIR incorporate by reference information from other documents, as set forth in Section 1.7 of the SPAS Draft EIR, including portions of the LAX Master Plan Final EIR and the LAX Master Plan

Alternative D Mitigation Monitoring and Reporting Program (MMRP). However, the SPAS Draft EIR provides a comprehensive, programmatic analysis of impacts specific to each of the nine alternatives considered therein. Thus, although the improvements associated with SPAS Alternative 3 are essentially the same as those proposed under the LAX Master Plan Alternative D, the analysis of SPAS Alternative 3 is not based on the LAX Master Plan Final EIR's analysis of Alternative D except in those instances where information and data from the LAX Master Plan Final EIR is relevant and has been incorporated by reference.

The commentor is incorrect in stating that the salient features of the approved LAX Master Plan "have been replaced" by the SPAS project. Pursuant to the Stipulated Settlement, the SPAS project is a study of potential alternative designs, technologies, and configurations for the LAX Master Plan Program. At this time, no decision has been made as to which, if any, of these alternatives may ultimately be selected. In the meantime, LAWA continues to move forward with those non-Yellow Light projects approved under the LAX Master Plan that are not subject to the SPAS requirement of the Stipulated Settlement.

SPAS-AL00007-42

Comment:

II. THE NOP'S PROJECT DEFINITION IS INCOMPLETE.

The five components of the Project being environmentally reviewed are apparently derived from the Stipulated Settlement between Petitioners in El Segundo, et al. v. City of Los Angeles ("Settlement"), § V which provides for "potential alternative designs, technologies, and configurations for the LAX Master Plan program that would provide solutions to the problems that the yellow light projects were designed to address consistent with a practical capacity of LAX at 78.9 million annual passengers (the 'Alternative Projects')." Stipulated Settlement, § V.D.2.

First, it should be noted that the Project's five components actually boil down to only two: (1) the North Airfield Reconfiguration; and (2) the proposed GTC. This is because the APM and onsite road improvements are necessitated by, and part and parcel of, the proposed GTC. It also appears, according to the description of the various components and their alternatives in the NOP, that the APM and onsite road improvements would only occur for the purpose of linking the GTC and CTA. Thus, if the GTC were not built (the existing condition), the ancillary transportation improvements would not occur either.

In addition, the options relating to the demolition of Terminals 1 through 3 are constrained to "yes" or "no". As there is no off-site ticketing facility proposed, as there was in Alternative D, there is, in reality, no "yes" option, because such an option would effectively obliterate 30% of the airport's terminal capacity, without any potential replacement.

Response:

The five components of SPAS addressed in the SPAS Draft EIR--the GTC, APM2 from the GTC to the CTA, demolition of CTA Terminals 1 through 3, north runway reconfiguration, and onsite road improvements associated with the GTC and APM2--are identified in Section 7.H.1 of the LAX Specific Plan, as amended, which requires LAWA to initiate a complete LAX Specific Plan Amendment Study prior to seeking an LAX Plan Compliance determination for any one of these projects. Section 2.3.1 of the SPAS Draft EIR identifies the problems these Yellow Light Projects were designed to address and discusses the various alternative designs, technologies, and configurations associated with reconfiguration of the north airfield, demolition of Terminals 1 through 3, and construction of the GTC and APM2, which would link the GTC to the CTA.

Section 2.3.1 of the SPAS Draft EIR discusses the characteristics of each proposed alternative, including any improvements or modifications of ground access facilities. The "onsite road improvements associated with development of the GTC", and identified as one of the Yellow-Light Projects, consist of a specific set of new roadways located east of Aviation Boulevard and west of La Cienega Boulevard, and north of Imperial Highway and south of Arbor Vitae Street, and would only occur for the purpose of linking the planned facilities along Aviation Boulevard, including the ITC, GTC,

and public parking, and, as noted by the commentor, these specific "onsite road improvements" would not be required in the absence of the GTC.

The SPAS process identified seven alternative configurations for the north airfield, which are all evaluated in the SPAS Draft EIR. Demolition of Terminals 1 through 3 were not merely constrained to "yes" or "no" options. Rather, as an alternative to demolishing the terminal concourses, new and modified terminal facilities are proposed in the CTA to provide for additional passenger processing capabilities, including most notably a new Terminal 0, as well as lengthening the Bradley West concourse and MSC and replacing Terminal 3. Please see Section 2.3.1 of the SPAS Draft EIR for a description of the terminal facilities/changes proposed under each alternative. Elimination of the GTC resulted in two alternative configurations for use of Manchester Square (i.e., parking or a combination of parking and a CONRAC) (see Alternatives 1, 2, 8, and 9). Finally, two alternative technologies for transporting passengers between proposed facilities in Manchester Square and the CTA were evaluated, including a dedicated busway and an APM.

SPAS-AL00007-43

Comment:

Moreover, at least one of the two remaining components, the North Airfield Runway Reconfiguration, is inextricably linked to other projects either in planning or ongoing at LAX, but excluded from the NOP's current project definition. For example, it has long been conceded by LAWA that one of the principal purposes of the North Airfield Reconfiguration is to provide sufficient runway separation to allow unencumbered access by New Large Aircraft ("NLA"), expected to begin service at LAX in 2010, and thereby to equalize operations between the two runway complexes. The Crossfield Taxiway Project, being evaluated concurrently but separately with this NOP, has substantially the same purpose, i.e., to allow free access for NLAs and effective passage between the South and North Airfields (Crossfield Taxiway NOP, p. 4).

For purposes of CEQA review, a "project" is "the whole of an action which has potential for resulting in either a direct physical change to the environment or a reasonably foreseeable indirect change." CEQA Guidelines § 15378(a). "A public agency may not divide a single project into smaller individual projects in order to avoid its responsibility to consider the environmental impacts of the project as a whole." Sierra Club v. Westside Irrigation District, 128 Cal.App.4th 690, 698 (2005).2

Here, the synergistic impacts of the various projects is beyond question. The Crossfield Taxiway is a necessary component of access to and from the North Airfield with impacts that are not addressed in this NOP. Similarly, the new midfield satellite terminal, and the gate additions at the TBIT are intimately related to the changes in the North Airfield Complex, as the new, associated taxiway system appears to encourage expedited access from the North Airfield Complex, without which the North Airfield Complex would become a victim of the same airfield gridlock that LAWA now purports to foresee for the whole airport, if the Project is not implemented.

Although "where the second activity is independent of, and not a contemplated future part of, the first activity, the two activities may be reviewed separately, even though they may be similar in nature," Sierra Club, 128 Cal.App.4th at 699, i.e., have independent utility, that circumstance does not exist here. Even now, the above specified projects are moving forward at the same time, toward a single, connected goal, the enhancement of the LAX airfield capacity, with particular emphasis on NLA serving the international market. It is therefore Cities' position that the various planned projects should be included in the Project Definition for the NOP and evaluated in the same EIR.

2 The National Environmental Policy Act, 42 U.S.C. § 4321, et seq., ("NEPA"), under which this Project must also be reviewed in order for LAWA to obtain Federal funding for its implementation, further requires that the environmental analysis of multiple actions must be included in a single document "when the record raises 'substantial questions' about whether there will be 'significant environmental impacts' from the collection of anticipated projects." Klamath-Siskiyou Wildlands Center v. BLM, 387 F.3d 989, 999 (9th Cir. 2004).

Response:

Although the Crossfield Taxiway Project, Bradley West Project, and planned Midfield Satellite Concourse all have a relationship to the north airfield, these projects are not Yellow Light Projects as defined in the LAX Specific Plan, as amended, or in the Stipulated Settlement. Their implementation is not dependent on implementation of any of the Yellow Light Projects or alternatives to the Yellow Light Projects that have been evaluated in the SPAS Draft EIR, and none of the elements of any of the SPAS alternatives is dependent on implementation of any of these projects. These projects have independent utility from the SPAS alternatives, including the reconfiguration of the north airfield, and are important improvements at LAX regardless of whether or not future modifications to the north airfield runways occur under SPAS. A proposal that is related to a project but has independent utility and is not necessary for the project to proceed need not be included as part of the project description and may be reviewed in its own EIR, as a separate project. (Communities for a Better Env't v. City of Richmond (2010) 184 Cal.App.4th 70.) An EIR need not examine the impacts of facilities that are planned independently of the project and would not change the scope or nature of the project. (Anderson First Coalition v. City of Anderson (2005) 130 Cal.App.4th 1173.) Construction of the Crossfield Taxiway Project and Bradley West Project did not commit LAWA to proceeding with any of the SPAS alternatives, nor would construction of the Midfield Satellite Concourse. Each of these projects were evaluated independently in project-level EIRs, and have specific objectives that are separate from the objectives of SPAS relative to the north airfield. See, in particular, Section 2.3 of both the Crossfield Taxiway Project Final EIR and the Bradley West Final EIR.1,2 for a discussion of the relationship between each of these projects and SPAS, see Section 3.3.2 of these Final EIRs. Moreover, the SPAS Draft EIR provides a project description that is sufficient to allow adequate evaluation and review of the environmental impact of the project. (San Joaquin Rapto Rescue Center v. County of Merced (2007) 149 Cal.App.4th 645, 655.)

Section V.F of the Stipulated Settlement provides that, while the LAX SPAS is being processed, LAWA may continue to process and develop projects that are not Yellow Light Projects, consistent with the LAX Specific Plan Compliance Review procedures. Such was the case with the Crossfield Taxiway Project and Bradley West Project, and will be the case with the Midfield Satellite Concourse Project. However, each of these projects is considered in the analysis of cumulative impacts associated with the SPAS alternatives. See Section 5.3 of the SPAS Draft EIR for an identification of cumulative projects, including these projects. In addition, see Response to Comment SPAS-AL00007-44 regarding the analysis of cumulative impacts in the SPAS Draft EIR. As indicated in that response, these projects were appropriately identified as independent projects causing related impacts and analyzed in the context of the cumulative impact analysis.

1. City of Los Angeles, Los Angeles World Airports, Final Environmental Impact Report for Los Angeles International Airport Crossfield Taxiway Project, January 2009.
2. City of Los Angeles, Los Angeles World Airports, Final Environmental Impact Report for Los Angeles International Airport Bradley West Project, September 2009.

SPAS-AL00007-44

Comment:

III. THE EIR'S CUMULATIVE IMPACT ANALYSIS SHOULD AT MINIMUM INCLUDE ALL PROJECTS NOT INCLUDED IN THE SPAS.

Even if, for argument's sake, the myriad of projects currently planned or being implemented at LAX were not part of a larger project "the agency may prepare one EIR for all projects, or one for each project, but shall in either case comment upon the cumulative effect," CEQA Guidelines § 15165. "The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project, when added to other closely related past, present and reasonably foreseeable probable future projects." CEQA Guidelines § 15355.

It is beyond dispute that the complex of projects at issue in this NOP are "closely related" both to each other, as well as to other "present", or, at minimum, "reasonably foreseeable future projects such as the Midfield Satellite Terminal and the Crossfield Taxiway. Their collective scope, however, requires more

than a simple "comment". If the projects are not evaluated as part of the same project, substantially the same attention should be paid to their impacts in the cumulative impacts analysis. Absent the requisite attention to the collective effects of the myriad of projects that are or will shortly be implemented to enhance "throughput rate", i.e., capacity, FAA Advisory Circular 150/5060-5, page 1, on the LAX airfield, the EIR will be inadequate.

Response:

The SPAS Draft EIR included all past, present, and reasonably foreseeable airfield- and terminal-related improvement projects with the potential for impacts that could combine with impacts of the SPAS alternatives in the cumulative impacts analysis (see Section 5.3 of the SPAS Draft EIR, particularly Section 5.3.1, Section 5.3.2, and Figure 5-2), as requested by the comment. As identified in Section 5.3, cumulative airfield-related projects included the South Airfield Improvement Project (i.e., southerly relocation of Runway 7R/25L and construction of a center parallel taxiway, completed in 2008); the Crossfield Taxiway Project (i.e., construction of a new north-south taxiway, Taxiway R, in the midfield, completed in 2010); Taxilanes S and T, which are being constructed in conjunction with the Bradley West Project; future Midfield Satellite Concourse (MSC) Taxiways; various runway and taxiway modifications, including those required to meet Runway Safety Area (RSA) requirements, on Runways 7L/25R, 6L/24R, and 6R/24L; and other airfield improvements. Substantial cumulative terminal-related projects include the Bradley West Project, currently under construction; the future MSC, including both a concourse in the midfield area and a passenger processing facility in the CTA; and improvements to both the north and south terminals. As explained in Section 3 of Appendix F-2 of the Preliminary LAX SPAS Report, the cumulative projects identified above were assumed in the simulation analysis of future conditions with implementation of the SPAS alternatives. Therefore, the simulation analysis represents future conditions with the airfield and terminal changes associated with each of the SPAS alternatives as well as changes associated with these cumulative projects.

All of the cumulative projects identified in Section 5.3 of the SPAS Draft EIR have independent utility from the SPAS alternatives (i.e., their implementation is not dependent on implementation of any of the SPAS alternatives, and none of the elements of any of the SPAS alternatives is dependent on implementation of any of the projects identified in Section 5.3). Therefore, these projects were appropriately identified as independent projects causing related impacts and analyzed in the context of the cumulative impact analysis. CEQA does not require an EIR's cumulative impact analysis to "pay substantially the same attention" to the direct and cumulative impacts of a project. Section 15130(b) of the State CEQA Guidelines specifies that the "discussion of cumulative impacts shall reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as great detail as is provided for the effects attributable to the project alone."

Also, please note that the comment does not identify any specific probable future projects at LAX that were omitted from the SPAS Draft EIR cumulative impact analysis.

SPAS-AL00007-45

Comment:

IV. THE NOP FAILS TO ADDRESS SURFACE TRAFFIC IMPACTS RESULTING FROM THE PROJECT.

Cities are concerned about the Project's potentially significant impacts on surface traffic, not merely in areas immediately contiguous to LAX, but also on routes frequently traveled to get there. Cities are already suffering from the surface traffic generated by current operations, most, if not all, of which remains unmitigated. As passenger traffic and capacity at LAX increases, so does traffic on the surface streets and interstates (I-405, I-105) used to access it. As the traffic on the freeways becomes more congested, travelers exit these freeways seeking alternative routes which usually end up being the surface streets of Inglewood, Culver City and Westchester, in particular Sepulveda Blvd.(N/S) as far north as Slauson Ave. & Centinela Ave.; La Cienega (N/S) from Centinela to Imperial Highway; as well as Manchester and Century Blvds. (E/W) and Imperial Hwy. (E/W).

The proposed Project has the potential to cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system. It may easily exceed the level of service

standard established by the county Congestion Management Agency for designated roads and highways; cause a substantial increase in hazards; and increase demand for off-street parking. This increased surface traffic also has strong potential to adversely affect the infrastructure of the streets, as well as air quality, in neighborhoods in the proximity of the airport as well as throughout the region. Those impacts must be addressed in the EIR, not only because they are a direct result of the Project individually, but also because there will be additional contributions from other projects, "past, present and reasonably foreseeable" cumulatively.

Response:

The comment states that increased traffic on freeways can result in greater use of surface streets as alternative routes and that the SPAS Draft EIR should address project impacts in the context of cumulative development in the area. The use of Los Angeles' travel demand forecasting model in the traffic analysis allows for the precise considerations discussed in the comment. As described in Section 4.12.2.2.2, the model includes growth dynamically and iteratively assigns traffic over the entire roadway network, including both freeways and surface streets. As described on page 4-1208 in Section 4.12.2.2.3, the 2025 forecasts included projected growth. The off-airport transportation analysis included a broad geographic scope, as shown in Figure 4.12.2-1, which included intersections in Inglewood, Culver City, and Westchester (City of Los Angeles). Parking is discussed in Section 4.12.1.2, Section 4.12.1.3.6, and Section 4.12.1.9.3 of the SPAS Draft EIR. The air quality analysis also included emissions associated with vehicle trips, as described in greater detail in Section 4.2.2.2 of the SPAS Draft EIR. The off-airport transportation evaluation for the SPAS EIR includes several analyses conducted to comply with Los Angeles County Congestion Management Plan (CMP) requirements. These are described in Section 4.12.2.2.1 beginning on page 4-1196.

SPAS-AL00007-46

Comment:

In addressing such impacts, it is important that consideration is given to appropriate avoidance and mitigation measures that take into consideration the "actual" traffic patterns and impacts on the surface traffic in Cities and neighboring communities. Cities strongly urge LAWA to develop effective surface traffic mitigation such as that previously proposed in detail during the SPAS process, including, but not limited to, an additional off ramp on the northbound 405 freeway south of LAX ("Lennox off ramp") to offload traffic directly into the airport before it enters Culver City, and another off ramp on the south bound 405 freeway directly into the Manchester Square development. It appears the "Keep Access to CTA - Building Transportation Centers at Manchester Square and at Aviation/Imperial and Provide Drop Off/Pick Up Area East of Terminal 1 option, as part of the 100 feet to the North alternative takes traffic off the 405 freeway northbound, but not southbound. The Cities (and their consultants) are looking forward to working closely with LAWA on developing and implementing reasonable mitigation measures and alternatives to address surface traffic..

Response:

The comment states that development of traffic mitigation measures should take into consideration the "actual" traffic patterns in the surrounding communities. The comment also urges LAWA to consider additional freeway off-ramps as potential mitigation measures. The Los Angeles' travel demand forecasting model, described in Response to Comment SPAS-AL00007-45, was calibrated and validated for use in the SPAS Draft EIR analysis, and included both static and dynamic validation procedures to ensure that it is appropriate for SPAS. The LAX Master Plan proposed to develop a new freeway interchange on I-405 at Lennox Boulevard.

The comment suggests that the SPAS alternatives include "an additional off ramp on the northbound 405 freeway south of LAX ('Lennox off ramp') to offload traffic directly into the airport before it enters Culver City." A new interchange on I-405 at Lennox Boulevard was not considered to be an effective mitigation measure for SPAS because it would not directly serve the most substantial traffic-generating elements of the SPAS alternatives. Under the existing LAX Master Plan (SPAS Alternative 3), it is assumed that the CTA is closed to private vehicles and that the vast majority of passenger pick up and drop off activities would occur at the Ground Transportation Center located in Manchester Square. Manchester Square is located immediately west of I-405 and one-half mile north of Lennox Boulevard.

Because of the volume of airport-related traffic traveling to and from the GTC under the LAX Master Plan, a Lennox Interchange with direct connections to the GTC was proposed as a traffic mitigation alternative. SPAS Alternatives 1-2, 4, 8, and 9 assume that the CTA remains open to private vehicles and that the majority of passenger pick up and drop offs occur in the CTA. A new interchange at Lennox Boulevard is not considered under CEQA to be an effective mitigation measure in Section 4.12.2 of the SPAS Draft EIR since there are more convenient freeway ramps already existing for the proposed airport facilities.

The comment also suggests the SPAS alternatives include "another off ramp on the south bound 405 freeway directly into the Manchester Square development." The SPAS Alternatives 1, 2, 8, and 9 provide direct access from the I-405 Freeway southbound off-ramp to Manchester Square.

SPAS-AL00007-47

Comment:

V. THE PROPOSED MOVEMENT OF RUNWAY 6L/24R 340 FEET NORTH HAS SIGNIFICANT CAPACITY AND NOISE ENHANCING POTENTIAL.

The NOP proposes an alternative that moves Runway 6L/24R 340 feet to the North, as well as an extension of approximately 1495 feet west, with the width increased by 50 feet, and a new Modified Group VI parallel center taxiway 520 feet south of relocated Runway 6L/24R and 520 feet north of Runway 6R/24L. The NOP suggests that the planned reconfiguration is designed to address safety issues, e,g., "reduce the risk of runway incursions, enhance the safety of aircraft operations at LAX, and provide a better balance in operations between the North Airfield and the South Airfield."

Leaving aside the obvious, that a firm conclusion on the runway reconfiguration's safety effects cannot be definitively determined until the North Airfield Safety Study, currently being conducted by LAWA, is completed and evaluated by the public, analyses performed by consultants on behalf of Cities already indicates that: (1) there exist numerous measures that are more efficient in effecting safety goals, such as improved runway lighting and marking, especially since only a small proportion of the total incursions and incidents at LAX occurred on the North Airfield; and (2) the proposed separation has significant capacity enhancing potential, particularly that of allowing triple simultaneous arrivals to both the North and South Runway Complexes.

Response:

LAWA issued the original Notice of Preparation (NOP) for the SPAS Draft EIR in March 2008 and, following completion of the LAX North Airfield Safety Study (NASS) in spring 2010, issued a Revised NOP in October 2010. The LAX NASS is specifically noted on page 4 of the NOP. The NASS is also referenced and summarized on page 4-505 in Section 4.7.2 of the SPAS Draft EIR and provided in its entirety as Appendix H-6 of the Preliminary LAX SPAS Report. Please refer to Response to Comment PC00130-168 regarding the NASS and the opinion of the academic panel involved in that study.

In recent years, the FAA and LAWA have worked together to implement numerous safety measures, as discussed beginning on page 4-484 in Section 4.7.2.3 of the SPAS Draft EIR. Nevertheless, as evidenced by the north airfield safety studies referenced in Section 4.7.2.3, safety and incursion problems still exist at the north airfield. The SPAS alternatives are designed to provide north airfield improvements that support the safe and efficient movement of aircraft at LAX. (See Section 2.2 of the SPAS Draft EIR.)

None of the runway separation distances proposed in the SPAS Alternatives 1 through 7 provide enough distance to change any of the current approach capabilities, either for visual flight rule or instrument flight rule conditions. Per FAA Advisory Circular 150/5300-13A, parallel runway separation for simultaneous visual operations is 700 feet, and the Advisory Circular recommends 1,200 for runway with ADG V and VI activity. Following FAA guidelines, LAX does not have sufficient runways spacing to operate simultaneous triple visual approaches. During instrument operations, FAA recommends 5,000 feet between runways for simultaneous triple approaches. Therefore, none of the proposed SPAS alternatives provide "significant capacity enhancing potential" as suggested by the commentor.

SPAS-AL00007-48

Comment:

Moreover, the reconfiguration will likely affect the size and location of the noise contours, moving them north and cast, beyond the scope of the relatively extensive 1992 noise contour used by LAWA for the determination of sound-mitigation construction funding for Inglewood.

Response:

This comment was provided in response to the release of the 2008 Notice of Preparation of the SPAS Draft EIR.

Please refer to Section 4.10.1 of the SPAS Draft EIR which presents the methodology, assumptions, and results of the SPAS Draft EIR aircraft noise analyses. Section 4.10.1.6, beginning on page 4-828, presents a detailed analysis of aircraft noise impacts under each SPAS alternative, along with results in tabular format and figures depicting aircraft noise contours.

Upon selection of a preferred SPAS alternative, LAWA will assess any potential implications to any LAWA noise monitoring and residential soundproofing program, as well as the use of the 1992 noise contour. Please see Section 4.9.3.3 of the SPAS Draft EIR for discussion the Aircraft Noise Mitigation Program (ANMP) and updates to that program. As discussed therein, "all incompatible land uses within the 1992 fourth quarter 65 CNEL noise contour or within 65 CNEL areas extending beyond the 1992 contour based on the most recent quarterly report, are eligible for participation in the ANMP." Please also see Response to Comment SPAS-AL00007-19.

SPAS-AL00007-49

Comment:

The reconfiguration may also displace overflights on approach to relocated Runway 6L/24R to the north, thereby bringing increased noise impacts, as well as air quality and other impacts not only to Inglewood, but to Culver City as well.

Response:

As described and depicted in Section 3.2 in Appendix J1-1 of SPAS Draft EIR, the assumed location of flight tracks would change with the proposed location of the runways under each SPAS alternative. These changes are accounted for in several sections of the SPAS Draft EIR.

The SPAS Draft EIR addresses impacts associated with aircraft noise in Sections 4.9 and 4.10.1. As shown in Figures 4.9-7 through 4.9-13 and 4.10.1-14 through 4.10.1-33 of the SPAS Draft EIR, none of the SPAS alternatives would result in significant aircraft noise impacts to areas within the City of Culver City. While it is true that those alternatives involving the relocation of Runway 6L/24R northward (i.e., Alternatives 1, 5, and 6) would result in increased aircraft noise impacts to areas immediately north and northeast of the airport, there would be an accompanying decrease in aircraft noise impacts to areas east, southeast, and south of the airport. As indicated in Sections 4.9 and 4.10.1 and summarized in Tables 1-16 and 1-17 of the SPAS Draft EIR, there would, in general, be fewer residential units exposed to 65 CNEL by moving Runway 6L/24R northward (Alternatives 1, 5, and 6) than would occur in moving 6R/24L southward (Alternatives 3 and 7) or not moving either runway (Alternatives 2 and 4), and the total residential population newly exposed to 65 CNEL would be lowest under Alternative 5 (i.e., relocate Runway 6L/24R 350 feet northward) than under any other alternative. Relative to a 1.5 CNEL increase above 65 CNEL, which includes areas currently exposed to >65 CNEL, the total residential units and residential population exposed to such an increase is consistently higher for alternatives that move Runway 6R/24L southward (Alternatives 3 and 7) or do not move the runways (Alternatives 2 and 4). These differences in the numbers of homes and people being exposed to aircraft noise impacts--specifically, that total overall aircraft noise impacts would be lower with alternatives that move Runway 6L/24R northward--are due to the fact that the land use/development intensities in areas to the east, southeast, and south are higher than in the areas north of the airport. That is, although more homes to

the north of the airport would be impacted by noise with a northward move of Runway 6L/24R, an even greater number of homes to the east, southeast, and south of the airport would no longer be impacted by noise, resulting in an overall decrease in the numbers of homes and people exposed to aircraft noise impacts.

Regarding air quality, as indicated in Section 4.2 of the SPAS Draft EIR, operation of the airport would result in significant and unavoidable impacts to air quality. Even after mitigation, operational emissions of sulfur dioxide (SO2), PM10, and PM2.5 would be significant and unavoidable under all of the alternatives. Operational concentrations of NO2, PM10, and PM2.5 would also be significant and unavoidable under all of the alternatives.

SPAS-AL00007-50

Comment:

Finally, the NOP gives little attention to the environmental impacts of the original impetus for the runway separation, i.e., to accommodate the NLA which have a wing span of 262 feet and carry up to 800 passengers.

Response:

The increased runway separation proposed under various SPAS alternatives serves a number of purposes that relate to several aircraft types, not just new large aircraft (NLA). As described in Chapter 2 of the SPAS Draft EIR, the increased separation proposed under Alternatives 1, 3, 5, 6, and 7 allows for addition of a centerfield parallel taxiway, the safety benefits of which are described in Section 4.7.2. While the commentor is correct about the wingspan of an NLA, specifically an Airbus A380, being 262 feet, the reference to NLA carrying up to approximately 800 passengers is misleading given that seating capacity is only for a cabin design that is entirely economy-class seating, whereas the standard common three-class cabin design (i.e., First Class, Business/Executive Class, and Coach) has a seating capacity of approximately 525 passengers.1 The seating capacity of the A380 aircraft operated by QANTAS, which has the most daily A380 flights of any carrier at LAX, is 450.

The SPAS Draft EIR provides a comprehensive analysis of the environmental impacts of each SPAS alternative, taking into account the existing (2009) and future (2025) fleet mix that includes NLA (i.e., ADG VI aircraft such as the A380). Please see Appendix F-1 of the Preliminary LAX SPAS Report for a discussion of the 2009 and 2025 Passenger Forecast and Design Day Flight Schedule models, which includes projections about the number of NLA expected to operate at LAX in 2025. The effects of operations of NLA at LAX, including increased activity of NLA, are analyzed throughout the SPAS Draft EIR.

1. Airbus, A380 Family, Available: www.airbus.com/aircraftfamilies/passengeraircraft/a380family/, accessed November 27, 2012.

SPAS-AL00007-51

Comment:

It should be noted that neither NOP Figure 5, nor Figure 11, fully depicts the configuration of the North Airfield, as both omit: (1) the displaced threshold intended for use on Runway 6L/24R, to ensure arrivals at the same runway point as on the current runway length; and (2) the Runway Protection Zones ("RPZ") for both runways. The latter are important because of the constraints on the use of the land that falls within them. Specifically, FAA regulations require that RPZ property belonging to the airport be kept largely clear of structures in order to "enhance the protection of people and property on the ground." FAA Advisory Circular 150/5300-13, § 212. Moreover, to the extent that property within other jurisdictions such as Westchester fall within the RPZ, the ALUCP for LAX may constrain the reuse of such property by its owners, California Public Utilities code § 21675(a).

Response:

The displaced thresholds and Runway Protection Zones (RPZ) are not depicted in the 2008 NOP, which was prepared in accordance with Section 15082 of the State CEQA Guidelines. Section 15082 states that the NOP must include, among other things, the location of the project, as demonstrated either by street address and cross street or by attaching a specific map. The maps included in the NOP show the location of the project, as well as the various alternatives discussed in the Preliminary LAX SPAS Report and SPAS Draft EIR.

However, graphics depicting displaced thresholds intended for use on Runway 6L/24R in each alternative were developed for the SPAS Draft EIR. For additional information on the displaced thresholds for each alternative, see Figures 2-1 through 2-9 in Sections 2.3.1.1 through 2.3.1.9 of the SPAS Draft EIR.

Full descriptions of airfield surfaces, including RPZs, are included in the SPAS Draft EIR. For additional information on RPZs for each alternative, see the Airfield Surfaces portion of Sections 4.7.2.6.1 through 4.7.2.6.9 of the SPAS Draft EIR.

SPAS-AL00007-52

Comment:

In summary, the proposed runway reconfiguration is potentially damaging to Cities. Cities have, instead, offered, in partnership with co-Petitioners El Segundo and ARSAC, and continue to support, the alternative which allows movement of Runway 6L/24R 100 feet to the north. (See, NOP, Figure 11). Petitioners offer this alternative in recognition of LAWA's need to facilitate operations on the airfield, but with the equivalent understanding that such improvement need not come at Petitioners' environmental expense. Movement of Runway 6L/24R 100 feet to the north will allow the same runway separation as now exists on the South Runway Complex, the current targeted recipient complex for all NLA traffic, which LAWA has deemed "safe" for that purpose. The 100 feet north alternative would, thus, allow precisely the same balance between the runway complexes as that articulated as a primary goal in the LAX Master Plan § 1.1, Goal 7, while, at the same time, providing environmental mitigation to surrounding communities.

In short, the alternative that allows movement of Runway 6L/24R 100 feet to the north offers LAWA the same benefits it sought for the South Complex, without either the adverse impacts, or potential controversy that will unavoidably accompany the increased capacity, air and surface traffic, and environmental impacts attendant upon movement of Runway 6L/24R 340 feet to the north. Petitioners strongly urge that the alternative of moving Runway 6L/24R 100 feet to the north be adopted as the EIR's preferred alternative.

Cities appreciate this opportunity to comment and look forward to partnering with LAWA to implement a mutually acceptable and environmentally sensitive airport development.

Response:

The commentor's preference toward Alternative 6, which would move Runway 6L/24R 100 feet to the north, is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project.

The SPAS Draft EIR evaluated the potential environmental impacts of all SPAS alternatives. Please also note that the comment presents a personal opinion as to the efficacy of the proposed alternatives that is not supported by facts or substantial evidence.

SPAS-AL00007-53

Comment:

Petitioners' Overview of Guiding Principles for Environmental Analysis:
LAX Specific Plan Amendment Study EIR

Submitted by Petitioners: City of El Segundo, City of Inglewood, City of Culver City, County of Los Angeles, and Alliance for a Regional Solution to Airport Congestion (ARSAC).

Background: In January of 2005, Petitioners filed lawsuits challenging the approval of the LAX Master Plan Program and the associated Environmental Impact Report (EIR) prepared by Los Angeles World Airports (LAWA) under the California Environmental Quality Act (CEQA). These suits were resolved by a 2006 Stipulated Settlement between LAWA and Petitioners. In response to the Notice of Preparation (NOP) recently released by LAWA for the Specific Plan Amendment Study (SPAS) Draft EIR, Petitioners now jointly submit this overview of principles that should guide LAWA in that environmental review process. Petitioners will also submit detailed individual comments.

Response:

The comment is noted. Please see Responses to Comments SPAS-AL00007-54 through SPAS-AL00007-59 below.

SPAS-AL00007-54

Comment:

LAWA's Obligation to Avoid and Reduce Impacts to Surrounding Communities. As LAWA proceeds with refinement and analysis of options as part of the SPAS process, it must continually recognize its obligation to avoid and mitigate impacts to the communities that surround LAX. Options under consideration must be evaluated and ranked based on how they would impact the environment, public health and safety in surrounding communities (e.g., noise, air quality, traffic). All alternatives should be subject to a full and fair evaluation in the SPAS DEIR and LAWA should remain open to options that would avoid or mitigate impacts to its neighbors, taking care not to prematurely select a preferred alternative.

Response:

As provided in Section 1.2.1 of the SPAS Draft EIR, a SPAS project objective is to minimize environmental impacts on surrounding communities. The SPAS Draft EIR demonstrates LAWA's commitment to identify and apply ways to avoid or mitigate environmental impacts on surrounding communities. Please see the various sections of the SPAS Draft EIR for discussions of potential environmental impacts as well as Table 1-6 for a list of all applicable LAX Master Plan commitments, LAX Master Plan mitigation measures, and SPAS-specific mitigation measures to minimize impacts on surrounding communities. There is no requirement in the LAX Specific Plan, the Stipulated Settlement, or CEQA to rank options under consideration as to how they would impact the environment, public health, and safety in the surrounding community. However, Alternative 2 was designated in Section 1.5 of the SPAS Draft EIR as the environmentally superior alternative; this designation took into consideration impacts on the surrounding community.

Please see Response to Comment SPAS-AL00007-6 regarding the fact that nine alternatives were subject to a full and fair evaluation in the SPAS Draft EIR. LAWA did not "prematurely select" a preferred alternative; LAWA staff did not identify a Staff-Recommended Alternative until after publication of the SPAS Draft EIR and the close of the public review period. Please see Chapter 2 of this Final EIR for a discussion of the LAWA Staff-Recommended Alternative and its associated environmental impacts and recommended mitigation measures.

SPAS-AL00007-55

Comment:

Continued Consultation with Surrounding Communities. The alternatives described in the SPAS NOP were developed and selected by LAWA during a lengthy consultation process with Petitioners. That consultation process grew out of the 2006 Stipulated Settlement, which states, in relevant part, that An LAX Specific Plan Amendment Process Advisory Committee shall be created consisting of representatives of the City of Los Angeles, County of Los Angeles, El Segundo, Inglewood, Culver City, and ARSAC, LAWA shall consult with the Committee during each significant step of the LAX Specific

Plan Amendment Process." Petitioners wish to recognize LAWA's compliance to date with this provision of the Stipulated Settlement. LAWA must now ensure that it continues to consult with Petitioners as the EIR process proceeds and the SPAS alternatives are developed in more detail. In particular, LAWA should take care to consult with Petitioners regarding the details and analysis of the alternatives supported by any Petitioner.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. LAWA has and continues to consult with Petitioners as the EIR process proceeds. In compliance with Section V.J of the Stipulated Settlement, LAWA established the LAX SPAS Advisory Committee. The Advisory Committee members included representatives from the County of Los Angeles, City of Los Angeles, City of El Segundo, City of Culver City, City of Inglewood, and Alliance for a Regional Solution to Airport Congestion (ARSAC). (See generally Chapter 5 of the Preliminary LAX SPAS Report.) LAWA held 24 meetings with the Advisory Committee between March 2006 and June 2012. A list of these dates is provided in Appendix D-2 of the Preliminary LAX SPAS Report. An additional meeting was held with the Advisory Committee on December 4, 2012. Meetings were scheduled prior to and following the public meetings that LAWA convened to seek community input on SPAS, as well as at each significant step of the SPAS process. The Advisory Committee members provided input and feedback on various aspects of the airport planning process, and suggested alternatives to be studied as part of SPAS. Documentation of the Advisory Committee meetings through June 2012 is provided in Appendix D-2 of the Preliminary LAX SPAS Report.

SPAS-AL00007-56

Comment:

Extension of Gate Constraint. LAWA, FAA and the Petitioners all agree that limiting the number of gates at LAX will promote efficient passenger operations and encourage other airports in the Los Angeles basin to increase capacity to serve aviation demand. Accordingly, the long term success of the regional approach to serving aviation demand depends on maintaining appropriate gate constraints at LAX. The 2006 Stipulated Settlement between LAWA and the Petitioners limits the number of permissible gates at LAX to 163 and, commencing in 2010, requires LAWA to begin reducing the number of operating gates at LAX to 153. This settlement provision is operative through December 31, 2020. As part of the SPAS process, LAWA must analyze the continuation of the LAX gate constraints beyond 2020, as well as the possible enhancement of those constraints at a level that will efficiently serve up to 78.9 million annual passengers at LAX, while encouraging growth elsewhere in the region, including at the other airports owned and operated by LAWA.

Response:

This comment was submitted in connection with the commentor's comments on the 2008 SPAS NOP and, as such, was considered by LAWA in determining the scope of the EIR and in developing the SPAS project description. The statement in the comment that "The 2006 Stipulated Settlement between LAWA and the Petitioners limits the number of permissible gates at LAX to 163 and, commencing in 2010, requires LAWA to begin reducing the number of operating gates at LAX to 153" paraphrases Section IV.B.1 of the Stipulated Settlement, but does not acknowledge Section IV.C, which explains that Section IV.B.1 "shall not apply if either (1) total passenger operations at LAX are below 75 million annual passengers or (2) the LAX Master Plan Program is substantially revised pursuant to the LAX Specific Plan Amendment Process such that the total number of gates is reduced to 153 or less."

As described in Section 2.3 of the SPAS Draft EIR, all of the SPAS alternatives are designed to have no more than 153 passenger gates. The comment requests a continuation of the gate constraints identified in Section IV.B of the Stipulated Settlement beyond December 31, 2020, which is the final operative date of such constraints, pursuant to the Stipulated Settlement, and "enhancing" those constraints. None of this is required by the Stipulated Settlement, particularly where, as here, all of the SPAS alternatives are designed to have no more than 153 passenger gates. The comment does not identify any significant environmental impact of the SPAS that would be reduced or avoided by continuing the gate constraints beyond 2020, any specific means of enhancing the constraints, or any

impact that would be reduced by doing so. Note that in addition to limiting the gate count to 153, the SPAS project includes an amendment to Section 7.H of the Specific Plan (applicable to all alternatives, including the existing LAX Master Plan) that would provide opportunities for adjustments if LAX reaches 75 or 78.9 MAP earlier than expected. This amendment, set forth in detail in Chapter 7 of the Preliminary LAX SPAS Report, would address potential variations in passenger projections over time, first by requiring action to encourage further shifts in passenger and airline activity to other regional airports if the annual aviation activity analysis forecasts that the annual passengers for that year at LAX are anticipated to exceed 75 MAP, and, second, by requiring a Specific Plan Amendment Study if the annual aviation activity analysis forecasts that LAX annual passengers for that year are anticipated to exceed 79.9 MAP.

SPAS-AL00007-57

Comment:

Airfield Balance. In the NOP, LAWA indicates that under the LAX Master Plan, one of its goals is to "provide a better balance in operations between the North Airfield and the South Airfield." Petitioners support this goal and urge LAWA to conduct a full analysis of whether and to what extent each of the proposed. SPAS alternatives would help achieve better airfield balance. Petitioners agree that total flight operation balance can lead to less operational crowding, which is good for all.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. As identified in Section 1.2.1 of the SPAS Draft EIR, an objective of the SPAS effort is to "provide north airfield improvements that support the safe and efficient movement of aircraft at LAX". Runway 24L is not long enough under existing conditions to accommodate some fully-loaded departing aircraft, resulting in higher utilization of the south airfield. (Section 2.3.1 of the SPAS Draft EIR.) As explained in Section 4.7.2 and Table 4.7.2-8 of the SPAS Draft EIR, some of the SPAS alternatives propose changes to the north airfield that will accommodate larger aircraft. These changes will alleviate the problem of having to taxi large aircraft to the south complex, thus improving airfield balance. (See page 5-80 of the Preliminary LAX SPAS Report.) This is especially important given that operation of large aircraft (i.e., ADG V and VI) is expected to increase substantially by the year 2025. (See Table 8 and Table 12 of Appendix F-1 of the Preliminary LAX SPAS Report).

Please see Section 1.2.1 of the SPAS Draft EIR for a discussion of the problem that "the primary north airfield departure runway (6R/24L) is too short for certain larger aircraft (e.g., fully-loaded Boeing 747-400) on long-haul flights, requiring those aircraft to taxi to the south airfield, resulting in less efficient operations and disproportionate environmental impacts." As discussed and depicted in Section 2.3.1 of the SPAS Draft EIR, each of the SPAS airfield alternatives (Alternatives 1 through 7) includes an extension to Runway 6R/24L to help balance long-haul departures between the north and south airfields. Additionally, see Table 1-3 of the SPAS Draft EIR for a preliminary assessment of the alternatives and whether or not an alternative would promote airfield balance. Please also refer to Response to Comment PC00130-511 for additional discussion regarding airfield balance.

SPAS-AL00007-58

Comment:

Regional Approach. Petitioners strongly support a regional approach to accommodating passenger and cargo aviation demand throughout Southern California. Because the area around LAX is fully developed, and because we must reduce vehicle miles traveled to improve air quality, decrease greenhouse gases, and increase productivity, a regional solution to serving aviation demand is essential. The regional approach, which is fully supported by the Southern California Association of Governments, must be a key component of everything LAWA does, including in the SPAS process. LAWA should vigorously pursue accommodating aviation demand at Palmdale and Ontario, and work aggressively with other airport operators and local governments to advance the regional approach.

Response:

Please refer to Topical Response TR-SPAS-REG-1 regarding the fact that LAWA, through the LAX Master Plan, the SPAS process, and multiple other efforts, supports the regionalization of air travel demand in Southern California. As also described therein, the LAX Specific Plan amendment proposed as part of SPAS further supports such regionalization.

SPAS-AL00007-59

Comment:

DEIR Public Review Period. The NOP indicates that LAWA intends to provide just 45 days for public review and comment on the Draft SPAS EIR. In light of the complexity of this project and LAWA's tendency to produce lengthy CEQA documents, Petitioners anticipate that 45 days will not be sufficient.

Response:

This comment is noted. LAWA provided a 75-day review period for the SPAS Draft EIR. Section 21091(a) of the Public Resources Code requires that the review period for a Draft EIR that is submitted to the State Clearinghouse for review shall be at least 45 days. (See also State CEQA Guidelines Section 15105.) The review period for the SPAS Draft EIR provided an additional 30 days for public comment beyond the requirements of CEQA.

SPAS-AL00007-60

Comment:

The following are the comments of the Cities of Inglewood and Culver City ("Cities") concerning the Revised Notice of Preparation ("Revised NOP") for the Los Angeles International Airport ("LAX") Specific Plan Amendment Study ("SPAS").' The Revised NOP commences the environmental review of proposed alternatives to the implementation of five development projects at LAX, including a Ground Transportation Center ("GTC"), Automated People Mover ("APM") from the GTC to the Central Terminal Area ("CTA"), and associated on-site road improvements; demolition of Terminals 1, 2 and 3; and reconfiguration and separation of Runways 6L/24R and 6R/24L on the North Runway Complex (these activities, taken together will be referred to as "Project"). Cities regard the Project as a component of a more comprehensive expansion plan, including, but not limited to, construction of Midfield Satellite Terminal, a Crossfield Taxiway, and redesign and addition of gates at the Tom Bradley International Terminal ("TBIT").

1 Cities of Inglewood and Culver City are Petitioners and Settling Parties in the case of El Segundo, et al. v. City of Los Angeles, et al., Riverside County Superior Court Case No. RIC 426822.

Response:

Comments SPAS-AL00007-60 through SPAS-AL00007-75 provide comments on the 2010 NOP prepared for the LAX Specific Plan Amendment Study. All of these comments were considered prior to preparation of the SPAS Draft EIR. Responses to specific comments are provided below.

SPAS-AL00007-61

Comment:

As a threshold issue, please be advised that Cities respond to Question No. 2, Revised NOP, p. 2, as follows: Cities do not fall within the category of "responsible agency" or "trustee agency," as those terms are defined in 14 Cal.Code Regs. §§ 15096, 15381, and 15386.2

2 CEQA's implementing regulations will be referred to throughout these comments as "CEQA Guidelines."

Response:

The comment is noted.

SPAS-AL00007-62

Comment:

Please be further advised that the following comments concerning significant environmental issues raised by the Project, alternatives and mitigation measures are necessarily preliminary, due to the attenuated character of the Revised NOP. Cities therefore reserve their right to supplement these comments in response to future environmental documents.

Response:

The comment is noted. Please see Responses to Comments SPAS-AL00007-63 through SPAS-AL00007-75 below.

SPAS-AL00007-63

Comment:

I. THE REVISED NOP STILL CONTEMPLATES "TIERING" OF THE NOP ON THE "APPROVED MASTER PLAN" WHICH WILL RESULT IN IMPROPERLY ATTENUATED ENVIRONMENTAL REVIEW.

The Revised NOP continues to state, despite Cities' prior comments on the Original NOP concerning the pitfalls of this approach, that the SPAS EIR will be a Supplemental EIR tiered from the LAX Master Plan EIR (NOP, p.5), "providing new or revised analyses of the environmental impacts specific to the alternatives associated with the Yellow Light Project options. . ." Moreover, LAWA, in its NOP for the Crossfield Taxiway Project (which was published contemporaneously with the publication of the Original NOP), justified expedited environmental review on the premise that adequate environmental review was already completed during the prior Master Plan environmental review. While the Legislature has directed local agencies to "tier" EIRs whenever feasible, the utility of tiering is limited to those situations where the individual projects are consistent with the larger project such as the approved Master Plan project which has already been environmentally reviewed. "[T]iering is a process by which agencies can adopt programs, plans, policies, or ordinances with EIRs focusing on 'the big picture,' and can then use streamlined CEQA review for individual projects that are consistent with such . . . [first tier decisions]. . ." Koster v. County of San Joaquin, 47 Cal.App.4th 29, 36 (1996). [Emphasis added.]

In this case, despite the fact that the "approved Master Plan" remains in place, many of its most salient features, such as the Ground Transportation Center ("GTC"); closure of the CTA to surface traffic; and movement of Runway 6R/24L 340 feet to the south, necessitating the restructuring of Terminals 1 through 3, are being replaced by the Projects currently being evaluated under this Revised NOP. Thus, because of the proposed amendments, the components of the proposed Airport Master Plan differ materially from the project originally evaluated in the approved Master Plan and cannot serve as a "baseline" for analysis. As an example, the proposed movement of Runway 6R/24L 400 feet north is a radical departure from the movement contemplated in the Master Plan 340 feet south, possibly impacting, among other things, the size and location of the noise contours and the Runway Protection Zone ("RPZ").

Moreover, the inclusion of alternatives reflecting the Yellow Light Projects, the original components of the Airport Master Plan, does not rectify the problem. The Yellow Light Projects are "yellow light" because the Settlement between the parties in the above-referenced action contemplates their replacement.3 Therefore, the yellow light projects cannot serve as the basis for either the "Existing Condition Alternative," or the "No Project Alternative" because the Settlement ensures that they do not exist in the Airport Master Plan now, and that they will not in the future.

In short, the significant differences between the "No Project/No SPAS Alternative (Approved Master Plan)," and the actual "No Project Alternative" raises the question of what is left of the original Master Plan, in terms of viable project alternatives, to make tiering an appropriate option. Given these circumstances, the Cities question the appropriateness of the "tiering" of the Revised NOP projects upon the Master Plan EIR.

3 See, e.g., Settlement, § V.D.1. "Potential alternative designs, technologies, and configurations for the LAX Master Plan Program that would provide solutions to the problems that the Yellow Light Projects were designed to address . .." [Emphasis added.] and Settlement, § V.D.3 "Potential environmental impacts that could result from replacement of the Yellow Light projects with the Alternative Projects, and potential mitigation measures that could provide a comparable level of mitigation to that described for the Yellow Light Projects . . ." [Emphasis added.]

Response:

Much of the content of this comment is similar to that of comment SPAS-AL00007-41; please refer to Response to Comment SPAS-AL00007-41. The latter portion of the comment suggests that implementation of the Yellow Light Projects, as proposed in the LAX Master Plan, cannot be considered as the basis "for either the 'Existing Conditions Alternative,' or the "No Project Alternative.'" Please see Response to Comment SPAS-AL00007-7 for the reasons why this implication is incorrect, including the fact that the Yellow Light Projects remain part of the approved LAX Master Plan. The Stipulated Settlement does not prohibit implementation of the Yellow Light Projects, but rather the Stipulated Settlement and the LAX Specific Plan require a Specific Plan Amendment Study prior to seeking an LAX Plan Compliance determination for any of the Yellow Light Projects.

SPAS-AL00007-64

Comment:

II. THE PROJECT DOES NOT CREATE CONDITIONS THAT ENCOURAGE AIRLINES TO GO TO OTHER AIRPORTS IN THE REGION.

Cities submit that the Revised NOP contemplates projects which, when taken together, defy the Settlement's mandate that the SPAS will, among other things, "creat[e] conditions that encourage airlines to go to other airports in the region." Settlement, § V.C. As an example, the Revised NOP acknowledges that the most extreme alternatives for the North Airfield reconfiguration, and particularly the 400 foot north alternative, are explicitly aimed at "accommodat[ing] the largest aircraft types currently in service and anticipated for the future (Group V and Group VI aircraft) . . ." Revised NOP, p. 6, by creating a "Modified Group VI airfield," Id., which can operate the largest aircraft models substantially without operational restrictions. By doing so, Los Angeles World Airports ("LAWA") staff is overtly setting the stage for the exacerbation of the outflow of airline traffic and passengers from other LAWA operated airports, particularly Ontario International Airport ("ONT"), and into LAX.

ONT has lost 22 years of traffic growth since 2007, a loss of $400 million to the Inland Empire economy and more than 8,000 jobs. Moreover, airlines are continuing to downsize ONT and it lost its last international passenger flight in February, 2010. Certainly, part of the problem can be attributed to the current state of the national economy, but by no means all, as other airports in the region such as Palm Springs, Long Beach and John Wayne actually gained passengers during the period 2000-2009. While passenger traffic at ONT declined 27.7% between the years 2000 and 2009, LAX itself lost comparatively fewer passengers at 9%.

The best explanation lies in ONT's cost structure when compared with that of LAX and surrounding airports, as well as LAWA's de-emphasis on encouraging growth. For example, ONT's airline costs per passenger are higher than at any other secondary airport in Southern California or the United States (the second highest airport costs for Southwest Airlines after New York's LaGuardia). Moreover, L.A.'s Living Wage Ordinance for airport workers add significant cost burden to airlines serving ONT.

Equally important is the LAWA staff's emphasis on supporting LAX. When ONT lost its last international passenger flight, LAWA staff publicly stated that ONT would not receive international flights in the future. In addition, L.A. Airport Commissioners have publicly spoken on the need to make LAX the priority for restoring passenger traffic to the region. To add insult to injury, no credible marketing plan has been introduced for ONT or airports under LAWA sponsorship other than LAX. In 2010, for example, LAWA will spend $6.4 million marketing LAX, but only $450,000 marketing ONT.

This trend, and its encouragement by the dramatic reconfiguration of the North Airfield, has impacts not only for the Inland Empire, but for residents living around LAX as well. While the Settlement requires that the SPAS, among other things, "identify specific plan amendments that . . . minimiz[e] environmental impacts on surrounding communities," Settlement § V.C., it is clear that the dramatic reconfiguration of the airfield necessary to accommodate Category VI aircraft will affect the size and location of the LAX noise contours, moving them north and east; potentially displace overflight on approach to the north; and realign Runway Protection Zones at each end of the North Airfield runways, causing additional, hitherto unanalyzed constraints on land use in communities to the north and east.

Response:

Comments regarding LAWA's compliance with the Stipulated Settlement require legal conclusions that are beyond the scope of what is required by CEQA. Please refer to Topical Response TR-SPAS-REG-1 regarding the fact that LAWA, through the LAX Master Plan, the SPAS process, and other efforts, supports the regionalization of air travel demand in Southern California. As indicated therein, the potential LAX Specific Plan amendment to Section 7.H further supports such regionalization.

Topical Response TR-SPAS-REG-1 specifically discusses the status of LAWA's management initiatives and marketing efforts for the LA/Ontario International Airport. The objectives of such initiatives are specifically targeted towards reducing expenses, increasing passenger traffic, and increasing airline activity at ONT. LAWA and executive management of the City of Los Angeles have implemented, and will continue to evaluate and pursue, numerous measures relative to increased stability and growth of ONT. Such measures are intended to enhance the viability and attractiveness of ONT as a preferred airport for passengers and airlines within the Southern California regional airport system. However, the topical response points out that even though LAWA controls both ONT and LAX, LAWA cannot force passengers or airlines to utilize one airport over the other.

The comment on the 2010 Revised NOP does not accurately reflect the discussion presented in the subject document. The 2010 Revised NOP does not state or imply that "the most extreme alternatives for the North Airfield reconfiguration, and particularly the 400 foot north alternative, are explicitly aimed at 'accommodat[ing] the largest aircraft types currently in service and anticipated in the future (Group V and Group VI aircraft)…'" The text that is quoted by the commentor from page 6 of the Revised NOP is an excerpt from the discussion of the problems that the north airfield reconfiguration was designed to address, which describes how the north airfield design under the approved LAX Master Plan was intended to address the issue of meeting FAA design standards for ADG V and VI aircraft. The full text surrounding the subject excerpt is as follows:

"The North Airfield configuration set forth in the approved LAX Master Plan was designed to accommodate the largest aircraft types currently in service and anticipated for the future (Group V and VI aircraft), reduce the risk of runway incursions, enhance the safety and efficiency of aircraft operations at LAX, and provide a better balance in heavy aircraft operations between the North Airfield and the South Airfield. The North Airfield configuration set forth in the approved Master Plan would achieve these goals by relocating Runway 6R/24L 340 feet to the south of the existing runway centerline in order to accommodate a 75-foot-wide centerfield taxiway between Runway 6L/24R and Runway 6R/24L with 520 feet separation between each of the runway centerlines and the new taxiway centerline." As described in Section 2.2 of the SPAS Draft EIR, one of the objectives of the SPAS project is to provide north airfield improvements that support the safe and efficient movement of aircraft at LAX, which includes, among other things as listed on page 2-2 of the SPAS Draft EIR, LAWA's desire to provide airfield improvements that are consistent with FAA design standards for all-weather operation of ADG V and VI aircraft currently in service and anticipated for the future at LAX. As described in Section 2.3 of the SPAS Draft EIR, a broad range of airfield improvement alternatives was developed for evaluation in the SPAS Draft EIR, each of which responds differently to meeting that objective and only one of which (Alternative 5) fully meets that objective.

The commentor goes on to state that by creating a Modified Group VI airfield, which "can operate the largest aircraft models substantially without operational restrictions" LAWA staff is "overtly setting the stage for the exacerbation of the outflow of airline traffic and passengers from other LAWA operated airports, particularly Ontario International Airport ('ONT'), and into LAX." Aircraft Design Group (ADG) VI aircraft for commercial passenger service is currently limited to only the Airbus A380 and Boeing

747-8, with the A380 having been used for scheduled passenger service since October 2007 and 747-8 just now starting to be used for scheduled passenger service. To date, scheduled passenger service using ADG VI aircraft has been limited to long-haul international flights, especially to and from Asia, Australia, New Zealand, and, more recently, Europe. Providing airfield improvements at LAX that meet FAA design standards for ADG VI aircraft, which would alleviate the need for special operational procedures by airport operations staff and FAA air traffic control tower when a ADG VI aircraft in arriving, taxiing, or departing on the north airfield, is very unlikely to draw passenger activity away from LAWA's other airports such as LA/Ontario International Airport and Van Nuys given that the market segment likely to be using such aircraft (i.e., long-distance international carriers at major airports offering a variety of services and connecting flights) are currently not serving those airports to begin with and/or are not likely to be candidates for new service.

Regarding minimization of impacts, comments regarding LAWA's compliance with the Stipulated Settlement require legal conclusions that are beyond the scope of what is required by CEQA. As noted above, the SPAS Draft EIR includes and addresses a broad range of alternatives pertaining to improvements for the north airfield, including several options for relocation of runways. Chapter 4 provides a comprehensive analysis of the environmental impacts and mitigation measures associated with each option, including, but not limited to, aircraft noise impacts with changes in noise contours evaluated (see Section 4.10.1) and aircraft safety including runway safety areas (RSAs), protection zones (RPZs), and FAR Part 77 imaginary surfaces (see Section 4.7.2), and land uses in communities around LAX (see Section 4.9).

SPAS-AL00007-65

Comment:

III. THE "REVISIONS" TO THE NOP APPEAR LITTLE MORE THAN JUSTIFICATIONS FOR "PRE-COMMITMENT" TO THE MOST EXTREME ALTERNATIVE(S) FOR NORTH AIRFIELD RECONFIGURATION.

Agencies may not "pre-commit" to project approval because "[a] fundamental purpose of [CEQA review] is to provide decision-makers with information they can use in deciding whether to approve a proposed project . . ." Laurel Heights Improvement Association v. Regents of the University of California, 47 Cal.3d 376, 394 (1988) [emphasis in original]. Here, with the exception of some prefatory comments, a substantial component of the changes memorialized in the Revised NOP go to justify adoption of the most draconian alternatives proposed for the reconfiguration of the North Airfield.

Response:

Section 3.1.1 of the 2010 SPAS NOP factually describes existing conditions related to the north airfield, describes the problems the north airfield reconfiguration in the LAX Master Plan was designed to address, and presents six reconfiguration options. There is nothing in the 2010 SPAS NOP or the SPAS Draft EIR to suggest that LAWA preferred one reconfiguration option over another, or that LAWA was pre-committed to any of the options. Please also see Response to Comment SPAS-AL00007-67 below.

SPAS-AL00007-66

Comment:

First, it should be noted that the Project's five components still actually boil down to two: (1) the North Airfield Reconfiguration; and (2) the proposed GTC. This is because the APM and on-site road improvements are necessitated by, and part and parcel of, the proposed GTC. It also appears, according to the description of the various components and their alternatives in the Revised NOP, that the APM and on-site road improvements would only occur for the purpose of linking the GTC and CTA. Thus, if the GTC were not built (the existing condition), the ancillary transportation improvements would not be necessary.

In addition, the alternatives relating to the demolition of Terminals 1 through 3 are constrained to "yes" or "no." As, under the express terms of the Settlement, alternatives to the GTC must be found and

evaluated, there is, in reality, no "yes" option, because such an option would effectively obliterate 30% of the airport's terminal capacity, without any potential replacement.

Response:

The content of this comment is essentially the same as comment SPAS-AL00007-42; please see Response to Comment SPAS-AL00007-42.

SPAS-AL00007-67

Comment:

Moreover, the NOP revisions appear to be largely aimed at justifying the most extreme alternative for reconfiguration of the North Airfield. On the one hand, the Revised NOP dismisses the conclusions of the North Airfield Safety Study ("Safety Study") regarding the purported contribution of the Project to airfield safety.4 While it is true that the Safety Study did find that the existing runway configuration already provides a high level of safety, it went on to state that the Project could not be justified on safety grounds.

Apparently, at least partially relinquishing the safety justification, the Revised NOP emphasizes instead the attributes of a "Modified Group VI airfield . . designed to accommodate the new generation of wide-bodied airplanes that began to operate at LAX in 2008," Revised NOP, p. 6. The rationale articulated in the Revised NOP is that "the North Airfield configuration set forth in the approved LAX Master Plan [movement of Runway 6L/24R 340 feet south] was designed to accommodate the largest aircraft types . . . reduce the risk of runway incursions, enhance the safety and efficiency of aircraft operations at LAX, and provide a better balance in heavy aircraft operations between the North Airfield and the South Airfield," Revised NOP, p. 6.

In taking that position, the Revised NOP ignores the data arising from the first four years of the Specific Plan Amendment Study process, in which Petitioners participated, and during which it was determined that less extreme alternatives such as movement of Runway 6L/24R 100 feet to the north could also accommodate centerline taxiway and other airfield improvements, Revised NOP, p. 6, increase the length of Runway 24L, Id., and, thus, also reduce the risk of runway incursion, enhance safety and efficiency of aircraft operations and provide a better balance between runway complexes.

4 "Completion of LAX North Airfield Safety Study (February 19, 2010), which found that, although the current north airfield configuration provides a high level of safety, changes to the configuration by further separating the runways could create even greater safety and might significantly reduce airport congestion during peak hours." Revised NOP, p. 4.

Response:

The project addressed in the SPAS Draft EIR is the SPAS, including the range of alternatives addressed therein (see Section 1.2 of the SPAS Draft EIR). The North Airfield Safety Study (NASS) does not address the SPAS project; its purpose was to "inform decision makers on the scope and severity of operation safety problems of the north airfield and a range of potential solutions." (See Section 4.7.2 of the SPAS Draft EIR for additional discussion of the NASS.) Note also that the NASS represents a subjective value judgment on the importance of reducing the risk of a fatal runway collision, which is not shared by the FAA, the federal agency responsible for the safety of civil aviation.

The alternatives addressed in the SPAS Draft EIR include the concept of relocating Runway 6L/24R 100 feet to the north, presented as Alternative 6, as well as several other options for runway and taxiway improvements. An evaluation of airfield safety considerations associated with each of the airfield improvement options (i.e., Alternatives 1 through 7) is presented in Section 4.7.2, the results of which are summarized in Table 1-12 of the SPAS Draft EIR. The ultimate determination of whether to select one of the SPAS alternatives and the rationale for such a determination is left to the decision-makers. This comment will be provided to the decision-makers for their review prior to making a decision.

SPAS-AL00007-68

Comment:

In summary, given LAWA's apparent continuing dedication to the attributes of the Project set forth in the approved Master Plan, and reconfirmed in the Original NOP, it appears from the Revised NOP that the Project has fallen victim to the flaw of "pre-commitment" that will render the EIR based on it, inadequate.

Response:

Please see Response to Comment SPAS-AL00007-65, which demonstrates that LAWA was not pre-committed to a particular alternative.

SPAS-AL00007-69

Comment:

IV. THE EIR'S CUMULATIVE IMPACT ANALYSIS SHOULD, AT MINIMUM, INCLUDE ALL PROJECTS PLANNED OR RECENTLY IMPLEMENTED AND NOT INCLUDED IN THE SPAS.

"The agency may prepare one EIR for all projects, or one for each project, but shall in either case comment upon the cumulative effect," CEQA Guidelines § 15165. "The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects." CEQA Guidelines § 15355(b).

Here, the synergistic impacts of the various projects is beyond question. The Crossfield Taxiway is a necessary component of access to and from the North Airfield. Similarly, the new Midfield Satellite Terminal, and the reconstruction and addition of gates at the TBIT are intimately related to the changes in the North Airfield complex, as the new, associated taxiway system appears to encourage expedited access from the North Airfield complex, without which the North Airfield complex would become a victim of the same airfield gridlock that LAWA now purports to foresee for the whole airport if the Project is not implemented.

It is beyond dispute that the complex of projects currently being implemented or contemplated in the Revised NOP are "closely related" to other "present", or, at minimum, "reasonably foreseeable future" projects such as the Midfield Satellite Terminal and the Crossfield Taxiway. Their collective scope, however, requires more than a simple "comment." As the projects were not evaluated as part of the same project, substantially the same attention should be paid to their impacts in the cumulative impacts analysis. Absent the requisite attention to the collective effects of the myriad of projects that are or will shortly be implemented to enhance "throughput rate", i.e., capacity, FAA Advisory Circular 150/5060-5, page 1, on the LAX airfield, the EIR will not adequately disclose the Project's capacity enhancing potential and concomitant environmental impacts.

Response:

This comment is substantially the same as Comment SPAS-AL00007-44. Please see Response to Comment SPAS-AL00007-44.

SPAS-AL00007-70

Comment:

V. THE PROPOSED MOVEMENT OF RUNWAY 6L/24R 400 FEET NORTH HAS ADDITIONAL CAPACITY AND NOISE ENHANCING POTENTIAL.

The Revised NOP, after more than five years of discussion of the Specific Plan Amendment, at this late date reveals an entirely new set of alternatives for the North Airfield Reconfiguration that include an even more extreme alternative than the movement of Runway 6L/24R 340 feet north in the Original

NOP. This proposed increased runway separation will have a concomitantly increased impact on surrounding communities.

Response:

As noted on page 6 of the 2010 NOP, north airfield reconfiguration options then under consideration had been modified since the 2008 NOP in response to changed conditions and additional planning efforts. These north airfield reconfigurations were further refined when the alternatives were finalized for inclusion in the SPAS Draft EIR. The 2010 NOP did not include an entirely new set of alternatives for the north airfield reconfiguration. Rather, the 2010 NOP included three of the same north airfield reconfigurations that were included in the 2008 NOP in addition to three new reconfigurations. It should be noted that the "more extreme alternative" to which the commentor refers (i.e., movement of Runway 6L/24R 400 feet north) was not carried forward for analysis in the SPAS Draft EIR. Rather, the most northerly movement of Runway 6L/24R considered in the SPAS Draft EIR was 350 feet north, only 10 feet farther north that the 340 north option included in the 2008 NOP. The concept development process is documented in Chapter 5 of the Preliminary LAX SPAS Report. The impacts of all of the SPAS alternatives were fully evaluated in the SPAS Draft EIR, including impacts associated with the various configurations of the north airfield. As demonstrated in the SPAS Draft EIR, the impacts associated with the various north airfield configurations cannot be uniformly characterized. In some cases, alternatives with increased runway separation would have greater impacts than lesser separations, in some cases, alternatives with increased separation would have lesser impacts, and in some cases, impacts would be similar regardless of the alternative.

SPAS-AL00007-71

Comment:

Most notably, the reconfiguration will almost certainly affect the size and location of the noise contours, moving them north and east, beyond the scope of the relatively extensive 1992 noise contour used by LAWA for the determination of sound mitigation construction funding for Inglewood.

Response:

The content of this comment is similar to comment SPAS-AL00007-48; please see Response to Comment SPAS-AL00007-48.

SPAS-AL00007-72

Comment:

The reconfiguration may also displace overflights on approach to relocated Runway 6L/24R to the north thereby bringing increased noise impacts, as well as air quality and other impacts, not only to Inglewood but to Culver City as well.

Response:

The content of this comment essentially the same as comment SPAS-AL00007-49; please refer to Response to Comment SPAS-AL00007-49.

SPAS-AL00007-73

Comment:

Finally, the Revised NOP gives little attention to the potential impacts of the original impetus for the runway separation, i.e., to accommodate the New Large Aircraft ("NLA") which have a wingspan of 262 feet and carry up to 800 passengers.

Response:

The content of this comment is essentially the same as comment SPAS-AL00007-50; please refer to Response to Comment SPAS-AL00007-50.

SPAS-AL00007-74

Comment:

It should be noted that none of the figures in the Revised NOP depicting the options for reconfiguration of the North Airfield contain the accompanying Runway Protection Zones ("RPZ"). Depiction of RPZs is important because of the constraint on the use of land that falls within them. Specifically, FAA regulations require that RPZ property belonging to the airport be kept largely clear of structures in order to "enhance the protection of people and property on the ground." FAA Advisory Circular 150/5300-13, § 212. Moreover, to the extent that property within other jurisdictions such as Westchester falls within the RPZ, the ALUCP for LAX may dramatically constrain the use of such property by its owners, see, Cal. Pub. Util. Code § 21675(a).

Response:

The Runway Protection Zones (RPZ) under existing (baseline) conditions and under SPAS alternatives 1 through 7 are depicted in Figures 4.7.2-3 and 4.7.2-4 (baseline conditions) in Section 4.7.2.3 and Figures 4.7.2-6 through 4.7.2-19 (Alternatives 1 through 7) in Section 4.7.2.6 of the SPAS Draft EIR. Additionally, the types and quantities of parcels that fall within the RPZ, but are not within the Airport Property Boundary are identified in accompanying tables (Table 4.7.2-3 (baseline conditions) and Tables 4.7.2-9 through 4.7.9-15 (Alternatives 1 through 7)). As discussed in Section 4.7.2.6 and shown on the figures, residential uses are currently located within the RPZ east of Runway 6L/24R and would remain in the RPZ under Alternatives 2, 3, 4, and 7. Under Alternatives 1, 5, and 6, the RPZ would shift westward and residential uses would no longer be within the RPZ.

SPAS-AL00007-75

Comment:

In summary, the revised alternatives for runway reconfiguration in the Revised NOP are, in large part, damaging to Cities. Cities have, instead, offered, in partnership with co-Petitioners El Segundo and ARSAC, and continue to support, the alternative which allows movement of Runway 6L/24R 100 feet to the north. (See, Revised NOP, Figure 7). Petitioners offer this alternative in recognition of LAWA's need to facilitate operations on the airfield but with equivalent understanding that such improvements need not come at Petitioners' environmental expense. Movement of Runway 6L/24R 100 feet to the north will allow the same runway separation as now exists on the South Runway Complex, the current targeted recipient complex for NLA traffic; is sufficient to accommodate a center taxiway to enhance efficiency and expedite movement of the NLAs; and has been deemed "safe" by LAWA for that purpose. The 100 feet north alternative would, thus, allow precisely the same balance between the runway complexes as that articulated as a primary goal in the LAX Master Plan, § 1.1, Goal 7, while, at the same time, providing environmental mitigation to surrounding communities.

In short, the alternative that allows movement of Runway 6L/24R 100 feet to the north offers LAWA substantially the same benefits it sought for the South Complex, without either the adverse impacts or potential controversy that will unavoidably accompany the increased capacity, air and surface traffic, and environmental impacts attendant upon movement of Runway 6L/24R to the north in accordance with the most extreme alternatives proposed in the Revised NOP. Petitioners strongly urge that the alternative of moving Runway 6L/24R 100 feet to the north be adopted as the EIR's Preferred Alternative.

Cities appreciate this opportunity to comment and look forward to partnering with LAWA to implement a mutually acceptable and environmentally sensitive airport development.

Response:

The content of this comment is similar to comment SPAS-AL00007-52; please refer to Response to Comment SPAS-AL00007-52.

SPAS-AL00008 Fujioka, William T County of Los Angeles Chief Executive Office Operations and Budget 10/10/2012

SPAS-AL00008-1

Comment:

Thank you for the opportunity to submit written comments on the Specific Plan Amendment Study Draft Environmental Impact Report (SPAS Draft EIR) prepared by Los Angeles World Airports (LAWA). The County of Los Angeles supports the modernization of LAX and we are glad to provide these comments to assist in the process. Our complete comments are contained in the attached document. Below is a brief summary highlighting our key issues and questions for your consideration and response:

Response:

The comment is noted. Please see Responses to Comments SPAS-AL00008-2 through SPAS-AL00008-54 below.

SPAS-AL00008-2

Comment:

- Settlement compliance: As a signator to the Stipulated Judgment, the County is keenly interested in seeing, as part of this Draft EIR, a discussion that sets forth all of the environmental commitments contained in the Settlement Agreement and illustrates how each commitment is implemented in the proposed SPAS alternatives.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Environmental commitments in the Stipulated Settlement relevant to SPAS are reflected in the project objectives described in Section 2.2 of the SPAS Draft EIR. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-AL00008-3

Comment:

- The Draft EIR should address a definitive project; selected alternatives do not fulfill the "Rule of Reason:" We believe that a definitive project description at the beginning is necessary to ensure that all environmental impacts of the project are analyzed to avoid a piecemeal approach, and to allow for meaningful public comment. These objectives are not achieved by discussing a group of alternatives and then selecting the project at the end of the process, allowing no remaining time for public input. Moreover, the approach is not consistent with the "Rule of Reason," wherein alternatives set forth in an EIR "shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project" per California Environmental Quality Act (CEQA) Guidelines §15126.6(c). This problem is evident in Draft EIR §7.1 which states that the significant unavoidable adverse impacts identified in the EIR (including direct impacts related to air quality, human health risk, traffic, noise, and land use) "pertain to all of the alternatives unless otherwise noted."

Response:

The SPAS Draft EIR's approach to the project description and alternatives was consistent with CEQA's requirements. Please see Response to Comment SPAS-AL00007-6, which explains why the analysis of nine alternatives in the SPAS Draft EIR instead of a single proposed project was consistent with CEQA's requirements and facilitated public review of the alternatives. Chapter 2 of this Final EIR presents the LAWA Staff-Recommended Alternative, which was identified after receiving and

considering all comments on the SPAS Draft EIR. The description of the LAWA Staff-Recommended Alternative and the summary of its impacts is not significant new information, and all of the comments received on the SPAS Draft EIR, and the responses to those comments provided in Chapter 4 of this Final EIR, apply to the LAWA Staff-Recommended Alternative, which will be considered by the decision-makers when they deliberate, in a public process with public input, on whether to approve a particular SPAS alternative.

The SPAS alternatives evaluated in the SPAS Draft EIR reflect a reasonable range, consistent with the requirements of CEQA. The alternatives analyzed in the SPAS Draft EIR meet CEQA's "rule of reason," which governs the choice of EIR alternatives, in that they permit a reasoned choice and allow informed decision-making. (State CEQA Guidelines Section 15126.6(a) and Section 15126.6(f); City of Maywood v. Los Angeles Unified School District (2012) 208 Cal.App.4th 362, 419.) It is true that State CEQA Guidelines Section 15126.6(f) states that alternatives must be limited to those that avoid or substantially lessen the impacts of "the project." However, this Guidelines provision must be interpreted in light of the SPAS' approach to alternatives, in which the SPAS Draft EIR does not present a single preferred alternative. Rather, each of the SPAS alternatives includes certain features that could avoid or substantially lessen certain impacts of other alternatives that do not include these features.

Sections 1.2.2 and 2.3.1 of the SPAS Draft EIR identify the reasons for analyzing Alternatives 1 through 9. The extent to which each alternative would attain the objectives of SPAS is identified in Table 1-2 of the SPAS Draft EIR. Additionally, Chapter 5 of the Preliminary LAX SPAS Report describes the basis, nature, and characteristics of the early alternative concepts and the associated concept development process. The SPAS Draft EIR includes sufficient information about each alternative to allow meaningful evaluation and analysis. (State CEQA Guidelines Section 15126.6(d)). Table 1-4 of the SPAS Draft EIR provides a summary of the impacts of each alternative. Review of this table identifies the extent to which an alternative would avoid or substantially lessen any significant effects of another alternative. For some, but not all, environmental impact topics, none of the alternatives would avoid or lessen the significant impacts associated with the topic. In these cases, no feasible alternatives or mitigation measures have been identified that would avoid or lessen such impacts.

SPAS-AL00008-4

Comment:

- Passenger and gate provisions are now moot: Delays and weak economic conditions have largely rendered moot the passenger and gate provisions contained in the Settlement Agreement. Furthermore, gate limits in the FAA Record of Decision may conflict with the Settlement provisions, and it is unclear how inconsistencies would be reconciled.

Response:

The comment summarizes the concerns expressed in more detail in comment SPAS-AL00008-27; please refer to Response to Comment SPAS-AL00008-27.

SPAS-AL00008-5

Comment:

- Alternatives should be analyzed in terms of passenger capacity: It would be helpful for LAWA to present a graphic layout of gates or calculations supporting the stated ratio of passengers to gates. The Draft EIR should offer these data so that reviewers can confirm that any and all of the Master Plan alternatives conform to agreed-upon passenger limitations.

Response:

The comment summarizes the concerns expressed in more detail in comment SPAS-AL00008-27; please refer to Response to Comment SPAS-AL00008-27.

SPAS-AL00008-6

Comment:

- The Draft EIR should discuss the relationship between the Ground Transportation Center (GTC), Narrow Body Equivalent Gates and passenger capacity: The Draft EIR should discuss the passenger capacity of the GTC in Alternative 3 so that reviewers can gauge conformance of proposed alternatives to Million Air Passengers (MAP) limits in the Settlement.

Response:

The comment summarizes the concerns expressed in more detail in comment SPAS-AL00008-28; please refer to Response to Comment SPAS-AL00008-28.

SPAS-AL00008-7

Comment:

- The reconfigured terminals should be analyzed in terms of passenger capacity: As you know, the number of gates correlates directly with passenger capacity. Accordingly, the Draft EIR should identify the location of all gates and detail how aircraft gates will service passengers including remote gates, as well as address type of aircraft, hours of operation, layout and other pertinent factors.

Response:

The comment summarizes the concerns expressed in more detail in comment SPAS-AL00008-29; please refer to Response to Comment SPAS-AL00008-29. All of the SPAS alternatives are designed and analyzed for a practical capacity of 78.9 MAP, and provide no more than 153 gates at that capacity. (See Chapter 1 of the SPAS Draft EIR.)

SPAS-AL00008-8

Comment:

- Runway capacity increases should be defined for all alternatives: In order for readers to understand the aircraft and passenger serving capacity of alternatives, the airfield modeling data and a summary of the runway specific aircraft assignments should be provided for each alternative. The Draft EIR should also provide information about the passenger growth-inducing impact of increasing peak hour Instrument Flight Rules (IFR).

Response:

The comment summarizes the concerns expressed in more detail in comments SPAS-AL00007-4 and SPAS-AL00008-30; please refer to Response to Comment SPAS-AL00007-4 regarding runway capacity under each SPAS alternative; and Response to Comment SPAS-AL00008-30 regarding peak hour Instrument Flight Rules (IFR) operations. Please also see Response to Comment SPAS-AL00008-29 regarding considerations associated with characterizing the "practical capacity" of an airport.

SPAS-AL00008-9

Comment:

- 1995 MAP estimates are outdated: MAP estimates should be recalculated to account for changing economic conditions, technology, business models, and use of leisure time.

Response:

The comment summarizes the concerns expressed in more detail in comment SPAS-AL00008-31; please refer to Response to Comment SPAS-AL00008-31.

SPAS-AL00008-10

Comment:

- Significant adverse impacts to nine County intersections need to be mitigated: Individual agencies need to provide evidence where traffic mitigation measures are judged infeasible, or the measures must be funded and implemented. The County Department of Public Works does not agree that the Draft EIR adequately analyzes and discloses the impacts and appropriate mitigations for County intersections. The County requests that LAWA consult and work with its Public Work's engineering staff before finalizing the EIR.

Response:

The comment summarizes the concerns expressed in more detail in comment SPAS-AL00008-32; please refer to Responses to Comments SPAS-AL00008-32, as well as SPAS-AL00001-1, and SPAS-AL00009-1. CEQA does not require discussion of infeasible mitigation measures. As discussed under State CEQA Guidelines Sections 15126.4(a)(1) and (a)(5), "The EIR shall describe *feasible* measures…If the Lead Agency determines that a mitigation measure cannot be legally imposed, the measure need not be proposed or analyzed." (Emphasis added; see also Concerned Citizens of South Central Los Angeles v. Los Angeles Unified School Dist. (1994) 24 Cal.App.4th 826, 841.)

Los Angeles County, including the Public Works Department, has been given the opportunity to comment on the Notices of Preparation prepared for SPAS, as well as the SPAS Draft EIR. Los Angeles County submitted comments on the Notice of Preparation (see Appendix A of the SPAS Draft EIR), and the SPAS Draft EIR. (See comment letters SPAS-AL00001, SPAS-AL00008, SPAS-AL00009.) Please see Response to Comment SPAS-AL00008-32 for additional discussion of consultation with Los Angeles County.

SPAS-AL00008-11

Comment:

- Secondary traffic impacts should be studied in this Draft EIR: The Draft EIR should analyze overall system deficiencies caused by diversion of traffic from significantly impacted intersections to other routes.

Response:

The comment summarizes the concerns expressed in more detail in comment SPAS-AL00008-33; please refer to Response to Comment SPAS-AL00008-33.

SPAS-AL00008-12

Comment:

- Mitigation options are suggested: Additional traffic mitigation measures are suggested for Draft EIR consideration in order to mitigate the significant adverse impacts to County intersections.

Response:

The comment notes that additional traffic mitigation measures are suggested for consideration, at which the specific suggestions are presented later in comments SPAS-AL00008-34 through SPAS-AL00008-42; please refer to Responses to Comments SPAS-AL00008-34 through SPAS-AL00008-42.

SPAS-AL00008-13

Comment:

- Noise impacts need further study: The Draft EIR should show both model and measurement data for the 2009 baseline in order for readers to assess the difference between the two approaches. Further, a 3 decibel (dB) difference should not be discounted in the Draft EIR as less than significant.

Response:

The comment summarizes the concerns expressed in more detail in comment SPAS-AL00008-44; please refer to Response to Comment SPAS-AL00008-44.

SPAS-AL00008-14

Comment:

- Noise impacts on Lennox would be influenced by differential use of the north and south runways: Replacement of Terminals 1, 2 & 3 with linear concourse could increase pressure on the South airfield; the County requests that LAWA guarantee a semi-equal balance of north/south runway selection to protect Lennox from even greater noise impact.

Response:

The comment summarizes the concerns expressed in more detail in comment SPAS-AL00008-47; please refer to Response to Comment SPAS-AL00008-47.

SPAS-AL00008-15

Comment:

- Noise impacts on Lennox raise Environmental Justice concerns: Lennox, a minority community, is the only residential neighborhood around LAX with homes in the 75 dB Community Noise Equivalent Level (CNEL). Environmental justice aspects of this impact merit review under CEQA, including mitigation focused on regionalization and balanced airfield operations.

Response:

Please refer to Topical Response TR-SPAS-REG-1 regarding the fact that LAWA, through the LAX Master Plan, the SPAS process, and other efforts, supports the regionalization of air travel demand in Southern California. As indicated therein, the potential LAX Specific Plan amendment to Section 7.H identified as part of SPAS further supports such regionalization. As indicated in Section 2.2 of the SPAS Draft EIR, one of the project objectives of SPAS is to improve airfield balance, especially with respect to improving the ability of the north airfield to accommodate the departure of large heavy aircraft such as Boeing 747-400 on long-haul flights, the majority of which currently operate on the south airfield. As described in Section 2.3, several of the SPAS alternatives - specifically, Alternatives 1, 2, 3, 5, 6, and 7, propose a 1,250 foot or greater extension on the east end of Runway 6R/24L, which is the primary departure runway for the north airfield, to better accommodate such aircraft and improve airfield balance. The improved ability for more aircraft to use the north airfield would reduce operations on the south airfield, which is directly west of Lennox.

Also, please note that CEQA does not require the SPAS EIR to include an environmental justice analysis. CEQA is concerned with physical impacts on the environment, such as whether and where the SPAS alternatives increase noise levels. It is not concerned with the social or economic status of the affected communities, or whether low income or minority communities are disproportionately affected by noise impacts. "Economic and social changes resulting from a project shall not be treated as significant effects on the environment." (State CEQA Guidelines Section 15131(a)). "[T]he question under CEQA is whether a project will affect the environment of persons in general, not whether a project will affect particular persons." (Eureka Citizens for Responsible Government v. City of Eureka (2007) 147 Cal.App.4th 357, 377.)

SPAS-AL00008-16

Comment:

- Air emissions from the 405 Freeway should be considered in the air quality assessment: Draft EIR background air quality analyses did not include readings along eastern boundary where the 405 Freeway is a major pollutant source; readings on eastern boundary should be included in the EIR.

Response:

The comment summarizes the concerns expressed in more detail in comment SPAS-AL00008-49; please refer to Response to Comment SPAS-AL00008-49.

SPAS-AL00008-17

Comment:

- Air quality mitigation measures in the Draft EIR are insufficient: LAWA should revise the Draft EIR to eliminate generalized air quality enforcement language and to incorporate state of the art mitigations.

Response:

The comment summarizes the concerns expressed in more detail in comment SPAS-AL00008-50; please refer to Response to Comment SPAS-AL00008-50.

SPAS-AL00008-18

Comment:

- Regionalization is the key to avoiding or reducing significant "unavoidable" adverse impacts: Requirements of the Settlement Agreement §VII and VIII have not been largely addressed by LAWA, although Draft EIR §6.2 demonstrates that regionalization is the key to mitigating the significant 'unavoidable' impacts listed in Draft EIR §7.1. LAWA should address this relationship and adopt regionalization to fulfill its CEQA obligation to mitigate significant impacts with feasible mitigation measures.

Response:

The commentor is incorrect in asserting that "Regionalization is the key to avoiding or reducing significant ‘unavoidable' adverse impacts" and that "Draft EIR § 6.2 demonstrates that regionalization is the key to mitigating the significant ‘unavoidable' impacts listed in Draft EIR § 7.1."

Section 7.1 of the SPAS Draft EIR identifies unavoidable significant impacts related to air quality, greenhouse gases, human health risk assessment, land use (as related to aircraft noise impacts), aircraft noise, construction equipment noise, cumulatively considerable contribution to combined noise levels (i.e., aircraft noise, road traffic noise, construction-related noise, and transit noise), on-airport transportation, off-airport transportation, and solid waste. Section 6.2 of the SPAS Draft EIR notes that a shift in future aviation activity from LAX to other airports in the region may reduce impacts specific to LAX, but also notes that such a shift in aviation activity to other airports in the region would be accompanied by a shift in such environmental impacts to the affected airports. The discussion in Section 6.2 also indicates that without knowing the location(s) and extent to which activity at LAX is diverted elsewhere in the region, it is speculative to conclude what those specific impacts would be and the extent of any shift. It is reasonable to anticipate, however, that redirecting flights from LAX to other airports in the region would not eliminate impacts related to air pollutant emissions, including greenhouse gas, noise, increased traffic generation, and solid waste generation, but rather would shift such impacts to elsewhere in the region.

Please also refer to Topical Response TR-SPAS-REG-1 regarding the fact that LAWA, through the LAX Master Plan, the SPAS process, and multiple other efforts, supports a regional approach to accommodating air travel demands in Southern California; however, LAWA does not have the ability or authority to force regionalization to occur.

SPAS-AL00008-19

Comment:

- The County strongly supports alternatives that connect LAX to the regional rail system: The lack of an adequate transit system is responsible for some of the most pressing environmental impacts on unincorporated communities around LAX. Alternatives that would provide connections between LAX

and the Crenshaw/LAX light rail line or the existing Metro Green Line Station will greatly improve airport access, and at the same time reduce traffic and noise concerns. The EIR should compare the benefits to traffic of transit and transportation mitigation options.

Response:

The comment summarizes the concerns expressed in more detail in comment SPAS-AL00008-53; please refer to Response to Comment SPAS-AL00008-53.

SPAS-AL00008-20

Comment:

Thank you once again for this opportunity to comment upon this critically important undertaking. The County looks forward to receiving responses to the comments offered herein. We know you are committed to good faith compliance to the requirements of CEQA and to terms of the Settlement Agreement, which will facilitate modernization of LAX, a goal that is shared equally by LAWA and the County of Los Angeles.

Response:

The comment is noted. A copy of the Final EIR will be sent to the County of Los Angeles at least 10 days prior to certification of the Final EIR. The Final EIR will also be available at www.laxspas.org.

SPAS-AL00008-21

Comment:

1.0 BACKGROUND AND SUMMARY

1.1 Background

During 2001, A.C. Lazzaretto & Associates was retained by the County of Los Angeles (County) to review and comment on the Draft Environmental Impact Statement/Environmental Impact Report (DEIS/EIR) prepared for Los Angeles World Airport's (LAWA) Proposed Los Angeles International Airport (LAX) Master Plan. The 2001 Draft EIS/EIR addressed three build alternatives, a no-build alternative, and the existing setting for the Los Angeles International Airport (LAX) Master Plan.

A.C. Lazzaretto & Associates assembled a team of environmental review experts to review the document for consistency and accuracy. Working in collaboration with County staff, a detailed comment letter was prepared and submitted to LAWA on 28 June 2001. Thereafter, in response to considerable public comment and the terrorist attacks that occurred on September 11, 2001, LAWA suspended work on the earlier EIS/EIR to develop a fourth alternative (Alternative D, the Enhanced Safety & Security Plan). LAWA issued a Supplement to the Draft EIS/EIR for public comment in July of 2003 to update information presented in the Draft EIS/EIR and to integrate Alternative D into the environmental review process. The Supplement offered no response to comments submitted on the 2001 DEIS/EIR.

Response:

The comment summarizes some of the background associated with the LAX Master Plan EIR and does not pertain to the SPAS Draft EIR. As a point of clarification, however, to the commentor's indication that the 2003 Supplement to the LAX Master Plan Draft EIR offered no response to the comments submitted on the 2001 LAX Master Plan Draft EIR: the Supplement was, by name and function, a supplement to the Draft EIR, which focused on the analysis of Alternative D that was added to the range of LAX Master Plan alternatives. The LAX Master Plan Final EIR published in 2004 provided written responses to all comments received on the 2001 Draft EIR and on the 2003 Supplement, consistent with the intent and requirements of CEQA.

SPAS-AL00008-22

Comment:

Following publication of the SDEIS/EIR, the County again retained A.C. Lazzaretto & Associates to review and comment on the revised document, and A.C. Lazzaretto & Associates in turn assembled the team of environmental review experts that had reviewed the 2001 document. The focus of this review was on document consistency, accuracy, and plan changes incorporated since release of the original Draft EIS/EIR. Results of the 2003 SDEIS/EIR review indicated that many of the concerns expressed in the County's earlier comment letter remained, particularly with respect to LAWA's unconvincing efforts to limit growth at LAX and strengthen the role of outlying airports; the County expressed these concerns in a comment letter submitted to LAWA during October 2003. LAWA thereafter prepared a Final EIS/EIR that restated contested points from the earlier 2001 and 2003 Draft EIS/EIR documents, with no substantive effort to respond to the many comments and questions raised by the County (as noted in a May 2004 comment letter directed to the Final EIS/EIR).

Response:

The comment summarizes some of the history associated with the LAX Master Plan EIR and the County's consultant's involvement in providing comments on the LAX Master Plan Draft EIR, which was subsequently finalized, ultimately certified as complete, and is considered adequate pursuant to the requirements of CEQA. The comment does not pertain to the SPAS Draft EIR.

SPAS-AL00008-23

Comment:

During August 2004, LAWA released two compromise plans regarding the LAX Master Plan process: the "LAX Plan" (referred to as the 'Consensus Plan' and developed through the efforts of Los Angeles City Councilwoman Cindy Miscikowski), and an alternative LAX Modernization Proposal ('Alternative Plan E-1, developed through the efforts of Councilman Bernard Parks). The County undertook a detailed review to determine the extent to which these plans would resolve seven long-standing concerns:

1. The need to establish a long-term cap on operations at LAX;
2. Affirmative steps to expand the regional airport system in tandem with LAX;
3. The obligation to mitigate impacts on Manchester Square related to environmental justice and neighborhood compatibility;
4. The incorporation of essential safety and security design features on and around the airport;
5. The pressing need to fast track transportation improvements that will remove airport traffic from local community roadways; and
6. Unambiguous commitments to comply with agreed-upon negotiating elements.

The compromise plans offered by Council Members Miscikowski and Parks both sought to resolve significant concerns associated with Master Plan Alternative D, as outlined in the Final EIS/EIR. However, neither plan assured that the concerns raised by the County Board of Supervisors would be resolved with respect to future development of LAX.

Response:

The comment summarizes some of the history associated with the LAX Master Plan EIR and the County's consultant's involvement in providing comments on the LAX Master Plan Draft EIR. The LAX Master Plan Final EIR was subsequently prepared and certified as being completed in compliance with CEQA. The comment does not pertain to the SPAS Draft EIR.

SPAS-AL00008-24

Comment:

In September 2004 LAWA released an Addendum to the Final EIR for the modernization of LAX. The Final EIR Addendum provided additional discussion pertaining to a proposed relocation and property

acquisition plan, environmental justice, air quality, a feasibility analysis of the three "Alternative E" proposals, and refinements to the Environmental Action Plan as well as refinements to the LAX Specific Plan for Alternative D. LAWA did not release the Addendum for public review or comment (both would be voluntary under CEQA), and the Los Angeles City Council thereafter certified the environmental documents and approved the project (Alternative D) on December 2004.

During January 2005 a number of lawsuits were filed challenging the City's CEQA approvals. Settlement discussions ensued in an effort to resolve concerns of the County and other agencies and organizations' while providing a clear pathway for LAWA to move forward with the Master Plan Process. The settlement process continued throughout 2005, and in February 2006 the final Judgment Pursuant to Stipulated Settlement (Settlement) was filed with the Superior Court of the County of Riverside.

The Settlement Agreement Recitals note that the "petitioners have long been concerned about the impacts of LAX operations on traffic, noise, human health risks and the quality of life in communities surrounding LAX, as well as the need to limit future growth at LAX through a broad regional effort to meet air transportation demand at other airports in the region." The introduction further notes that the Settlement Agreement is intended to serve in lieu of a court determination of the merits of the parties' claims, and the Court shall retain jurisdiction over enforcement of the mutual obligations specified in the Settlement Agreement.

Pursuant to the Settlement Agreement, the petitioners dismissed all causes of action against the City and LAWA challenging the Master Plan approvals. The City's responsibility under the Settlement Agreement is to minimize environmental impacts of LAX operations, which have been of long-standing concern. The SPAS Draft EIR, however, does not provide detailed analyses that clearly demonstrate to the petitioners how the proposed project alternatives would adequately address the long-standing environmental issues that underlie LAWA's Specific Plan and Settlement obligations.

1 The Petitioners included the cities of El Segundo, Inglewood and Culver City, the Alliance for a Regional Solution to Airport Congestion [ARSAC], and the County of Los Angeles.

Response:

The comment provides some background regarding the LAX Master Plan Stipulated Settlement Agreement not directly related to the SPAS Draft EIR. It then concludes with a statement that the SPAS Draft EIR does not provide sufficient detailed analyses showing how the SPAS alternatives would adequately address the long-standing environmental issues that underlie the LAX Specific Plan and Stipulated Settlement obligations. While this particular comment does not elaborate on what specific aspects of the SPAS Draft EIR analysis are lacking, it is assumed that those concerns are expressed elsewhere in the comment letter, in which case please see Responses to Comments SPAS-AL00008-1 through SPAS-AL00008-23 and Responses to Comments SPAS-AL00008-25 through SPAS-AL00008-54. Comments regarding LAWA's compliance with the Stipulated Settlement require legal conclusions that are beyond the scope of what is required by CEQA.

The SPAS Draft EIR includes and analyzes a broad range of airfield improvement alternatives, all of which include numerous LAX Master Plan commitments, LAX Master Plan mitigation measures, and SPAS mitigation measures to minimize impacts on surrounding communities. Table 1-6 in the SPAS Draft EIR lists those commitments and measures for each alternative, which are described in greater detail in Chapter 4 of the document.

SPAS-AL00008-25

Comment:

1.2 Summary

The County has examined the SPAS Draft EIR and project alternatives in terms of the commitments contained in the Settlement Agreement and in the Specific Plan. Provided below in Table 1 is a very brief synopsis of key elements of the Settlement Agreement. The County's comments are summarized thereafter (in Table 2) and presented in the sections that follow. Section 8 provides a Glossary of terms and acronyms used herein.

Table 1. SYNOPSIS OF STIPULATED SETTLEMENT REQUIREMENTS

SECTION	**SUMMARY OF SETTLEMENT AGREEMENT REQUIREMENTS**
I	***Settlement Overview***
II	***Dismissal of Actions, Release of Claims***
III	***Federal Aviation Administration (FAA) Determination regarding LAWA Expenditures***
IV	***Passenger Gate Provisions*** A. No more than 163 gates through 12/31/15 B1. Eliminate 2 Narrow Body Equivalent Gates (NBEG)/year up to 10 total, with a maximum of 153 gates through 12/31/20 B2. LAWA gets NBEG credits if gates are closed ahead of schedule B1 doesn't apply if fewer than 75 million air passengers (MAP) or if the Master Plan is revised to have 153 gates or less B1 doesn't apply during emergency or peak periods; a maximum of 30 days of peak periods each year B1 doesn't apply to general aviation, charter flights or similar operations, etc. LAWA to identify gates to be closed; petitioners may conduct inspections up to 4 times each year The West Satellite Concourse and Automated People Mover no longer classified as "yellow light' projects but as "green light" projects; Specific Plan to be amended with support of Petitioners
V	***SPAS Process*** Process to begin within 60 days of Settlement Agreement LAWA to complete Phase I within 6 months After Phase I is complete, LAWA has 24 months to prepare the SPAS (i.e., the current review) with all required environmental documentation needed to modernize LAX with service capacity up to 78.9 MAP SPAS to focus on Yellow Light issues, security, traffic, aviation, environmental impacts, mitigations LAWA to identify the study methodology per CEQA/NEPA requirements LAWA may simultaneously pursue non Yellow-Light projects while study underway Local agencies to be consulted during CEQA traffic analysis, selecting up to 15 added intersections for analysis, with mitigation for significant impacts and LAWA funding or fair share contribution Final Specific Plan to conform to FAA requirements Security issues to be assessed by experts Specific Plan Advisory Committee to be created (LA City, LA County, El Segundo., Culver City, Inglewood, the Alliance for a Regional Solution to Airport Congestion (ARSAC) and consulted at each major step of process
VI	***Funding of Mitigation Measures*** LAWA to fund Mitigation Measures provided FAA authorizes use of airport revenue funds
VII	***Regional Airport Working Group*** LAWA to invite FAA, the Southern California Assn. of Governments (SCAG), 5 Counties (LA, San Bernardino, Orange County, Ventura County, Riverside County) &airport operators to participate in regional airport working group working toward regional distribution of air traffic. Group shall (a) coordinate with Southern California Regional Airport Authority (or equivalent), (b) consider Regional Airport Authority JPA; and (c) support appropriate legislation; LA City to retain control of LAX, Ontario (ONT), Palmdale & Van Nuys airports.
VIII	***Regional Strategic Planning Initiative***

	LAWA to develop a Regional Strategic Planning (RSP) initiative to encourage expanded passenger & cargo use of Ontario & Palmdale airports, with annual reports & marketing strategies. First RSP due by 31 Dec 2006.
IX	***Outreach to Airport Neighbors*** LAWA to join working group with ARSAC & Council District 11 to recommend to the Board of Airport Commissioners (BOAC) how to better respond to neighbors' concerns and enhance relations. Key goals: • Effectively share info regarding LAWA & LAX Projects • Identify and work with community to address LAWA neighbors' concerns re: operations at LAX • Coordinate LAWA staff responsibilities for responding to complaints with LAWA staff & follow-up to verify that they've been addressed • Work with neighbors & elected officials to resolve community issues & review stakeholder liaison position.
X	***Avigation Easements*** LAWA to refrain from requiring avigation easements as precondition for funding mitigations Where acoustics are inadequate to achieve sound levels, (1) an easement may be required if the home was built after 1989, (2) If built before 1989 & exposed to 75+ Community Noise Equivalent Level (CNEL), LAWA may require an easement at Fair Market Value, and (3) easements must conform to Caltrans format Eligible homeowners must authorize & confirm sound installation & acknowledge extent of mitigation Prior easements and agreements are not a part of the settlement provisions. Future zone changes that create noise-impacted parcels shall have avigation easements in place
XI	***West Employee Parking Structure*** LAWA to prepare a project EIR for the West Employee Parking project before any approvals are granted.
XII	***LAX Connection to Green Line*** LAWA to study ways to connect LAX to Green Line; results due within 1 year of the Settlement (by February 2007).
XIII	***Enforcement***
XIV	**Extraordinary Financial Situations**
XV	**Miscellany**

Table 2. SUMMARY OF LOS ANGELES COUNTY COMMENTS ON SPAS DRAFT EIR

ISSUES	BRIEF COMMENT SUMMARY	SEE SECTION
The EIR should Show how alternatives achieve Settlement commitments	The Draft EIR needs to provide a detailed analysis that sets forth all of the environmental commitments in the Settlement and shows how each is implemented in the proposed SPAS alternatives.	**1.0**
Under CEQA an EIR must be Addressed to 'Project' (not a series of alternatives), and the selected Alternatives violate the Rule of Reason	The Draft EIR offers a "discussion of the objectives associated with completion of the SPAS process" without identifying a preferred alternative as the true project; this approach leads to an incomplete analysis and is improper under CEQA. Moreover, the nine Alternatives described in this EIR do not fulfill the 'Rule of Reason' because the significant adverse impacts are shared by all alternatives whereas the Rule of Reason calls for selection of alternatives that would avoid or lessen project impacts.	**2.0**
Passenger & Gate Provisions are Moot	Delays and economic conditions have rendered moot the Settlement passenger and gate provisions. Furthermore, gate limits in the FAA Record of Decision (ROD) may conflict with Settlement provisions; it is unclear how inconsistencies would be reconciled. All should be updated.	**3.0**
Alternatives Must be analyzed in terms of Passenger Capacity	LAWA has never presented a graphic layout of gates or calculations supporting the stated ratio of passengers to gates; the Draft EIR should offer these data.	**3.**[1]
Relationship of GTC, NBEG and MAP	Alternative 3 includes construction of a massive remote terminal (the GTC) that would replace terminals now located in the Central Terminal Area (CTA). The Draft EIR needs to discuss the passenger capacity of the GTC and the potential for the GTC to replace the need for NBEGs so that reviewers can gauge conformance of proposed alternatives to MAP limits and other terms and commitments contained in the Settlement.	**3.2**
The Capacity of Reconfigured Terminals should be Assessed	The reconfigured linear terminal in Alternative 3 introduces new variables into the assessment of passenger capacity. These variables must be explained and analyzed as part of the Draft EIR. It also needs to analyze how north airfield improvements will change runway usage and aircraft types, in turn impacting passenger capacities at LAX.	**3.3**

Runway Capacity Increases should be defined for all Alternatives	In order for readers to understand the aircraft and passenger serving capacity of the alternatives, the Draft EIR must include the airfield modeling data and a summary of the runway specific aircraft assignments for each alternative. The Draft EIR should also provide information about the passenger growth-inducing impact of increasing peak hour IFR. These data will facilitate assessment of the full passenger carrying capacity associated with each alternative.	**3.4**
1995 MAP estimates are now outdated	MAP estimates should be recalculated to account for changing economic conditions, technology, business models, and use of leisure time.	**3.5**
Significant Impacts to 9 County Intersections must be Mitigated	Individual agencies need to provide evidence where traffic mitigation measures are judged infeasible, or the measures must be funded and implemented	**4.1**
Secondary Traffic Impacts require Study in this DEiR	The Draft ER must analyze overall system deficiencies caused by diversion of traffic from significantly impacted intersections to other routes.	**4.[2]**
Suggested Traffic Mitigation Options	Additional measures are offered for Draft EIR consideration to mitigate significantly impacted County intersections.	**4.3**
Noise impacts require further study	The Draft EIR must show both model and measurement data for the 2009 baseline to assess the difference between the two approaches and identify potential biases, and a 3 decibel (dB) difference should not be discounted as less than significant.	**5.0 and 5.1**
Differential use of the north & south runways impacts noise levels in Lennox.	Replacement of Terminals 1, 2 & 3 with linear concourse could increase pressure on south airfield; County requests that LAWA guarantee a semi-equal balance of north/south runway selection to protect Lennox from even greater noise impact.	**5.2**
Environmental Justice requires Balanced Airfield Operations to reduce Lennox noise	Lennox, a minority community, is the only residential neighborhood around LAX with homes in the 75 dB CNEL. Environmental justice aspects of this impact merit review under CEQA, including mitigation focused on regionalization and balanced airfield operations.	**5.3**
Regionalization is a Viable means to reduce Noise and Air- Quality Impacts	Regionalization must be included in the mix of mitigation measures. Most of the measures in the current mitigation plan are based on voluntary actions, and the benefits from departure pattern changes, if approved, are negligible in terms of overall noise level reductions.	**5.4**
Air Quality impacts require further study in the Draft EIR	Draft EIR background air quality analyses omitted readings along the eastern boundary, where the 405 Freeway is a major pollutant source; readings on eastern boundary should be included in the background measurements provided in the Draft EIR.	**5.5**
Air Quality mitigations are weak	LAWA should revise the EIR to eliminate nebulous air quality	**5.6**

and outdated	enforcement language and to incorporate state of the art mitigations.	
Regionalization is key to reducing significant 'unavoidable' adverse project impacts	Requirements of Settlement §VII & §VIII have been virtually ignored by LAWA, Draft EIR §6.2 demonstrates that regionalization is key to mitigating the significant 'unavoidable' impacts listed in Draft EIR §7.1. LAWA must disclose this relationship and pursue Regionalization to fulfill its CEQA obligation to reduce significant impacts with feasible mitigation.	**6.1 and 6.2**
The County Strongly Supports Alternatives that Connect LAX to the Regional Rail System	The construction of the Crenshaw/LAX light rail line with a stop at LAX will greatly improve airport access, at the same time reduce traffic and noise concerns. Please provide clarification as to the Metro connections and/or improvements associated with each of the potential SPAS alternatives.	**7.0**

Response:

The comment is noted. The commentor's synopsis of the Stipulated Settlement requirements provided in Table 1 of the comment is noted; this synopsis does not require further response because it does not raise any significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)). Table 2 of the comment summarizes the concerns expressed in more detail in comments SPAS-AL00008-26 through SPAS-AL00008-54; please refer to Responses to Comments SPAS-AL00008-26 through SPAS-AL00008-54.

SPAS-AL00008-26

Comment:

2.0 DISCUSSION OF VARIOUS ALTERNATIVES AS THE "PROJECT" DOES NOT COMPLY WITH CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA)

The Draft EIR (DEIR), which is delineated a "Program EIR", describes the project as a "discussion of the objectives associated with the completion of the SPAS process; the specific characteristics of the SPAS alternatives considered and carried forward for evaluation in the EIR; and the SPAS alternatives considered, but rejected from further consideration." DEIR, p. 1-45.

Such a "discussion" does not qualify as a project under CEQA. Therein, a project is defined to mean "an activity which may cause either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment." [Public Resources Code section 21065.] A "discussion of alternatives" can have no impact. It is the development of the alternative as a project that would have the impact. Moreover, Public Resources Code §21080.5 states that "the phrase 'carrying out or approving a project' shall include the carrying out or approval of a plan for a project that expands or enlarges an existing publicly owned airport by any political subdivision ..." But, the DEIR does not analyze a plan. In short, while a project can be a plan, it is not a discussion of various plans.

The DEIR is essentially a "project alternatives" section to an EIR required by CEQA Guideline §15126.6, which requires analysis of a reasonable range of alternatives to the project. A table in the DEIR: "presents a preliminary evaluation of the relationship between each project objective and each SPAS alternative. A more detailed evaluation of that relationship will be completed in conjunction with further evaluation of the alternatives through preparation of the Final EIR and during the public hearing process." (DEIR 1-26) Delaying the choice of the project among alternatives (as opposed to choosing an alternative as the initial project) does not comply with CEQA. While a project may be refined as part of the CEQA process (e.g., due to comments), it appears the intent is not to allow the initial choice of the project to be identified from the group of alternatives until the end of the process.

A definitive project description at the beginning is necessary to ensure that all environmental impacts of the project are analyzed, avoid a piecemeal approach, and allow for meaningful public comment. None of those objectives are achieved by discussing a group of alternatives and then picking the project at the end of the process, which allows no time left for public input. Moreover, the approach undermines the 'Rule of Reason' wherein alternatives set forth in an EIR "shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project". (CEQA Guidelines §15126.6(c)). This shortcoming is particularly evident in the list of significant unavoidable adverse project impacts. As identified in Draft EIR §7.1, the significant unavoidable impacts identified in the EIR 'pertain to all of the alternatives unless otherwise noted' and include direct impacts related to air quality, human health risk, traffic, noise, and land use.

In sum, selecting the project at the end of the process turns CEQA on its head. The problem of defining the project as a discussion of alternatives is highlighted by the following statement in the DEIR with respect to project impacts: "All of the SPAS alternatives would result in lower GHG emissions from aircraft operations ... than would occur in 2025 without the project." If the "project" as defined in the DEIR is a discussion, that statement makes no sense. Rather, it implies that the "project" is really one of the alternatives. Failure to identify which of the alternatives is the real project until the end detrimentally impacts the ability of the public to comment on the specific project. It also would preclude LAWA from relying on the EIR as a program EIR, as it seems to intend. Instead, once selecting its alternative, LAWA would then need to do a new EIR on that alternative as the master project in order to use or reply upon that EIR for the subsequent projects developed under that alternative.

- LAWA should revise the current SPAS DEIR so that the project incorporates a chosen set of improvements to meet the seven objectives set forth in pages 2-1 through 2-5 of the DEIR. LAWA should present all other options as alternatives to the proposed project.

Response:

The SPAS project is not a "discussion of various plans." The text on page 1-45 of the SPAS Draft EIR quoted by the commentor is quoted out of context. The subject text merely outlines the content of Chapter 2, stating that the chapter "provides a discussion of: the objectives associated with completion of the SPAS process; the specific characteristics of the SPAS alternatives considered and carried forward for evaluation in this EIR; and the SPAS alternatives considered, but rejected from further consideration," as well as a description of the intended uses of this EIR. Page 1-10 of the SPAS Draft EIR clearly states that "the proposed project is the LAX SPAS," and describes that the SPAS process "involves the identification and evaluation of potential alternative designs, technologies, and configurations for the LAX Master Plan Program that would provide solutions to the problems that the Yellow Light Projects were designed to address,… [and] includes identification of potential amendments to the LAX Specific Plan that plan for the modernization and improvement of LAX in a manner that is designed for a practical capacity of 78.9 MAP while enhancing safety and security, minimizing environmental impacts on the surrounding communities, and creating conditions that encourage airlines to go to other airports in the region, particularly those owned and operated by LAWA."

Please see Responses to Comments SPAS-AL00007-6 and SPAS-AL00008-3 for an explanation of why the analysis of nine alternatives in the SPAS Draft EIR instead of a single proposed project was consistent with CEQA's requirements and facilitated public review of the alternatives. As noted in Response to Comment SPAS-AL00008-3, the SPAS alternatives evaluated in the SPAS Draft EIR reflect a reasonable range, consistent with the requirements of CEQA. (State CEQA Guidelines Section 15126.6.) Section 15126.6(a) of the State CEQA Guidelines states that "[t]here is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason." As indicated in Response to Comment SPAS-AL00007-6, the SPAS Draft EIR was prepared with a sufficient degree of analysis to provide the decision-makers with information which enables them to make a decision which intelligently takes account of environmental consequences. (State CEQA Guidelines Section 15151.) All of the environmental impacts of each alternative are analyzed, and the "whole of the action" is analyzed. Presentation of the impacts of the nine SPAS alternatives allows for meaningful public comment. Nothing would be gained had LAWA selected one of the nine alternatives as the proposed project in the SPAS Draft EIR, and then evaluated the other options as alternatives to the proposed project.

The SPAS Draft EIR is not defective because it integrates the project description and the alternatives description into a single chapter. Rather, a lead agency is free to choose its own format for an EIR, as long as each Guidelines requirement is covered somewhere in the document. (State CEQA Guidelines Section 15120(a).)

Regarding the commentor's statement that, once it has selected an alternative, LAWA would need to do a new EIR on that alternative, the identification of a staff-recommended alternative by LAWA does not require recirculation of the SPAS Draft EIR, as the impacts of all of the SPAS alternatives were fully analyzed and disclosed in the SPAS Draft EIR. See Section 2.1.3 of this Final EIR for a discussion of the relationship between the LAWA Staff-Recommended Alternative and the SPAS Draft EIR. Selection of a staff-recommended alternative does not meet any of the criteria for recirculation outlined in Section 15088.5 of the State CEQA Guidelines. Similarly, should the decision-makers ultimately approve the LAWA Staff-Recommended Alternative or another alternative evaluated in the SPAS Draft EIR, additional CEQA review would not be required, because the conditions requiring preparation of a Supplemental or Subsequent EIR would not exist. (State CEQA Guidelines Section 15162.)

The commentor appears to recommend that the SPAS Draft EIR should have pre-committed to and described "the real project," without being open to the possibility that other feasible alternatives might be selected. However, EIRs should be prepared "as early as feasible in the planning process," and lead agencies may not take actions that could foreclose feasible alternatives before completing the CEQA process. (State CEQA Guidelines Section 15004(b).)

SPAS-AL00008-27

Comment:

3.0 SETTLEMENT SECTION IV PASSENGER GATE PROVISIONS HAVE BEEN RENDERED MOOT

A careful review of the Draft EIR points to the need for additional relevant environmental information about passenger service levels and gates. The information is required to verify that LAWA and the City of Los Angeles are fulfilling their obligations to the petitioners under the Settlement Agreement, and to fulfill the full disclosure requirements of CEQA. Moreover, it appears that economic conditions have rendered moot key provisions contained in Settlement §IV.

3.1 Airport passenger capacity should be analyzed and disclosed for each Alternative

The mainstay of the 2005 Settlement Agreement between petitioners and LAWA is a cap of 78.9 Million Air Passengers (MAP) through benchmark years 2015 and 2020 (when the Settlement expires.) The ostensible controlling factor is to limit LAX to using 163 aircraft passenger gates (153 by 2015 if 75 MAP is achieved). The following table from the LAWA website displays passenger levels starting in 1994.

Table 3: LAX PASSENGER LEVELS 1994-2011

Year	Departing	Arriving	Total
1994	**25,812,087**	**25,238,188**	**51,050,275**
1995	**27,234,353**	**26,674,870**	**53,909,223**
1996	**29,162,942**	**28,811,617**	**57,974,559**
1997	**30,313,688**	**29,828,900**	**60,142,588**

1998	**30,826,859**	**30,388,853**	**61,215,712**
1999	**32,298,944**	**31,980,627**	**64,279,571**
2000	**33,836,077**	**33,467,105**	**67,303,182**
2001	**31,007,930**	**30,598,274**	**61,606,204**
2002	**28,181,481**	**28,042,362**	**56,223,843**
2003	**27,544,606**	**27,438,232**	**54,982,838**
2004	**30,343,873**	**30,360,695**	**60,704,568**
2005	**30,649,324**	**30,840,074**	**61,489,398**
2006	**30,500,130**	**30,540,936**	**61,041,066**
2007	**31,244,261**	**31,194,322**	**62,438,583**
2008	**29,930,985**	**29,884,661**	**59,815,646**
2009	**28,288,211**	**28,232,632**	**56,520,843**
2010	**29,605,542**	**29,463,867**	**59,069,409**
2011	**30,923,005**	**30,939,047**	**61,862,052**

Examination of Table 3 demonstrates that passenger levels in 2011 are essentially the same as they were in 1998, and approximately 10% below levels of 2000. Passenger levels increased 4.7% in 2011 and are increasing at a similar rate thus far in 2012. Even if this accelerated rate of growth persists (which is unlikely), LAX will not reach the 78.9 MAP level until 2017. SCAG, FAA and industry sources are forecasting more moderate growth rates, indicating that levels may not reach 78.9 MAP until well beyond 2020. Furthermore, the SPAS Draft EIR is based on an increase of 31% in operations between 2009 and 2025 (based on extrapolating the daily aircraft operations figures appearing on Draft EIR Table 4.10 1-7 as shown in Table 3) which would bring the total to only 74.01 MAP in 2025.

Table 4, based on Draft EIR Table 4.10 calculates the 2025 MAP by extrapolating the 1493 daily operations and 56.52 MAP from 2009. The 2025 MAP projection of 74.01 may be somewhat low owing to a slight increase in the use of larger aircraft, but still the 2025 MAP level is far below the 78.9 MAP included in the Settlement Agreement. Based on this analysis, it is probable that limitations in the Settlement Agreement are not in danger of being exceeded. However, it is beneficial to maintain a cap on the growth of LAX within the Settlement timeframe.

Table 4. DAILY AIRCRAFT OPERATIONS BY AIRCRAFT TYPE FOR 2009 & 2025 FORECASTS[2]

	NJT	SJT	SNB	LNB	SWB	LWB	NLA	TOTAL
2009	158	259	630	207	87	151	1	1493
% of total	11%	17%	42%	14%	6%	10%	0%	
2025	146	344	741	283	218	194	29	1955
Change	-12	85	111	76	131	43	28	462
% of total	-8%	33%	18%	37%	151%	28%	2800%	31%
TOTAL	7%	18%	38%	14%	11%	10%	1%	

2 NJT-non-jet aircraft; SJT=small jet aircraft; SNB=small narrow body aircraft; LNB=long narrow body aircraft; SWB=small wide body aircraft; LWB=large wide-body aircraft; NLA=new larger aircraft.

The Settlement Agreement also includes a provision that the proposed gate limitations will not "restrict access to LAX below those disclosed in the FAA Record of Decision (ROD) for the No Project and Approved Project Scenario for 2015." The ROD indicates that the No Project scenario would be 78.7 MAP. The FAA ROD does not specifically indicate the Project Scenario for 2015, and the FAA ROD makes no mention of gates. Furthermore, Settlement §IV.A and §1V.B trigger the restrictions on gate levels only when and if passenger levels at LAX exceed 75 MAP. Since it is highly unlikely that LAX will reach that level before 2020 (when the Settlement is scheduled to expire) the gate restrictions also are rendered moot.

To reduce environmental impacts, the County's objectives related to the LAX Master Plan include limiting the ultimate service level of LAX to 78.9 MAP, a figure derived in part from forecasts conducted by LAWA in 1995 indicating demand at LAX would be 98 MAP in 2015. Clearly, given the above data, those forecasts have proven to be wide of the mark. The primary mechanism for achieving this is a limit of 153 NBEG.

- Passenger and gate provisions should be updated to reflect delays and economic conditions that have rendered moot the provisions contained in the Settlement. Furthermore, gate limits in the FAA Record of Decision (ROD) may conflict with Settlement provisions. LAWA should specify how inconsistencies will be resolved in terms of the access limits in FAA's Approved Project Scenario for 2015 and the gate limitations contained in the Settlement Agreement.

Response:

Comments regarding LAWA's compliance with the Stipulated Settlement require legal conclusions that are beyond the scope of what is required by CEQA. In accordance with CEQA requirements, the SPAS Draft EIR provides full disclosure of the environmental impacts associated with each of the SPAS alternatives at a future (2025) passenger activity level of 78.9 MAP compared to baseline conditions (2009 at 56.5 MAP). As further described below, all of the SPAS alternatives are designed to provide no more than 153 passenger gates at buildout in 2025, and the impacts analysis is based on a future activity level of 78.9 MAP in 2025, which already takes into account economic conditions over the past several years that have substantially slowed the rate of activity growth at LAX.

The comment's characterization of the LAX Master Plan Stipulated Settlement's provisions regarding number of passenger gates and future activity levels is incorrect. Specifically, it is incorrect that "the mainstay of the 2005 Settlement Agreement between petitioners and LAWA is a cap of 78.9 Million Air Passengers (MAP) through benchmark years 2015 and 2020 (when the Settlement expires.)" Under FAA rules, LAWA may not restrict access to the airport and may not impose any "cap" on aircraft operations, nor regulate or legally control in any way what operations the airlines might wish to

undertake at any particular airport.1 The Stipulated Settlement's gate reduction provisions are set forth in Section IV of the agreement and require LAWA to gradually discontinue operations at narrow body equivalent gates ("NBEG") at LAX such that the total number of passenger gates will be reduced to 153 by the end of 2015. However, this requirement does not apply if either (1) total passenger operations at LAX are below 75 MAP, or (2) the LAX Master Plan Program is substantially revised pursuant to the SPAS process such that the total number of gates is reduced to 153 or less. (Stipulated Settlement, Section IV.C.) The FAA reviewed these requirements in 2005 and determined that "the passenger gate provision in Section IV [of the Stipulated Settlement] is consistent with the FAA's Final Environmental Impact Statement (EIS) dated January 2005, and the Record of Decision (ROD) dated May 20, 2005." (Letter from Catherine Lang, FAA, to Lydia Kennard, LAWA, dated December 13, 2005.)

The Stipulated Settlement also requires that the SPAS identify Specific Plan amendments that plan for the modernization and improvement of LAX in a manner that is designed for a practical capacity of 78.9 MAP, and also requires that the SPAS alternatives be consistent with a practical capacity of 78.9 MAP. (Stipulated Settlement, Sections V.C and V.D.) As indicated in Section 1.2.1 of the SPAS Draft EIR, one of the objectives of the SPAS is to: "Plan improvements that do not result in more than 153 passenger gates at 78.9 MAP," and all of the SPAS alternatives include no more than 153 passenger gates at buildout in 2025.

The commentor makes certain assumptions and extrapolations using the historical LAX passenger data referenced in the comment. The associated resulting numbers of operations, passenger activity levels and daily operations by aircraft type represent the commentor's own interpretation of future activity at LAX based on conjecture with no supporting evidence. Appendix F-1, LAX 2009-2025 Passenger Forecast and Design Day Flight Schedule Development, of the Preliminary LAX SPAS Report, provides a detailed analysis of forecast activity associated with SPAS, based on substantial evidence. In preparing these forecasts and projections for the SPAS Draft EIR, LAWA relied on aviation planning experts with substantial experience in the development of airport activity forecasts, and also took into consideration recent activity forecasts for LAX prepared by the FAA. Details regarding the methodology and assumptions used in developing the activity level forecast for SPAS are documented in Appendix F-1 of the Preliminary LAX SPAS Report. A new activity level forecast for LAX was developed for SPAS, recognizing that the previous forecast for the LAX Master Plan was outdated and did not account for several influences that subsequently occurred, such as increased fuel prices and the worldwide economic recession, which clearly indicated that LAX would not reach a passenger activity level of 78.9 MAP by 2015. Based on the methodology and assumptions described therein, LAWA's experts estimated that a future activity level of 78.9 MAP at LAX would occur by approximately 2024. The 78.9 MAP forecast reflects that fact that all of the SPAS alternatives include (i) no more than 153 gates and (ii) amendment of the LAX Specific Plan Section 7.H, requiring action to encourage further shifts in passenger and airline activity to other regional airports if the annual aviation activity analysis forecasts that the annual passengers for that year at LAX are anticipated to exceed 75 MAP, and requiring a Specific Plan Amendment Study if the annual aviation activity analysis forecasts that LAX annual passengers for that year are anticipated to exceed 78.9 MAP. Both this physical gate limit and the proposed amendment to the LAX Specific Plan reflect the fact that the practical capacity of LAX is based on market assumptions, as well as the expected physical characteristics of the various functional elements of the airport and how they are planned and expected to work together, given how the market is likely to respond and use LAX. (See Section 6.2. of the Preliminary LAX SPAS Report)

Although economic conditions and other factors have resulted in lower activity levels at LAX than originally anticipated in the LAX Master Plan, the provisions of the Stipulated Settlement are not moot, nor do they conflict with the FAA ROD.

1. Under the Airport Noise and Capacity Act of 1990 (commonly called "ANCA") (49 USC Sections 47521-33), and its implementing regulations (14 C.F.R. Part 161), federal law prohibits an airport proprietor from unilaterally imposing any restrictions on "access" to the airport by Stage 3 aircraft. Following the phase-out of most noisy Stage 2 aircraft during the 1990s, Stage 3 aircraft comprise essentially all commercial aircraft landing at any U.S. airport. Any Stage 3 restriction is subject to review and approval by the FAA. The FAA strongly discourages any operational limits imposed under Part 161 and prefers and promotes permanent solutions to operational concerns and inefficiencies through capacity improvements. Further, the federal Airline Deregulation Act of 1978 expressly preempted the ability of airport proprietors to control the "price, route or service of an air carrier." (49

USC Section 41713(b)(1).) The United States Supreme Court has interpreted this prohibition broadly to mean that airports "may not seek to impose their own public policies or theories of ... regulation on the operations of an air carrier." (Morales v. Trans World Airlines, Inc. (1992) 504 US 374, 384.)

SPAS-AL00008-28

Comment:

3.2 The Draft EIR should reexamine the ratio of passengers to equivalent gates

LAWA has never presented calculations relating to the MAP/Gate ratio, and neither the Master Plan nor the current Draft EIR contains algorithms supporting the ratio of passengers to gates, as indicated in the ACL & Associates' 2004 report. Numerous variables complicate the ability of aircraft loading gates to serve passengers, and many of these variables are airport-specific (e.g. size, location, terminal layout, hours of operation, etc.). The Settlement uses the term NBEG to link gates to passenger capacity, but there is no single recognized science for this ratio and the term in not contained in the Settlement definitions. Moreover, there is no established consensus on the number of gates currently in use at LAX, nor the types of gate, nor their status in terms of NBEG. (Wikipedia lists 108 gates attached to the nine terminals). The Settlement states there were/are 163 gates at LAX, and this number includes every conceivable aircraft parking spot on the airfield (in the words of the Settlement: "wherever passengers will board and exit an aircraft"). In the 2004 report, ACL indicated the true number of gates was closer to 133 as reported in the Master Plan document itself. Because the number of gates correlates directly with passenger capacity, the Draft EIR should disclose in graphic form the location of every extant aircraft gate for each alternative or combined alternative. Considering that LAWA has been operating LAX continually for over 75 years, this task should be easily accomplished. To offer some comparison of the variable relationship between MAP and the number of gates, Table 5 presents current conditions at the highest passenger volume U.S. airports as of 2011:

Table 5. 2011 MAP, NUMBER OF GATES & MAP/GATE RATIOS FOR U.S. AIRPORTS
(Source: Airport Operating Council International and Wikipedia)

AIRPORT	2011 MAP	GATES	MAP/GATE
Atlanta	92.4	206	448,544
Chicago O'Hare	66.7	192	347,396
LAX	61.8	108	572,222
Dallas Fort-Worth	57.7	231	249,784
Denver	52.8	152	347,368
John F. Kennedy (New York City)	27.7	151	183,444
San Francisco	40.8	102	400,000

A review of Table 5 indicates LAX is currently utilizing its gates to process passengers at a much higher rate than other comparable airports. (Table 5 has not been corrected for NBEG, and the number of gates at LAX was set at 108 according to Wikipedia which lists only "contact" gates, that is, attached to a terminal.) The high figure for LAX is likely due to the use of remote gates. This comparison is presented only as an indication of the type of analysis that needs to be completed by the Master Planning team.

- The Draft EIR must provide information for each of the proposed alternatives in sufficient detail to assess the potential capacity of each of the proposed gates to serve passengers given the type of aircraft, the hours of operation, the physical layout of the terminal waiting lounges and other factors pertinent to the analysis. This information must be included in the Draft EIR as part of the Project Description and assessed in the Growth Inducing analysis with respect to gate and capacity limitations contained in the Settlement Agreement.

- In conjunction with the gate/MAP analysis, and because the number of aircraft gates is a determining factor for the enforcement of passenger constraints, each alternative must reveal exactly where each gate will be located and the capacity or design function of each gate (e.g., Narrow Body, Long Narrow Body, Large Wide Body, New Large Aircraft, etc.). This will enable reviewers of the Draft EIR to ascertain the number of passengers each alternative is capable of serving. The Draft EIR must also disclose the passenger-carrying capacity of all remote gates, particularly in light of the widespread use (at LAX and other major airports) of remote gates that rely on buses or foot travel to link passengers to the terminal.

- Alternative 3 includes construction of what is essentially a massive remote terminal known as the GTC. This facility would replace terminals now located in the Central Terminal Area (CTA) and provide passenger processing and baggage check in. Passengers and baggage would flow to aircraft via an Automated People Mover and via a baggage tunnel. The Draft EIR should discuss the passenger-serving capacity of the GTC and the potential that the GTC could replace the need for NBEGs.

Response:

The commentor references comments submitted by the County of Los Angeles in 2003 on the LAX Master Plan Supplement to the Draft EIR. In accordance with CEQA requirements, LAWA prepared written responses to all comments received on the LAX Master Plan Draft EIR and the LAX Master Plan Supplement to the Draft EIR; the LAX Master Plan Final EIR, which includes those responses as Part II of the document, was certified as complete and adequate under CEQA. The LAX Master Plan Final EIR is available on LAWA's website at the following address: http://www.ourlax.org/publications.aspx. All of the SPAS alternatives plan for the same number of passenger gates, 153, and a future passenger activity level of 78.9 MAP as in Alternative D of the LAX Master Plan, and those planning parameters are consistent with the provisions of the Stipulated Settlement and with the detailed analysis of forecast activity associated with SPAS provided in Appendix F-1, LAX 2009-2025 Passenger Forecast and Design Day Flight Schedule Development, of the Preliminary LAX SPAS Report.

The commentor is incorrect in stating that there is no consensus regarding gates currently in use at LAX. Pursuant to Section IV.F. of the Stipulated Settlement, Petitioners (i.e., Cities of El Segundo, Inglewood, and Culver City, County of Los Angeles, and ARSAC) have the right to conduct physical inspections for gates verification at LAX. Such inspections affords Petitioners the opportunity to observe first-hand the location and use of all passenger gates at LAX. LAWA has accommodated all Petitioner requests for such gate inspections/verifications and the results of the inspections are reflected in current LAX gate maps accessible on the internet at http://www.lawa.org/welcome_lax.aspx?id=1180 - Click on the link named "LAX Current Passenger Gate Positions." This gate count was most recently verified by Petitioners in January 2012. As indicated in the Gate Summary, there were 136 gates in use at LAX at that time.

Regarding the commentor's request to "disclose in graphic form the location of every extant aircraft gate for each alternative," please refer to Figures A through D in Appendix F-1 of the Preliminary LAX SPAS Report for illustrations and information on the assumed numbers of gate positions under the 2009 and 2025 conditions. Each figure contains a summary table with the number of gates at each terminal and commuter position. Accordingly, 159 passenger gates were assumed in use in 2009 and 153 passenger gates were assumed in use under each SPAS alternative in 2025.

The 2011 passenger and gate data obtained by the commentor from the Airport Operating Council International and Wikipedia (Table 5 of the comment) is acknowledged. The data presented in that table contradicts the commentor's earlier statement preceding the table, which indicates "Because the number of gates correlates directly with passenger capacity,…" As evidenced in the table, with numbers ranging from approximately 183,000 passengers per gate to over 570,000 passengers per gate, no apparent correlation can be drawn between the number of passenger gates and passenger capacity without assessing multiple contributing factors, most of which are very specific to each airport.

The commentor's calculations of 572,222 passengers per gate for LAX is invalid (refer to Table 5 of the comment). As of January 2012, and per the LAWA current gate map referenced above, the number of passenger gates currently in use is 136 gates (108 Central Terminal Area (CTA) gates, 18 West Remote passenger gates and 10 gates at the American Eagle Commuter Facility). The commentor

appears to have only used 108 gates as a denominator. The commentor further acknowledged that this high number may be due to the use of remote gates at LAX. If the intent were to compute the number of passengers per CTA gate only (i.e., 108 passenger gates), the numbers of passengers should be discounted to take out the volumes of passengers being accommodated at the West Remote Gates and at the American Eagle Commuter Facility. Dividing 61.8 MAP by 108 gates suggests that all LAX passengers are accommodated at CTA gates, which is not accurate.

The commentor requests information sufficient to assess the "potential capacity of each of the proposed gates to serve passengers" in an attempt to determine if these facilities conform to the passenger and gate levels stated in the Stipulated Settlement. The Stipulated Settlement requires that the SPAS identify Specific Plan amendments that plan for the modernization and improvement of LAX in a manner that is designed for a practical capacity of 78.9 MAP, and also requires that the SPAS alternatives be consistent with a practical capacity of 78.9 MAP. (Stipulated Settlement, Sections V.C and V.D.) As indicated in Section 1.2.1 of the SPAS Draft EIR, one of the objectives of the SPAS is to: "Plan improvements that do not result in more than 153 passenger gates at 78.9 MAP," and all of the SPAS alternatives include no more than 153 passenger gates at buildout in 2025.

The actual size of any new terminal facility would ultimately be determined through additional project-level planning and design work for each individual project.

Regarding the request for information on "where each gate will be located and the capacity or design function of each gate," please refer to the following:

- Figures B through D in Appendix F-1 of the Preliminary LAX SPAS Report for illustrations of the assumed gate position layouts under each SPAS alternative
- Response to Comment SPAS-PC00130-188 for a list of assumed numbers of gates under SPAS Alternatives 1 through 4 by terminal and Aircraft Design Group (ADG)
- Response to Comment SPAS-PC00130-770 for additional information on the assumed 2025 DDFS fleet mix

Regarding the request for "passenger-carrying capacity of all remote gates", as indicated under the heading of "Terminal Facilities" on pages 2-10, 2-17, 2-21, 2-30, 2-33, and 2-37 in Chapter 2 of the SPAS Draft EIR, under Alternatives 1, 2, 3, 5, 6, and 7, the west remote gates would be eliminated upon completion of the airfield and terminal improvements associated with these alternatives. Figures B through D in Appendix F-1 of the Preliminary LAX SPAS Report depict the largest commuter passenger aircraft assumed to be accommodated at each commuter position. The largest commuter passenger aircraft assumed to operate at the commuter positions in 2025 is an Embraer Regional Jet 140 with 44 seats.

Regarding the Ground Transportation Center (GTC), the planned size of many related facilities, including the GTC, was based on programmatic estimates made during the LAX Master Plan study. The development of related airport facilities (GTC, terminals, Automated People Mover, etc.) was planned to meet the forecasted 78.9 MAP passenger level and 153 gate totals. The actual size of each related facility would ultimately be determined through additional project-level planning and design work for each individual project.

SPAS-AL00008-29

Comment:

3.3 Capacity of the reconfigured terminal in Alternative 3 must be assessed

Alternative 3 would replace the piers at terminals 1, 2 and 3 with a singular linear terminal, and would replace vehicle parking in the Central Terminal Area with terminal facilities. The reconfigured terminal area and the addition of a GTC inject vastly different variables into the equation predicting air passenger capacity. There are substantial capacity differences between a linear terminal, such as exist at John Wayne Airport, and the pier terminals now existing at LAX terminals 1, 2 and 3. Linear terminals allow free flow of passengers between gates, provide flexible passenger enplaning and deplaning, provide flexible aircraft parking, and possess other advantages. The Draft EIR should assess these variables in

order to compare existing passenger capacity with the passenger capacity of proposed alternatives. In general, linear terminals provide more capacity than pier terminals because of the ease of entry through security, the absence of bottlenecks at the pier entry point, and the free flow of passengers through the lounge areas.

- For the reasons enumerated above and because the number of gates is the seminal focus of the Settlement, the capacity of the reconfigured terminal spaces must be assessed in terms of NBEG. The EIR must assess these variables in order to compare existing passenger capacity with the passenger capacity of proposed alternatives.

Response:

The commentor submits that "capacity of the reconfigured terminal in Alternative 3 must be reassessed." The planned size and capacity of many related facilities, including the linear concourse to replace Terminals 1, 2, and 3 under SPAS Alternative 3, was based on programmatic estimates made during the LAX Master Plan study. Section 3.3 of Appendix F-2 of the Preliminary LAX SPAS Report discusses the terminal assumptions for Alternative 3, including the gate positions for the linear concourse. (Also see Appendix F-2 of the Preliminary LAX SPAS Report for a discussion of the gate positions and terminal assumptions for all the alternatives.) As described in Section 6.2 of the Preliminary LAX SPAS Report, LAX Master Plan Alternative D was designed to serve the same practical capacity as the then existing airport would have served without the LAX Master Plan improvements (i.e., the same number of passengers that would have been served if no LAX Master Plan improvements had been made). All of the SPAS alternatives have similarly been designed with 153 gates and analyzed at a practical capacity of 78.9 MAP. As described in Section 6.2 of the Preliminary LAX SPAS Report, the term "practical capacity" in this context means a forecast of activity determined by how LAX's various components will function together in the context of real-world market conditions, particularly given the market conditions projected in LAX's forecast. While practical capacity is not based solely on market assumptions, it takes into account the expected physical characteristics of the various functional elements of the airport and how they are planned and expected to work together, given how the market is likely to response to and use LAX. Section 6.2 of the Preliminary LAX SPAS Report also sets forth a potential revision to Section 7.H of the LAX Specific Plan that would provide opportunities for adjustments if LAX reaches 75 or 78.9 MAP earlier than expected. Therefore, it is not necessary to reassess the capacity of the reconfigured terminal in SPAS Alternative 3.

SPAS-AL00008-30

Comment:

3.4 Runway capacity increases must be defined for all Alternatives

Alternatives 1 through 7 include various improvements to the north airfield, all designed to increase aircraft flow and safety. They also increase the peak hour Instrument Flight Rules (IFR) capacity of the north airfield. Peak hour IFR capacity is a key measure of the ability of a runway system to serve aircraft operations. Such information is not included in the DEIR. The inclusion of this information in the Draft EIR is critical to understanding the capacity of the proposed physical improvements. The FAA provides guidance to assessing airfield capacity in AC 150-5060-5; and the analysis is supported by a variety of advanced modeling techniques. Draft EIR Table 4.10 1-7 includes a footnote indicating the use of 2011 SIMMOD model runs and Integrated Noise Model (INM) output files. (SIMMOD is a sophisticated airfield modeling computer program; details are available at http://web.mit.edu/aeroastro/www/labs/AATT/reviews/simmod.html.) The Noise section of the Draft EIR uses INM to generate noise contours and other noise impact levels.

While the technical appendices may include detailed runway use information, the Draft EIR does not include easily accessible tables indicating how many aircraft are assigned to each runway for each build alternative. Although projected noise contours are significantly larger under the build alternatives, the Draft EIR provides only one table in the Noise section that lists daily operations per aircraft type.

- In order for readers to understand the aircraft and passenger serving capacity of the alternatives, the Draft EIR must include the airfield modeling data and a summary of the runway specific aircraft assignments for each alternative. (At the time of our review, the web version of the Draft EIR included

no link to the appendices where this information may be located.) Furthermore, the Draft EIR should provide information regarding the passenger growth-inducing impact of increasing the peak hour IFR. Together, these data will enable reviewers to assess the full passenger carrying capacity that could feasibly be associated with each alternative.

Response:

The commentor's statement that the proposed SPAS alternative improvements to the north airfield would "increase the peak hour Instrument Flight Rules (IFR) capacity of the north airfield" is not valid.

As discussed on page 1-10 in Section 1.2.1 of the SPAS Draft EIR, improvements proposed under the SPAS alternatives are meant to "support the safe and efficient movement of aircraft at LAX." The SPAS improvements did not include any changes that would enhance instrument approach capabilities to the north airfield runways. Refer to pages 1-10 and 1-11 in Section 1.2.1 regarding a list of existing problems associated with the current airfield design at LAX. Today, simultaneous dual approaches to Runways 6L/24R and 6R/24L under IFR conditions are not possible. Under IFR conditions, the northern runways at LAX are treated as a single runway because the spacing between the two runway centerlines is less than 2,500 feet. Please refer to the Federal Aviation Administration (FAA) guidance in Advisory Circular 150/5300-13a, Section 316 on page 85 regarding parallel runway separation requirements. None of the SPAS alternatives would provide a minimum of 2,500 feet between Runways 6L/24R and 6R/24L that would allow an increase in IFR capacity. Please refer to Section 4.7.2.3 under the section heading of "Runway Separation Distances" on pages 4-487 and 4-488 of the SPAS Draft EIR regarding additional information on runway separation distances and simultaneous operations.

In addition, Appendix F-2 of the Preliminary LAX SPAS Report documents the results of the airspace SIMMOD simulation under the following airspace configurations: Visual Flight Rule (VFR) with visual approaches, VFR with Instrument Landing System (ILS) approaches and Instrument Meteorological Conditions (IMC) with instrument approaches. As presented in Table 7 on page 45 (2009 conditions), Table 10 on page 63 (SPAS Alternative 1), Table 12 on page 73 (SPAS Alternative 2), Table 14 on page 91 (SPAS Alternative 3) and Table 16 on page 107 (SPAS Alternative 4), the assumed percentage of IMC with instrument approaches (i.e., approaches under IFR conditions) was kept identical to that assumed under the 2009 conditions (i.e., 4.1 percent of the total annual operations). When compared to the 2009 conditions, the resulting increase of the peak hour throughput under IMC with instrument approaches under the SPAS alternatives is due to an increase in the total number of operations, not an increase of the airport runway system IFR capacity. Under each of these four SPAS alternative, the resulting peak hour throughput varies slightly between 122 and 125 hourly operations under IMC with instrument approaches, compared to 103 hourly operations in 2009. Regarding information on the SPAS Draft EIR modeled results in terms of peak hour throughput, refer to Response to Comment SPAS-AL00007-4.

The commentor further discusses FAA guidance related to assessing airfield capacity, as well as modeling techniques such as SIMMOD airspace simulation and the Integrated Noise Model (INM) aircraft noise modeling. Both modeling technics were used for the purposes of the SPAS Draft EIR and were documented in Appendix F-2 of the Preliminary LAX SPAS Report (SIMMOD airspace modeling) and in Appendices J1-1 and J1-2 of the SPAS Draft EIR (aircraft noise modeling).

The commentor requests additional information related to "airfield modeling data and a summary of the runway specific aircraft assignments for each alternative." Airfield modeling data represent large amounts of data required to run both the INM and the airspace simulation SIMMOD model. Such databases cannot readily be provided in manageable tabular format and often require the INM and SIMMOD models to be accessed. However, in response to this comment, Table 1 below provides additional detail regarding the assumptions used in the SPAS Draft EIR noise analysis, specifically the number of Average Annual Day (AAD) operations modeled in the INM by runway, type of operation (arrival/departure), aircraft category, and scenario (2009, Alternatives 1, 2, 3, and 4).

Table 1

Aircraft Noise Analysis - Number of Average Annual Day Operations by Runway, Type of Operation (Arrival/Departure), Aircraft Category, and Scenario

Runway	Arrival/ Departure	Aircraft Category	2009	Alt. 1	Alt. 2	Alt. 3	Alt. 4
06L	A	NJT	0.45	0.60	0.60	0.63	0.61
06L	A	SJT	0.82	1.78	1.71	1.72	1.69
06L	A	SNB	2.26	4.16	4.22	3.69	4.09
06L	A	LNB	0.79	1.13	1.21	1.13	1.19
06L	A	SWB	0.37	0.87	0.85	0.91	0.90
06L	A	LWB	1.12	0.92	0.91	0.93	0.87
06L	A	NLA	0.01	0.20	0.20	0.20	0.20
06L	A Total		5.82	9.66	9.70	9.22	9.55
06L	D	NJT	0.05	0.12	0.11	0.22	0.12
06L	D	SJT	0.00	0.00	0.00	0.00	0.00
06L	D	SNB	0.12	0.34	0.35	0.91	0.40
06L	D	LNB	0.00	0.00	0.00	0.00	0.00
06L	D	SWB	0.00	0.00	0.00	0.00	0.00
06L	D	LWB	0.00	0.00	0.00	0.00	0.00
06L	D	NLA	0.00	0.00	0.00	0.00	0.00
06L	D Total		0.17	0.46	0.46	1.13	0.52
06L Total			5.99	10.13	10.16	10.35	10.07
24R	A	NJT	36.45	29.33	29.10	26.73	29.17
24R	A	SJT	52.71	84.01	81.42	66.86	82.14
24R	A	SNB	176.74	174.65	172.70	170.63	171.31
24R	A	LNB	23.34	59.04	57.45	54.41	56.90
24R	A	SWB	7.10	32.33	31.68	38.86	32.59
24R	A	LWB	33.27	28.24	27.75	39.57	27.24
24R	A	NLA	0.58	8.58	8.57	8.62	7.08
24R	A Total		330.18	416.19	408.67	405.69	406.43
24R	D	NJT	4.24	4.08	5.29	6.05	4.20
24R	D	SJT	1.66	1.70	1.90	1.50	3.13
24R	D	SNB	4.86	1.32	1.94	0.00	5.57
24R	D	LNB	0.21	0.00	0.00	0.00	0.00
24R	D	SWB	0.03	0.00	0.00	0.00	0.00
24R	D	LWB	0.00	0.00	0.00	0.00	0.00
24R	D	NLA	0.00	0.00	0.00	0.00	0.00
24R	D Total		11.00	7.09	9.13	7.55	12.90
24R Total			341.18	423.29	417.80	413.24	419.33
06R	A	NJT	0.45	1.13	1.12	1.09	1.14
06R	A	SJT	0.77	2.34	2.36	2.35	2.36
06R	A	SNB	2.54	2.91	2.85	2.98	2.94
06R	A	LNB	3.33	3.97	3.96	4.69	3.99
06R	A	SWB	2.01	4.99	5.05	4.95	5.03
06R	A	LWB	3.37	6.92	6.66	6.87	6.88
06R	A	NLA	0.00	0.00	0.00	0.00	0.00
06R	A Total		12.47	22.26	21.99	22.93	22.34
06R	D	NJT	0.40	0.58	0.58	0.48	0.58
06R	D	SJT	0.57	1.56	1.57	1.96	1.58
06R	D	SNB	1.32	4.09	4.08	4.16	4.02
06R	D	LNB	0.32	0.85	0.84	1.32	0.81
06R	D	SWB	0.05	0.61	0.61	0.93	0.61
06R	D	LWB	0.09	0.53	0.51	0.63	0.49
06R	D	NLA	0.00	0.16	0.16	0.16	0.16
06R	D Total		2.75	8.39	8.35	9.64	8.26
06R Total			15.22	30.65	30.34	32.56	30.60
24L	A	NJT	1.01	3.23	3.50	5.40	3.34
24L	A	SJT	1.15	7.75	10.34	18.21	10.27
24L	A	SNB	2.80	9.52	11.27	29.14	10.97
24L	A	LNB	0.51	4.90	6.61	11.01	7.03

Table 1

Aircraft Noise Analysis - Number of Average Annual Day Operations by Runway, Type of Operation (Arrival/Departure), Aircraft Category, and Scenario

Runway	Arrival/ Departure	Aircraft Category	2009	Alt. 1	Alt. 2	Alt. 3	Alt. 4
24L	A	SWB	0.25	2.17	2.49	7.64	2.23
24L	A	LWB	1.90	2.08	2.60	8.07	2.22
24L	A	NLA	0.00	0.00	0.00	0.00	0.00
24L	A Total		7.62	29.66	36.81	79.48	36.06
24L	D	NJT	37.43	26.84	24.80	23.19	22.92
24L	D	SJT	43.18	74.63	73.44	81.74	72.81
24L	D	SNB	191.45	217.16	215.20	212.99	215.66
24L	D	LNB	22.07	55.39	55.28	57.04	55.27
24L	D	SWB	4.55	27.05	27.32	29.79	27.36
24L	D	LWB	14.21	31.95	32.18	29.14	30.64
24L	D	NLA	0.57	3.79	3.87	3.80	3.75
24L	D Total		313.47	436.82	432.10	437.70	428.41
24L Total			321.09	466.47	468.91	517.18	464.48
07L	A	NJT	0.32	0.90	0.92	0.75	0.87
07L	A	SJT	0.29	0.73	0.74	0.77	0.73
07L	A	SNB	0.41	3.79	3.76	3.76	3.65
07L	A	LNB	4.29	2.91	2.94	1.73	2.89
07L	A	SWB	2.25	4.79	4.72	4.79	4.78
07L	A	LWB	2.93	5.62	5.75	5.31	5.54
07L	A	NLA	0.00	0.00	0.00	0.00	0.00
07L	A Total		10.48	18.73	18.84	17.11	18.46
07L	D	NJT	0.28	0.66	0.66	0.66	0.66
07L	D	SJT	0.95	1.51	1.50	1.10	1.49
07L	D	SNB	2.03	3.09	3.10	2.45	3.11
07L	D	LNB	0.79	1.70	1.71	1.25	1.63
07L	D	SWB	0.39	1.31	1.29	1.00	1.31
07L	D	LWB	0.76	1.00	1.02	0.90	1.03
07L	D	NLA	0.00	0.00	0.00	0.00	0.00
07L	D Total		5.19	9.26	9.29	7.36	9.22
07L Total			15.67	27.99	28.13	24.47	27.68
25R	A	NJT	1.62	4.64	4.72	2.54	4.23
25R	A	SJT	2.09	8.88	8.82	6.03	9.48
25R	A	SNB	3.43	21.92	22.30	8.73	23.06
25R	A	LNB	2.04	6.68	6.57	2.66	6.49
25R	A	SWB	0.87	8.27	8.33	4.16	8.46
25R	A	LWB	0.74	12.20	12.03	4.74	12.30
25R	A	NLA	0.00	0.00	0.00	0.00	0.00
25R	A Total		10.79	62.59	62.78	28.87	64.02
25R	D	NJT	33.90	31.78	33.18	32.58	36.18
25R	D	SJT	74.32	69.77	70.54	63.28	70.33
25R	D	SNB	112.57	143.49	144.81	148.96	140.72
25R	D	LNB	77.82	72.73	72.84	71.05	72.95
25R	D	SWB	35.89	76.31	76.06	73.41	75.99
25R	D	LWB	54.18	51.44	51.33	53.89	52.81
25R	D	NLA	0.00	0.00	0.00	0.00	0.00
25R	D Total		388.68	445.51	448.78	443.18	448.98
25R Total			399.47	508.10	511.56	472.05	512.99
07R	A	NJT	0.38	0.75	0.76	0.75	0.73
07R	A	SJT	0.92	1.44	1.48	1.51	1.47
07R	A	SNB	1.44	2.89	2.86	3.37	2.92
07R	A	LNB	1.03	1.41	1.33	1.42	1.34
07R	A	SWB	0.59	1.12	1.15	1.10	1.08
07R	A	LWB	0.92	0.70	0.71	0.72	0.74
07R	A	NLA	0.00	0.11	0.11	0.10	0.11
07R	A Total		5.30	8.42	8.41	8.97	8.39
07R	D	NJT	0.07	0.18	0.18	0.18	0.18

Table 1

Aircraft Noise Analysis - Number of Average Annual Day Operations by Runway, Type of Operation (Arrival/Departure), Aircraft Category, and Scenario

Runway	Arrival/ Departure	Aircraft Category	2009	Alt. 1	Alt. 2	Alt. 3	Alt. 4
07R	D	SJT	0.10	0.47	0.47	0.47	0.47
07R	D	SNB	0.04	0.02	0.02	0.02	0.02
07R	D	LNB	0.02	0.03	0.03	0.03	0.03
07R	D	SWB	0.05	0.10	0.10	0.10	0.10
07R	D	LWB	0.09	0.29	0.29	0.30	0.29
07R	D	NLA	0.01	0.11	0.11	0.13	0.12
07R	D Total		0.37	1.21	1.21	1.24	1.21
07R Total			5.66	9.63	9.62	10.21	9.61
25L	A	NJT	38.49	33.51	33.36	36.18	33.99
25L	A	SJT	70.68	64.83	64.87	74.29	63.61
25L	A	SNB	125.36	150.55	150.44	148.09	151.45
25L	A	LNB	67.98	51.61	51.57	54.60	51.83
25L	A	SWB	29.79	54.45	54.72	46.58	53.91
25L	A	LWB	31.27	40.50	40.78	30.99	41.41
25L	A	NLA	0.11	5.74	5.75	5.70	7.24
25L	A Total		363.69	401.18	401.49	396.43	403.44
25L	D	NJT	2.80	9.84	9.27	10.71	9.24
25L	D	SJT	8.61	22.11	22.33	21.69	21.95
25L	D	SNB	2.29	0.89	0.89	0.90	0.89
25L	D	LNB	2.13	0.94	0.94	0.95	0.94
25L	D	SWB	2.40	3.62	3.61	3.76	3.62
25L	D	LWB	6.39	11.99	11.86	12.34	11.94
25L	D	NLA	0.11	10.56	10.48	10.54	10.60
25L	D Total		24.72	59.94	59.37	60.89	59.18
25L Total			388.42	461.12	460.87	457.31	462.61
Grand Total			1492.69	1937.38	1937.38	1937.38	1937.38

Notes:

NJT = non-jet aircraft
SJT = small jet aircraft
SNB = small narrow-body aircraft
LNB = long narrow-body aircraft
SWB = small wide-body aircraft
LWB = large wide-body aircraft
NLA = new large aircraft

Source: Ricondo & Associates, 2012.

The commentor also inquires about "passenger growth-inducing impact of increasing the peak hour IFR." As discussed above, based on the fact that the SPAS alternatives did not provide for an increase in IFR capacity and the fact that the 2025 Design Day Flight Schedule (DDFS) was developed independently from the LAX airfield capacity, the SPAS Draft EIR did not analyze a potential increase in passenger volumes due to an increase in peak hour IFR operations.

All of the aforementioned appendices associated with the SPAS Draft EIR and the Preliminary LAX SPAS Report were available on the LAWA SPAS website (laxspas.org), with links that were tested and validated by numerous parties on the day the SPAS Draft EIR was released for public review (July 27, 2012), and were also on the CDs that were hand-delivered on or about that day to the commentor and to the Cities of Inglewood and Culver City, which the commentor represents, and were within the complete hard-copy sets of documents also hand-delivered to those Cities.

SPAS-AL00008-31

Comment:

3.5 The Master Plan forecasts are outdated and inaccurate and need to be redone

The Master Plan forecasts developed by LAWA in 1995 have not stood the test of time. These forecasts projected 98 MAP and 3.6 MAT (Million Annual Tons) of cargo at LAX for 2015. Recent levels, despite 4-5% increases in 2011 and 2012, are 61 MAP and 1.7 MAT. In 2000, levels were 67 MAP and 2.0 MAT. Thus, not only have the high forecasts not been achieved, levels have decreased 10% to 20%. As stated above, the Draft EIR itself uses a forecast of approximately 74 MAP in 2025. Thus, while it is obvious that the Draft EIR is using forecasts that are vastly different from the ones used in the original Master Plan EIR, there is no discussion or revelation regarding these new forecasts. Recent forecasts by SCAG, FAA and the airline industry also indicate a rate of increase much less than envisioned in the 1995 Master Plan. Much has occurred in the world since 1995 including not only 9/11 and the Great Recession, but also a vast difference in how business is conducted and how income is distributed. The introduction of the Internet and computer interconnectedness (as documented in Thomas Friedman's book, "The World is Flat.") have reshaped the global economy. The U.S. economy is in a state of flux with no clear direction, and North American airlines are operating on very thin margins (0.5%) with uncertain forecasts for future revenues.

Accommodating LAWA's 1995 forecasts formed the Purpose and Need of the original Master Plan and its constituent projects. The FAA ROD that certified the EIS also cites accommodating these forecasts as the Purpose and Need for the Master Plan. The Settlement Agreement is based on these outdated and discredited forecasts, as are the follow-on Specific Plan Amendment and its Draft EIR.

- Considering that the 1995 passenger demand forecasts comprise the fundamental basis for development of the proposed project alternatives, it is important that the current Draft EIR, disclose the new forecasts and their underlying assumptions.

Response:

The passenger forecast used for the SPAS planning and Draft EIR analyses is not based on 1995 forecast, but was developed anew based on baseline (2009) conditions. Please refer to Section 1 in Appendix F-1 of the Preliminary LAX SPAS Report regarding the passenger forecast developed for the SPAS Draft EIR. Section 4.2 in Appendix F-1 discusses projections of cargo, general aviation, non-scheduled passenger and military operations developed for the SPAS Draft EIR; these projections were not based on 1995 projections, but rather a review of recent trends. Thus, the forecasts and projections used for SPAS planning account for changes since 1995 noted by the comment, such as more recent economic conditions and business trends.

SPAS-AL00008-32

Comment:

4.0 THE SPAS PROCESS DOES NOT FULFILL TRAFFIC COMMITMENTS CONTAINED IN SETTLEMENT §IV.G. AND FAILS TO COMPLY WITH CEQA

4.1 SPAS Alternatives would significantly impact nine County intersections yet mitigation (partial) is provided for only one of these intersections.

The County Department of Public Works does not agree that the Draft EIR adequately analyzes and discloses the impacts and appropriate mitigations for County intersections. The County requests that LAWA consult and work with its Public Work's engineering staff before finalizing the EIR. The study area for the traffic analysis includes over 100 intersections. Table 6 lists the 40 intersections that are all or partially in the County, and notes the impact analysis findings for each. Mitigation is proposed in those cases where LAWA considers the improvements to be feasible, also shown in Table 6.

Table 6. INTERSECTIONS IN LA COUNTY IMPACTED BY SPAS PROJECT ALTERNATIVES

NO	INTERSECTION	JURISDICTION	IMPACT (Y/N)	MITIGATION
1	Admiralty Way & Bali Way	LA County	No	NA
2	Admiralty Way & Fiji Way	LA County	No	NA
3	Admiralty Way & Mindanao Way	LA County	No	NA
4	Palawan Way & Admiralty Way	LA County	No	NA
5	Via Marina & Admiralty Way	LA County	No	NA
20	Aviation Blvd & West 120th	El Segundo/LA County	No	NA
21	Lincoln Blvd & Bali Way	Caltrans/LA City /LA County	No	NA
23	Centinela Ave & Jefferson Blvd	LA City/LA County	No	NA
27	La Tiejera Blvd & Centinela Ave	LA City/LA County	YES	Not Feasible
36	La Cienega Blvd & Century Blvd	Inglewood/LA City /LA	YES	Not Feasible
52	52 Inglewood Ave & El Segundo Blvd	Hawthorne/LA County	No	NA
53	La Cienega Blvd & El Segundo Blvd	Hawthorne/LA County	No	NA
56	Lincoln Blvd. & Fiji Way	Caltrans/LA City/LA County	No	NA
63	Hawthorne Blvd & Lennox Blvd	LA County	YES	Not Feasible
67	La Cienega Blvd & Imperial Hwy	LA City/LA County	No	NA
75	1-405 NB Ramps (e/o La Cienega Blvd) & Imperial Hwy	Caltrans/Hawthorne/LA County	No	NA
76	Inglewood Ave & Lennox Blvd	LA County	YES	Not Feasible
86	La Brea Ave/Overhill Dr & Stocker St.	LA County	YES	Not Feasible
87	La Brea Ave & Slauson Ave.	LA County	YES	Partial
89	La Cienega Blvd & Lennox Blvd	LA City/LA County	No	NA
91	La Cienega Blvd NB Ramps & Slauson Ave	LA County	No	NA
92	La Cienega Blvd SB Ramps & Slauson Ave	LA County	No	NA
93	La Cienega Blvd & Stocker St.	LA County	YES	Not Feasible
94	La Cienega Blvd & 111th St	LA City/LA County	No	NA
95	La Cienega Blvd & West 120th St	LA County	YES	Not Feasible
97	La Cienega Blvd & I-405 SB Ramps (s/o Century Blvd)	Caltrans/LA City/LA County	No	NA
98	La Cienega Blvd & I-405 SB Ramps (n/o Century Blvd)	Caltrans/LA City/LA County	No	NA
107	Lincoln Blvd & Mindanao Way	Caltrans/LA City/LA County	No	NA
119	119 Ocean Ave/Via Marina & Washington Blvd	LA City/LA County	YES	Not Feasible
120	Overhill Dr & Slauson Ave.	LA County	No	NA
122	Palawan Way & Washington Blvd	LA City/LA County	No	NA
140	SR-90 WB Ramps & Slauson Ave	Caltrans/Culver City/LA	No	NA
157	La Cienega Blvd. & 104th St.	LA City/LA County	No	NA
173	Western Ave & Imperial Hwy	LA County	YES	Not Feasible
175	Vermont Ave & Manchester Ave	Caltrans/LA City/LA County	No	NA
176	Vermont Ave & Century Blvd	LA City/LA County	No	NA
177	Vermont Ave & Imperial Hwy	LA City/LA County	No	NA
185	Crenshaw Blvd & Rosecrans Ave	Gardena/Hawthorne/LA	No	NA

190	Western Ave & El Segundo Blvd	Gardena/LA County	No	NA
191	Vermont Ave & El Segundo Blvd	LA City/LA County	No	NA
NA = Not Applicable; e/o-east of; n/o=north of; s/o=south of				

Table 7 lists nine intersections located wholly or partially in the County that would experience significant adverse impacts from the project. At only one of these 9 intersections is LAWA proposing to reduce the impacts to less than significant levels; mitigation for the remaining 8 significantly impacted intersections has been found infeasible by LAWA. Table 7 outlines forecast service levels and LAWA's proposed mitigation for these nine significantly impacted intersections:

Table 7. COUNTY INTERSECTIONS SIGNIFICANTLY IMPACTED BY THE SPAS ALTERNATIVES

LOCATION	LEVEL OF SERVICE	MITIGATION
36. La Cienega Blvd & Century Blvd	F	No Feasible Mitigation
63. Hawthorne Blvd & Lennox Blvd	D	No Feasible Mitigation
76. Inglewood Ave & Lennox Blvd	D	No Feasible Mitigation
86. La Brea Ave/Overhill Dr & Stocker St.	F	No Feasible Mitigation
87. La Brea Ave & Slauson Ave	F	Partial
93. La Cienega Blvd & Stocker St	F	No Feasible Mitigation
95. La Cienega Blvd & W. 120th St	D	No Feasible Mitigation
119. Ocean Ave/Via Marina & Washington Blvd	F	No Feasible Mitigation
173. Western Ave & Imperial Hwy	E	No Feasible Mitigation

With few exceptions, the impact findings apply to all five alternatives (1, 2, 4, 8 and 9). Some of the impacted locations show Level of Service (LOS) D operating conditions, but are identified as being impacted by the project based on LA County criteria for a significant contribution to the volume/capacity ratio when the with-project LOS is D (which is generally considered an adequate LOS, however the impact is caused by the high project contribution).

Of primary concern are the locations at LOS E or F without identified mitigation, which six of the County intersections fall into this category. The traffic study identifies potential mitigation measures for each location, but deems them infeasible due to "policy" considerations such as needing additional right-of-way, sidewalk - adjustments, or impacting other modes of travel.

- Based on review of the SPAS Draft EIR, it appears that the feasibility findings represent LAWA's interpretation of each jurisdiction's assessment. The County requests that LAWA modify/clarify the following:
- Did LAWA extend to Los Angeles County the offer to fund or provide fair-share mitigation for the significantly impacted County intersections?
- What evidence can be provided that the County rejected potential mitigation measures as infeasible?
- When did LAWA provide the County with an opportunity to select intersections for the Draft EIR analysis, and which intersections did the County submit to LAWA for this purpose?
- Given the potential magnitude of the deficiencies noted in Table 7, it is important that the affected jurisdictions either verify the finding of infeasibility or be given an opportunity to consider implementation of the identified improvements (or other appropriate improvements) with necessary funding or fair-share contributions by LAWA. This is critical because the Settlement Agreement requires LAWA to "contribute its fair share for each mitigation measure to the implementing agency."

Response:

The comment states that "THE SPAS PROCESS DOES NOT FULFILL TRAFFIC COMMITMENTS CONTAINED IN SETTLEMENT §IV.G AND FAILS TO COMPLY WITH CEQA"

Stipulated Settlement Section IV.G does not address traffic, but discusses the fact that the West Satellite Concourse will not be considered a Yellow Light project. Section V.G of the Stipulated Settlement provides that "For any new significant traffic impact that is identified as a result of the traffic study, LAWA will propose *feasible* mitigation measures, *if any*, to mitigate the potentially significant impact." (Emphasis added.) As discussed in Response to Comment SPAS-AL00008-10, this does not require discussion of infeasible mitigation measures.

The comment lists the 40 study intersections that are wholly or partially within the jurisdiction of Los Angeles County, and correctly notes that the SPAS Draft EIR identified significant impacts at nine of those intersections. The comment correctly notes that with the addition of project traffic, six of those nine significantly impacted intersections are projected to operate at LOS E or LOS F, while three are projected to operate at LOS D. The comment states that locations where LOS E or LOS F operation is projected are of primary concern. The commentor asks if LAWA consulted with Los Angeles County on the selection of study intersections, if LAWA consulted with Los Angeles County prior to rejecting certain mitigation measures as infeasible, and if LAWA offered to fully or partly fund mitigation at the impacted intersections under the County's jurisdiction.

Input from Los Angeles County Department of Public Works on the geographic scope of the traffic impact analysis was solicited during the preparation of the SPAS Draft EIR via letters dated April 6, 2006 and April 8, 2008, which also contained a list of intersections that LAWA planned to analyze. As discussed under State CEQA Guidelines Section 15082(b), one of the purposes of commenting upon the Notice of Preparation is to "provide the lead agency with specific detail about the scope and content of the environmental information…" Los Angeles County's June 30, 2008 NOP comment letter explicitly commented upon the "scope and focus" of the transportation analysis. (SPAS Draft EIR, Appendix A, Part 1 of 2, page 162.) In addition, on October 16, 2012 and December 10, 2012, LAWA and its consultant met with staff of the Los Angeles County Department of Public Works to discuss the extent of the County's existing signal coordination system (intelligent transportation systems, or ITS) and whether contributions to improving or expanding that system could be considered as mitigation measures. County staff indicated that the existing system is not as extensive or as sophisticated as it could be. At study intersections where significant impacts were identified but where no physical improvements are feasible at this intersection, a partial mitigation measure (subject to FAA approval) is that LAWA will make a monetary contribution to upgrading the County's ITS system to partially mitigate the alternative's contribution to the cumulative impacts (i.e., the Future (2025) With Alternative versus without alternative).

The comment also suggests that LAWA found mitigation measures infeasible based purely on "policy" considerations. Contrary to the assertion, Section 4.12.2.7.1 of the SPAS Draft EIR provides numerous grounds for infeasibility of some of the traffic improvements, as do the Response to Comments in the Final EIR, including economic infeasibility, environmental infeasibility (including impacts to alternative modes of transportation), legal infeasibility, social infeasibility, and policy infeasibility. Please see Responses to Comments SPAS-AL00001-1, SPAS-AL00008-34, SPAS-AL00008-35, SPAS-AL00008-36, SPAS-AL00008-37, SPAS-AL00008-38, SPAS-AL00008-39, SPAS-AL00008-40, and SPAS-AL00008-41, SPAS-AL00008-42, addressing comments submitted by Los Angeles County, which discuss the feasibility of specific mitigation measures.

SPAS-AL00008-33

Comment:

4.2 The Draft EIR does not address overall system deficiencies associated with significant adverse effects

The foregoing discussion points to significant, unmitigated, direct adverse impacts to eight County intersections, and partial mitigation at one County intersection. LAWA does not propose full mitigation for any of the 9 significantly impacted County intersections. The fact that demand is forecasted to exceed capacity at these critical County intersections clearly indicates that some amount of traffic will divert to other routes. These traffic diversions will cause indirect impacts and overall system deficiencies throughout the region.

- It is incumbent upon the Draft EIR to identify and analyze system-wide deficiencies caused by traffic diverted from significantly impacted intersections, and undertake additional efforts as needed to evaluate the mitigation measures for feasibility in coordination with the affected jurisdictions.

Response:

The comment states that secondary (i.e., indirect) impacts should be assessed due to the diversion of traffic from congested intersections to other routes. As described in Section 4.12.2.2.2 of the SPAS Draft EIR, the traffic analysis in the SPAS Draft EIR employed a focused travel demand forecasting model to assist in estimating the routes that airport-generated traffic would use, as well as the routes of other traffic in the vicinity. Development of the model for use in this study included both static and dynamic validation tests. Because it was determined to operate within accepted standards for accuracy, it was found to be appropriate for this use. Figure 4.12.2-2 of the SPAS Draft EIR shows the model process, which includes iterative traffic assignment until traffic is optimally distributed over the street network. This dynamic assignment process accounts for traffic diversion from congested routes to other available routes. By using the resulting forecast traffic volumes, the SPAS Draft EIR traffic analysis did, in fact, include secondary traffic impacts that could be caused by diversion from congested routes.

SPAS-AL00008-34

Comment:

4.3 The Draft EIR must consider additional measures to reduce traffic impacts

Within the larger context, there are certain locations where potential mitigation measures are available and should be evaluated within the Draft EIR.

- Provided below is a list of intersections and recommended potential mitigation measures and/or analyses that merit thorough evaluation in the Draft EIR:

- 27. La Tijera Boulevard & Centinela Avenue: The DEIR makes a finding that the addition of a second southbound left-turn lane (which would mitigate the project impact) is physically feasible, but has policy constraints (narrowing sidewalks and impacts to alternative transportation modes). The County has not evaluated this finding in coordination with the City of Los Angeles recognizing that the projected LOS D may be considered acceptable by the City.

Response:

The comment states that the County has not evaluated the finding that no mitigation is feasible at La Tijera Boulevard and Centinela Avenue (study intersection 27), but notes that the City of Los Angeles may consider projected future operation at LOS D acceptable.

Contrary to the assertion in the comment, potential mitigation was evaluated at Intersection 27, but was determined to be infeasible. (See SPAS Draft EIR, Section 4.12.2.7.1 ["Identification and Evaluation of Mitigation Measures."], page 4-1293.) The mitigation measure considered at this location was the addition of a second southbound left-turn lane, which would align with the dual northbound left-turn lanes. Implementation of this measure would require narrowing the sidewalk on the northbound departure of the intersection, where a bus stop and shelter are located. Because the sidewalk there is only approximately ten feet wide and includes existing transit infrastructure, it was determined that the sidewalk there could not feasibly be narrowed while maintaining the current level of pedestrian safety and if implemented would result in secondary impacts to alternative modes of transportation (pedestrian access and transit stop access).

In addition, as stated on page 4-1293 of the SPAS DEIR "It is noted that a recent study conducted for SCAG developed grade separation concept designs for the adjacent intersection of La Cienega Boulevard at Centinela Avenue, La Tijera Boulevard, and Fairview Boulevard. If this grade separation concept becomes feasible, LAWA can provide fair share contribution, subject to FAA approval," LAWA is not relying upon the grade-separation project in the SCAG study to reduce impacts to less than

significant since the implementation of this measure is under the jurisdiction of another agency and cannot be guaranteed at this time. Nevertheless, this mitigation measure for the subject intersection has been included in the SPAS Final EIR as Mitigation Measure MM-ST (SPAS)-38. Please see Chapter 5, Corrections and Additions Related to the SPAS Draft EIR.

As discussed in Response to Comment SPAS-AL00008-32, consultation between LACDPW and LAWA confirmed that, at this time, no physical improvements are feasible at this intersection, but a potential partial mitigation measure was identified for this location. If permitted by the FAA, LAWA will make a monetary contribution to upgrading the County's ITS system at this intersection to partially mitigate the alternative's contribution to the cumulative impacts (i.e., the Future (2025) With Alternative versus without alternative).

However, as the contribution to Los Angeles County is conditional pending approval by FAA and the County does not have a method to quantify the benefits of this improvement, no quantitative V/C reduction has been taken for this location. Therefore, in response to this comment, Section 4.12.2.7.2 of the SPAS Draft EIR has been revised to incorporate the proposed mitigation measure and Table 4.12.2-27 through 4.12.2-38 (on page 4-1315 through 4-1326) of the SPAS Draft EIR have been revised to add a footnote stating that no V/C credit was taken at this intersection. Please see Chapter 5, Corrections and Additions Related to the SPAS Draft EIR. Therefore, the impact at this location would remain significant and unavoidable.

SPAS-AL00008-35

Comment:

- 36. La Cienega Boulevard & Century Boulevard: This intersection is a critical location as far as airport accessibility is concerned. Right-of-way is constrained by large office buildings on the northeast and southwest corners, which are not constrained by buildings and where consideration should be given to opportunities presented by right-of-way acquisition from these parts of the intersection. The Cities of Inglewood and Los Angeles share this intersection.

Response:

Potential mitigation was evaluated at Intersection 36 but was determined to be infeasible. (See SPAS Draft EIR, Section 4.12.2.7.1 ["Identification and Evaluation of Mitigation Measures."].) The comment states that the County considers La Cienega Boulevard and Century Boulevard (study intersection 36) to be a "critical intersection" but correctly notes that large office buildings constrain the ability to widen the eastbound and westbound approaches on Century Boulevard.

The wording in the remainder of the comment is unclear. To the extent the commentor is suggesting right-of-way acquisition, the commentor's suggestion is considered infeasible for the reasons discussed on page 4-1294 of the SPAS Draft EIR. As discussed therein, removal of existing businesses, including two high-rise commercial buildings with multiple tenants and two gas stations, is considered economically infeasible, socially infeasible, infeasible based upon policy considerations, and infeasible due to inconsistency with the project objectives (i.e., inconsistent with the objective of advancing "economic growth and vitality of the Los Angeles region.") The physical improvement would also create secondary environmental impacts associated with demolition and construction, such as noise and air quality, and therefore is considered infeasible.

In addition, page 4-1294 of the SPAS Draft EIR notes that the "impact at this location could be reduced through increased service levels of the airport employee TDM/Vanpool program." This mitigation program has been suggested in MM-ST (SPAS)-1 on page 4-1307 in Section 4.12.2.7.2 of the SPAS Draft EIR and has already been incorporated into the project to the extent feasible.

As discussed in Response to Comment SPAS-AL00008-32, consultation between LACDPW and LAWA confirmed that no physical improvements are feasible at this intersection, but a potential partial mitigation measure was identified for this location. If permitted by the FAA LAWA will make a monetary contribution to upgrading the County's ITS system at this intersection to partially mitigate the alternative's contribution to the cumulative impacts (i.e., the Future (2025) With Alternative versus without alternative).

However, as the contribution to Los Angeles County is conditional pending approval by FAA and the County does not have a method to quantify the benefits of this improvement, no quantitative V/C reduction has been taken for this location. Therefore, in response to this comment, Section 4.12.2.7.2 of the SPAS Draft EIR has been revised to incorporate the proposed mitigation measure and Table 4.12.2-27 through 4.12.2-38 (on page 4-1315 through 4-1326) of the SPAS Draft EIR have been revised to add a footnote stating that no V/C credit was taken at this intersection. Please see Chapter 5, Corrections and Additions Related to the SPAS Draft EIR. Therefore, the impact at this location would remain significant and unavoidable.

SPAS-AL00008-36

Comment:

- 63. Hawthorne Boulevard & Lennox Boulevard: This intersection has some physical constraints, but could potentially be improved with the removal of the north-south median, restriping with minor sidewalk adjustments, and lane width reductions. The potential for such improvements should be the subject of a more detailed evaluation, recognizing that the projected LOS D could be considered acceptable by the City.

Response:

Potential mitigation was evaluated at Intersection 63 but was determined to be infeasible. (See SPAS Draft EIR, Section 4.12.2.7.1 ["Identification and Evaluation of Mitigation Measures."]) As noted therein, there are existing right-of-way constraints, and the mitigation measure would require the removal of existing one-story commercial businesses on Hawthorne Boulevard, including a car wash, a restaurant and a retail store.

The comment recommends that mitigation at the intersection of Hawthorne Boulevard and Lennox Boulevard (study intersection 63) be further evaluated, but notes that the City of Los Angeles may consider projected future operation at LOS D acceptable. The comment specifically suggests the potential to remove the raised center median on Hawthorne Boulevard, restripe Hawthorne Boulevard with narrowed lanes and narrowing of the sidewalk.

The intersection modifications cited in the comment were considered when mitigation options at this location were being evaluated. The existing curb lanes are currently just wide enough to allow drivers in the northbound and southbound curb lanes to pass buses at the far-side bus stops that are present in both directions. If the curb lanes were narrowed, the resulting lane widths would no longer allow drivers to readily pass by stopped buses and result in operational problems thereby increasing traffic impacts and creating safety problems, making the suggestion infeasible. Also, based on consultation between LAWA and Los Angeles County staff during the meetings that took place on December 10, 2012 and on December 18, 2012 the addition of a southbound travel lane would require the prohibition of on-street parking, which is considered by the County to be infeasible at this location due to the partial reliance of businesses in this commercial district upon street parking. Removal of the median would also create secondary environmental impacted associated with demolition and construction, such as noise, air quality, etc., and is therefore considered infeasible. Further, median landscaping and beautification improvements were made in 2012 on the segment of Hawthorne Boulevard from 104th Street to 111th Street, which includes the intersection with Lennox Avenue, and removal of the median would reduce the value of the recent investment in that corridor.

As discussed in Response to Comment SPAS-AL00008-32, consultation between LACDPW and LAWA confirmed that no physical improvements are feasible at this intersection, but a potential partial mitigation measure was identified for this location. If permitted by the FAA, LAWA will make a monetary contribution to upgrading the County's ITS system at this intersection to partially mitigate the alternative's contribution to the cumulative impacts (i.e., the Future (2025) With Alternative versus without alternative).

However, as the contribution to Los Angeles County is conditional pending approval by FAA and the County does not have a method to quantify the benefits of this improvement, no quantitative V/C reduction has been taken for this location. Therefore, in response to this comment, Section 4.12.2.7.2

of the SPAS Draft EIR has been revised to incorporate the proposed mitigation measure and Table 4.12.2-27 through 4.12.2-38 (on page 4-1315 through 4-1326) of the SPAS Draft EIR have been revised to add a footnote stating that no V/C credit was taken at this intersection. Please see Chapter 5, Corrections and Additions Related to the SPAS Draft EIR. Therefore, the impact at this location would remain significant and unavoidable.

SPAS-AL00008-37

Comment:

- 76. Inglewood Avenue & Lennox Boulevard: Improvements as noted in the SPAS are physically feasible at this location, but would result in the loss of on-street parking. Since the projected performance is LOS D, these improvements are recommended if the high project contribution to this location is of concern (as determined through communications between the City and the County).

Response:

The comment states that the mitigation measure discussed in the SPAS Draft EIR for the intersection of Inglewood Avenue and Lennox Boulevard (study intersection 76) is physically feasible but would result in the loss of on-street parking on Inglewood Avenue. The comment appears to conditionally recommend the improvements, which were determined to be infeasible in the SPAS Draft EIR (see page 4-1297 of the SPAS Draft EIR), "if the high project contribution to this location is of concern (as determined through communications between the City and the County.)" The intended meaning of this conditional recommendation is not clear.

The loss of parking and potential narrowing of sidewalks on Inglewood Avenue at this location were considered when mitigation options were developed for this location but were rejected as infeasible because the sidewalk there could not feasibly be narrowed while maintaining the current level of pedestrian safety and convenience and this location is densely developed with residential and commercial uses that rely, in part, on on-street parking, thereby resulting in economic infeasibility, social infeasibility, policy infeasibility, and infeasibility based upon inconsistency with the project objectives (i.e., such a suggestion would not "Advance[ing] the Economic Growth and Vitality of the Los Angeles Region"; Section 1.2.1 of the SPAS Draft EIR).

This finding was discussed further with Los Angeles County staff during meetings that took place on December 10, 2012 and on December 18, 2012, prior to the completion of the SPAS Final EIR and concurrence was reached that a lack of right-of-way and the presence of on-street parking preclude the ability to physically mitigate the significant impact at this intersection. As discussed on page 4-1288 of the SPAS Draft EIR, the physical improvements suggested by the commenter are considered infeasible because they would result in impacts to alternative modes of transportation (narrowing of existing sidewalk on Inglewood Avenue). It should be noted that the reference to Imperial Highway in the discussion of Intersection 76 on pages 4-1288 and 4-1297 of the SPAS Draft EIR is a typographical error. The correct reference in each case is to Inglewood Avenue, not Imperial Highway. Please see Chapter 5, Corrections and Additions Related to the SPAS Draft EIR.

As discussed in Response to Comment SPAS-AL00008-32, consultation between LACDPW and LAWA confirmed that no physical improvements are feasible at this intersection but a potential partial mitigation measure was identified for this location. If permitted by the FAA, LAWA will make a monetary contribution to upgrading the County's ITS system at this intersection to partially mitigate the alternative's contribution to the cumulative impacts (i.e., the Future (2025) With Alternative versus without alternative).

However, as the contribution to Los Angeles County is conditional pending approval by FAA and the County does not have a method to quantify the benefits of this improvement, no quantitative V/C reduction has been taken for this location. Therefore, in response to this comment, Section 4.12.2.7.2 of the SPAS Draft EIR has been revised to incorporate the proposed mitigation measure and Table 4.12.2-27 through 4.12.2-38 (on page 4-1315 through 4-1326) of the SPAS Draft EIR have been revised to add a footnote stating that no V/C credit was taken at this intersection. Please see Chapter 5, Corrections and Additions Related to the SPAS Draft EIR. Therefore, the impact at this location would remain significant and unavoidable.

SPAS-AL00008-38

Comment:

- 86. La Brea Avenue/Overhill Drive & Stocker Street: This five-legged intersection is projected to operate at LOS F. An identified mitigation measure is to add a southbound through lane, which would require sidewalk modifications and potentially some right-of-way. Since this intersection is adjacent to open space, the feasibility of such an improvement should be evaluated to determine the extent of constraints to obtaining additional right-of-way.

Response:

The comment references a potential mitigation for intersection 86 which was determined to be infeasible on page 4-1298 of the SPAS Draft EIR. The comment appears to be referring to the second infeasible mitigation measure discussed in the fourth sentence of page 4-1298 under Intersection 86. (See Section 4.12.2.7.1, Identification and Evaluation of Mitigation Measures, of the SPAS Draft EIR.) The comment recommends that the potential mitigation measure described for the intersection of La Brea Avenue/Overhill Avenue and Stocker Street (study intersection 86) be further evaluated to determine whether the acquisition of adjacent parkland is feasible. As discussed on page 4-1298 of the SPAS Draft EIR, to fully mitigate the impact at this location would require the provision of a southbound through lane, which is not feasible within the existing right-of-way and would require narrowing sidewalks on La Brea Avenue south of Stocker Street. Because the sidewalk there is only approximately seven feet wide, it was determined that the sidewalk there could not feasibly be narrowed while maintaining the current level of pedestrian safety and if implemented would result in secondary impacts to alternative modes of transportation (pedestrian access). Acquisition of additional right-of-way would require removal of existing one-story commercial and motel businesses on the west side of La Brea Avenue, which is considered economically infeasible, socially infeasible, infeasible based upon policy considerations, and infeasible due to inconsistency with the project objectives (i.e., inconsistent with the objective of advancing "economic growth and vitality of the Los Angeles region.") The physical improvement would also create secondary environmental impacted associated with demolition and construction, such as noise, air quality, etc., and therefore is considered infeasible.

As discussed in Response to Comment SPAS-AL00008-32, consultation between LACDPW and LAWA confirmed that no physical improvements are feasible at this intersection, but a potential partial mitigation measure was identified for this location. If permitted by the FAA, LAWA will make a monetary contribution to upgrading the County's ITS system at this intersection to partially mitigate the alternative's contribution to the cumulative impacts (i.e., the Future (2025) With Alternative versus without alternative).

However, as the contribution to Los Angeles County is conditional pending approval by FAA and the County does not have a method to quantify the benefits of this improvement, no quantitative V/C reduction has been taken for this location. Therefore, in response to this comment, Section 4.12.2.7.2 of the SPAS Draft EIR has been revised to incorporate the proposed mitigation measure and Table 4.12.2-27 through 4.12.2-38 (on page 4-1315 through 4-1326) of the SPAS Draft EIR have been revised to add a footnote stating that no V/C credit was taken at this intersection. Please see Chapter 5, Corrections and Additions Related to the SPAS Draft EIR. Therefore, the impact at this location would remain significant and unavoidable.

SPAS-AL00008-39

Comment:

- 93. La Cienega Boulevard & Stocker Street: The DEIR declared improvements at this location as infeasible due to right-of-way constraints, even though there are no buildings in the vicinity. A recent SCAG study is referenced, indicating potential project participation in future improvements if and when something is identified; this should be pursued with a projected LOS F, with possibly some initial improvements identified.

Response:

The comment restates the discussion of a potential mitigation measure at La Cienega Boulevard and Stocker Street (study intersection 93) on page 4-1299 of the SPAS Draft EIR, a fair-share contribution to a grade separation should it be found feasible and should the FAA approve of a contribution by LAWA, and suggests that unspecified lesser improvements in the near term may be possible. This finding was discussed further with Los Angeles County staff during meetings that took place on December 10, 2012 and on December 18, 2012, prior to the completion of the SPAS Final EIR and concurrence was reached that no short-term physical mitigation measures are feasible at this location and the proposed fair-share contribution to the grade-separation, subject to FAA approval, as stated on page 4-1299 of the SPAS Draft EIR, remains feasible to fully mitigate the project impact at this location.

As discussed in Response to Comment SPAS-AL00008-32, consultation between LACDPW and LAWA confirmed that no physical improvements are feasible at this intersection in the near term but a potential partial mitigation measure was identified for this location. If permitted by the FAA, LAWA will make a monetary contribution to upgrading the County's ITS system at this intersection to partially mitigate the alternative's contribution to the cumulative impacts (i.e., the Future (2025) With Alternative versus without alternative).

However, as the contribution to Los Angeles County is conditional pending approval by FAA and the County does not have a method to quantify the benefits of this improvement, no quantitative V/C reduction has been taken for this location. Similarly, as the grade separation concept design for La Cienega Boulevard at Stocker Street is not reasonably foreseeable at this time, no quantitative V/C reduction has been taken for this location. Therefore, in response to this comment, Section 4.12.2.7.2 of the SPAS Draft EIR has been revised to incorporate the proposed mitigation measures and Tables 4.12.2-27 through 4.12.2-38 (on page 4-1315 through 4-1326) of the Draft EIR have been revised to add a footnote stating that no V/C credit was taken at this intersection. Please see Chapter 5, Corrections and Additions Related to the SPAS Draft EIR. Therefore, the impact at this location would remain significant and unavoidable.

SPAS-AL00008-40

Comment:

- 95. La Cienega Boulevard & W. 120th Street: While a potentially feasible mitigation measure is identified for this location (may require some right-of-way or sidewalk adjustment), the LOS D that is forecast may be considered acceptable.

Response:

The comment states that the County considers the mitigation measure discussed for the impact at the intersection of La Cienega Boulevard and 120th Street (study intersection 95), the addition of a second southbound left-turn lane, to be potentially feasible. The comment notes, however, that the projected future operation LOS D may be considered acceptable. This intersection is within the jurisdiction of the County of Los Angeles, in the community of Del Aire.

The SPAS Draft EIR concluded that the right-of-way acquisition that would be required rendered it infeasible due to economic and policy considerations. Please see pages 4-1299 and 4-1230 in Section 4.12.2.7.1 of the SPAS Draft EIR, to fully mitigate the impact at this location would require the provision of a southbound left-turn lane, which is not feasible within the existing right-of-way. This would require removal of existing one-story office and commercial buildings with multiple tenants on the east side of La Cienega Boulevard, and is considered economically infeasible, socially infeasible, infeasible based upon policy considerations, and infeasible due to inconsistency with the project objectives (i.e., inconsistent with the objective of advancing "economic growth and vitality of the Los Angeles region.") The physical improvement would also create secondary environmental impacts associated with demolition and construction, such as noise, air quality, etc., and therefore is considered infeasible.

As discussed in Response to Comment SPAS-AL00008-32, consultation between LACDPW and LAWA confirmed that no physical improvements are feasible at this intersection, but a potential partial mitigation measure was identified for this location. If permitted by the FAA, LAWA will make a monetary contribution to upgrading the County's ITS system at this intersection to partially mitigate the

alternative's contribution to the cumulative impacts (i.e., the Future (2025) With Alternative versus without alternative).

However, as the contribution to Los Angeles County is conditional pending approval by FAA and the County does not have a method to quantify the benefits of this improvement, no quantitative V/C reduction has been taken for this location. Therefore, in response to this comment, Section 4.12.2.7.2 of the SPAS Draft EIR has been revised to incorporate the proposed mitigation measure and Table 4.12.2-27 through 4.12.2-38 (on page 4-1315 through 4-1326) of the SPAS Draft EIR have been revised to add a footnote stating that no V/C credit was taken at this intersection. Please see Chapter 5, Corrections and Additions Related to the SPAS Draft EIR. Therefore, the impact at this location would remain significant and unavoidable.

SPAS-AL00008-41

Comment:

- 119. Ocean Avenue/Via Marina & Washington Boulevard: Because of the physical constraints, the finding of "economic and policy infeasibility" would appear to be realistic. Mitigation would require some form of system approach for the Marina Del Rey area, with potential participation by the project.

Response:

The comment states agreement with the finding of the SPAS Draft EIR that no mitigation is feasible for the intersection of Ocean Avenue/Via Marina and Washington Boulevard (study intersection 119) but suggests that LAWA should consider contributing to transportation improvements elsewhere in the Marina del Rey area. See also Response to Comment SPAS-AL00001-1 regarding unspecified transportation funding. The comment does not provide any specific information regarding the "system approach"; therefore, it is not possible to provide a more detailed response.

As discussed in Response to Comment SPAS-AL00008-32, consultation between LACDPW and LAWA confirmed that no physical improvements are feasible at this intersection, but a potential partial mitigation measure was identified for this location. If permitted by the FAA, LAWA will make a monetary contribution to upgrading the County's ITS system at this intersection to partially mitigate the alternative's contribution to the cumulative impacts (i.e., the Future (2025) With Alternative versus without alternative).

However, as the contribution to Los Angeles County is conditional pending approval by FAA and the County does not have a method to quantify the benefits of this improvement, no quantitative V/C reduction has been taken for this location. Therefore, in response to this comment, Section 4.12.2.7.2 of the SPAS Draft EIR has been revised to incorporate the proposed mitigation measure and Table 4.12.2-27 through 4.12.2-38 (on page 4-1315 through 4-1326) of the SPAS Draft EIR have been revised to add a footnote stating that no V/C credit was taken at this intersection. Please see Chapter 5, Corrections and Additions Related to the SPAS Draft EIR. Therefore, the impact at this location would remain significant and unavoidable.

SPAS-AL00008-42

Comment:

- 173. Western Avenue & Imperial Highway: The improvement identified at this location (addition of a separate eastbound right-turn lane) has the potential for a functional right turn lane, which may require some restriping and minor sidewalk adjustment. This improvement could be pursued as a means of alleviating the projected LOS E.

Response:

The comment states that it may be feasible to implement the mitigation concept described for the intersection of Western Avenue and Imperial Highway (study intersection 173), the provision of additional eastbound capacity. The commentor's suggestion is different from the measure evaluated on page 4-1306 of the SPAS Draft EIR. The SPAS Draft EIR analysis assessed the potential to provide a

separate eastbound right-turn lane, which would require additional right-of-way acquisition on the private property occupied by a one-story restaurant on the southwest corner of this intersection, and concluded that economic, policy, and environmental reasons made the acquisition of right-of-way infeasible.

The comment suggests that roadway restriping and sidewalk narrowing could provide a narrower functional right-turn lane, instead of a standard full right-turn lane. Because the sidewalk there is only approximately 12 feet wide, it was determined that the sidewalk there could not feasibly be narrowed while maintaining the current level of pedestrian safety and if implemented would result in secondary impacts to alternative modes of transportation (pedestrian access). The location of this intersection is adjacent to other commercial buildings, a residential neighborhood, and a community college, each of which generates pedestrian activity. Therefore, the commentor's suggestion is considered economically infeasible, socially infeasible, infeasible based upon policy considerations, and infeasible due to inconsistency with the project objectives (i.e., inconsistent with the objective of advancing "economic growth and vitality of the Los Angeles region").

As discussed in Response to Comment SPAS-AL00008-32, consultation between LACDPW and LAWA confirmed that no physical improvements are feasible at this intersection, but a potential partial mitigation measure was identified for this location. If permitted by the FAA, LAWA will make a monetary contribution to upgrading the County's ITS system at this intersection to partially mitigate the alternative's contribution to the cumulative impacts (i.e., the Future (2025) With Alternative versus without alternative).

However, as the contribution to Los Angeles County is conditional pending approval by FAA and the County does not have a method to quantify the benefits of this improvement, no quantitative V/C reduction has been taken for this location. Therefore, in response to this comment, Section 4.12.2.7.2 of the SPAS Draft EIR has been revised to incorporate the proposed mitigation measure and Table 4.12.2-27 through 4.12.2-38 (on page 4-1315 through 4-1326) of the SPAS Draft EIR have been revised to add a footnote stating that no V/C credit was taken at this intersection. Please see Chapter 5, Corrections and Additions Related to the SPAS Draft EIR. Therefore, the impact at this location would remain significant and unavoidable.

SPAS-AL00008-43

Comment:

5.0 ADDITIONAL STUDIES AND MITIGATION ARE NEEDED TO REDUCE NOISE AND AIR QUALITY IMPACTS ASSOCIATED WITH THE SPAS ALTERNATIVES

Noise impacts have been a consistent concern to the County and the planned growth to 78.9 MAP by 2025 (from the 56.5 MAP in the year 2009 baseline) adds to that concern. The increased passenger levels would be accommodated by an increase of 30% in average daily aircraft operations, and accompanied by a 40% increase in passenger traffic (using larger capacity aircraft).

As discussed in §2 of this Comment Letter, LAX passenger traffic has been relatively flat near 60 MAP for almost 10 years and it may be optimistic to anticipate attainment of the 78.9 MAP cap by 2025. The economic downturn of the last 5 years has adversely impacted business and leisure travel such that extrapolation of the airline passenger growth trend has been distorted. Therefore, it may take longer than forecast to reach the passenger cap.

No dramatic improvements in aircraft emissions or noise levels are anticipated in the future fleet compared to existing conditions. As a result, a slower rate of growth will spread out the impact horizon but will not likely affect the final impact profile. However, one implication of a possibly delayed build-out timeframe is that building LAX "convenience" improvements (e.g. passenger processing systems, customs, etc.) will induce passenger traffic growth that might have used alternative airports had the improvements been better phased to match actual MAP growth.

In other words, the proposed improvements may undermine regionalization of air service, which is contrary to LAWA's Settlement commitment to encourage the growth of passenger activity at

underutilized LAWA-owned commercial airports in the region. Monopolizing or cannibalizing of demand retards airport regionalization. This is a central and long-standing point of concern for Los Angeles County and communities around LAX, as discussed more fully in Section 6 below.

Response:

Please refer to Topical Response TR-SPAS-REG-1 regarding the fact that LAWA, through the LAX Master Plan, the SPAS process, and multiple other efforts, supports a regional approach to accommodating air travel demands in Southern California. Also, please note that this comment does not raise any new significant environmental issues or address the adequacy of the analysis included in the SPAS Draft EIR. (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15205(a)).

The commentor's statement that "it may take longer than forecast to reach the passenger cap" is speculative. Appendix F-1 of the Preliminary LAX SPAS Report describes in detail the methodology, substantial evidence, and assumptions used in forecasting that the passenger activity level at LAX will reach 78.9 MAP by 2025. The activity level forecast already takes into consideration the economic downturn of the past several years.

Regarding comments that the SPAS alternatives will induce passenger traffic growth that might have used alternative airports, or lead to the "monopolizing or cannibalizing of demand" within the region, the commentor provides no data or analysis in support of that claim, which is speculative in nature. Moreover, as described in Section 2.2 of the SPAS Draft EIR, the project objectives associated with SPAS include making improvements to the north airfield that support the safe and efficient movement of aircraft at LAX, improving the ground access system to better accommodate airport-related traffic, maintaining LAX's position as the premier international gateway, planning improvements that do not result in more than 153 passenger gates at 78.9 MAP - consistent with the LAX Master Plan and the requirements of the Stipulated Settlement, enhancing safety and security at LAX, minimizing environmental impacts on surrounding communities, and producing an improvement program that is efficient, sustainable, feasible, and fiscally responsible. The SPAS improvements are intended to address problems specific to LAX that the Master Plan Yellow Light Projects were proposed to address.

Regarding the commentor's reference to additional concerns being discussed in Section 6 of the comment letter, please refer to Responses to Comments SPAS-AL00008-51 and SPAS-AL00008-52 for responses that address those concerns.

SPAS-AL00008-44

Comment:

5.1 Noise impacts require further study in the SPAS Draft EIR

While the Draft EIR noise analysis methodology is based on approaches that are recognized as industry standards, the analysis still falls short. An extensive level of effort was given to achieve full public disclosure of noise impacts, particularly from aircraft operations. The methodology description further outlines the possible shortcomings of relying completely on a computer model, even when the input data has been very carefully developed (as in this case). The fact that the FAA requires use of the Integrated Noise Model (INM) for noise impact analysis obscures the fact that the noise contour maps show an exact delineation of impacted versus not impacted uses when the actual location has a substantial margin of uncertainty. The methodology description notes that there may be differences between modeled results and measured noise levels resulting from both uncertainties in each approach as well as possible biases in either technique but no values are presented that would allow for public understanding of the possible range of modeling uncertainty. For full disclosure, it would be instructive to show in the Draft EIR both model and measurement data for the 2009 baseline case to determine the typical difference between the two approaches and to see if there are any distinct biases in those differences.

The methodology description notes that there is a 95% confidence level that the model-measured levels will be within 3 to 5 decibels of each other. However, decibels are a logarithmic progression. For an identical noise generation scenario, it takes twice as many events to increase noise levels by + 3 dB. A

fleet of 2,000 identical aircraft in identical operation would generate a + 3 dB increase above the same scenario with 1,000 identical aircraft because 10 x log(2000/1000)=+3 dB. The discussion notes that a + 3 dB difference between modeling and measurement is not necessarily a significant difference. The County believes that a 1,000 aircraft per day difference is a significant difference and should be analyzed accordingly.

Response:

The commentor inquires about multiple topics related to the SPAS Draft EIR aircraft noise analysis assumptions, methodology, and impact results. The commentor first suggests that the noise analysis "falls short" because the analysis relies upon modeled rather than measured data.

As acknowledged by the commentor, the SPAS aircraft noise analysis "is based upon approaches that are recognized as industry standards" and includes input data that "has been very carefully developed." As also acknowledged by the commentor, analytical models often have a 95 percent confidence interval of plus or minus 3 dBA. Detailed discussion and the rationale regarding the selection of modeled rather than measured data is provided in Section 4.10.1.1.4 of the SPAS Draft EIR and Sections 2 through 2.2 in Appendix J1-1 of the SPAS Draft EIR.

As discussed on page 1 in Section 2 of Appendix J1-1 of the SPAS Draft EIR, "[a]lthough differences between measured and modeled noise levels can occur, the related variances between the two are expected to remain consistent over a series of modeled scenarios (i.e., the difference between measured baseline noise and measured future noise conditions [assuming this was feasible.], would be the same as the difference between modeled baseline noise and modeled future noise conditions)…While modeled and measured aircraft noise data may not always match precisely, it is the most comprehensive and reliable approach given the limitations described above and the geographic scope of the analysis [see SPAS Draft EIR Figure 4.10.1-6]."

Furthermore the INM modeling results provide data which typically cannot be provided by measured data. As discussed further on page 1 in Section 2 of Appendix J1-1 of the SPAS Draft EIR, "In addition the INM can compute noise at specific points on the ground (e.g., residences, schools, places of worship, and other non-residential noise-sensitive facilities)." Furthermore, localized measurements may not always accurately represent noise levels because measured noise levels can be affected by highly localized factors, such as nearby structures, nearby landscaping, or other localized noise sources.

This approach used in the SPAS Draft EIR is consistent with CEQA, which allows the lead agency to make reasonable assumptions, including assumptions associated with aircraft noise levels. (See Public Resources Code Section 21080(e).) As also discussed under State CEQA Guidelines Section 15204(a), "reviewers should be aware that the adequacy of an EIR is determined in terms of what is reasonably feasible, in light of factors such as the magnitude of the project at issue, the severity of its likely environmental impacts, and the geographic scope of the project. CEQA does not require the lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commentors." Given the limitations associated with measured data, LAWA appropriately determined modeled data was more appropriate for the SPAS aircraft noise analysis. This analysis appropriately provides "decision-makers with information which enables them to make a decision which intelligently takes account of environmental consequences." (State CEQA Guidelines Section 15151.)

The comment also states, "The fact that the FAA requires use of the Integrated Noise Model (INM) for noise impact analysis obscures the fact that the noise contour maps show an exact delineation of impacted versus not impacted uses when the actual location has a substantial margin of uncertainty." LAWA has not however ignored localized factors and recognizes, as acknowledged on page 4 in Section 2.2 of Appendix J1-1 of the SPAS Draft EIR that "a line drawn on a map does not imply that a particular noise condition exists on one side of the line and not on the other." The application of the noise insulation mitigation program, as discussed on page 4-686, is based upon noise measurements and ongoing monitoring at the specific parcels. As discussed on page 4-795 of the SPAS Draft EIR, LAWA provides Los Angeles County with these measured noise levels as part of the noise variance.

In a previous comment (comment SPAS-AL00008-13), which relates to the present discussion, the commentor further refers to the fact that "a 3 decibel (dB) difference should not be discounted in the Draft EIR as less than significant." The commentor is referring the differences between measured baseline data and modeled baseline data, and suggests that the difference between the two should be considered a significant impact. However, under CEQA, impacts are made in comparison to existing conditions (baseline); existing conditions are therefore not impacts of the project. (See State CEQA Guidelines Section 15125(a) and 15126.2(a); see also Watsonville Pilots Association v. City of Watsonville (2010) 183 Cal. App. 4th 1059 ["The FEIR was not required to resolve the [existing] overdraft problem, a feat that was far beyond its scope"]. For the purposes of CEQA analyses, the aircraft noise analysis assesses noise-sensitive uses and noise increases above existing modeled conditions. (See Section 4.10.1.4 of the SPAS Draft EIR for further details.) The significance of the impact is based primarily upon the difference between the future with alternative scenarios versus baseline scenario, and it would not be appropriate to compare future modeled conditions with existing measured conditions. As discussed above in this response, the difference between measured baseline noise and measured future noise conditions (assuming this was feasible), would be the same as the difference between modeled baseline noise and modeled future noise conditions. Therefore, making a comparison between future modeled conditions and existing measured conditions, would overstate impacts and would not be realistic.

The commentor provided a mathematical analysis and stated that "for an identical noise generation scenario, it takes twice as many events to increase noise levels by + 3 dB." As analyzed in Appendix J1-1 of the SPAS Draft EIR, the SPAS Draft EIR aircraft noise analyses accounted for an additional 444 average annual day (AAD) operations between the 2009 baseline and the 2025 conditions. Such a difference in the number of AAD operations was fully analyzed in the SPAS Draft EIR aircraft noise analyses.

SPAS-AL00008-45

Comment:

5.2 Differential use of the north and south airfields may play a key role in noise impacts

The selection of a blanket aircraft noise threshold of significance of a + 1.5 dB CNEL increase where noise-sensitive areas are exposed to levels exceeding 65 dB CNEL ignores the fact that a +1.5 dB CNEL increase at a 65 dB CNEL baseline is less of an issue than a +1.5 dB CNEL increase above a 75 dB CNEL baseline. A sliding scale threshold that recognizes the difference in impact severity as a function of the baseline would be more instructive and useful. With regard to a +1.5 dB increase, all things being equal, it requires a 41% increase in identical noise generating events to achieve a corresponding +1.5 dB noise level increase. While a 1.5 dB change would be almost undetectable under ambient conditions, the modification in the physical environment that might cause that change can be very large. For example, the noise level from 140,000 cars per day is only +1.5 dB higher than from 100,000 per day, but 40,000 more cars could create a major traffic impact even if the noise increment is barely detectable.

Response:

In accordance with the City of Los Angeles CEQA threshold guidance, "a significant impact on ambient noise levels would normally occur if noise levels at a noise sensitive use attributable to airport operations exceed 65 dB CNEL and the project increases ambient noise levels by 1.5 dB CNEL or greater."1 That City of Los Angeles threshold was utilized for the SPAS aircraft noise impacts analysis, as acknowledged on page 4-825 of the SPAS Draft EIR. This threshold is consistent with the Federal Aviation Administration (FAA) Order 5050.4B which establishes the threshold of significance at DNL 1.5 dB at or above DNL 65 dB (see Table 7.1 of Order 5050.4B).

This threshold is considered conservative, given that a 3 dBA increase is considered noticeable, as acknowledged in one of Los Angeles County's recent Draft EIRs.2

A vast majority of areas located inside the 75 dB CNEL contour is located within airport property, under both the 2009 baseline and 2025 conditions. Refer to Figure 4.10.1-11 in Section 4.10.1.3 of the SPAS Draft EIR for an illustration of the 2009 conditions 75 CNEL noise contours. See Section 4.10.1.6 of the

SPAS Draft EIR for figures depicting the 2025 conditions 75 CNEL noise contours under each SPAS alternative.

The commentor further states that "While a 1.5 dB change would be almost undetectable under ambient conditions, the modifications in the physical environment that might cause that change can be very large. For example, the noise level from 140,000 cars per day is only +1.5 dB higher than from 100,000 per day, but 40,000 more cars could create a major traffic impact even if the noise increment is barely detectable."

The commentor's analogy regarding a 1.5 dB increase in noise levels and an attendant increase in traffic volumes confuses "cause and effect" and fails to accurately reflect how the off-airport transportation analysis was conducted. The off-airport transportation analysis (Section 4.12.2) was used to determine the number of vehicle trips generated, which was then used to determine the amount of noise that would be generated from those vehicle trips; as discussed in the road traffic noise methodology discussion (Section 4.10.2.2 of the SPAS Draft EIR). All reasonably foreseeable changes to the environment caused by the project have been accounted for in their individual resource sections in Chapters 4 and 5 of the SPAS Draft EIR.

1. City of Los Angeles, Environmental Affairs Department, L.A. CEQA Thresholds Guide, 2006, page I4-5.
2. LA County Draft EIR for "Disney ABC Studios at The Ranch" Project: "For purposes of this analysis, a 'substantial noise increase' is defined as an increase of 3 dBA when the ambient noise level is greater than 45 dBA and an increase of 5 dBA or greater when the ambient noise level is 45 dBA or below. The 3 dBA threshold represents the minimum change in noise that is detectable by the average human listener, whereas 5 dBA represents the change in noise that is considered clearly noticeable." (LA County Draft EIR, page V.C-21.) Available at: http://planning.lacounty.gov/case/view/vesting_tentative_tract_map_no._071216_conditional_use_permit_2009-00126_di/; a direct link to the first volume is provided here: http://planning.lacounty.gov/assets/upl/case/tr_071216_deir-volume1.pdf.

SPAS-AL00008-46

Comment:

Besides the anticipated MAP growth (which may or may not occur within the adopted planning horizon), unincorporated areas east of Runways 7/25, most heavily impacted by airfield noise compared to any community in southern California, are also sensitive to any change in runway utilization patterns. Runway and flight track selection has been performed by a computer model and it is not possible to independently verify future utilization patterns. The Lennox community is mainly impacted by the aircraft landing on 25L, and to a certain extent by run-up and initial take-off roll by aircraft on Runway 25R. There is likely a preference by airlines based in Terminals 4 - 8 to use the south airfield closest to their gates. The Draft EIR does not include a preliminary gate assignment map if Terminals 1, 2 and 3 are demolished and a linear concourse is built; however greater pressure on using the south airfield can be expected with increased north/south gate asymmetry under this alternative.

- The Draft EIR should include a preliminary gate assignment map if Terminals 1, 2 and 3 are demolished and a linear concourse is built, and analyze the potential for greater pressure on south airfield use in conjunction with increased north/south gate asymmetry.

Response:

The projected gate positions for Alternative 3 used for airfield modeling are depicted in Figure 23 of Appendix F-2 of the Preliminary LAX SPAS Report.

SPAS-AL00008-47

Comment:

5.3 Environmental justice requires consideration of balanced airfield operations to reduce noise impacts on the community of Lennox

As part of the Draft and Final EIR, LAWA should guarantee a semi-equal balance of north/south runway selection similar to a mitigation measure for airfield operations as a means of protecting Lennox and other unincorporated communities from even greater noise impacts. This recommendation is reinforced by the issue of environmental justice: almost 90% percent of the Lennox community, which is the only residential neighborhood around LAX having some homes within the 75 dB CNEL noise contour, is a predominantly minority community and is the most heavily impacted. It is the only community with an additional school potentially noise-impacted above baseline conditions for most SPAS alternatives. Noise protection for this community should be a priority item consistent with LAWA's commitments in the Settlement Agreement.

- The Draft EIR should identify noise protection for Lennox as a priority consistent with LAWA's commitments in the Settlement Agreement, as well as CEQA's requirements for lead agencies to consider whether environmental and public health burdens associated with a project might disproportionately impact certain communities.

Response:

The assignment of aircraft to either the north airfield or the south airfield is at the discretion of the FAA air traffic control tower, consistent with the procedures and responsibilities set forth for air traffic controllers in FAA Order 7110.65, and is not within the jurisdiction or ability of LAWA. However, as described in Section 2.2 of the SPAS Draft EIR, one of the project objectives pertaining to the north airfield improvements is to lengthen the primary departure runway (Runway 6R/24L), which is currently too short for certain large aircraft (e.g., fully-loaded Boeing 747-400) on long-haul flights. Alternative 1, 2, 3, 5, 6, and 7 include a 1,250+ foot easterly extension of Runway 6R/24L, which can support a better balance between the north airfield and south airfield relative to operations of large heavy aircraft.

As described in Section 4.9.3.3 of the SPAS Draft EIR, LAWA has an extensive aircraft noise mitigation program (ANMP), which includes homes that are subject to aircraft noise levels of 65 CNEL and above. In conjunction with the ANMP, LAWA supports the soundproofing of homes impacted by aircraft noise through provisions of the LAX Master Plan Community Benefits Agreement (Section III)) and the LAX Master Plan Stipulated Settlement (Exhibit A - Additional Mitigation Measure A). Both the Community Benefits Agreement and the Stipulated Settlement specifically identify the County of Los Angeles, within which Lennox is located, as a recipient of residential soundproofing funds and other aircraft noise mitigation provisions from LAWA. None of the SPAS alternatives negate or diminish those existing commitments.

As indicated in Section 4.10.1 of the SPAS Draft EIR, Jefferson Elementary School, which is located in Lennox, would be significantly impacted by aircraft noise for future (2025) conditions compared to baseline (2009) conditions. This impact would occur under any and all of the alternatives for airfield improvements (i.e., Alternatives 1 through 7), irrespective of whether there is a northward runway move (Alternatives 1, 5, and 6), a southward runway move (Alternatives 3 and 7), or no runway move (Alternatives 2 and 4). However, Jefferson Elementary School, along with other schools within the Lennox School District, is specifically included in Exhibit A of the Settlement Agreement entered into between LAWA and the Lennox School District in February 2005, which provides for the soundproofing of school facilities.

Also, CEQA does not require an EIR to include an environmental justice analysis. CEQA is concerned with physical impacts on the environment, such as whether and where the SPAS alternatives increase noise levels. It is not concerned with the social or economic status of the affected communities, or whether low income or minority communities are disproportionately affected by noise impacts. "Economic and social changes resulting from a project shall not be treated as significant effects on the environment." (State CEQA Guidelines Section 15131(a).) "[T]he question under CEQA is whether a project will affect the environment of persons in general, not whether a project will affect particular persons." (Eureka Citizens for Responsible Government v. City of Eureka (2007) 147 Cal.App.4th 357, 377.)

SPAS-AL00008-48

Comment:

5.4 Regionalization is a viable means for reducing impacts to noise and air quality

Only one noise mitigation measure vaguely hints at regionalization as a viable means for reducing impacts when it acknowledges that a "reduction in aircraft operations" would have a noise control benefit. Contrary to the Settlement Agreement, the proposed LAX improvements would likely serve as a disincentive for airlines to shift flights to Ontario or for passenger service to start up again from Palmdale. Unless there is a coupling of LAX improvements with economic incentives for airlines to shift some flights to other LAWA airports, no significant change at under-utilized Ontario or non-utilized Palmdale is expected. Regionalization must be included in the mitigation measure mix because most of the measures in the current mitigation plan are based on voluntary actions and benefits from departure pattern changes, which are negligible in terms of overall noise level reductions.

- Regionalization must be included in the mix of mitigation measures since most measures in the current plan are based on voluntary actions benefits from departure pattern changes, which are negligible in terms of overall noise level reductions.

Response:

Please refer to Topical Response TR-SPAS-REG-1 regarding regionalization, which includes a discussion of LA/Ontario International Airport and Palmdale Regional Airport.

The current noise abatement program at LAX, as summarized on page 4-827 of the SPAS Draft EIR, includes several measures related to aircraft departures based on the fact the highest noise levels associated with aircraft operations occur during takeoffs; however, the program also includes many other measures as well. The most notable of these measures include the preferential runway use, whereby aircraft departures typically occur on the inboard runways and aircraft arrivals occur on the outboard runways, which places the noisier of those two type operations farthest away from residential communities to the north and south of the airport. Additionally, the Over-Ocean procedures, which occur between the hours of midnight and 6:30 a.m., call for both arrivals and departures to occur to the west over the bay/ocean instead of over populated areas to the east. The noise abatement program also includes measures limiting certain on-airport aircraft activities so as to avoid or reduce potential noise impacts on noise-sensitive uses nearby, such as restricting jet engine "run-ups" during the night and delineating areas where aircraft are only allowed to be towed while on the ground.

The comment presents no facts or evidence showing that regionalization would mitigate the significant noise and air quality impacts of the SPAS alternatives. Further, as described in SPAS Draft EIR Section 6.2, shifting LAX aviation activity to other airports could cause significant air quality and noise impacts at those airports.

The comment suggests that the SPAS alternatives are "contrary to the Settlement Agreement." However, nothing in the Stipulated Settlement specifically requires shifting flights to Ontario, or passenger service from Palmdale to resume.

SPAS-AL00008-49

Comment:

5.5 Air quality impacts require further study in the SPAS Draft EIR

The Draft EIR predicts that significant unavoidable air quality impacts will occur during construction activities for all SPAS alternatives, and for all pollutants, using SCAQMD-recommended CEQA significance thresholds. Significant levels of emissions of SO2, PM-10 and PM-2.5 are calculated to derive from increased airfield operations to achieve a 78.9 MAP service level. Acute toxic air contaminant (TAC) exposure associated with acrolein in jet engine exhaust at the airport fence-line is calculated to exceed the generally accepted hazard index for that TAC.

The analytical approach used to evaluate site-specific impacts was to calculate airport-related emissions associated with each alternative (but not combined alternatives), perform a dispersion analysis, superimpose the predicted concentration upon the background, and then compare the combined exposure to acceptable incremental thresholds or to ambient air quality standards. It would appear, however, that the analysis did not consider the 405 Freeway as a major source of air pollution upwind of homes, schools and other sensitive land uses. This is a significant oversight because the freeway carries roughly 330,000 vehicles per day during a peak month on segments near LAX with strongly prevailing west to east winds. Peak airport activity impacts are shown to be at the eastern property line for most pollutants and most alternatives. The impact analysis is remiss in using background concentrations measured in Westchester to characterize the non-airport baseline in communities directly east of the freeway; LAWA should modify the Draft EIR to include a supplemental set of background measurements set at the eastern property boundary.

- The air quality impact analysis is remiss in using background concentrations measured in Westchester to characterize the non-airport baseline in communities directly east of the freeway; LAWA should modify the Draft EIR to include a supplemental set of background measurements set at the eastern property boundary near the 405 Freeway.

Response:

The South Coast Air Quality Management District (SCAQMD) has developed specific guidelines for conducting air quality impact analyses in CEQA documents, the CEQA Air Quality Handbook (SCAQMD 1993). The pertinent section of the guidelines for approach to determine existing air quality at a project site is spelled out in Chapter 8, Section 8.1:

"Existing Air Quality. To characterize the site-specific air quality setting, the environmental document should contain a summary of the most current air quality data. The data must be derived from the nearest District monitoring station located in the same source receptor area(s) (SRA) as the project (see map in Figure 8-3). Some stations do not monitor all pollutants. In that instance, information on the remaining pollutants should be drawn from the nearest upwind station which monitors the pollutants…."

The nearest SCAQMD monitoring station is the LAX Hastings site (Station 820, also known as the Southwest Coastal Los Angeles County monitoring station, or Los Angeles - Westchester Parkway site), which is located on LAX property. This site monitors ozone (O3), carbon monoxide (CO), nitrogen dioxide (NO2), sulfur dioxide (SO2), and respirable particulate matter (PM10). This site does not monitor fine particulate matter (PM2.5); therefore, PM2.5 data was collected from the nearest station that monitors this pollutant - the North Long Beach Station (Station 072, also known as the South Coastal 1 Los Angeles County monitoring station). The existing air quality data at LAX for the most recent three years available from these stations were summarized in Section 4.2.3.3, Table 4.2-3, of the SPAS Draft EIR.

The peak background concentration for many of the pollutants were obtained during periods when the wind was blowing from the east, across the I-405 freeway and other major roadways, to the monitoring station. In such cases, the freeway contributions to background concentrations are included in the analysis. For example, the peak background 1-hour NO2 concentrations used for the ambient background (0.094 ppmv, equivalent to 177 micrograms/cubic meter) occurred on November 15, 2008, between 9:00 a.m. and 10:00 a.m. The hourly wind direction for this hour was from the east-southeast (106 degrees) at 4.3 meters/second (9.8 mph). The ambient background concentration would have included contributions from vehicles traveling on Westchester Boulevard, vehicles at the intersection of Sepulveda and Century Boulevards, aircraft operating on the north airfield (Runways 24L and 24R), portions of the air cargo handling activity along the south side of Century Boulevard, as well as traffic on I-405 between I-105 and Century Boulevard. Given the hourly wind speed of approximately 10 mph, emission sources beyond I-405 to the east may also contribute to this background concentration. The peak hourly CO concentration used for background also occurs when the wind is blowing from the east-southeast. Establishing and operating a monitoring station along the I-405 Freeway is not required for this project under CEQA since SCAQMD monitoring station does collect impacts from sources to the east, including the I-405.

SPAS-AL00008-50

Comment:

5.6 Air quality mitigation measures are weak and outdated

The air quality impact mitigation discussion relies heavily on commitments made during the adoption of the LAX Master Plan EIR. Some of these measures are nebulous, lack force, outdated, and contain no contingency measures if parts of the mitigation menu prove to be infeasible. Caveats such as "as soon as possible, to the extent feasible, minimum practical, encourage, promote, if feasible" should be reviewed to verify feasibility and, where feasibility is uncertain, provide back-up measures that are equally effective. Measures that reference smog alerts are outdated: there has not been a second-stage smog alert in more than 20 years, so agreeing to stop work is a meaningless mitigation measure. Limiting engine idling to ten minutes has generally been replaced to five minutes consistent with state law for on-road trucks. The use of outdated and ineffective air quality mitigation measures is inexcusable in light of the Draft EIR determination that impacts on air quality, greenhouse gases and human health risks will all be significant, adverse and 'unavoidable.'

The air quality mitigation plan should eliminate outdated mitigation measures and include state-of-the-art commitments, including use of a specified percentage of low emissions engines in heavy equipment to reduce off-site migration of ozone precursors and carcinogenic diesel particulate matter.

Response:

The mitigation measures that were applied to the SPAS alternatives are summarized in Section 4.2.5 of the SPAS Draft EIR. These measures included 17 mitigation actions that will be applied to construction activities and an additional 17 mitigation actions that will be applied to operational sources. However, the potential emissions benefits were only quantified for three (3) specific actions: use of diesel particulate filters on construction equipment, watering to reduce construction activity fugitive dust, and estimated LAX FlyAway ridership use to reduce passenger and employee trips to and from the airport. The LAX FlyAway ridership was estimated from recent ridership use of the existing FlyAway stations. While LAWA has committed to the other mitigation measures listed in Section 4.2.5, estimates of emission reductions by 2025 for those was determined to be too speculative to be appropriate to include in the evaluation, and the analysis does not take any emission-reduction credit for these measures or rely on them to reduce impacts.

An important issue that LAWA faces when establishing mitigation measures is that it does not own or operate most of the sources. To ensure that projects constructed with LAWA approval comply with all mitigation measures, LAWA would incorporate the construction measures into specifications that the construction contractors must follow. The ability to enforce operational mitigation measures is more difficult. LAWA has been incorporating what can be enforced through lease agreements. However, under the Interstate Commerce Clause of the U.S. Constitution, the federal government limits the amount of direct control LAWA can place on the airline tenants with regard to activity restrictions (i.e., the Commerce Clause authorizes Congress to regulate commerce in order to ensure that the flow of interstate commerce is free from local restraints imposed by various states or local agencies - the channels of interstate commerce include roadways, waterways, and airways, and the "instrumentalities" of interstate commerce include people as well as vehicles, machines, etc., which are employed or used in the carrying out of commerce). Therefore, the language in the operational mitigation measures is drafted to reflect these restrictions on enforcement.

Where recent federal, state, or local air quality regulations have become more stringent than the mitigation measures, such as in the case of idling restrictions for heavy-duty trucks in California, where the 2008 California Air Resources Board requirement limits most idling to no more than five minutes whereas the 2004 LAX MMRP has a limit of 10 minutes, the more stringent regulations of the state will be followed.

Additionally, the SPAS Draft EIR is a programmatic document. Generally speaking, program EIRs analyze broad environmental effects of the program with the acknowledgement that site-specific environmental review will be required when future development projects are proposed under the

approved program. (State CEQA Guidelines Section 15168.) Mitigation measures are components of the Draft EIR and are subject to the same requirements regarding their level of detail. (See State CEQA Guidelines Section 15126.4.) An attempt to provide mitigation measures for project-level impacts would be speculative at this point given the lack of information about future site-specific development. When such development is proposed, the project level environmental document prepared will include specific enforceable measures as needed.

Notwithstanding the above, LAWA has added several new mitigation measures related to air quality impacts, based on suggestions provided by the South Coast Air Quality Management District; please see Responses to Comments SPAS-AR00002-5 through SPAS-AR00002-41.

SPAS-AL00008-51

Comment:

6.0 LAWA HAS NOT PURSUED SETTLEMENT COMMITMENTS TO SUPPORT REGIONALIZATION OF AIR SERVICE

The Settlement Agreement includes two separate sections that outline LAWA's obligation to take the lead in promoting regional airports other than LAX. The two sections are summarized below:

- Section VII-Regional Airport Working Group: LAWA shall invite the FAA, SCAG, the Counties of Los Angeles, Orange, Ventura, Riverside and San Bernardino, and airport operators in the Los Angeles region to participate in a regional airport working group to make plans to achieve a regional distribution of air traffic demand. The regional working group will consider a framework for coordinating all airport master planning and facility construction consistent with the adopted SCAG Regional Aviation Plan. For the purposes of effectuating a regional approach to southern California's air transportation needs, the regional group shall consider (1) coordinating with the southern California Regional Airport Authority or its successor; (2) the feasibility of entering into a joint powers agreement to create a regional airport authority; and for (3) supporting legislative efforts to create such an authority. Notwithstanding the above, the City of Los Angeles and LAWA shall maintain financial and operational control of LAX, Ontario, Palmdale and Van Nuys Airport.

- Section VIII-Regional Strategic Planning: LAWA shall develop a regional strategic planning initiative to encourage the growth of passenger and cargo aviation activity at underutilized LAWA-owned commercial airports in the region (currently ONT and Palmdale). The regional strategic planning initiative will be prepared annually and will describe potential marketing strategies, potential opportunities for increased utilization of under-utilized facilities and other techniques by which LAWA will coordinate and support regional strategic planning for LAWA-owned commercial airports in the region. The first regional strategic planning initiative will be prepared by December 31, 2006.

The issue of regionalization has always been central to the petitioners' concerns, and appropriately so. Regionalization of passenger demand is the cornerstone for long-term mitigation of impacts on surrounding neighborhoods associated with expanded service at LAX.

6.1 Regionalization of air service is the key to reducing significant adverse SPAS impacts to less than significant levels

SPAS Draft EIR Section 6.2 discusses LAWA's commitments to regionalization of air service, and the mitigation value of regionalization. That commitment, pursuant to the Settlement Agreement, was that this SPAS study would identify Specific Plan Amendments "creating conditions that encourage airlines to go to other airports in the region." (SPAS Report, p. 9) With respect to LAWA's commitments, §6.2 of the DEIR notes that Specific Plan §7.H calls for LAWA to undertake passenger and airline surveys and studies the results of which would help LAWA identify actions to encourage airlines to provide domestic passenger service at other airports in the region. This same discussion goes on to say that it is not possible to identify those actions, because they would be determined by results of the surveys and studies. In other words, the Draft EIR does not assess results of these studies because LAWA has not fulfilled this requirement of the Settlement Agreement or Specific Plan.

Absent study and survey results, the Draft EIR instead offers a programmatic review that identifies five airports potentially capable of receiving 'some aspect of activity shifted from LAX': Burbank, Long Beach, John Wayne, Ontario and Palm Springs. Palmdale is not included on this list because 'no airline has successfully sustained a sufficient passenger base to maintain operations there, even with LAWA subsidies.' The Draft EIR states that increased future activity levels at the remaining airports is already contemplated in the 2012 and 2008 SCAG Regional Transportation Plans and associated environmental documents, implying that SCAG is responsible for activity at airports in the region. It is important to recognize, however, that actions by SCAG and other agencies do not relieve LAWA of its obligations under the Settlement Agreement and Specific Plan §7.H.

The Draft EIR then outlines, at a programmatic level, the environmental benefits at and around LAX that might be associated with regionalization of air passenger service, key portions of which are summarized in Table 8 below:

Table 8. SIGNIFICANT 'UNAVOIDABLE' ADVERSE IMPACTS THAT WOULD BE MITIGATED AT LAX THROUGH AIR SERVICE REGIONALIZATION

IMPACTS LISTED AS SIGNIFICANT & UNAVOIDABLE IN SPAS Draft EIR §7.1	MITIGATION BENEFITS THAT WOULD RESULT FROM REGIONALIZATION AS LISTED IN Draft EIR 6.2
AIR QUALITY & GREENHOUSE GAS EMISSIONS	Air Quality and Greenhouse Gas emission impacts associated with flights, construction and airport-related traffic would be shifted to the other airport regions and thereby reduced at and around LAX.
HUMAN HEALTH RISKS	Human health risks associated with toxic air contaminant emissions associated with flights, construction and airport-related traffic would be shifted to the other airport regions and thereby reduced at and around LAX.
LAND USE COMPATIBILITY	Land use incompatibility impacts associated with noise-sensitive uses would be shifted to the other airport regions and thereby reduced around LAX.
NOISE	Noise associated with aircraft, construction and airport-related traffic would be shifted to the other airport regions and thereby reduced at and around LAX.
TRAFFIC	Vehicle trips to, from and within the airport would be shifted to the other airport regions and thereby reduced at and around LAX.
UTILITIES	Impacts on utility and service systems including solid waste would be shifted to the other airport regions and thereby reduced at and around LAX.

- The potential environmental benefits of air service regionalization (noted in SPAS Draft EIR §6.2 and summarized in Table 8) correspond exactly to the discussion of significant adverse environmental impacts that LAWA claims (in SPAS Draft EIR §7.1) cannot be mitigated to less than significant levels: Air Quality, Greenhouse Gas Emissions, Human Health Risks, Land Use Compatibility, Noise, Traffic and Utilities. This highlights the critical necessity to create conditions that actually encourage use of other airports, not just doing studies; the Draft EIR must be revised to reflect this priority.

Response:

Comments regarding LAWA's compliance with the Stipulated Settlement require legal conclusions that are beyond the scope of what is required by CEQA. Please refer to Topical Response TR-SPAS-REG-1 regarding the fact that LAWA, through the LAX Master Plan, the SPAS process, and multiple other efforts, supports the regionalization of air travel demand in Southern California. The topical response explains how the potential amendment to Section 7.H of the LAX Specific Plan would promote regionalism. Please note that the comment does not present any evidence or raise any new significant environmental issues or address the adequacy of the analysis included in the SPAS Draft EIR. (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15205(a)).

The comment states that the SPAS Draft EIR implies that "SCAG is responsible for activity at airports in the region." LAWA disagrees that the SPAS Draft EIR makes this implication. LAWA acknowledges that SCAG is responsible for regional airport planning, but not for the on-the-ground activity at airports.

Regarding Table 8, the comment presents no facts or evidence showing that regionalization would mitigate the significant impacts listed. Further, as described in Section 6.2 of the SPAS Draft EIR, shifting LAX aviation activity to other airports could cause significant air quality and noise impacts at those airports. The impact analyses in Section 6.2 are not limited to potential environmental benefits at LAX, but also consider impacts at the other airports. Section 6.2 does not conclude--for any impact analyzed--that there are net environmental benefits of regionalization, when considering the region as a whole, and any such conclusion would be speculative.

SPAS-AL00008-52

Comment:

6.2 LAWA has not honored its commitments to air service regionalization

Despite the significant mitigation potential associated with regionalization, LAWA has made only token efforts to fulfill the regionalization requirements contained in the Settlement Agreement and Specific Plan. In Settlement §VII, LAWA agreed to invite FAA, SCAG, airport operators and the counties of Los Angeles, San Bernardino, Orange, Ventura and Riverside to participate in a regional airport working group that would join forces to achieve regional distribution of air traffic. This group was going to coordinate with the Southern California Regional Airport Authority (reactivated in 2005), consider creation of a Regional Airport Joint Powers Authority, and support appropriate legislation. In practice, however, this group met briefly during 2006 and then disbanded and LAWA has taken no substantive steps whatsoever to fulfill this commitment.

In Settlement §VIII, LAWA agreed to develop a Regional Strategic Planning Initiative to encourage expanded passenger & cargo use of Ontario and Palmdale airports, with annual reports & marketing strategies. LAWA did hire a director to oversee this effort and several strategies were discussed, but the effort fell apart in its infancy and LAWA has not taken steps to revive the RSP initiative.

During the 6 years since the Settlement was finalized, Ontario Airport has made numerous efforts to gain greater control over its destiny. Recently, cities and counties in the Inland Empire have formed the Ontario International Airport Authority in a renewed attempt to gain control of Ontario Airport and to attract more passengers and airline service. The San Bernardino County Board of Supervisors on August 28, 2012 unanimously approved a new government agency to oversee L.A./Ontario International Airport. The August 2012 vote established the Ontario International Airport Authority as a joint-powers arrangement with the City of Ontario, which has been steadily pressuring LAWA to turn the airport over to local officials, and Ontario City Council members subsequently voted to approve the new agency.

The five-Member authority includes Ontario City Council members Alan D. Wapner and Jim Bowman as well as San Bernardino County Supervisor Gary Ovitt, whose district includes the cities of Chino, Chino Hills, Montclair, Ontario and a portion of Upland. Formerly the mayor of Ontario and Chairman of the Board of Supervisors, Ovitt is also a past president of SCAG and a current board member of the San Bernardino Associated Governments, the transportation planning agency. Goals of the newly created JPA are to help Ontario Airport rebound from the economic downturn of recent years while positioning itself for long-term growth.

SCAG has endorsed the transfer of control of this facility to the City of Ontario, and the Ontario JPA continues to seek support from the City of Los Angeles and from LAWA. However, the City and LAWA have steadfastly refused to relinquish control to Ontario and continue to assert that the lack of service to Ontario is attributable to the economy and the decisions of airlines. In September 2012 the City of Los Angeles again rejected efforts by Ontario to take control of the airport, citing the diversion of funds from LAWA as the basis for their decision.

It is evident that the weak economy has impacted air service at regional airports throughout and beyond southern California. And it is true that Ontario International Airport has seen a pronounced decline in passengers, as have other regional air facilities throughout and beyond southern California, including LAX. The brief hiatus in air travel demand could have enabled LAWA and the City of Los Angeles to devote even greater attention to pursuing their commitments (per Settlement Sections VII and VIII, and Specific Plan Section 7.H) so that the framework for successful regionalization would be firmly in place when air travel demands rebound in future years. LAWA and the City have failed to take advantage of this opportunity.

Instead, LAWA has ignored these most essential commitments and now seeks to label as 'unavoidable' the significant adverse impacts on air quality, human health, greenhouse gas emissions, noise and traffic associated with the proposed SPAS alternatives. Regionalization of air service can effectively mitigate these impacts and LAWA has the obligation - as Lead Agency under CEQA, as signator to the 2006 Settlement Agreement, and as author of the Specific Plan - to ensure that this is accomplished to the fullest possible degree.

Response:

Comments regarding LAWA's compliance with the Stipulated Settlement require legal conclusions that are beyond the scope of what is required by CEQA. Please refer to Topical Response TR-SPAS-REG-1 regarding the fact that LAWA, through the LAX Master Plan, the SPAS process, and multiple other efforts, supports the regionalization of air travel demand in Southern California. The topical response specifically discusses issues pertaining to LA/Ontario International Airport. Please note that comments related to LAWA's support of regionalization do not raise any new significant environmental issues or address the adequacy of the analysis included in the SPAS Draft EIR. (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15205(a).)

SPAS-AL00008-53

Comment:

7.0 THE COUNTY STRONGLY SUPPORTS ALTERNATIVES THAT CONNECT LAX TO THE REGIONAL RAIL SYSTEM

The lack of an adequate transit system is responsible for some of the most pressing environmental impacts on unincorporated communities around LAX. Several identified components (including the construction of the Crenshaw/LAX light rail line with a stop at LAX and the construction of an ITC at Continental City with a pedestrian bridge to the existing Metro Green Line Station) will greatly improve airport access, and at the same time reduce traffic and noise concerns. The Draft EIR is not entirely clear, however, as to which of the Alternatives would include these components.

Draft EIR Table 4.6-7 provides a discussion of potential measures set forth by the California Office of the Attorney General to reduce greenhouse gas emissions (GHG). One of the stated Land Use measures is to 'incorporate public transit into the project's design' (page 4-416). The accompanying discussion states, "With the exception of Alternative 4, all of the SPAS alternatives include facilities that can improve and encourage transit use at the airport, such as the Intermodal Transportation Facility (ITF) (Alternatives 1, 2, 8 and 9), the Ground Transportation Center (GTC and [ITC (Alternative 3), and the elevated/dedicated busway or Automated People Mover (APM) that would connect the CTA to the ITF and the future LAX/Crenshaw Metro Light Rail Station (Alternatives 1, 2, 8 and 9).

It appears, however, that the connection to the future LAX/Crenshaw Metro Light Rail Station is also be part of Alternative 3 and that Alternative 3 would additionally include a pedestrian bridge connection to

the Metro Green Line. Draft EIR §4.9.6.3 (Alternative 3) states, "Alternative 3 reflects the improvements of the approved LAX Master Plan (i.e., Alternative D) and consists of the implementation of all components of the LAX Master Plan, including the Yellow Light Projects. The components that are pertinent to the land use analysis include the construction of an ITC at Continental City with a pedestrian bridge to the existing Metro Green Line Station; development of a CONTAC at Lot C; development of two APM systems connecting the ITC, GTC, CONRAC, and CTA, with a planned connection to the future Metro LAX/Crenshaw Light Rail Train Station.." The foregoing contrasts subtly with the discussion contained in Table 4.6-8 (GHG Reduction Measures from the Governor's Office of Planning and Research), where one of the stated Land Use and Transportation measures is to 'incorporate...public transit into the project design' (page 4-419). The accompanying discussion states, "With the exception of Alternative 4, all of the SPAS alternatives include facilities that can improve and encourage transit use at the airport, such as the ITF (Alternatives 1, 2, 8 and 9), the GTC and ITC (Alternative 3), and the elevated/dedicated busway or APM that would connect the CTA to the ITF and the future LAX/Crenshaw Metro Light Rail Station (Alternatives 1, 2, 8 and 9).

In addition to clarifying proposed transit improvements, it would be helpful if the EIR would analyze the overall transportation benefits of potential ground transportation improvements (including the full range of mitigation options-proposed and rejected) in comparison with the transportation benefits associated with proposed SPAS transit improvements (as linked to various SPAS alternatives). Further a more detailed micro-simulation might facilitate assessment of the complex secondary impacts noted in Section 4 of our comment letter (concerning traffic impacts and mitigation commitments).

In closing, we again emphasize that the County is strongly supportive of any SPAS alternatives that would enhance the direct connections between LAX and Metro's Light Rail Lines (including the Crenshaw/LAX Line and the Metro Green Line), as well as future connections to the regional rail system. The County also supports measures to increase local bus service to the airport terminals, perhaps through enhancement of the existing bus terminal at Lot C or a new terminal at Aviation and Century Boulevards. The County thanks LAWA for its consideration of the transit recommendations herein, as well as the traffic recommendations contained in Section 4 of this comment letter.

- Please provide clarification as to the Metro connections and/or improvements associated with each of the potential SPAS alternatives.

- Please provide an analysis that contrasts the transportation benefits associated with proposed transit improvements with the transportation benefits of proposed and rejected traffic mitigation measures.

Response:

Please see Topical Response TR-SPAS-T-1 regarding transit options into LAX. The topical response clarifies the transit-related ground access components associated with each of the SPAS alternatives.

Regarding the consistency of the SPAS alternatives with the Attorney General and Governor's Office of Planning and Research suggested GHG reduction measure of incorporating public transit into the project's design, the SPAS Draft EIR sections cited by the commentor clearly explain the different ways that the SPAS alternatives do incorporate public transit into the "project design." The comment does not indicate any errors in these SPAS Draft EIR discussions.

Sections 14.12.1 and 14.12.2 of the SPAS Draft EIR analyze the on-airport and off-airport impacts of the SPAS alternatives as a whole. However, the commentor is requesting separate transportation impact analyses for two individual components of the SPAS alternatives: ground transportation improvements and transit improvements. CEQA does not require an EIR for an integrated project to analyze the impact of individual project components, just the project as a whole. This is especially the case for a Program EIR, which is prepared for a series of actions "that can be characterized as one project." (State CEQA Guidelines Section 15168(a).)

The SPAS alternatives were designed and analyzed as complete systems. That is, impacts to transportation were analyzed based on the assumption that all of the ground access improvements associated with a particular alternative would be implemented, including both non-transit-related improvements (such as the ITF or parking in Manchester Square) as well as transit-related

improvements (such as connectivity to the future Metro Aviation/Century Station). Moreover, many of the SPAS ground access improvements include components that are non-transit related as well as components that are transit related. For example, the dedicated busway is not a transit-related improvement by itself; however, the proposed stop at the Metro Aviation/Century Station would provide access to transit and can, therefore, be considered a transit-related improvement.

Also, the commentor requests evaluation of the transportation benefits of transportation mitigation measures proposed for implementation, as well as rejected mitigation measures. Draft EIR Sections 14.12.1.10 and 14.12.2.7 of the SPAS Draft EIR analyze the transportation benefits of those transportation mitigation measures proposed for implementation. As described in Section 4.12.2.7 of the SPAS Draft EIR, a number of transportation mitigation measures are not feasible to implement. CEQA does not require discussion of infeasible mitigation measures. As discussed in State CEQA Guidelines Section 15126.4(a)(1) and (a)(5), "The EIR shall describe feasible measures…If the Lead Agency determines that a mitigation measure cannot be legally imposed, the measure need not be proposed or analyzed." (See also Concerned Citizens of South Central Los Angeles v. Los Angeles Unified School Dist. (1994) 24 Cal.App.4th 826, 841.)

Although it was not based on a detailed micro-simulation, the on-airport transportation analysis contained in the SPAS Draft EIR is sufficient and appropriate for addressing the potential impacts of the SPAS alternatives. The comment does not provide any facts or evidence indicating that the SPAS Draft EIR transportation impact methodologies were inadequate. CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commentors (Section 15204(a) of the State CEQA Guidelines). Moreover, consistent with Section 15151 of the State CEQA Guidelines, the SPAS Draft EIR transportation impact analysis provided "a sufficient degree of analysis to provide decision-makers with information which enables them to make a decision which intelligently takes account of environmental consequences." EIRs for plan-level projects need not be as detailed as EIRs for specific projects. (State CEQA Guidelines Section 15146(b).) More detailed project-level analysis would be conducted if individual second-tier projects are proposed for implementation. At that time, detailed design-level data would be developed, providing the basis to complete project-level CEQA analysis of transportation impacts using more detailed micro-simulation.

Comments indicating support for any SPAS alternative that would enhance the direct connections between LAX and Metro's light rail lines (e.g., Alternatives 1, 2, 3, 8, and 9), as well as support for construction of an ITC at Continental City with a pedestrian bridge to the existing Metro Green Line Station (i.e., Alternative 3) are noted and are hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project.

Please also see Chapter 2 of this Final EIR regarding the LAWA Staff-Recommended Alternative, which couples the airfield and terminal improvements associated with Alternative 1 with the ground access components associated with Alternative 9. Please see Response to Comment SPAS-AL00003-8 regarding connectivity to Metro bus operations. Please see Responses to Comments AL00008-32 through AL00008-42 regarding the traffic recommendations contained in Section 4 of the commentor's letter.

SPAS-AL00008-54

Comment:

8.0 ACRONYMS AND ABBREVIATIONS

Table 9 provides a list and explanation for the acronyms and abbreviations used in this comment letter.

Table 9. ACRONYMS AND TERMS USED IN THIS DOCUMENT

ACRONYM OR TERM	EXPLANATION
ACL	A.C. Lazzaretto and Associates, consultant to the County of Los Angeles for review of the SPAS Draft EIR.
ARSAC	Alliance for a Regional Solution to Airport Congestion
CEQA	California Environmental Quality Act (for projects requiring approval by agencies in the state of California)
CNEL	Community Noise Equivalent Level (a weighted measurement of sound)
dB	Decibel
EIR/DEIR	Environmental Impact Report, Draft Environmental Impact Report
FAA	Federal Aviation Administration
GTC	Ground Transportation Center
IFR	Instrument Flight Rules
INM	Integrated Noise Model, used to generate noise contours and other noise impact data
LAWA	Los Angeles World Airports
LAX	Los Angeles International Airport
LNB	Long Narrow Body aircraft
LOS	Level of Service, used to measure the effectiveness of transportation facilities
LWB	Large Wide Body aircraft
MAP	Million Air Passengers
MAT	Million Annual Tons, used to measure cargo usage
NBEG	Narrow-Body Equivalent Gates
NEPA	National Environmental Policy Act (for projects requiring federal agency approval)
ONT	Ontario International Airport, owned by LAWA
ROD	Record of Decision (approval documentation required under NEPA)
RSP	Regional Strategic Planning, to encourage regionalization of air services
SCAG	Southern California Assn. of Governments, preparer of the Regional Aviation Plan
Settlement	Final Judgment Pursuant to Stipulated Settlement, February 2006.
SIMMOD	A sophisticated airfield modeling computer program
SPAS	Specific Plan Amendment Study

Response:

The comment is noted.

SPAS-AL00009 Miyamoto, Charlotte County of Los Angeles Department of Beaches and Harbors 10/10/2012

SPAS-AL00009-1

Comment:

The Los Angeles County Department of Beaches and Harbors has the following comments on the Draft Environmental Impact Report (Draft EIR) for the Los Angeles International Airport (LAX) Specific Plan Amendment Study (SPAS):

The Off-Airport Transportation traffic study indicates on Page 4-1301, the project would have a significant impact at the intersection of Lincoln Boulevard and Washington Boulevard. The report states, "The addition of a southbound through lane would fully mitigate the project at this location. However, adding a southbound through lane would require widening of the southbound approach and departure... is considered infeasible... No other feasible improvements has been identified to fully mitigate the project impact...Therefore, this impact would remain significant and unavoidable..." We disagree that there are no other feasible mitigation measures. Costco also had an impact on the Lincoln/Washington intersection and was required to pay Culver City $1.5 million towards the SR90 Connector Road to Admiralty Way project to mitigate their impact. Similarly, this project should contribute towards the SR90 Connector Road to Admiralty Way project to mitigate this project's impact or contribute to Admiralty Way improvements, since Admiralty Way serves as a "relief valve" to Lincoln Boulevard when it reaches capacity.

Table 4.12.2-25 shows in the PM peak hour Admiralty/Fiji LOS A, Admiralty/Mindanao LOS B and Admiralty/Palawan LOS B. These levels of service show less congestion than the levels of service shown in recent previous traffic studies. Provide the backup data to verify these levels of service.

All the intersections of Lincoln Boulevard near Marina del Rey show worse levels of service after the project, except the intersection of Lincoln/Mindanao shows no change in the PM peak hour. This appears to be an error. Provide the backup data to verify these levels of service.

We have also sent you these comments via e-mail.

Response:

The content of this comment letter is identical to comment letter SPAS-AL00001; please refer to the responses to comment letter SPAS-AL00001.

SPAS-PC00001 Lowell, William None Provided 8/25/2012

SPAS-PC00001-1

Comment:

I WOULD LIKE TO KNOW WHY WE HAVE NOT GOTTEN OUR NOISE EASEMENT MONEY THAT WAS PROMISED LAST OCTOBER 2011 WHEN WE SIGNED THE PERMISSION FOR THEM TO FLY OVER OUR HOUSE, WHEN I ASKED HER WHEN I SIGNED THE PAPER SHE SAID MOST LIKELY IN FEBRUARY 2012. IT DID NOT HAPPENED, WHO'S RESPONSIBLE FOR GETTING IT DONE? IT IS IRRESPONSIBLE FOR IT NOT BEING DONE.

Response:

The "noise easement" refers to sound insulation of eligible properties located within the noise impact area (i.e., 65 CNEL or higher noise levels) under the Aircraft Noise Mitigation Program (ANMP), as described on pages 4-664 through 4-667 in Section 4.9.3.3 of the SPAS Draft EIR. Participants in the ANMP include communities within unincorporated Los Angeles County, the City of Los Angeles, the City of Inglewood, and the City of El Segundo. Each participating jurisdiction is responsible for implementing its own ANMP to mitigate noise impacts or eliminate incompatible land use within the communities surrounding LAX. Because the commentor's property (located at 10615 Buford Avenue, in the community of Lennox) is within Los Angeles County, the County of Los Angeles Economic and Housing Development, Residential Sound Insulation Program/Noise Easement Acquisition Program is responsible for implementing the ANMP. Under the Noise Easement Acquisition Program, those properties within the highest impacted areas of Lennox are required to sign a noise easement before beginning any sound insulation work. If all criteria are met and the property participates in the Sound Insulation Program, the property owner is entitled to receive $2,500 per property for single-family, duplex, or triplex units and $500 for condominiums. Regarding individual cases, the commentor should contact the County's Residential Sound Insulation Program/Noise Easement Acquisition Program at (323) 890-7325 or (323) 838-5033.1

1. Community Development commission of the County of Los Angeles, Economic and Housing Development Programs, Available: http://www3.lacdc.org/CDCWebsite/EHD/Programs.aspx?id=5335, accessed November 16, 2012.

SPAS-PC00002 Schneider, Denny LAX-Community Noise Roundtable 8/25/2012

SPAS-PC00002-1

Comment:

Where are the fleet mixes used for each alternative in the Air Quality analysis?

Response:

The detailed aircraft fleet mixes used in the technical analyses are presented in Appendix J1-1 of the SPAS Draft EIR. Table 3 presents the fleet mix used for the baseline (2009) conditions, while Table 8 presents the fleet mix used for all alternatives in 2025. The aircraft fleet mix is also summarized in Appendix F-1 of the Preliminary LAX SPAS Report: Table 8 for 2009 and Table 12 for 2025.

SPAS-PC00003 Recinos, Jorge L None Provided 8/25/2012

SPAS-PC00003-1

Comment:

I am very happy for the project of the airport expansion but I ask that at the same time I'd like you to pay attention to the salaries of each worker and that they are below the minimum wage and that is not enough to live on. The airport expansion should continue but we the workers are the ones suffering with the poverty of the airport

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00004 Garner, Ryan None Provided 8/25/2012

SPAS-PC00004-1

Comment:

- Traffic in Central Terminal Area is a disaster.
- Need a Multi-Modal solution desparately (i.e. rail, bus, all grade - separated)

Response:

The comment regarding existing traffic in the CTA is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

With regard to the second part of the comment, as described and depicted in Chapter 2 of the SPAS Draft EIR, the SPAS alternatives seek to incorporate multimodal solutions. Specifically, as described in Chapter 2, an Intermodal Transportation Facility (ITF), defined on page 4-1091 in Section 4.12.1.6.1, is included as part of Alternatives 1, 2, 8, and 9, and an Intermodal Transportation Center (ITC) is included as part of Alternative 3. Further, LAWA is working cooperatively with Metro to explore options to better connect the airport with the expanding regional rail system, specifically the new Crenshaw/LAX Transit Corridor and the extended Green Line, which will include a new station at Century and Aviation Boulevards. Please also see Topical Response TR-SPAS-T-1 regarding transit options into LAX.

SPAS-PC00004-2

Comment:

- I strongly support Alternative 3 for taffic & grud trasportation access

Response:

The commentor's support for Alternative 3 is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Chapter 2 of this Final EIR regarding the LAWA Staff-Recommended Alternative, which couples the airfield and terminal improvements associated with Alternative 1 with the ground access components associated with Alternative 9, including a discussion of the rationale behind the selection of these alternatives over the other alternatives evaluated in the SPAS Draft EIR.

SPAS-PC00005 Boyiaris, Nick None Provided 8/25/2012

SPAS-PC00005-1

Comment:

Unless you move south of Rwy 24L the noise patterns over Westchester and Playa Del Rey & surrounding communities will increase so much more than currently.

Response:

A discussion of project impacts resulting from aircraft noise under Alternatives 1 through 7 is provided in Sections 4.9.6 and 4.10.1.6 of the SPAS Draft EIR. As analyzed therein, under Alternatives 1 through 7, some areas within Westchester, Playa del Rey, and surrounding communities would be newly exposed to noise levels of 65 CNEL or higher, increases of 1.5 CNEL or higher within the 65 CNEL or

higher noise contours, outdoor noise levels above 75 CNEL, and single event aircraft noise levels which results in classroom disruption. As concluded in Sections 4.9.7, 4.9.8, and 4.10.1.8 of the SPAS Draft EIR, interim impacts prior to implementation of LAX Master Plan Mitigation Measures MM-LU-1, MM-LU-3, MM-LU-4, MM-N-4, and LAX Master Plan Commitment N-1, would be significant and unavoidable. In addition, impacts on parks and certain residential uses within outdoor private habitable areas newly exposed to noise levels of 75 CNEL or higher (which would not occur in the communities of Westchester or Playa del Rey) would be significant and unavoidable.

Although the commentor's property is located within the 65 CNEL noise contour and, as implied by the commentor in Comment SPAS-PC00005-2, has received soundproofing, noise exposure at the commentor's property could increase by 1.5 CNEL or higher (not accounting for existing insulation) within the 65 CNEL contour under Alternatives 1 through 7 as analyzed in Sections 4.9.6 and 4.10.1.6 of the SPAS Draft EIR. In conformance with Title 21 requirements, interior noise levels must be 45 CNEL or less. As stated in LAX Master Plan Mitigation Measure MM-LU-1, LAWA would continue post-insulation noise monitoring to help ensure achievement of interior noise levels at or below 45 CNEL. Currently, LAWA conducts post-construction noise tests on a random sample of homes to verify the efficacy of the soundproofing installation. To date, all testing has confirmed that interior noise levels have been reduced to 45 CNEL through soundproofing, as required.

SPAS-PC00005-2

Comment:

People cannot stay in their homes, that have been soundproofed, for 24 hrs per day. When today's quiet planes fly to and from Rwy 24R one cannot hear anything but the aircraft's engines roaring.

Response:

Impacts associated with each alternative related to aircraft noise are provided in Section 4.10.1.6. The comment questions the effectiveness of the Aircraft Noise Mitigation Program (ANMP) (soundproofing). As discussed under Mitigation Measure MM-LU-1, LAWA shall expand and revise the existing ANMP. (See Section 4.9.5, Section 4.9.6.10, Section 4.10.1.8 of the SPAS Draft EIR.) As part of the ANMP, LAWA includes pre- and post-insulation noise monitoring to ensure achievement of interior noise levels at or below 45 CNEL. (See page 4-686 of SPAS Draft EIR.) However, as acknowledged in Section 4.9.8 and 4.10.1.8 of the SPAS Draft EIR, some aircraft noise impacts would remain significant and unavoidable, due in part to noise levels in some outdoor habitable areas and interim impacts before implementation of the mitigation measures.

SPAS-PC00005-3

Comment:

Stay further south of Rwy 24L or else buy out every home owner all the way to Manchester.

Response:

This comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project.

The commentor suggests LAWA "buy out every homeowner all the way to Manchester." The commentor does not specify whether he is referencing Manchester Square, located east of the airport, or Manchester Avenue, located north of the airport.

Under CEQA, impacts are only required for significant impacts, and mitigation measures must have a rough proportionality and nexus to those impacts. (See State CEQA Guidelines Sections 15041 and 15126.4(a)(3).) Many of the areas potentially included within the scope of the commentor's suggestion are not significantly impacted by the SPAS alternatives (e.g., see Figure 4.10.1-15 of the SPAS Draft EIR for aircraft noise impacts under Alternative 1). As discussed on page 4-666 of the SPAS Draft EIR, "[d]ecisions to pursue noise insulation or acquisition are made by each jurisdiction. Sound insulation under the ANMP has been prioritized for residential land uses." As described on pages 4-664 through

4-667 in Section 4.9.3.3 of the SPAS Draft EIR, incompatible uses (including residential) located within noise impacted areas (i.e., 65 CNEL or higher noise levels) are eligible for sound insulation under the Aircraft Noise Mitigation Program (ANMP). As summarized in Section 4.9.7 of the SPAS Draft EIR, those residential uses and non-residential noise-sensitive facilities newly exposed to noise levels of 65 CNEL or higher under Alternatives 1 through 7, including those alternatives that move runway 6L/24R northward, would be eligible for sound insulation under the ANMP and through implementation of LAX Master Plan Mitigation Measure MM-LU-1. The LAX Master Plan noise and land use mitigation measures fully mitigate the significant noise impacts on interior noise levels once implemented, as defined under California Code of Regulations, Title 21, Section 5033 (see page 4-933 of the SPAS Draft EIR). Furthermore, LAWA has spent hundreds of millions of dollars for soundproofing homes, including homes in areas north of LAX. These types of decisions do not need to be revisited in every subsequent environmental document. (See Citizens of Goleta Valley v. Board of Supervisors of Santa Barbara County (1990) 52 Cal.3d 553.)

SPAS-PC00006 Callahan, Edward None Provided 8/25/2012

SPAS-PC00006-1

Comment:

The traffic mitigation make sense - though there is no attempt to mitigate the 105 back up.

Response:

The comment that "the traffic mitigation makes sense" is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project.

The comment regarding the SPAS Draft EIR making "no attempt to mitigate the 105 backup" is noted; however, as presented in Section 4.12.2.6, no significant traffic impacts were identified at the CMP freeway monitoring locations on I-105. As stated in Section 4.12.2.7.1 of the SPAS Draft EIR, significant and unavoidable impacts were found at two study intersections from which queues extend onto westbound I-105 during peak times. While mitigation measures were identified that would reduce the level of the significant impacts identified at I-105 Ramps (e/o Aviation Boulevard) & Imperial Highway (MM-ST (SPAS)-24 at study intersection 74) under Alternative 3 and at Sepulveda Boulevard & I-105 Westbound Ramps (n/o Imperial Highway) (MM-ST (SPAS)-1 at study intersection 139) under Alternatives 1-2, 4, 8, and 9 (see Section 4.12.2.7.2), no mitigation measures were identified that would fully mitigate the significant impacts at those intersections.

SPAS-PC00006-2

Comment:

Moving the runway north and claiming that this will not affect noise is ridiculous. The reality is that more air traffic will be on the north runways.

Response:

The comment suggests that the SPAS Draft EIR concludes that the alternatives "will not affect noise." Contrary to this assertion, some aircraft noise impacts were determined to be significant and unavoidable, as summarized in Section 4.10.1.8 of the SPAS Draft EIR.

The commentor is also suggesting that more traffic on the north runways would generate more aircraft noise on the northside.

Page 4-828 in Section 4.10.1.6 of the SPAS Draft EIR clearly lists the anticipated CNEL changes in 2025 with an increase in passenger activity, an associated increase in the number of operations, as well

as an anticipated change in fleet mix. As a result, the overall size of the future (2025) aircraft noise contours under each of the alternatives increases when compared with the baseline (2009) conditions.

Section 4.10.1.6 provides the comparison of aircraft noise impacts for all alternatives. Table 4.10.1-55 provides a summary of the population, dwellings, and non-residential noise-sensitive facilities that would be within the 65 CNEL or higher noise exposure contour with the implementation of the various alternatives compared to the baseline (2009) conditions. Any increase in the number of people that would be impacted by aircraft noise will be due to the growth in aircraft activity projected to occur by 2025. The table also compares the implementation of the various alternatives to 2025 "no additional improvements" conditions.

While it is true that those alternatives involving the relocation of Runway 6L/24R northward (i.e., Alternatives 1, 5, and 6) would result in increased aircraft noise impacts to areas immediately north and northeast of the airport, there would be an accompanying decrease in aircraft noise impacts to areas east, southeast, and south of the airport. As indicated in Sections 4.9, Land Use and Planning, and 4.10.1, Aircraft Noise, and summarized in Tables 1-16 and 1-17 of the SPAS Draft EIR, there would, in general, be fewer residential units exposed to 65 CNEL by moving Runway 6L/24R northward (Alternatives 1, 5, and 6) than would occur in moving 6R/24L southward (Alternatives 3 and 7) or not moving either runway (Alternatives 2 and 4), and the total residential population newly exposed to 65 CNEL would be lowest under Alternative 5 (i.e., relocate Runway 6L/24R 350 feet northward) than under any other alternative. Relative to a 1.5 CNEL increase above 65 CNEL, which includes areas currently exposed to >65 CNEL, the total residential units and residential population exposed to such an increase is consistently higher for alternatives that move Runway 6R/24L southward (Alternatives 3 and 7) or do not move the runways (Alternatives 2 and 4). These differences in the numbers of homes and people being exposed to aircraft noise impacts--specifically, that total overall aircraft noise impacts would be lower with alternatives that move Runway 6L/24R northward--are due to the fact that the land use/development intensities in areas to the east, southeast, and south are higher than in the areas north of the airport. That is, although more homes to the north of the airport would be impacted by noise with a northward move of Runway 6L/24R, an even greater number of homes to the east, southeast, and south of the airport would no longer be impacted by noise, resulting in a general overall decrease in the numbers of homes and people exposed to aircraft noise impacts.

SPAS-PC00007 Gat, Jonathan None Provided 8/25/2012

SPAS-PC00007-1

Comment:

CHANGES AND MODERNIZATION MUST TAKE PLACE. TOO MUCH OF THE FACILITY IS OUT OF DATE. I THINK THE IDEA OF A CONSOLIDATED CAR RENTAL FACILITY IS A GOOD ONE. A SINGLE LINEAR TERMINAL ON THE NORTH SIDE IS PROBABLY A VERY EFFICIENT ALTERNATIVE.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00008 Schneider, Gary N None Provided 8/25/2012

SPAS-PC00008-1

Comment:

I LIVE IN DEL REY, A NEIGHBORHOOD JUST NORTH OF PLAYA VISTA. IN RECENT YEARS, I HAVE EXPERIENCED MASSIVE INCREASES IN NOISE LEVELS FROM LAX.

Response:

The commentor is located approximately 2.6 miles away from LAX and approximately 2 miles away from LAX's 60 CNEL contour (depending upon the SPAS alternative) and 2.3 miles from Santa Monica Airport. For discussion of the alternatives' impacts associated with aircraft noise, please see Section 4.10.1 of the SPAS Draft EIR.

While it is accepted that aircraft activity at LAX has and continues to generate high levels of noise that are incompatible with residential and other noise-sensitive land uses near the airport, these issues are currently addressed through the following programs:

- The Aircraft Noise Mitigation Program (ANMP) and Residential Soundproofing Program. Under the ANMP, incompatible land uses (defined as residential dwellings, schools, hospitals and convalescent homes, and churches/places of worship) located within the 1992 fourth quarter 65 CNEL noise contour or within the 65 CNEL areas extending beyond the 1992 contour based on the most recent quarterly report, are eligible for sound insulation or, in some cases, acquisition. The residential soundproofing program provides sound insulation for eligible residential units through such measures as replacing loose-fitting doors and windows with acoustically rated doors and windows to reduce interior noise levels to 45 CNEL. (See also Section 4.9.3.3 of the SPAS Draft EIR.)

- The Aircraft Noise Abatement Program. This program provides for the abatement of aircraft noise through operation or source noise control including aircraft traffic, flight, and runway use procedures. (See Section 4.10.1.5 of the SPAS Draft EIR.)

- Noise complaint hotline, and internet based electronic complaint form and flight tracking system. In order to inform the public and track and respond to noise complaints associated with a specific flight (for example high single event noise levels associated with early turns, missed approaches, or low altitude), LAWA maintains a 24-hour noise complaint hotline ((424) 64-Noise), and an electronic complaint form and Internet flight tracking system (http://www.lawa.org/welcome_lax.aspx?id=788).

- Voluntary Residential Acquisition Program for Manchester Square and the Belford area. This Program was established based on interest from homeowners and residents who requested that LAWA purchase their properties in lieu of soundproofing. Acquisition, demolition, and clearing are currently underway. This program is independent of the LAX Master Plan. (See pages 4-667 and 4-668 in Section 4.9.3.3 of the SPAS Draft EIR.)

- LAX Community Noise Roundtable. The LAX Community Noise Roundtable was created by LAWA in September 2000 in an effort to help reduce and mitigate adverse noise impacts on surrounding communities from LAX operations. Membership of the Roundtable consists of local elected officials and staff, representatives of congressional offices, members of recognized community groups, the FAA, the Air Transportation Association, and LAWA Management. (See http://www.lawa.org/LAXNoiseRound Table.aspx.)

- LAX Area Advisory Committee. The LAX Area Advisory Committee works in conjunction with the Board of Airport Commissioners and LAWA Community Relations staff to address concerns in their respective communities resulting from airport operations, including noise, traffic, and signs. The 19-member committee is comprised of representatives appointed by elected officials from communities

surrounding LAX, including Culver City, El Segundo, Hawthorne, Inglewood, Lennox, Marina del Rey and Westchester/Playa del Rey. (See http://www.lax.aero/LAXAAC.aspx.)

The commentor suggest that there has been a "massive increase" in noise levels in recent years, but this assertion is not supported by facts or evidence. As discussed on page 4-796 of the SPAS Draft EIR, both the project level analysis and the cumulative analysis account for the fact that the commercial aircraft fleet now operating in the United States is generally much quieter than the earlier aircraft fleets based on the Congressional mandate that new aircraft comply with strict noise levels standards (i.e., Stage 4 certification) and older noisier aircraft (Stage 1 and Stage 2) be retired from operation (14 CFR Part 36). This is evidenced by the fact that the 65 CNEL contours for LAX under current and future conditions are generally smaller than the 65 CNEL contours for LAX from two decades ago.

SPAS-PC00008-2

Comment:

ANY THOUGHT OF MOVING THE NORTH RUNWAY 100'-350' FARTHER NORTH WOULD MAKE LIFE & LIVING INTOLERABLE!

IT IS OUT OF THE QUESTION TO THINK OF RELOCATING THE NORTH RUNWAY FARTHER NORTH!

Response:

A discussion of project impacts resulting from exposure to aircraft noise levels of 65 CNEL or higher under the Alternatives 1 through 7 (which includes the relocation of Runway 6L/24R northward under Alternatives 1, 5, and 6) is provided in Sections 4.9 and 4.10.1 of the SPAS Draft EIR. As shown in Figures 4.9-7, 4.9-8, 4.9-9, 4.9-10, 4.9-11, 4.9-12, and 4.9-13 of the SPAS Draft EIR, the community of Del Rey would not be newly exposed to high noise levels under Alternatives 1 through 7. Furthermore, as shown in Figures 4.10.1-16, 4.10.1-19, 4.10.1-22, 4.10.1-27, 4.10.1-30, and 4.10.1-33 of the SPAS Draft EIR, the community of Del Rey would not be exposed to high single event aircraft noise levels associated with nighttime awakening under existing conditions or as a result of the SPAS project. Please see Response to Comment SPAS-PC00008-1 regarding current measures underway to address existing high aircraft noise levels. Please also see Responses to Comments SPAS-PC00042-5 and SPAS-PC00130-938 regarding the effects of noise on humans. In general, potential aircraft noise impacts of the proposed SPAS alternatives on the community of Del Rey would be less than significant due to the distance of this community from LAX (approximately 2.5 miles to the north).

SPAS-PC00009 Aguilar, Angela M SEIU 8/24/2012

SPAS-PC00009-1

Comment:

I live in San Bernardino and I would like that the Ontario airport be modernized as I live over there and travel every day to LAX. I'd like to work closer to where I live, as it takes 2 hours of travel time because there is no work near Ontario. I hope that Ontario Airport would be larger and that I could earn a fair living, we do not want dirty contractors.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00010 Aguilar, Ramon None Provided 8/25/2012

SPAS-PC00010-1

Comment:

I Ramon agree with the expansion of the airport, but I would also like for you to help us obtain more benefits for the workers, I began working work for the airport in 94 and 212 is my salary and only reaches $3.35 per hour, I await for your assistance.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00011 Rivas, Guadalupe SEIU 8/24/2012

SPAS-PC00011-1

Comment:

My family and I support the expansion or modernization of LAX as it will create jobs for numerous families however we only support it, if the jobs are fair and the benefits help us move ahead in the future, we don't want dirty contractors that they only want to take our money and put it in their pocket, we ask that they be fair we can all live in peace and harmony. Thank you

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00012 Bray, Sandra ARSAC 8/25/2012

SPAS-PC00012-1

Comment:

LEAVE THE NORTH AIRFIELDS AS IS OR MOVE IT SOUTH - FIX THE TERMINALS & GROUND TRANSPORTATION

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00012-2

Comment:

QUIT INTRUDING INTO THE WESTCHESTER COMMUNITY (HOMES & BUSINESS DISTRICT)

Response:

Regarding analysis of property acquisition impacts on the Westchester community associated with the RPZ, please see Responses to Comments SPAS-AL00007-26 and SPAS-PC00130-931. A discussion of property acquisition that could occur under the SPAS alternatives is provided in Sections 2.3.1.11 and 4.9.6 of the SPAS Draft EIR. Specifically, the property acquisition that would be required under Alternatives 1, 2, 3, 4, 8, and 9 is shown in Figures 2-11, 2-12, 2-13, and 2-14 and listed in Table 2-4 and Table 2-5 in Section 2.3.1.11 of the SPAS Draft EIR. As indicated in these figures and tables, no residential acquisition or acquisition within the Westchester Business District is proposed.

SPAS-PC00013 Rodriguez, Alfredo SEIU 8/25/2012

SPAS-PC00013-1

Comment:

I support the expansion project at the airport 100 percent, and I am a worker of the airport for 12 years. Throughout this time I've seen that the companies do not comply with the regulations of the city of Los Angeles. They do not give us a fair salary, a health plan that covers our needs, and I ask that you please make these companies comply and remember that the workers deserve respect today, tomorrow and always. Thank you.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00014 Rodriguez, Crissel SEIU-USWN 8/25/2012

SPAS-PC00014-1

Comment:

I am not in favor with the current plans of expansion at LAX. As an organizer and supporter of workers at LAX I have found that this modernization project is an insult for the citizens around LAX that live in poverty stricken areas. As a global studies major I have studied how developing countries often times have a company operating within its villages and everything around the company, the cities, the infrastructure is in shambles. When I drive through the streets of Inglewood and Hawthorne I am dismayed that citizens live next to a billion dollar hub and receive no economic rewards. It is time to reconsider how resources are distributed and these modernization projects continue to be part of the problem, rather than the solution.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project.

As part of the LAX Master Plan Stipulated Settlement, subject to LAWA's ability to use airport revenue to the extent permissible under federal law and policies, or to develop other state or federal funding sources, LAWA will provide funding to Inglewood, Los Angeles County, El Segundo, and ARSAC totaling $266 million over a 10-year period to include: (1) accelerated noise mitigation for Inglewood, Los Angeles County and El Segundo; (2) job training and increased job opportunities; (3) traffic mitigation for Inglewood and El Segundo; (4) street removal and landscaping in the dunes west of Pershing Drive; and (5) street lighting in Westchester. An additional commitment of $60 million will be spent by LAWA on various air quality and environmental justice programs. Details of the Community Benefits Agreement are provided at http://ourlax.org/comBenefits.aspx.

SPAS-PC00015 Baca, Mary J None Provided 8/25/2012

SPAS-PC00015-1

Comment:

1) Intermodal Transportation facilities included in Alternatives 8 and 9 would transfer all the traffic currently associated with the car rentals into one area closer to homes.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. The changes to the on-airport and off-airport transportation systems associated with operation of a CONRAC under Alternatives 8 and 9 are included in the transportation impacts analyses included in Section 4.12.1, On-Airport Transportation, and Section 4.12.2, Off-Airport Transportation, of the SPAS Draft EIR.

SPAS-PC00015-2

Comment:

3) Second choice would be Alternative 2 which addresses safety concerns without increasing the impact on Westchester area

Response:

The commentor's support for Alternative 2 is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Chapter 2 of this Final EIR regarding the LAWA Staff-Recommended Alternative, which couples the airfield and terminal improvements associated with Alternative 1 with the ground access components associated with Alternative 9, including a discussion of the rationale behind the selection of these alternatives over the other alternatives evaluated in the SPAS Draft EIR. Please see Response to Comment SPAS-PC00130-168 regarding conclusions of the NASS relative to north airfield safety. Regarding enhancements to the safety and efficiency of the airfield under each alternative, please see Table 4.7.2-16 on page 4-570 in Section 4.7.2 of the SPAS Draft EIR. As indicated in that table, the SPAS alternatives achieve substantial enhancements in safety and efficiency; the degree to which safety and efficiency is enhanced varies between the alternatives.

SPAS-PC00015-3

Comment:

2) terminals should be improved without adjusting runways therefore alternative 4 is preferrable.

Response:

The commentor's support for Alternative 4 is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Chapter 2 of this Final EIR regarding the LAWA Staff-Recommended Alternative, which

couples the airfield and terminal improvements associated with Alternative 1 with the ground access components associated with Alternative 9, including a discussion of the rationale behind the selection of these alternatives over the other alternatives evaluated in the SPAS Draft EIR.

SPAS-PC00016 Conine, Patricia None Provided 8/25/2012

SPAS-PC00016-1

Comment:

I HAVE BEEN HEARING FOR SEVERAL YEARS, THAT LANDING ADG6 AIRCRAFT NOW REQUIRES NON STANDARD OPERATIONS. IF THIS IS DONE FREQUENTLY, WHY DOESN'T THAT BECOME THE STANDARD OPERATION

Response:

As described in Section 4.7.2, Safety, of the SPAS Draft EIR, the LAX airfield does not meet the Federal Aviation Administration's (FAA) separation standards for ADG VI aircraft set forth in Advisory Circular (AC) 150/5300-13A, Airport Design. As such, in order to ensure an acceptable level of safety while these aircraft operate, a series of restrictions are in place on ADG VI and other aircraft. Standardization of ADG VI operations refers to constructing airfield infrastructure that meets the FAA's separation standards, thus removing the operational restrictions.

SPAS-PC00017 None Provided None Provided 8/25/2012

SPAS-PC00017-1

Comment:

I am not in favor of moving north runway north as in Alternative 1, 5, & 6. NASA study commented that no changes need to be made for safety

Response:

The comment regarding not being in favor of moving the north runway north as in Alternatives 1, 5, and 6 is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. The NASA study, specifically the North Airfield Safety Study (NASS), did not comment "that no changes need to be made for safety." The academic panel reviewing the results of the analysis completed by NASA Ames offered their opinion that, based on safety grounds alone, it would be hard to argue for reconfiguring the north airfield. The NASS did determine that improvements to, and reconfiguration of, the north airfield would reduce the risk of a fatal runway collision. Additional discussion of the NASS and several other safety studies completed for the north airfield is provided in Section 4.7.2 of the SPAS Draft EIR.

SPAS-PC00018 Hamilton, Jacqueline Tuskegee Airmen, Inc. 8/25/2012

SPAS-PC00018-1

Comment:

THE RE-DESIGN PROJECT FOR LAX NEEDS TO INCLUDE ONGOING SAFETY PROCEDURES FOR THOSE OF US WHO HAVE HAD FAMILY MEMBERS AND THEIR INFORMATION DISPLAYED AT THE AIRPORT. THIS INCLUDES SAFETY FROM CRIMES SUCH AS IDENTITY THEFT, THEFT, MAIL FRAUD, ROBBERY, ILLEGAL STALKING AND HARASSMENT, VEHICLE BREAK-IN AND

THEFT, ILLEGAL CONFISCATION OF EARNED AND INHERITED ITEMS, ETC.., ALSO ILLEGAL HARASSMENT AND ATTEMPTS TO CORRUPT OUR CLEAR BACKGROUND RECORDS BY LAW ENFORCEMENT. PLEASE NOTIFY THOSE OF US WHO WERE SEVERELY VICTIMIZED BY CRIME IN LIVING IN THE MANCHESTER SQUARE AREA OF THE LAX AREA, THE STATUS OF OUR RELOCATION AWARDS, BECAUSE WE HAD TO RELOCATE DUE TO MAINTAING OUR SAFETY, ESPECIALLY FROM DERANGED CRIMINALS COMMITTING RACIALLY MOTIVATED AGGRAVATED ASSAULT AND CRIMINAL IDENTITY THEFT.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Response to Comment SPAS-PH300028-1 regarding relocation assistance. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00019 Loftus, Katy None Provided 8/25/2012

SPAS-PC00019-1

Comment:

Financial impact: For each alternative please explain how it will be funded
specifically: what is the total projected cost for ea. alternative? - what % of that cost is the responsibility of the airlines - what % is added to ticket fees - what % will be funded by bonds, etc.

Response:

Please see Response to Comment SPAS-PC00096-2 regarding funding sources for SPAS improvements. Rough-order-of-magnitude cost estimates for the SPAS alternatives were developed as part of SPAS. The cost estimates are discussed in Chapter 8 of the Preliminary LAX SPAS Report, with detailed information provided in Appendix G.

SPAS-PC00020 None Provided None Provided 8/25/2012

SPAS-PC00020-1

Comment:

What is the required buffer zone between the operational airport & the residential area?

Response:

There are various safety zone requirements set forth by the FAA relative to airport runways, and associated airspace, and taxiways. Section 4.7.2, Safety, of the Draft EIR describes such requirements and Figure 4.7.2-2 within that section delineates the typical nature, location, and dimensions of such safety areas. Figures 4.7.2-3 and 4.7.2-4 of the Draft EIR illustrate where those safety areas are located relative to the existing north airfield configuration, and Figures 4.7.2-6 through 4.7.2-19 show where the safety areas would be located with the airfield improvements proposed under SPAS Alternatives 1 through 7. As discussed in the section and shown on the figures, residential uses are currently located within the runway protection zone (RPZ) east of Runway 6L/24R and would remain in the RPZ under Alternatives 2, 3, 4, and 7. Under Alternatives 1, 5, and 6, the RPZ would shift westward and residential uses would no longer be within the RPZ.

SPAS-PC00021 Mitchell, Michael Mickey's Space Ship Shuttle 8/28/2012

SPAS-PC00021-1

Comment:

E2-2 page 2
1.2 98th Street I.T.F. out of Country & Long distance rail still go to inside CTA.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00022 None Provided None Provided 8/28/2012

SPAS-PC00022-1

Comment:

Posters 4.1-4.3 did not identify incompatible uses that are non-residential such as places of assembly (parks, schools child care centers etc.). Not sure if this was left out because there are no such uses w/in the runway protected zones.

Response:

Presentation Boards 4.1 through 4.3, used in Public Meetings during the SPAS Draft EIR public review period, summarize and illustrate information from Section 4.7.2, of the SPAS Draft EIR. The runway protection zone (RPZ) maps shown on Board 4.3 are from that section of the SPAS Draft EIR and delineate the nature and location of uses located within the two RPZs at the eastern ends of the runways in the north airfield. Such uses include residential and non-residential uses such as offices, commercial, parking, vacant, and government. There are no places of assembly such as parks, schools, or child care centers within those RPZs at the east ends of the runways. Park uses are located within the RPZ at the western end of Runway 6R/24L, as shown in green in Figures 4.7.2-4 (baseline conditions), 4.7.2-7 (Alternative 1), 4.7.2-9 (Alternative 2), 4.7.2-11 (Alternative 3), 4.7.2-13 (Alternative 4), 4.7.2-15 (Alternative 5), 4.7.2-17 (Alternative 6), and 4.7.2-19 (Alternative 7). The subject park uses include Vista del Mar Park on the east side of Vista del Mar (roadway) and a portion of Dockweiler State Beach on the west side of the Vista del Mar (roadway).

SPAS-PC00023 Nay, Mark R HNTB Architecture 8/28/2012

SPAS-PC00023-1

Comment:

THIS EFFORT HAS BEEN THOROUGHLY RESEARCHED ANALYZED AND A THOUGHTFUL APPROACH TO OPTIONS AND RECOMMENDATIONS. THIS PROCESS NEEDS TO BE COMPLETED SOON TO FACILITATE THE MUCH NEEDED MODERNIZATION & SAFETY IMPROVEMENTS. I SUPPORT THIS PLAN

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00024 Newsom, Bob HNTB 8/28/2012

SPAS-PC00024-1

Comment:

WE SUPPORT THE MISSION AND INTENT OF THE SPAS OBJECTIVES.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00025 Underwood, Brenda None Provided 8/28/2012

SPAS-PC00025-1

Comment:

I like Alternative 4, 5, 6, or 7

Response:

The commentor's support for Alternatives 4, 5, 6, or 7 is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Chapter 2 of this Final EIR regarding the LAWA Staff-Recommended Alternative, which couples the airfield and terminal improvements associated with Alternative 1 with the ground access components associated with Alternative 9, including a discussion of the rationale behind the selection of these alternatives over the other alternatives evaluated in the SPAS Draft EIR.

SPAS-PC00025-2

Comment:

I would like to have the water turned back on Manchester Square that waters the lots.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00025-3

Comment:

To many people living in campers in Manchester Square!

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00026 Rodine, Robert L The Polaris Group 8/28/2012

SPAS-PC00026-1

Comment:

Thank you. I'm Robert Rodine. My firm, The Polaris Group, provides economic and financial consulting, in part to the aviation industry.

In a few short years LAX, in spite of enormous private investment in our region, has descended to become the airport that was ranked #2 among the worst by Travel & Leisure Magazine in April 2012. That puts LAX just 1 above the anchor, LaGuardia, and below #3 from the bottom, Philadelphia.

In this ranking of 22 airports LAX was ranked at the bottom of the list for impression of safety standards, 21st in Check-in/Security and Cleanliness, and was generally characterized as worn out, having outdated infrastructure and being overcrowded and subject to delays.

If we don't want to become a Detroit we need to step up and make LAX Modernization our constant mantra. Not just in appearance but in functionality as well. In the words of Commissioner Torres-Gil we can't "forget that we are not just serving the community and the stakeholders around the Airport..." LAX is "serving 20 million plus residents in Southern California as well as uncounted millions that depend on us internationally..." and "this Airport is a critical economic engine of Los Angeles."

The June 18, 2012, SPAS report to the BOAC enumerated 7 Integrated and Standalone Airfield Alternatives that will move us toward the Modernization of our Airport that is so gravely needed. It is crystal clear, from the chart included on page 7 of the Report, that Alternative 5, representing the relocation of Runway 24 R 350 feet northward is the one Alternative that does the most in meeting "all planning objectives to the greatest extent." In view of this I strongly urge that this Alternative 5 be designated as "The Preferred Alternative" in the final EIR.

Response:

The commentor's support for Alternative 5 is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Chapter 2 of this Final EIR regarding the LAWA Staff-Recommended Alternative, which couples the airfield and terminal improvements associated with Alternative 1 with the ground access components associated with Alternative 9, including a discussion of the rationale behind the selection of these alternatives over the other alternatives evaluated in the SPAS Draft EIR. It should be noted that, the Management Report to BOAC on June 18, 2012 identified four integrated alternatives (Alternative 1 through 4), three stand-alone airfield alternatives (5 through 7), and two stand-alone ground transportation alternatives (8 and 9). All nine of these alternatives are evaluated in the SPAS Draft EIR.

Table 1-2 of the SPAS Draft EIR provides an evaluation of the relationship between the objectives of the proposed project and each of the SPAS alternatives. As indicated therein, each alternative meets the planning objectives to a different extent. Only Alternatives 3 and 5 fully meet the planning objective

related to providing north airfield improvements that support safe and efficient movement of aircraft at LAX. Please also see Response to Comment SPAS-PC00149-2 regarding a discussion of the project objectives associated with the north airfield improvements.

SPAS-PC00027 Cherry, Nate RTKL 8/28/2012

SPAS-PC00027-1

Comment:

WE ARE TOLD THAT GROWTH PROJECTIONS ARE BASED UPON SCAG NUMBERS . . .

HOW DO THE PLANS EVALUATE OFFSITE GROWTH IN THE AREA RELATED TO SPECIFIC INDUSTRIES THAT BENEFIT FROM CLOSE PROXIMITY TO THE AIRPORT (BIOMEDICAL, LOGISTICS, ETC..)

Response:

The analysis of cumulative impacts in Chapter 5 of the SPAS Draft EIR relied, in part, on regional projections of population, housing, and employment prepared and adopted by SCAG as part of the SCAG 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). Cumulative impacts were evaluated on an aggregate, regional basis; off-site growth related to specific industries that benefit from proximity to the airport were not evaluated in the SPAS Draft EIR. However, the projections included in the SCAG RTP/SCS are based on an assumption of aviation activity at LAX of 78.9 million annual passengers, the same activity level as projected in the SPAS Draft EIR. For the reasons described on pages A-19 and A-20 of the 2008 SPAS NOP, and page A-20 of the 2010 SPAS NOP, as the SPAS alternatives do not include residential or business development, SPAS would not directly or indirectly induce population or housing growth, and no further analysis of induced growth was required in the SPAS Draft EIR.

SPAS-PC00028 Cherry, Nate RTKL 8/28/2012

SPAS-PC00028-1

Comment:

HOW DO THE ALTERNATIVES ANTICIPATE GROWTH IN CARGO THRUPUT? DO THEY WEIGH RELATIVE BENEFIT OF VARIOUS IMPROVEMENTS TO ROAD AND OTHER INTERMODAL CONNECTIONS?

Response:

The SPAS alternatives would not influence future cargo activity at LAX. However, the aviation forecast that was developed for the SPAS analysis projected total future aviation activity at LAX in 2025, including cargo operations. The methodology and assumptions pertaining to future cargo activity are described on page 24 of Appendix F-1 of the Preliminary LAX SPAS Report.

Impacts of the SPAS alternatives on off-airport roads are addressed in Sections 4.12.2 of the SPAS Draft EIR. The majority of the 200 intersections evaluated within the SPAS off-airport transportation study area would not be significantly impacted under Alternatives 1, 2, 3, 4, 8, and 9; however, significant impacts to some off-airport intersections and/or Congestion Management Plan (CMP) facilities would occur under each of these alternatives. The total number of significantly-impacted intersections and/or CMP facilities would vary slightly among those alternatives. Alternatives 5, 6, and 7 focus on airfield and terminal improvements that, in themselves, would not affect off-airport traffic, but would be coupled with the ground transportation improvements proposed under Alternatives 1, 2, 8, or 9, the impacts of which are summarized above. All of the SPAS alternatives except for Alternative 4

provide connectivity to regional transit. Please see Topical Response TR-SPAS-T-1 regarding intermodal connections associated with the SPAS alternatives.

SPAS-PC00029 Roberts, David Candidate for Council District 9 8/28/2012

SPAS-PC00029-1

Comment:

The modernization of LAX is crucial to the economic vitality for not only the City of Los Angeles but the greater Southern California region. The jobs created during construction will address historically high unemployment rates in the construction industry. Project Labor Agreements (PLA's) will ensure that 30% of the construction jobs created will be targetted to some of this region's most distressed communities including South Los Angeles where unemployment rates exceed 25%.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00030 Hamilton, Jacqueline Tuskegee Airmen, Inc. 8/28/2012

SPAS-PC00030-1

Comment:

BESIDES AIRCRAFT MOVEMENT SAFETY, ISSUES IN REGARDS TO PUBLIC SAFETY NEEDS TO BE ADDRESSED. IN LIVING IN THE MANCHESTER SQUARE AREA FROM 2001-2006 AND DURING THIS TIME WORKED FOR THE COMPANY UNICOM SYSTEMS, INC. MAINLY AND SOME OTHERS. I ALSO AM THE DAUGHTER OF WWII USAAF TUSKEGEE AIRMAN AND PILOT LT. JOHN L. HAMILTON WHOSE PHOTO AND INFORMATION WAS DISPLAYED IN THE MURAL PAINTED BY STAN STOKES, THAT IS ON PERMANENT DISPLAY AT A MUSEUM IN PALM SPRINGS. DURING THE TIME OF MY RESIDENCY IN THE MANCHESTER SQUARE AREA I WAS VICTIMIZED SEVERELY BY CRIME INCLUDING, THEFT, IDENTITY THEFT, MAIL FRAUD, STALKING, AGGRAVATED ASSAULT, HARASSMENT, VEHICLE BREAK-IN & THEFT, AND OTHER CRIMES THAT CAUSED SEVERE LOSS, AND EMPLOYMENT DISPLACEMENT. THE LAPD OFFICER WHO WAS HANDLING THE CRIME VICTIMIZATION, OFFICER THOMAS WICKS IS NOW RETIRED BUT WE HAVE NOT RECEIVED STATUS AND RESTITUTION FUNDS OWED AS WELL AS OUR RELOCATION AWARD OWED IN THIS CRIME VICTIMIZATION.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Response to Comment SPAS-PH300028-1 regarding relocation assistance. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00031 Mitchell, Michael Mickey's Space Ship Shuttle 8/28/2012

SPAS-PC00031-1

Comment:

1 & 2 plan
Page 4-1091 - for IMF It states Scheduled Service To Move out of CTA. The Scheduled Services to O.C.-Santa Monica, Santa Barbara, Oxnard, Antelope Valley, should stay in the CTA Not Move out to the IMTF. only the Super Shuttle, Prime Time & FlyAway should go to the IMF. The long distance scheduled Buses & Long Distance Vans should stay in the CTA.

Do not change Scheduled Service Companies in the CTA. Keep them as they are now. Much better design. Please call us.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00032 Mitchell, Michael S Terrestrial Trolley LLC 8/28/2012

SPAS-PC00032-1

Comment:

Attached Comments to Spas

REQUEST FOR RESPECT
Spas meetings are not announced to local transportation companies. Please have meetings on how the past companies are to be involved with LAX.

These companies have been here for decades and pay loop fees and do not cost any subsidized loss of money.

Please allow us information on how we will be treated in the new design.

We go long distances out to 75 miles to Santa Barbara, Palmdale, the Marine Base.
Our first stops are 35 miles off airport property. Please allow us to know with meetings on how we are to be treated in the future with your plans.

Response:

Please see Responses to Comments SPAS-PC00048-5 and SPAS-PC00130-358 regarding the extensive public outreach LAWA undertook to notify the public of the open house/public meetings that were held at the outset of the SPAS process and during the review period for the SPAS Draft EIR. These meetings were open to all members of the public, including companies that provide transportation services to LAX passengers. Information regarding how commercial vehicles, including shared ride vans shuttles and scheduled bus operators would be accommodated by the SPAS alternatives can be found on pages 4-1091 through 4-1093 of the SPAS Draft EIR and on page 2 of Appendix E2-2 of the Preliminary LAX SPAS Report. As indicated in the SPAS Draft EIR, for those alternatives that include an ITF (i.e., Alternatives 1, 2, 8, and 9), arriving passengers would travel to the

ITF to board certain shared ride vans and scheduled buses. Departing passengers using shared ride vans or scheduled buses would continue to be dropped off directly at their terminal. Under Alternative 3, all private and commercial vehicles, with the exception of LAWA FlyAways, would be precluded from entering the CTA and, instead, would use the planned GTC. The implementation of Alternative 4 would not result in changes to circulation of commercial vehicles, including shared ride vans and scheduled bus operations. (Alternatives 5, 6, and 7 focus on airfield improvements only; these alternatives would be paired with the ground access features of Alternative 1, 2, 8, or 9.)

SPAS-PC00032-2

Comment:

Please do not let the off shore monopoly transportation companies push us out of service we are a very important support system for when they are to big to fail and we keep the prices in check for the passengers needs and necessities.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00032-3

Comment:

Where are we in this plan?

Response:

The subject table was included within presentations given by LAWA staff during preparation of the SPAS Draft EIR. The column on the left delineates the alternative number and type of alternative (i.e., integrated alternatives, airfield alternatives, ground access alternatives) of the nine alternatives addressed in the SPAS Draft EIR. The column on the right indicates the main features of the potential SPAS development concepts that were previously referred to by their main project elements, prior to being formalized as SPAS Draft EIR alternatives. The main features summarized in the right-hand column are consistent with the descriptions of each alternative that are presented in Chapter 2, Project Description, of the SPAS Draft EIR.

As to the commentor's question "Where are we in this plan?" the nine alternatives summarized in the table represent the potential development options for SPAS that were addressed in the SPAS Draft EIR and will be considered by the decision-makers prior to taking action the on SPAS project. The alternatives summary table was not intended to include any information on individual shuttle services.

SPAS-PC00032-4

Comment:

TO: The BOAC of LAWA.The fly away to the valley is ok, The other fly away services should be estopped.

Provisions of the U.S. Code That Prohibit Diversion of Airport Revenues to Non-Airport Purposes, 49 U.S.C. 47101-47133

Section 47101(a)(13).
Airports should be as self-sustaining as possible under the circumstances existing at each particular airport and in establishing new fees, rates, and charges, and generating revenues from all sources, airport owners and operators should not seek to create revenue surpluses that exceed the amounts to

be used for airport system purposes for which airport revenues may be spent under section 47107(b)(1)....

FAA rule for airport operators

The airport owner is obligated to the Government to ensure that the facilities of the airport are made available to the public on fair and reasonable terms without unjust discrimination. Any lease or agreement granting the right to serve the public on the premises of an airport so obligated should be subordinate to the authority of the owner to establish sufficient control
over the operation to guarantee that patrons will be treated fairly. This applies not only to the purveyors of aeronautical services but to restaurants, shops, parking lots, ground transportation, and any establishment retaining commodities and/or services to the public.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00032-5

Comment:

To: The Honorable LAWA Airport Commissioners and Director Gina Marie

The Fly Away is not self-sustaining against FAA rules.

The Fly Away is a non- airport event and is a diversion of funds against FAA rules.
Regionalization of airports has happened and the volume of passengers is lowest in 20 years For 32 years the local companies have taken passengers without any cost to LAX, to all the destinations that the Fly Away and more. This would have saved LAX about 30 million dollars if the Fly Away had not started in 2006 and the 10 million dollars a year that the Fly Away took in transportation money from the public riding it would be in the hands of local drivers and not the over seas corporations that the Fly Away has subsidized with so much money. That money would help in the stores and businesses in the local area in Los Angeles and not France.

I have handed in a survey with hundreds of persons signing that they want Mickey's Space Ship Shuttle's Service. This was handed in a few years ago and Sandy Miller has them on file. We go long distances over 75 miles to the Marine Base in Orange County with a first drop off airport point of 35 miles. There are 8 scheduled service companies like ours that have been here for over 20 years at the scheduled service green stop. We expect that all the LAWA Commissioners and the wonderful President and Vice President and Director will allow these smaller and locally owned companies to be grand fathered into the plan of the CTA in the future of LAX to stay in service with the many hundreds of thousands of passengers that are loyal to us from the long distance areas we serve like Santa Barbara, Palmdale, Santa Maria, and the Marine Base. Companies like ours offer the public a not putting all your eggs in one basket design that the wonderful Director Gina Marie has warned about with other events in LAX. We agree with her and support her help to the local L.A. businesses. If you only have large fortune five hundred companies like Veolia that is from France and the Fly Away which is also owned over seas via L.A., Texas, Phenix, New York, Delaware over to Ireland. Many large companies go bankrupt and the airport is stuck without any recourse. This is why the free services that pay the loop fees to the airport and give a profit to the airport without any RFP's and loss of money are valuable to the airport. They are self sustaining which the Fly Away is not by a long run, and the people are use to them over the decades and do not want to change.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required

because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00032-6

Comment:

The Clifton Moore design of the CTA is perfect it is safe for a car bomb would only effect one terminal and if you collected all the people at one place like the design for over in West Chester it would be centered in one place for everyone and more dangerous for a car bomb. The way it is designed now it is spread out and as the vehicles service the passengers they are within 45 seconds curb & gone and the passengers love it and why fix something that is not broken.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. It is assumed that the comment that states "if you collected all the people at one place like the design for over in West Chester [sic]" is a reference to the Ground Transportation Center associated with the approved LAX Master Plan (SPAS Alternative 3). Security is not an environmental impact and is, therefore, not required to be discussed in the SPAS Draft EIR under CEQA or any other law. However, a security assessment of the SPAS alternatives is included in Appendix I of the Preliminary LAX SPAS Report to comply with the Stipulated Settlement and Section 7.G(2) of the LAX Specific Plan. The Security Assessment concluded that "the various SPAS alternatives…do not themselves create greater or lesser vulnerabilities to hostile actions than do existing conditions" (page ES-5). Specifically, the assessment found that the GTC associated with Alternative 3 would increase airport security (page 5-6).

No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00032-7

Comment:

The Fly Away is a dead horse that cost an arm and a leg. Give this all back to the local companies like Super Shuttle and Prime Time and keep the money here in L.A. Think of the passengers not the contractors giving money to the mayor. Passengers first. The Valley run has been around the for 32 years and is now a loss of 4 1/2 million dollars a year including the parking facility. The parking facility is built and cannot be taken back but the contract for service can be stopped and given to the many on-call services like Super Shuttle and Prime Time Shuttles that are always on the way from the valley and would take over the fly away operation for free due to 400 vans that need to come back to LAX. This would take the cars off the street and add the people to vans that come back anyway. This is a more efficient use of vans returning, the parking structures use, and CTA would be without large 48 passenger buses that average the size of the vans of 6 passengers giving more space in the airport for cars, less pollution, terrible noise from the large cng engines, also the money given to the van drivers of 15 million dollars a year taken away by the fly away given over seas would help the local economy and the vans they owned would be in better mechanical service since they have to maintain them themselves, as well as the passengers would have a way to go back and forth to the airport at a now basis since they only walk up to the CSR on the curb and load onto the vans to get back to their cars in the valley.

You may say we are keeping the money in the U.S.A. now with the new company Bauer's Limousine Service Inc. PSC - 8361 from San Francisco. The Decision from last year moving some authority to L.A. area does not have LAX airport on the decision like all the other Scheduled Service Companies. The fact that this is a foot note in the decision shows that it appears as the same owners are involved over seas but have made a deal in New York to transfer it all to Bauer just as they did in past with other AKA's. Note foot note with the usual suspected words of trade secrets that allows hide the over seas trick of a tax dodge. so to speak. or legal tax dodge.

1 The ruling provides that the confidential information will remain under seal for a period of two years from the date of the ruling. During this period the information shall not be made accessible or disclosed to anyone other than (a) Commissioners and Commission staff; (b) other parties to this proceeding who have executed a reasonable nondisclosure agreement with Applicant; or (c) upon further order or ruling of the Commission, the assigned Commissioner, the assigned ALJ or the ALJ then-designated as Law and Motion Judge. If Applicant believes that further protection of this information is needed after two years, it may file a motion stating the justification for further withholding the information from public inspection, or for such other relief as the Commission rules may then provide. The motion must be filed no later than 30 days before the expiration of the protective order.

So this did not go out to bid just as the first bid for the Fly Away in 2006 it went to the one bid company that had made the deal to transfer in New York City as I was told by Mr. Bauer on the phone last Friday. This company appears to be the the same over seas AKA design as coach america, gray line, california charters, airport bus of bakersfield, disneyland express, tour coach, starline, vip tours, etc. all having another name and as you have been shown before on an IRS receipt all owned by Banies Pickwick LTD in Ireland. What the mother Corporation does is not buy the new company they ask them to allow them to trade stock let them stay in place to run it and then they control it just as if nothing happened. They have done this over and over with many companies and I would suggest this is happening again here. Why don't you ask them to let you the LAX commissioners read the hidden secret trade information in the puc decision for why would you let a confidential fact go if you are giving them 15 million dollars. You see with local companies before the new fortune five hundred big boys hit town we did all this for nothing and you got paid for our loop fees and the public had phones at the baggage area so they could call us free and everyone could happily go out get right on and not have to go to over seas companies because they had no choice because the French company took over all the advertisement on the airport and helped there other French buddies Veolia by taking all the courtesy phones out of the terminals and make the public have less information that discriminated the local companies out of a lot of business, until the public caught on and now know to call by cell phone and do it. The Phone board that is touch screen just as it was in 1997 is not used and should be taken out and the courtesy phones put back in to help those that have ADA, are hard of hearing, are speaking other languages and will work when the electricity is off which the new JCD advertisement ones that are way out side the baggage area do not and the whole thing was to control public info and help their French buddies veolia transportation and Gray Line being the only companies seen by the public. This is unfair competition. The fly away had helpers on the curb for the first few years, they are gone now. This is illegal and also unfair competition and discrimination of marketing. Some how the Karma seems to come back on them for this. While I am thinking of it JC Decaux makes 120 million dollars a year and gives LAX some of this. But why job this out just to rent signs, can't the city do this and save 120 million dollars going over seas. Why can't LAX put up signs for 120 million dollars and not give it to them. This all seems so easy to give money over seas all the time. Why? We all know why down deep. But it will take time and remember Leland Wong? Cities are going bankrupt and the Fly Away is losing millions. Shut it down now. Our smaller 9 passenger buses are the best size and safer as well and take up very little room in the CTA with the emissions of a private car at most. We also use cng. The amount of load of persons unless it is a large charter is less than 9 passengers so why the big buses? It does not make sense. Let Super Shuttle do this and Prime Time and the Scheduled buses that have been doing it for decades. We pay loop fees and without money flying away to france for nothing. To us local companies it is a hugh mistake to do the fly away and since 2006 it has taken 60 million dollars from the local companies in fares and you have given them 60 million with a $35 million loss not including the parking lot in the valley for 33 million so this has lost 120 million dollars not including parking totally from local business and taxes. Commissioner Zifkin called it Alice in wonder land. How much do you need to know? It has been 6 years, in another 6 years 240 mill.

We have families that work hard helping people going to Orange County from all over the world many taking us 8 or 10 times in a row from Australia, New Zealand, Canada, Tahiti, Hawaii, England, they use us all the time over and over, please allow them to do what they want and let us service them. They do not want to ride big buses that are by fact easier to catch sicknesses on because of the amount of persons, are so dangerous there are people killed on the big buses every day. They are the dangerous way to travel the world. google bus wrecks and see why you should never ride one. Ever.

USA TODAY found at least 42 deaths of motor coach occupants and drivers were not reported using NHTSA's standard definition of a motor coach from 1995 to 2009, the most current year for which data are available. Since 2003, 32 fatalities were not included, which represents a 24% increase from the 133 deaths the agency counted.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. The LAX FlyAway program and shared-ride shuttle services such as Super Shuttle and Prime Time provide travelers with a range of transportation options for getting to and from LAWA. Providing a broad range of options makes it more likely that travelers will consider and choose alternative transportation to and from the airport, rather than driving individually in private automobiles, all of which supports the overall goal of reducing traffic, air pollution, and noise impacts. While shared-ride shuttle services might appeal to some travelers, others might be more attracted to an option that allows them to park their vehicles at a secure lot and board a bus that will transport them directly to the airport for a reasonable fee without numerous intermediate stops along the way, and provide the same service on the return trip. In the event the FlyAway program were to be terminated, the elimination of the clean modern 48-passenger FlyAway buses within the CTA would be replaced by numerous individual privately-owned vehicles or several 9-passenger vans for each bus replaced. There is no evidence that elimination of FlyAway buses would result in a net reduction in traffic, air pollution, and noise within the CTA, as suggested by the commentor. In fact, in 2011, the FlyAway network had an average daily ridership of 3,790 passengers, reduced vehicle emissions by almost 24 tons per day, and removed 3,221 vehicle trips per day (i.e., approximately 1,175,700 trips per year), traveling a combined total of 65,505 miles per day on roads approaching LAX.1

1. City of Los Angeles, Los Angeles World Airports, LAX Master Plan Mitigation Monitoring and Reporting Program (MMRP), 2011 Annual Progress Report, October 2012.

SPAS-PC00033 Riordan, Richard J Former Mayor of LA 8/25/2012

SPAS-PC00033-1

Comment:

We've planned long enough. The time for action at LAX is now.

I was honored to serve as Mayor of Los Angeles from 1993 to 2001. I love L.A. and I am proud of what our teamwork accomplished during my two terms in office. One item I was not able to complete was the modernization of Los Angeles International Airport (LAX).

Today, I am pleased to see the positive progress being made on the new Tom Bradley International Terminal, adding new gates for the latest large aircraft as well as other improvements that will enhance the positive experience for visitors to Los Angeles. But this is not enough.

The Los Angeles City Council approved the LAX Master Plan back in 2004. Now, eight years later, the approval process is just getting underway for long delayed and critically needed additional improvements to LAX.

During my administration, I proposed a Master Plan that would take the airport to 2015 and the clock continues to tick on much needed LAX modernization. We still have yet to address moving the north airfield to accommodate today's modern aircraft, properly connecting LAX to our City's mass transit and further enhancing overall airport safety and security. We've planned long enough. The time for action at LAX is now.

As the LAX Specific Plan Amendment Study (SPAS) process winds its way through public hearings and action by our Airport Commission and City Council, I call on our City leaders to make the tough decisions necessary to ensure that LAX becomes a world class airport for the 21st Century.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00034 Rothenberg, Alan LA Area Chamber of Commerce 8/29/2012

SPAS-PC00034-1

Comment:

I'm Alan Rothenberg, President of BOAC from 2005 to 2010 and incoming Chair of the LA Chamber.

Modernizing LAX and separating the north airfield runways is essential for safety, operational efficiency and competitive reasons.

The NASA-Aames study concluded that safety could be enhanced 40-55% by separating the runways. Those academics gratuitously stated that since LAX was already safe, based on the statistical probability of a crash it would not be cost effective to separate the runways.

Absolutely incredible! Today is the 7th anniversary of Katrina. Years before that disaster the Army Corp of Engineers recommended improving the levees. It was rejected because it would take a 100 year flood to overrun the levees so it would not be cost effective .Tragically, the 100 year flood came.

I sure would not want to be a member of BOAC or the Council who rejected a chance to enhance safety at LAX by 40-55% and later have blood on my hands when a subsequent crash takes the lives of 100s, maybe 1000s of people.

By the way, upon receiving the NASA-AAmes report, the FAA was incensed and sent a letter to Mayor Villaraigosa admonishing LAWA to "reconfigure the north airfield...to address...safety risks" and "to improve efficiency".

Response:

The comment is noted, along with the FAA letter referenced in the comment, and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. The SPAS Draft EIR addresses a range of options for improvements to the north airfield, including one, Alternative 5, that meets FAA standards for ADG V and ADG VI aircraft.

SPAS-PC00034-2

Comment:

Regarding cost effectiveness, please understand that LAX is financially self-sufficient. It doesn't take a penny from the taxpayers. It operates entirely on fees paid by airlines, passengers, concessionaires and other non-airline revenues.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the

adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Please see Response to Comment SPAS-PC00096-2 regarding funding sources for SPAS improvements.

SPAS-PC00034-3

Comment:

While the draft EIR studied many options, there is only one that maximizes safety, efficiency and competitiveness: Alternative 5; separating the runways 350 feet.

Doing nothing dooms LAX to be less safe, antiquated, inefficient and uncompetitive for yet another generation. And make no mistake: Alternative 2 being advocated by a handful of people means do nothing. In the face of the unanimous comments that LAX must be modernized, doing nothing is simply unacceptable.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00034-4

Comment:

One last item to clarify: Alternative 5 does not move the boundaries of LAX an inch. No homes or businesses will be taken. Initial assessments by the FAA indicate that the RPZ will not require taking any homes or businesses, with the possible exception of the HVAC UNIT ON TOP OF ONE OFFICE BLD

Response:

As noted in Table 4.9-5 in Section 4.9.6.1 of the SPAS Draft EIR, no acquisition is proposed for Alternatives 5, 6, and 7 since these alternatives focus on airfield and terminal components, although acquisition would be required for the ground access components with which these alternatives would be paired.

As described in Section 4.7.2.6.5 of the SPAS Draft EIR, under Alternative 5 the 350-foot northward shift of Runway 6L/24R would place portions of two multi-story structures and rooftop utilities within Part 77 surfaces and result in additional businesses in Westchester, near Sepulveda being located within the RPZ, as shown in Figure 4.7.2-15. As indicated in Section 4.7.2.6.1, of the SPAS Draft EIR, there are several options that can be considered relative to addressing potential safety hazards associated with incompatible structures and uses being located within controlled airspace areas; however, a determination as to the most suitable and practical option cannot be made until more detailed levels of planning and engineering on the selected alternative, if any, can be conducted in consultation with the FAA. It would be premature and speculative to say at this time whether incompatible structures or land uses within the RPZs would stay, be modified, or be removed. Such information would be developed during project-specific CEQA review should an alternative calling for shifting Runway 6L/24R northward be selected. It is appropriate for a first-tier program level EIR to defer detailed descriptions and impact analysis of individual projects in the program to future project-level CEQA documents. (State CEQA Guidelines Section 15383; Koster v. County of San Joaquin (1996) 47 Cal.App.4th 29, 37.)

Section 4.7.2 of the SPAS Draft EIR includes an analysis of impacts associated with modification or removal of structures and uses within the RPZ, should that occur in the future.

SPAS-PC00034-5

Comment:

Adopt Alternative 5. FIX LAX NOW

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00034-6

Comment:

My name is Alan Rothenberg. From 2005 through 2010 I was President of the Los Angeles World Airways Board of Airport Commissioners. Currently I am First Vice-Chair of and in 2013 will be Chair of the Los Angeles Area Chamber of Commerce.

From 1984, with the opening of the Tom Bradley International Terminal and the construction of the Upper Roadway in the Central Terminal Area in time for the 1984 Los Angeles Olympics there had been no material improvement to LAX. Plans proposed by Mayors from Bradley, to Riordan, to Hahn had been stalled, Finally in December 2004 the City Council adopted a Master Plan ("Alt D"), consisting of several important projects designated as "Green Lit" projects which could be constructed immediately, and designated others as "Yellow Lit" requiring studying alternatives.

Following settlement of a lawsuit that challenged the Master Plan, some $4 Billion of capital improvements have finally been made to LAX, the highlights of which are new reconfigured South Airfield runways, a new Central Utilities Plant (replacing one built in the 1960s) and, of course the magnificent Bradley West Terminal, the first phase of which is nearing completion.

However, the vital "yellow Lit" projects have been delayed until now. Those projects include:

- Phase two of the Bradley West Terminal;

- A midfield concourse to be connected to Bradley West;

- Remodeling and/or replacing the antiquated terminals 1,2 and 3;

- Re-engineering and reinforcing the upper roadway to enhance security ;

- Construction of a CONRAC;

- Creation of an automatic people mover to bring passengers from the CONRAC and from the terminal to be built by the MTA for the extension of the Crenshaw and Green Lines to LAX.

The required review (the Specific Plan Amendments or SPAs) was delayed for several years as a number of studies were made regarding the necessity to separate the runways and build a center taxiway on the North Airfield to enhance safety, all of which concluded that safety would be enhanced by separating the runways, the last of which, the so-called NASA-Aames study, concluded that safety would be improved by 40 to 55%. Following that study and certain inaccurate responses to it, the FAA strongly and unequivocally reiterated in writing what it had been telling LAWA for years, that the North Airfield runways had to be separated and reminding LAWA that the North Airfield did not meet the minimum FAA standards for Group V aircraft (e.g. 747s, 777s, the new Boeing Dreamliner) and Group VI aircraft (A380 and 747-800). A copy of that letter is being submitted along with this testimony.

Response:

The comment is noted, along with the FAA letter referenced in the comment, and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project.

SPAS-PC00034-7

Comment:

While safety and security are primary objectives for LAWA, and separating the North Airfield runways should be done for those reasons alone, it is of crucial importance to do so in order to enable LAX to operate at maximum efficiency and to assure that LAX will remain competitive.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00034-8

Comment:

Currently, because the runways are too close together, whenever a Group VI aircraft is taking off or landing, one of the parallel runways must be shut down. Based on existing and prospective orders for the new large aircraft from Airbus, maker of the A380 and Boeing, maker of the 747-800, unless the North Airfield runways are separated operating efficiencies will be adversely affected. I am submitting herewith an Airbus memo showing their forecasts for A380s at LAX. I have been advised by both Airbus and Boeing that they will be filing written comments supporting the necessity to separate the runways.

Response:

The comment and the attached letter from Airbus are noted and are hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Subsequent to providing this comment, Boeing and Airbus each submitted written comments on the Draft EIR, which are included, along with written responses by LAWA, in the Final EIR as Comment Letters SPAS-PC00092 and SPAS-PC00113, respectively. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00034-9

Comment:

Competitively, it is also urgent for LAX to separate the runways to accommodate the new large aircraft. Their range is such that flights from Asia and Australia, for example, can readily overfly Los Angeles. Other cities in the Western United States such as San Francisco, Seattle, Denver, Phoenix, Las Vegas and Dallas, all of whom have invested billions of dollars in modernizing their airports, can now be reached. Qantas, currently the airline bringing the most international passengers to LAX and a leading purchaser of the A380, is submitting written support for separating the runways. And, in fact, earlier in the process, when it appeared that Los Angeles might not go forward with the necessary runway separation, Qantas moved one daily flight to San Francisco. A study in 2006 by LAEDC concluded that the loss of just one daily international flight cost the region $632 million and 3,120 jobs annually. We simply cannot allow that to happen!

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00034-10

Comment:

The draft EIR studied many separation options, but to me there is only one: separate the runways by 350 feet north. The existing Alt. D is clearly an unworkable and disastrous alternative. Doing nothing means that LAX will be doomed for another generation to be an antiquated, inefficient, uncompetitive airport, that has not enhanced safety and security to the extent it should. Even at 340 feet, LAX will not even meet current FAA standards, although the FAA has indicated its willingness to continue to grant the necessary waiver to accommodate such a separation.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00034-11

Comment:

As stated previously, the decision to separate the runways is the key to unlocking the modernization of LAX:

-Phase two of Bradley West
-The midfield concourse
-Remodeling terminals 1, 2 and 3
-Reconstructing the Upper Roadway
-Building a CONRAC
-Creating an APM from the CONRAC and the Crenshaw/Green Line extensions.

As the recently prepared LAEDC Report concluded, LAX is an economic engine for the entire region, responsible for close to $40 billion to the economy and close to 300, 000 jobs. The projects outlined above are estimated to involve an additional $8.5 billion in hard costs of construction alone and close to another 100,000 jobs over the next 10-15 years.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00034-12

Comment:

The numbers from the LAEDC Report establish that LAX is responsible for more jobs than the aerospace industry, the entertainment industry, the burgeoning technology industry and the region's fashion design ,apparel manufacturing and wholesaling business.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00034-13

Comment:

Travel and Tourism, the largest sector of our economy urgently depends on a modern airport.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00034-14

Comment:

Just as our Port has to be modernized in anticipation of new competition from the almost completed expanded Panama Canal, so, too, does LAX have to be modernized to compete for travelers and cargo from other airports in the western United States. (Sometimes overlooked, LAX is the 2nd leading cargo airport in the U.S., trailing only Memphis, home of FedEx)

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00034-15

Comment:

All of this can be accomplished with no taking of homes and minimal, if any, disruption to the businesses along Sepulveda Blvd..

Response:

As indicated in Table 4.9-5 in Section 4.9.6.1 of the SPAS Draft EIR, no residential acquisition is proposed under any of the SPAS alternatives, including Alternative 5. Please see Responses to Comments SPAS-AL00007-26 and SPAS-PC00130-931 regarding the potential for property acquisition and changes in the RPZ to have an impact on the Westchester Business District, which includes businesses along Sepulveda Boulevard. As noted in Response to Comment SPAS-PC00130-931, no acquisition is proposed within the Westchester Business District. Indirect impacts to businesses along Sepulveda Boulevard due to such factors as project-related traffic or location within the RPZ were analyzed in Sections 4.12.2 and 4.7.2 of the SPAS Draft EIR.

As discussed on page 4-1183 in Section 4.12.2 of the SPAS Draft EIR, because the focus of Alternative 5 is on airfield and terminal improvements, this alternative, in itself, would not result in off-airport transportation impacts that could result in business disruption along Sepulveda Boulevard. As depicted

in Figure 4.7.2-15 of the SPAS Draft EIR, some businesses along Sepulveda Boulevard would be located within the RPZ under Alternative 5. As described in Response to Comment SPAS-AL00007-26, it is unknown whether acquisition would be necessary for addressing the presence of incompatible structures or uses within RPZ areas under any alternative. Please also see Response to Comment SPAS-PC00034-4 regarding impacts to businesses associated with Alternative 5.

SPAS-PC00034-16

Comment:

The CONRAC, MTA line extensions and the people mover will mean fewer cars on the surface streets.

Response:

The comment is correct and reflects the intent of those proposed ground transportation system improvements. Consolidation of the existing rental car operations dispersed around the airport into a single location will support the utilization of a single consolidated rental car shuttle system, thereby reducing the number of individual company shuttles currently traveling on local streets. The approved Metro Crenshaw/LAX Transit Line and Station will promote the use of transit to and from the airport, thereby reducing individual car trips. The proposed elevated/dedicated bus system (Alternatives 1, 2, and 8) and APM systems (Alternatives 3 and 9), which include a stop at the Metro facility noted above, will also help reduce vehicle trips on surface streets at and near the airport.

SPAS-PC00034-17

Comment:

The new large aircraft are quieter, less polluting and more fuel efficient than the older generation of planes they will replace, so there will be no degradation of the environment.

Response:

Newer generation large aircraft, such as the Airbus A380 and Boeing 747-8 and 787, are relatively cleaner, quieter, and more fuel efficient than older generations of large aircraft such as the 747-400. (See pages 4-796 and 4-1330 of the SPAS Draft EIR.) The assumptions used for the SPAS Draft EIR analysis of aircraft-related impacts, such as air quality and noise, take into consideration the growing number of such newer large aircraft in the fleet mix anticipated for future years (i.e., 2025).

SPAS-PC00034-18

Comment:

Over the past decade LAWA has spent in excess of $1 billion in soundproofing or acquiring homes disaffected by LAX operations. To the very limited extent, if any, that it is necessary LAWA will continue to do so, although I emphasize that it is not foreseen to be necessary.

Response:

As noted by the commentor, LAWA has spent in excess of $1 billion for soundproofing or acquiring homes. A review of LAWA records indicates that total expenditures to date include approximately $373 million for residential acquisition; $154 million for soundproofing (City of Los Angeles); $186 million for the Sound Insulation Grant (SIG) Program; $286 million in FAA funding for these programs at LAX; and $45 million in LAWA spending for a total of approximately $1.04 billion to soundproof or acquire homes.

Please see Response to Comment SPAS-PC00034-4 regarding acquisition of properties.

Regarding soundproofing, as shown in Tables 4.9-18 and 4.9-19, in Section 4.9.6.5 of the SPAS Draft EIR, under Alternative 5, some residential uses and non-residential noise-sensitive facilities would be newly exposed to 65 CNEL or higher noise levels or experience a noise increase of 1.5 CNEL or higher within 65 CNEL or higher noise contour in 2025 compared to 2009 baseline conditions. These properties would be eligible for sound insulation under LAX Master Plan Mitigation Measure MM-LU-1.

SPAS-PC00034-19

Comment:

Once the modernization has been completed, Los Angeles will be proud of its gateway to the world.

As the Coalition of the business community and labor has stated: "Enough is Enough" we must Fix LAX Now.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00034-20

Comment:

I enthusiastically support the efforts to continue the overall modernization of Los Angeles International Airport (LAX). For the millions of visitors who come to Los Angeles each year, our airport offers the first, and often lasting, impression of our city. As a world-class city, we should offer our visitors a world-class unforgettable experience.

This was our goal in 1984 when Mayor Tom Bradley led a successful modernization effort at LAX. The Summer Olympic Games of 1984 showcased Los Angeles to the rest of the world, and we worked hard to leave a positive and lasting impression for the thousands of athletes, journalists and fans who attended. At LAX, this meant the construction of a new, state-of-the art international terminal, renovation of the existing terminals, and a new mode of transportation within the airport through the construction of an upper roadway. Simply put, the Olympic Games provided us a tremendous and rare opportunity to restore LAX as a showpiece within the aviation industry.

Nearly thirty years later, Los Angeles is once again embarked on a massive renovation of our landmark airport and I salute Mayor Villaraigosa, the Airport Commission and its staff for embarking on a multi-billion dollar program. While the projects underway, especially the rebuilding of the Tom Bradley International Terminal, are greatly important to restoring the passenger experience, I know it is only the beginning in your efforts to fully modernize LAX. The projects you are currently considering will play an even more important role in securing LAX's role as the nation's leader in aviation. We need a renovated airfield that adequately accommodates the aircraft fleet currently being built. We need direct and easy public transportation to connect LAX to the rest of the community. We need passenger-friendly, first-class terminals to greet passengers and provide them with a positive first glimpse of Los Angeles.

It is our sincere hope to return the Olympic Games to Los Angeles for a third time. Preliminary plans are already underway for such an endeavor. In the consideration of a Host City's bid, decision-makers will look at a city's airport and infrastructure as one of the determining factors for consideration. I encourage and urge you to continue your efforts to fully modernize LAX now - keeping the Olympics hope alive.

Once again, we are provided with a tremendous opportunity, as what happened a generation ago when LAX accommodated those who came to experience the 1984 Summer Olympics. Like then, it will take the courage and perseverance of our elected officials and the Airport Commission to make this dream a reality. Time after time, we've seen this is a city of courageous people. Now is that time once again.

Response:

It is noted that this comment letter includes as an attachment a copy of the comment letter on the SPAS Draft EIR submitted by Peter Ueberroth (SPAS-PC00055). The comments in the attachment are noted and are hereby part of the Final EIR, and will be forwarded to the decision-makers for their

consideration prior to taking any action on the SPAS project. No further response is required because the comments do not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00035 Paxton, Lynne None Provided 8/29/2012

SPAS-PC00035-1

Comment:

I AM AGAINST MOVING ANY RUNWAY TO THE NORTH AT ALL.

MOVING ANY RUNWAY TO THE NORTH WILL RESULT IN EXCESSIVE NOISE SPIKES AFFECTING RESIDENTS LIVING TO THE NORTH, AS I DO.

THE DECIBLE LEVEL STUDIES PRESENTED ARE HOMOGENIZED BY AVERAGING-OUT DATA OVER 24 HR. DAYS AND A 365 DAY YEAR.

ACTUAL NOISE SPIKES WOULD GREATLY INCREASE THE DECIBLE LEVEL TO WHICH RESIDENTS WOULD BE SUBJECTED BY AN UNCOMPUTED, UNPRESENTED AMOUNT.

RECENT TAKE-OFFS ON THE NORTHERN-MOST RUNWAY (350 FT NORTH OF THE "NORMAL" TAKE-OFF RUNWAY) GAVE US RESIDENTS A TASTE OF WHAT IT WOULD BE LIKE MOVING A RUNWAY 350, 200 OR 100 FT NORTH.

I AM ADAMATLY OPPOSED TO ANY SOLUTION INVOLVING MOVING ANY RUNWAY TO THE NORTH.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Section 4.10.1, Aircraft Noise, of the Draft EIR addresses the aircraft noise impacts associated with each of airfield improvements alternatives (i.e., Alternatives 1 through 7), including those alternatives that propose moving Runway 6L/24R northward (i.e., Alternatives 1, 5, and 6). Section 4.9, Land Use and Planning, also discusses aircraft noise impacts, based on the technical analysis completed for Section 4.10.1. Changes in aircraft noise levels for each alternative, compared to 2009 baseline conditions, are delineated in the noise contour figures presented in those sections and are described in the associated text.

The community noise impact assessment completed for the Draft EIR is based upon the CNEL metric, which takes into account individual noise events (i.e., sound energy) throughout the 24-hour day, as representative of average conditions throughout the course of the year. More importantly, CNEL applies penalties for noise events occurring in the evening and nighttime hours, to account for noise during those periods being more intrusive. CNEL is widely recognized and used for community noise impact evaluations as described in Section 4.10.1.1.2. The aircraft noise impact analysis also provided analysis associated with nighttime awakenings, based in part upon the SEL noise metric, which accounts for "maximum sound level and the duration of the sound." (See SPAS Draft EIR Sections 4.10.1.1.2 and 4.10.1.2.3).

Regarding the commentor's reference to recent aircraft departures (take-offs) on Runway 6L/24R, which is normally used only for aircraft arrivals (landings), such activity occurred periodically in late August 2012, while repairs to Runway 6R/24L were underway. The runway noise levels during that period would not be representative of noise levels associated with operations on Runway 6L/24R if relocated northward by 100 feet, 260 feet, or 350 feet because the subject runway relocations would not change the normal (preferential) usage of Runway 6L/24R for arrivals.

SPAS-PC00036 Kapp, Martin None Provided 8/29/2012

SPAS-PC00036-1

Comment:

I MUCH PREFER CENTER TAXIWAY IDEA. I AM A LICENSED PILOT!

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00037 Purdy, Richard None Provided 8/29/2012

SPAS-PC00037-1

Comment:

NOT LIVING IN AN AREA DIRECTLY IMPACTED BY ANY OF THE ALTERNATIVES MY INCLINATIONS TREND TOWARD THE ALTERNATIVES THAT WOULD MOST IMPROVE AIRPORT OPERATION AND EFFICIENCY

I WOULD VERY MUCH LIKE TO SEE A PEOPLE MOVER THAT WOULD CONNECT WITH THE METRO LINES WITH THE AIRPORT THAT WOULD ALLOW AIRPORT TRIPS TO ORIGINATE LONG DISTANCES FROM THE AIRPORT.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00038 Vaughn, Vicki None Provided 8/29/2012

SPAS-PC00038-1

Comment:

Please, please please do NOT move any runway further north.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00038-2

Comment:

As it is now

(1) 757's & 737's reverse thrusters are deafening already. Adding better placed crossways makes a lot of sense as it allows planes to decelerate without waking the dead

Response:

The comment is noted. It appears that the commentor is referring to the use of high-speed runway exits (taxiways) for the arrival aircraft when referencing "crossways." As noted on page 4-930 in Section 4.10.1.7 of the SPAS Draft EIR, Alternatives 1, 2, 3, 5, 6, and 7 include improving the locations of high-speed exit taxiways from the outboard runway. The improvements of the high-speed exit taxiways from the runway would allow the aircraft to exit the runway with reduced reverse thrust that directs aircraft away from noise-sensitive uses.

Relatedly, there is a typographical error in the seventh sentence of the first paragraph under the heading "Airport Facilities" on page 4-930 of the SPAS Draft EIR (i.e., "exists" should be "exits"). As such the subject sentence has been revised. Please see Chapter 5, Corrections and Additions Related to the SPAS Draft EIR.

SPAS-PC00038-3

Comment:

(2) 747 long hauls taking off currently vibrate my whole house. If you move the runways further north I'll NEVER be able to enjoy my house again.

Response:

The impacts associated with aircraft noise from each SPAS alternative are presented in Sections 4.9.6 and 4.10.1.6 of the SPAS Draft EIR. Regarding vibration impacts associated with aircraft operations, consistent with the findings of the studies discussed below, the vibrations created by low-frequency noise from aircraft operations at LAX are not of significant magnitude to cause physical structural damage in standard residential construction.

Aircraft-generated vibrations are typically caused by low frequency noise energy produced by both engine and airframe sources. As described Topical Response TR-N-8 of the LAX Master Plan Final EIR, low frequency noise and its energy impacts were studied thoroughly in the mid-1970s with the inception of supersonic transport (SST) Concorde operations (LAX Master Plan Final EIR-Part II page 2-118). This aircraft was the loudest certified aircraft by International Civil Aviation Organization (ICAO) standards operating in the United States at that time, but is no longer in service. While the noise levels associated with that aircraft are much greater than that associated with today's typical commercial airline fleet mix, the effects of low frequency energy and vibration on the integrity of residential structures were found to be negligible from operation of the SST Concorde. Analyses conducted of five historic sites near the proposed subsonic flight path of the Concorde aircraft revealed breakage probabilities from noise-induced vibration for windows, brick chimneys, a stone bridge, and a plaster ceiling to be less than .001 percent per year.1 It was found that exposure to normal weather (such as thunder or wind loads) produces a higher probability of breakage than vibrations from the Concorde.

At Sully Plantation, Virginia, the test location nearest the Concorde flight path and therefore most likely to sustain vibration damage, calculations were based on a sound level of 104 dBA for each overflight, or an effective pressure of 0.313 pounds per square foot (psf). Estimates of the probability of breakage from one Concorde overflight are about one in every million years. The Concorde's contribution to the cumulative damage of a house in the neighborhood of Kennedy Airport was found to be insignificant. Everyday vibrations from wind and household activities were greater than those caused by aircraft in the worst conditions around normal airports.2

As presented in Table 2 of Appendix J1-2 of the SPAS Draft EIR, peak noise level computations for each of the SPAS alternatives indicate that equivalent or greater levels are achieved at five off-airport locations for 2009 baseline conditions, only one of which had residential uses (within the Belford area where homes are in the process of being acquired due to high noise levels). However, by 2025 none of the off-airport grid locations assessed around the airport would be exposed to noise at or above 104 dBA. Based upon the evaluations at Sully Plantation described above, the likelihood of breakage caused by aircraft at LAX is less than the one chance in every million years.

In April 2002, the Federal Interagency Committee on Aircraft Noise (FICAN) released a report "FICAN on the Findings of the Minneapolis-St. Paul International Airport (MSP) Low-Frequency Noise (LFN) Expert Panel," whereby, the Committee agreed with the findings of the MSP LFN Expert Panel Consensus that:

FICAN concurs with the findings that low-frequency noise from civil aircraft will not pose a public health risk, risk of structural damage, or an increase in indoor speech interference. These findings are consistent with the extensive Federal research on the civil SST, which would produce much higher levels of low-frequency noise than the subsonic aircraft operating at MSP. The issue of low-frequency noise and its impact on structures and people was explored in detail as part of the environmental assessment of the introduction of Concorde supersonic transport operations into the United States. Potential impacts were found to be negligible. Field studies found that the noise-induced vibrations as a result of Concorde overflights cause little or no structural damage. In addition, the Concorde sound pressure levels at low frequencies were found to be well below the EPA threshold for potential health impact.

In terms of other vibration effects like rattling and shaking, the long sound waves from low frequency (propeller, engine exhaust etc.) noise cause the associated vibrations and rumbling symptoms that are typically experienced by residents living near airports. As discussed above, these vibrations are not stressful to residential structures and create less of a risk of damage than typical household activities and wind gusts. As discussed above, there is no evidence to suggest that there are any secondary potential health impacts associated with vibration or that noise levels would significantly impact the enjoyment of the property beyond those impacts already disclosed in the aircraft noise analysis.

1. Hershey, Robert L., Russ J. Kevala, and Sharon L. Burns, Analysis of the Effect of Concorde Aircraft Noise on Historic Structures, Rep. No. FAA-RD-75-118, July 1975.
2. Federal Aviation Administration, Aviation Noise Effects, March 1985.

SPAS-PC00038-4

Comment:

If you do opt to move the runway, is it possible to be bought out? The loss of property value will eat ALL of my equity, if I'm even able to sell it.

Response:

There are no significant environmental impacts associated with any of the SPAS alternatives that warrant such an action by LAWA. Based on the street address indicated on the written comment, the commentor's residence is located northeast of the intersection of Lincoln Boulevard and Manchester Avenue, approximately 0.7 mile north of the nearest runway at LAX. The subject location is well outside of the 65 CNEL noise contour for 2009 baseline conditions and for 2025 conditions under all of the SPAS alternatives, based on the aircraft noise contours presented in Section 4.10.1 of the SPAS Draft EIR. No significant impacts related to noise or other environmental issues are identified in the SPAS Draft EIR relative to that area. Please also see Response to Comment SPAS-PC00005-3 for discussion of acquisition at other locations.

Regarding concerns about property values, it should be noted that, per Section 15131(a) of the State CEQA Guidelines, "economic or social effects of a project shall not be treated as significant effects on the environment." Although considerations other than environmental impacts have a role in the action

taken by the decision-makers, the purpose of an EIR is to focus on significant environmental effects associated with a proposed project.

SPAS-PC00039 Aniolek, Gregg None Provided 8/29/2012

SPAS-PC00039-1

Comment:

- Try to copy SFO design as much as possible. VERY good

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00039-2

Comment:

- Moving North Runway further up will be too much hassle (Community Redevelopment, legal issues, noise, problems, etc).

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project.

A discussion of property acquisition that could occur under the SPAS alternatives is provided in Sections 2.3.1.11 and 4.9.6 of the SPAS Draft EIR. Specifically, the property acquisition that would be required under Alternatives 1, 2, 3, 4, 8, and 9 is shown in Figures 2-11, 2-12, 2-13, and 2-14 and listed in Table 2-4 and Table 2-5 in Section 2.3.1.11 of the SPAS Draft EIR. As indicated in these figures and tables, no residential acquisition or acquisition within the Westchester Business District is proposed.

Please see Response to Comment SPAS-PC00130-931 regarding the potential for changes in the RPZ to have an impact on the Westchester Business District and homes.

The SPAS Draft EIR addresses impacts associated with aircraft noise and with construction traffic and equipment noise in Sections 4.10.1 and 4.10.3, respectively. The impacts associated with each of these categories of noise are summarized below.

As indicated in Section 4.10.1 of the SPAS Draft EIR, Alternatives 1 through 7 would result in some residential uses and non-residential noise-sensitive facilities being newly exposed to noise levels of 65 CNEL or higher or increases of 1.5 CNEL or higher within the 65 CNEL or higher noise contours. With implementation of LAX Master Plan mitigation measures, these impacts would be less than significant. However, interim impacts prior to the completion of mitigation, impacts on residential uses with outdoor habitable areas, and impacts on parks would remain significant and unavoidable. Alternatives 8 and 9 focus on ground access improvements that, in themselves, would not result in aircraft noise exposure but would be coupled with the airfield improvements proposed under Alternatives 1, 2, 5, 6, or 7, the impacts of which are summarized above. None of the alternatives would result in a significant impact relative to sleep awakenings. Under Alternatives 1 through 7, significant impacts would occur with an additional school being newly exposed to the 55 dBA Lmax. Each alternative would also result in significant impacts due to sustained interruption of classroom teaching at newly exposed schools through interior noise levels in excess of 35 dBA Leq(h). Implementation of LAX Master Plan mitigation measures would ultimately reduce impacts to these schools to a level that is less than significant.

However, interim impacts prior to completion of mitigation measures would remain significant and unavoidable.

Regarding construction traffic and equipment noise, as indicated in Section 4.10.3 of the SPAS Draft EIR, due to the periodic nature and limited incremental increase on area roadways, none of the alternatives would result in significant impacts related to construction traffic noise. However, all of the alternatives would result in significant impacts from construction equipment noise with the potential to effect sensitive receptors such as residential and school uses. The sources of those impacts differ by alternative, but can be generally characterized as temporary impacts associated with airfield improvements, ground access system improvements, and construction staging areas. While LAX Master Plan commitments and mitigation measures would reduce construction equipment noise impacts associated with all of the SPAS alternatives, it cannot be definitively concluded that all construction equipment noise impacts would be reduced to levels that are less than significant and these impacts are considered to be significant and unavoidable.

SPAS-PC00040 Bostide, Odysseus None Provided 8/29/2012

SPAS-PC00040-1

Comment:

I am concerned that expanding the runways before modernizing the existing infrastructure might result in a bad investment for the airport & the community at-large: mainly b/c the funding would not be there after expansion to modernize. The result would be an airport that doesn't function efficiently. Modernizing first makes sense b/c the investment would pay off in efficiency for certain.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Response to Comment SPAS-PC00130-40 regarding availability of funding for the SPAS improvements, Response to Comment SPAS-PC00130-41 regarding phasing, and Response to Comment SPAS-PC00130-725 regarding the economic benefits of terminal improvements versus runway improvements.

SPAS-PC00041 Topal, Jack None Provided 8/29/2012

SPAS-PC00041-1

Comment:

Alter 2
SP: 9
Fix the traffic
do not change runway pattern

Response:

The commentor's support for Alternatives 2 and 9 is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Chapter 2 of this Final EIR regarding the LAWA Staff-Recommended Alternative, which couples the airfield and terminal improvements associated with Alternative 1 with the ground access components associated with Alternative 9, including a discussion of the rationale behind the selection of these alternatives over the other alternatives evaluated in the SPAS Draft EIR.

SPAS-PC00042 Mitchell, Michael S Mickey's Space Ship Shuttle 8/29/2012

SPAS-PC00042-1

Comment:

1.2 98th Street Intermodal Transportation Facility
The proposed 98th Street ITF would be a multi-level facility located between 96th Street and 98th Street, west of Airport Boulevard. At approximately 14 acres (single level), the ITF would provide a variety of transportation activities, including a yet-to-be determined number of public parking spaces. Airport users Los Angeles International Airport 1 LAX Specific Plan Amendment Study Report July 2012 Appendix E2-2 - SPAS Alternatives Ground Transportation System Elements could use the ITF for remote passenger pick up and drop off. In addition, arriving passengers would travel to the ITF to board a door-to-door shuttle or scheduled bus such as the LAX FlyAway. Departing passengers using door-to-door shuttles or scheduled buses would continue to be dropped off directly at their terminal.

The ITF would likely include three levels of structured parking with a total of approximately 4,900 spaces. There would also be a plaza area for the busway/Automated People Mover (APM) station, waiting areas for passengers using the FlyAways and shared ride vans, and commercial support spaces to offer waiting passengers and their friends and family desired amenities such as food and beverages or other conveniences to encourage use of this facility. These functions may be on a separate level from the public parking.

The specific access/egress points have yet to be determined, but there would likely be driveways on 96th Street, 98th Street, and Airport Boulevard. Separate driveways for private vehicles and commercial vehicles would likely be provided. For safety or queuing considerations, some of the driveways might be limited to right-turn in/right-turn out.

NOTE:
If you have to build this structure above Please allow the long distance scheduled bus services - the Ventura Airporter, Bakersfield airport bus, Disneyland Express, Antelope Valley Shuttle, Santa Maria Shuttle, Shuttle 2000, Shuttle One, and Mickey's Space Ship Shuttle that are not fly away and super shuttle, prime time to stay in the CTA. We need two circuits for our long distance 35 mile first drop off services. Separate the Street Intermodal Transportation Facility local transportation from the long distance transportation by putting the long distance transportation in the CTA. This allows for our long distance passengers not to have as much time to load with baggage and we are at a 45 second rule at the curb just as the courtesy service buses for hotels and parking buses are. We pay loop fees as we have always and we are not bank rolled by the city. We do this free and pay loop fees.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00042-2

Comment:

- Problems -

- The central terminal area design does not meet current airport security needs associated with vehicular access to airport facilities. Put the personal passenger car down the center roads only.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. This comment presents personal opinions about security that are unsupported by facts, and therefore does not constitute substantial evidence under CEQA. Security is not an environmental impact and is, therefore, not required to be discussed in the SPAS Draft EIR under CEQA or any other law. However, a security assessment of the SPAS alternatives is included in Appendix I of the Preliminary LAX SPAS Report to comply with the Stipulated Settlement and Section 7.G(2) of the LAX Specific Plan. The Security Assessment concluded that "the various SPAS alternatives…do not themselves create greater or lesser vulnerabilities to hostile actions than do existing conditions" (page ES-5).

No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00042-3

Comment:

- The curb-front and access road system used for drop-off and pick-up of passengers in the terminal area was not built for today's level of traffic.

Not true, the passenger car can be re-routed down the center of the airport that is not used and only have access to parking lots. Leave the Commercial companies on the outside road ways. The one mile circle is the best you can get for area and service. To make this area smaller off airport will congest the area terribly.

Response:

The comment seems to be suggesting that passenger car traffic be routed down Center Way, which bisects the CTA on an east-west axis, and that commercial vehicles, such as shuttles, buses, and taxis, utilize World Way, which extends around the interior perimeter of the CTA. Such an assignment of vehicle types to roadways within the CTA is not feasible for several reasons. First, Center Way, including Center Way North and Center Way South, is a one-way street allowing only eastbound traffic movements. It is not wide enough nor is it designed for two-way traffic. As such, in-bound (i.e., westbound) passenger traffic would still have to utilize World Way North coming into the CTA. Much of the daily passenger traffic is associated with dropping off or picking up passengers at the curbsides of the terminals, which are accessible only from World Way. Additionally, entrances to the public parking structures within the CTA are located along World Way and are not accessible from Center Way. Based on the above, implementation of the suggested change in roadway assignments is not considered to be feasible.

SPAS-PC00042-4

Comment:

best solution:
- Access remains the same as it is today.
- If it is not broke do not fix it.

Please consider that you are completely making a mistake to put a one mile circle of traffic that now holds it's own even on Christmas and holidays and put this out side in a one block square area.

Response:

The commentor appears to refer to transit within the Central Terminal Area (CTA), and recommends that no changes be made in the CTA. Section 2.2 of the SPAS Draft EIR describes the problems associated with access within the CTA, providing the basis for the project objective to improve the ground access system at LAX. Section 4.12 of the SPAS Draft EIR describes and evaluates changes in the CTA associated with each of the nine alternatives. The SPAS Draft EIR evaluates a reasonable

range of alternatives, however, it is not necessary to prepare alternatives for individual project components as the commentor suggests. It should be noted that the deteriorating level of service within the CTA was addressed in Section 4.3.1 of the LAX Master Plan EIS/EIR. The LAX Master Plan (i.e., Alternative D), received final approval in May 2005, seven years ago.

SPAS-PC00042-5

Comment:

This is crazy plus the airplanes land right over it and the noise is so bad you will get law suites from ear damage.

Response:

An overview of the effects of noise on humans, including hearing loss, communication interference, sleep disturbance, physiological responses, and annoyance, is provided in Section 4.10.1.1.3 of the SPAS Draft EIR. As stated therein, hearing loss is generally not a concern in community noise problems, even very near a major airport or a major freeway. Environmental noise does not have an effect on hearing threshold levels particularly due to the fact that environmental noise does not approximate occupational noise exposures in heavy industry, very noisy work environments with long-term exposure, or certain very loud recreational activities such as target shooting, motorcycle or automobile racing, etc. The Occupational Safety and Health Administration (OSHA) identifies a noise exposure limit of 90 dBA for 8 hours per day to protect from hearing loss (higher limits are allowed for shorter duration exposures). Noise levels in neighborhoods, even in very noisy neighborhoods, are not sufficiently loud to cause hearing loss. While the results of the analysis provided in Section 4.10.1.6 of the SPAS Draft EIR indicate that aircraft noise impacts for all of the SPAS alternatives would be significant, such impacts would not reach the level that would result in hearing damage.

SPAS-PC00042-6

Comment:

It is right in the flight path and where an airplane if it is running out of gas will crash.

Response:

The site of the proposed ITF is over 800 feet south of the flight path of the nearest runway - Runway 6R/24L. Runway 6R/24L is used primarily for departures, while Runway 6L/24R is used mostly for arrivals. The proposed ITF is over 1,500 feet south of the approach path of Runway 6L/24R. Notwithstanding the above, any aircraft encountering an emergency situation would be subject to special flight procedures determined by the air traffic control tower, with the objective to protect the safety of those in the aircraft as well as those on the ground.

SPAS-PC00042-7

Comment:

The cost to bus or train people out to this area should be given to the workers not the construction if you want to invest into a great airport. Please do not let the political influence of the construction companies and lobbyist of the planning people to allow this to happen. It is just as bad a design as the expansion of the fly away that is losing 40 million dollars and taking 60 million dollars from the local companies that do this for free. You do not need the fly away it was taken care of for 32 years before you tried to pay someone to compete with the local companies. Why pay someone to compete with the local area businesses and those you pay are from over seas. THis is the 99% problem, giving only advantage to the big over seas businesses and not local. THis is terrible. Please consider what you are intentionally doing to local business in scheduled services. Keep the cta the same it works great. If you want to lighten the traffic bus personal traffic to lot c and let passenger cars pick up. But do not stop that which works better than any other in the world now.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00042-8

Comment:

Concerning:
1.2 Intermodal Transportation Facility.
Please change E2-2 spas page 4 to do away with the Intermodal Transportation Facility. If you have to do this which is a sin. Let us local scheduled service companies stay in the CTA let super shuttle, prime time, and fly away go out there. Let us stay the way it is now with the Santa Barbara Airbus. Antelope Valley, Santa Maria Bus, Oxnard Airporter, Shuttle One, Shuttle 2000, Airport Bus of Bakersfield, Disneyland Express, and Mickey's Space Ship Shuttle.

Response:

The SPAS Draft EIR provides a full range of alternatives, including Alternatives 3 and 4, which do not include an ITF. The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00043 Whiffen, Janice None Provided 7/30/2012

SPAS-PC00043-1

Comment:

We have owned a townhouse in lower Playa del Rey for the last 10 years.

Having worked at home for 8 of those years, I can tell you that even with double pane windows the noise is somewhat audible, but if the window was opened a crack, I could not have a phone conversation even with a noise cancellation headset.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Section 4.10.1 of the SPAS Draft EIR for discussion of impacts associated with aircraft noise. Please also see Response to Comment SPAS-PC00008-1 regarding current measures underway to address aircraft noise.

SPAS-PC00043-2

Comment:

We used to live on Convoy Street on the Marina Peninsula between Speedway and Pacific and never experienced the kind of air pollution we are now experiencing being that much closer to the airport. Now in Playa del Rey, every weekend we must first wash down our 3 balconies and patio before we can sit on the furniture, not to mention having to power wash the stucco on the outside of the building.

Response:

Deposition of particles and soot is a common occurrence in urban and suburban areas. Though often thought to be associated with airports and aircraft, various studies of deposition have not found any such link. Several of these studies are listed below with a summary of each study's findings.

- Boston-Logan - The first of these studies took place in and near Logan International Airport and involved the collection of atmospheric fallout at multiple sites located both on the airport and in nearby communities.1 Chemical analyses of the samples were also conducted in an attempt to identify the source(s) of the material. The findings suggest that deposition in the vicinity of Logan International Airport results from the combined effects of many urban-related sources (including motor vehicles, marine aerosols, and wind-blown dust) and that the contribution from the airport is indistinguishable from background levels.
- Charlotte-Douglas International - Another study was conducted around Douglas International Airport in Charlotte, North Carolina.2 Deposition particles were collected at both ends of the primary (north-south) runway, and at three locations in the community - north, south, and east of the airport. An advanced chemical fingerprinting (ACF) analysis was performed on the collected samples. The samples were compared to Jet A fuel samples, engine exhaust wipe samples, and a 'typical' urban dust sample from the National Institute of Science and Technology (NIST). The analysis focused on the comparison of saturated hydrocarbons, overall distribution of polycyclic aromatic hydrocarbons (PAH), ratios of selected homologues in the PAHs, and the presence of trace biomarkers called triterpanes and steranes. The results indicated that community samples and runway samples of saturated hydrocarbons, PAHs, and trace biomarkers were all similar to the NIST urban dust sample, and noticeably different than the jet fuel and engine wipe samples indicating that jet fuel and jet engine exhaust from the airport did not contribute significantly to the soot deposition samples analyzed.
- Chicago-O'Hare - A similar study was conducted in the vicinity of O'Hare International Airport involving the collection of soot/particulate matter and "chemical fingerprinting" of the material.3 The results indicate that the samples bore little resemblance to either unburned jet fuel or soot from jet exhaust and concluded that the fallout is most likely from regional pollution (i.e., not attributable to distinct sources).
- LAX (SCAQMD) - Air monitoring studies were also performed in the vicinity of LAX by the South Coast Air Quality Management District.4 For these studies, samples of atmospheric fallout were collected adjacent to the airport and at numerous residences located in the communities of El Segundo, Inglewood, Lennox, and Hawthorne. While soot particles were present in all the samples and generally in greater abundance than at other locations in the South Coast Air Basin, the studies concluded that there was "no discernable pattern of fallout material under LAX's flight path which would indicate a predominate influence from aircraft."
- LAX (LAWA) - A study commissioned by LAWA in 1998 that collected and evaluated atmospheric deposition samples at six sites surrounding LAX arrived at similar conclusions as the SCAQMD study listed above.5

In addition, researchers studying the deposition of particulate matter and trace metals to Santa Monica Bay and the bay watershed determined that the bulk of material being deposited was in particle size categories greater than 10 micrometers in diameter, meaning greater than PM10.6 Particles of this size are not emitted by aircraft, nor do the aircraft emitted particles ever coagulate/aggregate into particles larger than approximately 0.05 micrometers in diameter.7 Particles of this size do not settle out by gravity (referred to as sedimentation), but are carried downwind for large distances before being removed through rainout/washout or dry deposition.8

From all of these studies, it is reasonable to assume that atmospheric deposition of soot, dust and other forms of particulate matter occurs in measurable quantities in the vicinities of these large metropolitan airports. However, because air pollution in urban areas is generated by many different sources (both natural and man-made) and because many of the constituents are petroleum-based (e.g., burned and unburned fossil fuels), it is difficult to isolate and attribute the full impact of airports and aircraft on atmospheric deposition in urban areas. To date, the research results indicate that aircraft do not contribute substantially to deposition.

1. Massport, 1996, Logan Airport Soot Deposition Study, prepared by KM Chng.; Massport 1997, Soot Deposition Study: Logan Airport & Surrounding Communities, prepared by TRC Environmental.
2. City of Charlotte, 1998, Charlotte/Douglas International Airport - Soot Deposition Study, prepared by KM Chng.

3. City of Chicago, 1999, Findings Regarding Source Contribution to Soot Deposition, O'Hare International Airport and Surrounding Communities, prepared by KM Chng.
4. SCAQMD, 2000a,b, Air Monitoring Study in the Area of Los Angeles International Airport & Inglewood Particulate Fallout Study Under and Near the Flight Path to Los Angeles International Airport.
5. LAX Master Plan Final EIR, April 2004, Technical Report 4, Attachment Y, prepared by Camp Dresser & McKee, Planning Consultants Research, and AeroVironment Environmental Services.
6. Stolzenbach, et al., 2001, Measuring and Modeling of Atmospheric Deposition on Santa Monica Bay and the Santa Monica Bay Watershed, prepared by UCLA and the Southern California Coastal Water Research Project.
7. Kinsey, 2009, Characterization of Emissions from Commercial Aircraft Engines during the Aircraft Particle Emissions eXperiment (APEX) 1 to 3, USEPA; and Whitefield, et al., 2008, Summarizing and Interpreting Aircraft Gaseous and Particulate Emissions Data, Transportation Research Board.
8. Friedlander, 2000, Smoke, Dust, and Haze - Fundamentals of Aerosol Dynamics, Second Edition, Oxford University Press, New York.

SPAS-PC00043-3

Comment:

We moved to PDR knowing we were close to the airport, however, we may no longer be able to live here if the airport moves the north runway EVEN CLOSER to our home, increasing the airport noise we experience, the additional pollution we will have to breathe, and the transportation impacts.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project.

The SPAS Draft EIR addresses impacts associated with aircraft noise, road traffic noise, and construction traffic and equipment noise in Sections 4.10.1, 4.10.2, and 4.10.3, respectively. The impacts associated with each of these categories of noise are summarized below.

As indicated in Section 4.10.1 of the SPAS Draft EIR, Alternatives 1 through 7 would result in some residential uses and non-residential noise-sensitive facilities being newly exposed to noise levels of 65 CNEL or higher or increases of 1.5 CNEL or higher within the 65 CNEL or higher noise contours. With implementation of LAX Master Plan mitigation measures, these impacts would be less than significant. However, interim impacts prior to the completion of mitigation, impacts on residential uses with outdoor habitable areas, and impacts on parks would remain significant and unavoidable. Alternatives 8 and 9 focus on ground access improvements that, in themselves, would not result in aircraft noise exposure but would be coupled with the airfield improvements proposed under Alternatives 1, 2, 5, 6, or 7, the impacts of which are summarized above. None of the alternatives would result in a significant impact relative to sleep awakenings.

Concerning road traffic noise, as indicated in Section 4.10.2 of the SPAS Draft EIR, impacts related to ground access improvements proposed under Alternatives 1, 2, 3, 4, 8, and 9 would be less than significant as the incremental changes in road traffic noise levels under each of these alternatives would be less than a 3 dBA increase in CNEL. Alternatives 5, 6, and 7 do not include ground access improvements and would therefore not affect road traffic noise levels at off-site noise-sensitive uses.

Regarding construction traffic and equipment noise, as indicated in Section 4.10.3 of the SPAS Draft EIR, due to the periodic nature and limited incremental increase on area roadways, none of the alternatives would result in significant impacts related to construction traffic noise. However, all of the alternatives would result in significant impacts from construction equipment noise with the potential to effect sensitive receptors such as residential and school uses. The sources of those impacts differ by alternative, but can be generally characterized as temporary impacts associated with airfield improvements, ground access system improvements, and construction staging areas. While LAX Master Plan commitments and mitigation measures would reduce construction equipment noise impacts associated with all of the SPAS alternatives, it cannot be definitively concluded that all construction equipment noise impacts would be reduced to levels that are less than significant and these impacts are considered to be significant and unavoidable.

The SPAS Draft EIR addresses air quality impacts associated with the SPAS alternatives, including Alternatives 1, 5, and 6 which propose a northward relocation of Runway 6L/24R, in Sections 4.2. As indicated therein, even after mitigation, construction activities would result in significant and unavoidable air quality impacts under all of the alternatives. Specifically, under all of the alternatives except for Alternative 4, construction emissions of carbon monoxide (CO), volatile organic compounds (VOC), oxides of nitrogen (NOx), particulate matter with an equivalent aerodynamic diameter of 10 micrometers (PM10), and particulate matter with an equivalent aerodynamic diameter of 2.5 micrometers (PM2.5) would be significant and unavoidable. Under Alternative 4, significant and unavoidable construction emissions would occur for NOx and PM10. Under all of the alternatives, even after mitigation, construction-related concentrations of nitrogen dioxide (NO2) and PM10 would be significant and unavoidable.

Operation of the airport would also result in significant and unavoidable impacts to air quality. Even after mitigation, operational emissions of sulfur dioxide (SO2), PM10, and PM2.5 would be significant and unavoidable under all of the alternatives. Operational concentrations of NO2, PM10, and PM2.5 would also be significant and unavoidable under all of the alternatives.

Relative to off-airport traffic impacts, as addressed in Section 4.12.2 of the SPAS Draft EIR, the majority of the 200 intersections evaluated within the SPAS off-airport transportation study area would not be significantly impacted under Alternatives 1, 2, 3, 4, 8, and 9; however, significant impacts to some off-airport intersections and/or Congestion Management Plan (CMP) facilities would occur under each of these alternatives. The total number of significantly-impacted intersections and/or CMP facilities would vary slightly among those alternatives. Alternatives 5, 6, and 7 focus on airfield and terminal improvements that, in themselves, would not affect off-airport traffic, but would be coupled with the ground transportation improvements proposed under Alternatives 1, 2, 8, or 9, the impacts of which are summarized above.

SPAS-PC00043-4

Comment:

We support measured that would keep the LAX a safe airport. After reading the current SPAS report and the draft EIR we ascertained that there is NOTHING of magnitude to be gained by reconfiguring the north runway. It will not make the airport safer or more efficient. We strongly oppose this measure.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. The content of this comment is similar to comment SPAS-PC00053-4; please refer to Response to Comment SPAS-PC00053-4. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00043-5

Comment:

We implore you to look for other alternatives such as regional airports, better transit, relocation of car rentals, etc. to accommodate future air travel needs and to not increase the burden of Westchester and Playa del Rey residents?

Response:

Please see Topical Response TR-SPAS-REG-1 regarding the fact that LAWA, through the LAX Master Plan, the SPAS process, and multiple other efforts, supports the regionalization of air travel demand in Southern California. Please see Topical Response TR-SPAS-T-1 regarding transit as related to the SPAS improvements. Regarding relocation of rental car operations, Alternatives 3, 4, 8, and 9 include a Consolidated Rental Car (CONRAC) facility.

SPAS-PC00044 Child, Herb None Provided 7/30/2012

SPAS-PC00044-1

Comment:

As a neighbor and stakeholders in the LAX area, we are absolutely opposed to the expansion of the North runway. It has been proven by NASA and a panel of safety experts that an expansion north is not necessary for safety.

Response:

The comment regarding not being opposed to "expansion of the North runway" is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. The NASA study, specifically the North Airfield Safety Study (NASS), did not conclude that improvements to the north airfield are not necessary for safety. The academic panel reviewing the results of the analysis completed by NASA Ames offered their opinion that, based on safety grounds alone, it would be hard to argue for reconfiguring the north airfield. Note also that, as discussed in Section 4.7.2 of the SPAS Draft EIR, the FAA identified several critical flaws in the assumptions, methodology, and conclusions of the NASS. The NASS did determine that improvements to, and reconfiguration of, the north airfield would reduce the risk of a fatal runway collision. Additional discussion of the NASS and several other safety studies completed for the north airfield is provided in Section 4.7.2 of the SPAS Draft EIR.

SPAS-PC00044-2

Comment:

FURTHER, the real proponents of this expansion are the runway construction companies and its unions. They are expressing their usual self GREED. Most of these union workers do not live in the neighborhood and have no stake in this project except for more money for themselves.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00044-3

Comment:

We do not object to the rental car centralization at Manchester Square as it does not appear to add significantly to the noise level in our Playa/ Westchester area.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project.

The commentor's statement is correct. As indicated on pages 4-942 and 4-943 in Section 4.10.2 of the SPAS Draft EIR, the ground access improvements proposed under Alternatives 1, 2, 3, 4, 8, and 9, including development of a Consolidated Rental Car Facility (CONRAC) in Manchester Square proposed under Alternatives 8 and 9, would result in changes in road traffic noise levels at off-site noise-sensitive receptors; however, the predicted changes in road traffic noise levels under each of these alternatives would be less than a 3 dBA increase in CNEL at off-site receptor locations and,

therefore, would be less than significant. Alternatives 5, 6, and 7 do not include ground access improvements and would therefore not affect road traffic noise levels at off-site noise-sensitive uses.

SPAS-PC00045 Edelman, Lynn None Provided 7/28/2012

SPAS-PC00045-1

Comment:

A 2010 North Runway Safety Study conducted by NASA and a panel of Academic Experts found that the North Runway Complex is extremely safe, even at future fleet mix and traffic levels, and that the existing configuration would not unduly impact operational efficiency at LAX.

The inclusion of any work on the north runway brings into question the validity of ALL of the proposed work on LAX.

The runway work is so CLEARLY a boondoggle, that it brings into question the competence and integrity of the whole plan.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Response to Comment SPAS-PC00044-1 and Section 4.7.2 of the SPAS Draft EIR for a discussion of the North Airfield Safety Study (NASS) and several other safety studies completed for the north airfield. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00046 Pida, Jayson None Provided 8/11/2012

SPAS-PC00046-1

Comment:

You know the previous mayor/committees approved a plan that everyone liked : moving all the terminal/rental parking and the TSA security checks to an off-site area then destroying the old north side terminals and increasing the space between the runways that way. The city and LAWA even bought up an ENTIRE neighborhood for the off-site location -- it now sits boarded up or weed-choked like some 3rd world battle scene.

And now it's back to this nightmare...has everyone up to this mayor lost their minds ??

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00046-2

Comment:

Has anyone REALLY considered or calculated the astronomical economic loss or the destruction to people's lives ???

Response:

The commentor provides no evidence that SPAS would result in "astronomical economic loss or the destruction of people's lives." CEQA does not require purely social or economic impacts to be analyzed in an EIR. (State CEQA Guidelines Section 15064(e).) As required by CEQA, the SPAS Draft EIR evaluates physical impacts on the environment associated with over 20 topical issues and how such impacts have the potential to affect residents in surrounding communities.

SPAS-PC00046-3

Comment:

Of the massive traffic problems that will extend into Santa Monica from cutting off Lincoln blvd

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. In response to the statement of whether or not SPAS Draft EIR "…considered or calculated….the massive traffic problems that will extend into Santa Monica from cutting off Lincoln Boulevard," Lincoln Boulevard would not in fact be 'cut off.' Under Alternatives 1, 5, and 6, modifications to Runway 6L/24R would require realignment of a portion of Lincoln Boulevard but there would be no capacity reduction following construction. Section 4.12.2.5 of the SPAS Draft EIR lists the LAX Master Plan commitments and mitigation measures that are applicable to the SPAS alternatives, including those related to minimizing construction-related traffic effects. Section 4.12.2.6.3 of the SPAS Draft EIR discusses temporary traffic impacts to the off-airport transportation system during construction.

SPAS-PC00046-4

Comment:

or all the residences/businesses that will be destroyed along the Westchester Pkwy ?? Such as Otis College of Fine Art or the apartments and houses in Playa Del Rey and what about all the MAJOR businesses and office buildings that WILL be destroyed along Sepulveda Blvd from the airport to Manchester blvd -- this would tear out the economic heart of Westchester,

Response:

Regarding analysis of property acquisition impacts on the Westchester community associated with the RPZ, please see Responses to Comments SPAS-AL00007-26 and SPAS-PC00130-931. A discussion of property acquisition that would occur under the SPAS alternatives is provided in Sections 2.3.1.11 and 4.9.6 of the SPAS Draft EIR. Specifically, the property acquisition that would be required under Alternatives 1, 2, 3, 4, 8, and 9 is shown in Figures 2-11, 2-12, 2-13, and 2-14 and listed in Table 2-4 and Table 2-5 in Section 2.3.1.11 of the SPAS Draft EIR. As indicated in these figures and tables, no residential acquisition or acquisition of businesses along Westchester Parkway or acquisition of Otis College would occur under any of the SPAS alternatives, and no major businesses or office buildings would be destroyed along Manchester Boulevard. As listed in Table 2-4 and shown in Figure 2-11 of the SPAS Draft EIR, businesses proposed for acquisition along Manchester Boulevard include a vacant office building, Hollywood CPR, and Valet Air Park. In addition, as indicated in Figure 2-10 and listed in Table 2-3 of the SPAS Draft EIR, no businesses or offices, with the exception of the urgent care facility, along Sepulveda Boulevard or Westchester Parkway would be affected by the SPAS alternatives.

SPAS-PC00046-5

Comment:

not to mention all the new noise and pollution problems.
Someone has lost their mind (or they're just plain evil). Count me in to fight this all the way to the end.

Not-going-to-Take-it-anymore

Response:

The comment noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project.

The SPAS Draft EIR addresses impacts associated with aircraft noise, road traffic noise, and construction traffic and equipment noise in Sections 4.10.1, 4.10.2, and 4.10.3, respectively. The impacts associated with each of these categories of noise are summarized below.

As indicated in Section 4.10.1 of the SPAS Draft EIR, Alternatives 1 through 7 would result in some residential uses and non-residential noise-sensitive facilities being newly exposed to noise levels of 65 CNEL or higher or increases of 1.5 CNEL or higher within the 65 CNEL or higher noise contours. With implementation of LAX Master Plan mitigation measures, these impacts would be less than significant. However, interim impacts prior to the completion of mitigation, impacts on residential uses with outdoor habitable areas, and impacts on parks would remain significant and unavoidable. Alternatives 8 and 9 focus on ground access improvements that, in themselves, would not result in aircraft noise exposure but would be coupled with the airfield improvements proposed under Alternatives 1, 2, 5, 6, or 7, the impacts of which are summarized above. None of the alternatives would result in a significant impact relative to sleep awakenings. Under Alternatives 1 through 7, significant impacts would occur with an additional school being newly exposed to the 55 dBA Lmax. Each alternative would also result in significant impacts due to sustained interruption of classroom teaching at newly exposed schools through interior noise levels in excess of 35 dBA Leq(h). Implementation of LAX Master Plan mitigation measures would ultimately reduce impacts to these schools to a level that is less than significant. However, interim impacts prior to completion of mitigation measures would remain significant and unavoidable.

Concerning road traffic noise, as indicated in Section 4.10.2 of the SPAS Draft EIR, impacts related to ground access improvements proposed under Alternatives 1, 2, 3, 4, 8, and 9 would be less than significant as the incremental changes in road traffic noise levels under each of these alternatives would be less than a 3 dBA increase in CNEL. Alternatives 5, 6, and 7 do not include ground access improvements and would therefore not affect road traffic noise levels at off-site noise-sensitive uses.

Regarding construction traffic and equipment noise, as indicated in Section 4.10.3 of the SPAS Draft EIR, due to the periodic nature and limited incremental increase on area roadways, none of the alternatives would result in significant impacts related to construction traffic noise. However, all of the alternatives would result in significant impacts from construction equipment noise with the potential to effect sensitive receptors such as residential and school uses. The sources of those impacts differ by alternative, but can be generally characterized as temporary impacts associated with airfield improvements, ground access system improvements, and construction staging areas. While LAX Master Plan commitments and mitigation measures would reduce construction equipment noise impacts associated with all of the SPAS alternatives, it cannot be definitively concluded that all construction equipment noise impacts would be reduced to levels that are less than significant and these impacts are considered to be significant and unavoidable.

The SPAS Draft EIR addresses air quality impacts associated with the SPAS alternatives, including Alternatives 1, 5, and 6 which propose a northward relocation of Runway 6L/24R, in Sections 4.2. As indicated therein, even after mitigation, construction activities would result in significant and unavoidable air quality impacts under all of the alternatives. Specifically, under all of the alternatives except for Alternative 4, construction emissions of carbon monoxide (CO), volatile organic compounds (VOC), oxides of nitrogen (NOx), particulate matter with an equivalent aerodynamic diameter of 10 micrometers (PM10), and particulate matter with an equivalent aerodynamic diameter of 2.5 micrometers (PM2.5) would be significant and unavoidable. Under Alternative 4, significant and unavoidable construction emissions would occur for NOx and PM10. Under all of the alternatives, even after mitigation, construction-related concentrations of nitrogen dioxide (NO2) and PM10 would be significant and unavoidable.

Operation of the airport would also result in significant and unavoidable impacts to air quality. Even after mitigation, operational emissions of sulfur dioxide (SO2), PM10, and PM2.5 would be significant

and unavoidable under all of the alternatives. Operational concentrations of NO2, PM10, and PM2.5 would also be significant and unavoidable under all of the alternatives.

SPAS-PC00047 Sturtevant, Dwight B None Provided 8/26/2012

SPAS-PC00047-1

Comment:

YOU NEED TO LET METRO GO TO LAX AND STOP DRAGGING YOUR FEET

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Topical Response TR-SPAS-T-1 regarding transit options into LAX.

SPAS-PC00048 Mitchell, Michael S Mickey's Space Ship Shuttle 8/29/2012

SPAS-PC00048-1

Comment:

- Problems -
- The central terminal area design does not meet current airport security needs associated with vehicular access to airport facilities.
- The curb-front and access road system used for drop-off and pick-up of passengers in the terminal area was not built for today's level of traffic.

best solution:
- Access remains the same as it is today

The best design is right now, just make the fly away not go in at the same time for all it's services, if you time them 5 minutes a part this is the answer to stop your fly away congestion. Any normal company design knows this. The ITF should not be used, leaving it the way it is does not discriminate the other companies that have been there for over 20 years.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. SPAS Alternative 4 reflects an option whereby no ITF, Ground Transportation Center, or Intermodal Transportation Center would be constructed, such as proposed in the other SPAS alternatives. While Alternative 4 includes a consolidated rental car facility, which would reduce the number of individual rental car company shuttles traveling within the CTA, it does not include the changes to service requested in the comment. Alternative 4, along with all the other SPAS alternatives evaluated in the SPAS Draft EIR, will be considered by decision-makers before taking action on the project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00048-2

Comment:

If a bomb was to be used it is more dangerous in one place at the ITF, much more dangerous than at 8 terminals.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please note that this comment presents personal opinions about security that are unsupported by facts and therefore, do not constitute substantial evidence under CEQA. Security is not an environmental impact and is, therefore, not required to be discussed in the SPAS Draft EIR under CEQA or any other law. However, a security assessment of the SPAS alternatives is included in Appendix I of the Preliminary LAX SPAS Report to comply with the Stipulated Settlement and Section 7.G(2) of the LAX Specific Plan. The Security Assessment concluded that "the various SPAS alternatives…do not themselves create greater or lesser vulnerabilities to hostile actions than do existing conditions" (page ES-5). Specifically, the assessment found that the ITF associated with Alternatives 1, 2, 8, and 9 would increase airport security (pages 5-3, 5-4, 5-11, and 5-12). Please also see Sections 6.3.1.6, 6.3.2.6, 6.3.8.6, and 6.3.9.6 of the Preliminary LAX SPAS Report.

No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00048-3

Comment:

It is safe now and the the city is going broke and cannot carry more money going to bonds. the bond market is a bubble now. Note all the cities going bankrupt next door to lax.

Response:

Please see Response to Comment SPAS-PC00096-2 regarding funding sources for SPAS improvements, including bonds. As noted in that response, no general tax dollars would be used to pay for any of the proposed on-airport improvements. Moreover, general airport revenue bonds are repaid from airport revenues generated from airport users. The bonds are guaranteed only by the revenues from the airport and are not backed by the City of Los Angeles. Please see Response to Comment SPAS-PC00149-2 regarding safety related to the north airfield.

SPAS-PC00048-4

Comment:

The ITF is not fair to the local scheduled service companies, about 8 of them. This is a way of allowing the off shore monopolies company contracts to push the local companies out of the way and stop competition that keeps the public prices in check. The puc is against monopolies and so is the FAA. %10 of businesses must be small local business is an FAA rule. The local companies like Mickey's Space Ship Shuttle have taken hundreds of thousands of public passengers and they love us. Please do not put us out of business for this terrible design to stop the Clifton Moore design that works so well now. If you want to take only prime time and super shuttle out to the ITF do that but leave the scheduled service at the inter curb. Do not throw the baby out with the bath water on this. You have made a great mistake just designing the fly away bus company the local companies did this for free for 32 years and the way you are doing it is losing 40 million dollars and taking 60 million from local companies that would have made that money if it were not for this terrible design the fly away. Leave the valley schedule and maybe the down town but you have taken all this money over seas for the fly away company is over seas owned and bankrupt.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the

adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00048-5

Comment:

Please have meetings with the local companies for we are left out of the whole planning and this is discrimination.

Response:

This comment is noted. LAWA undertook an extensive public participation program in 2006, the outset of the SPAS process, to solicit public input from interested stakeholders. A series of six public meetings was held concerning various aspects of the SPAS planning process. These meetings were open to all members of the public, including companies that provide transportation services to LAX passengers. Documentation of these meetings is provided in Appendix D-1 of the Preliminary LAX SPAS Report.

In addition, LAWA conducted three open house/public meetings in August 2012 during the SPAS Draft EIR public review period to solicit comments on the SPAS Draft EIR. These meetings were also open to all members of the public, including companies that provide transportation services to LAX passengers. Materials from these meetings were posted on the project website, www.laxspas.org. In the event individuals were unable to attend the open house/public meetings, LAWA hosted a virtual online meeting from September 10, 2012 to October 10, 2012, which included audio recordings with information pertaining to the topics addressed at each of the eight meeting stations, accompanied by the visual materials that had been presented at each of the stations. The virtual meeting was accessible to all members of the public. Please see Response to Comment SPAS-PC00130-358 regarding the extensive public outreach LAWA undertook to notify the public of these open house/public meetings and the virtual meeting.

SPAS-PC00049 Briggs, Eric None Provided 8/27/2012

SPAS-PC00049-1

Comment:

There are many good options here, and I'm especially enthusiastic about the proposals for a people mover to a (hopefully built) Metro station, as well as changes to the northern terminals to allow access from one to the other without going through security again. Changes to the runways to reduce delays are also needed. I would like to voice my support for the project to counter the NIMBYism that will likely comprise the bulk of the comments. It's unfortunate the some people and business will be impacted, but this is a regional issue, and if we want to consider ourselves a world-class city, we need a functional, modern, world-class airport.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00050 Schneider, Barry None Provided 7/29/2012

SPAS-PC00050-1

Comment:

I would like to invite you to night of television watching at my house.

It consists mainly of stopping the program on our television while aircraft pass over our homes, at times, every three minutes, now so close and low that not ever the triple paned sound windows installed by airport sound stops the outrageous decibels from filling our home.

While this might sound like a minor inconvienence in light of international travel and growth for LAWA, it has, due to the ever encroaching runways, become an almost intolerable living situation.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Note that the comment primarily addresses existing conditions and does not address or comment on the noise analysis conducted in the SPAS Draft EIR, which addresses noise impacts of the SPAS alternatives. The commentor is referring in part to soundproofing associated with LAWA's Aircraft Noise Mitigation Program (ANMP) described on pages 4-664 through 4-667 in Section 4.9.3.3 of the SPAS Draft EIR. Under the ANMP incompatible uses (including residential) located within the noise impact area (i.e., exposed to 65 CNEL or higher noise levels) are eligible for sound insulation pursuant to the land use compatibility requirements of the California Airport Noise Standards (California Code of Regulations, Title 21, Subchapter 6, Section 5000 et seq.). To ensure that interior noise levels have been reduced to 45 CNEL or less after soundproofing (in conformance with Title 21), post-construction noise tests are conducted on a random sampling of homes to verify the efficacy of sound insulation. To date, all post-testing has confirmed that interior noise levels meet this requirement. It is not clear from the comment what is meant by "ever encroaching runways" as no change to runways in the north airfield (closest to Playa del Rey) have occurred in recent years. Furthermore, with implementation of the SPAS project and as stated in LAX Master Plan Mitigation Measure MM-LU-1, LAWA will continue post-insulation noise monitoring to ensure achievement of interior noise levels at or below 45 CNEL.

Please also see Response to Comment SPAS-PC00008-1 regarding current programs to address existing aircraft noise levels.

SPAS-PC00050-2

Comment:

I have no fight with expansion, just stop coming closer to homes in the Playa area. Or better yet, if you want to make all of Playa del Rey like the fallow "deadlands" as we locals call the weed covered concrete and old and broken street light lined areas near our homes, simply buy up the rest of Playa del Rey and fly to your hearts content and we will all move on…

Response:

As analyzed in Sections 4.9.6 and 4.10.1.6 of the SPAS Draft EIR, some areas in Playa del Rey would be newly exposed to noise levels of 65 CNEL or higher, or experience increases of 1.5 CNEL or higher within the 65 CNEL or higher noise contours under SPAS Alternatives 1 through 7 compared to 2009 baseline conditions. Please see page 4-686 of the SPAS Draft EIR, which includes expansion and revisions to the existing ANMP program, under Mitigation Measure MM-LU-1.

Regarding the commentor's suggestion to "simply buy up the rest of Playa del Rey," please see Response to Comment SPAS-PC00005-3, regarding purchase of property within noise impacted areas.

Furthermore, not all areas in Playa del Rey would be significantly impacted; therefore, such a measure would be out of proportion to the scope of environmental impacts and would lack a sufficient nexus. (See State CEQA Guidelines Section 15041.)

SPAS-PC00050-3

Comment:

All we are saying, is, enough is enough. Expand no more -- you have had all you need for safety and profit. Let us live some semblance of a normal life without further encroachment.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00050-4

Comment:

As an aside, I would offer an odd scientfic theory, one I learned of while writing the screenplay on the life of Nikola Tesla -- he discovered that sound could be altered or eliminated if met with the same frequency of sound. While I am no scientitst, merely a writer, there does exist a method of eliminating or at least disapating the mind shattering, house rattling jet blast that hits our neighborhood on a daily and nightly basis, at times in to the early AM hours well after midnight that seems far closer than ever in the twelve years I've lived here.

It might interest your acoustic engineers (if such people exist in your purview, which I think they do not) to perhaps look into Mr. Tesla's theory on frequency, since he was the bonifide genius who gave us AC power, the electric motor and more or less made our modern age, such as it is, available to the human race.

Response:

The comment refers to the work of Nikola Tesla and his theory that one sound could be nullified with the use of an equal sound of identical frequency but 180 degrees out of phase. In essence, sound is a series of positive and negative pressure waves propagated through a media, in this case air. If an equal sound made of pressure waves of the same frequency but sequenced so that every positive pressure part of the original wave is met with an equal sound of negative pressure and vice versa then the waves would cancel out and there would be no sound. In today's modern era, this is called Noise Cancellation or Active Noise Control. This technology cannot be used to reduce noise levels across a broad geographic area of noise receptors. Noise travels in a spherical pattern, and while a speaker might reduce noise at one location, it would increase noise levels at other locations (i.e., constructive interference). While outdoor Active Noise Control research has been conducted at the source of the noise (i.e., the aircraft), that technology is not yet mature and useable for practical application. NASA has current research to use Active Noise Control within aircraft engines to cancel noise at its source and this technology will likely have practical use in future generations of aircraft jet engines. NASA has published research on this technology (NASA FACTS, Making Future Commercial Aircraft Quieter, FS-1999-07-003-GRC, which is available at http://www.nasa.gov/centers/glenn/about/fs03grc.html.) This technology is not yet mature to implement in aircraft, nor does LAWA have the legal or practical authority to set aircraft design standards, which are controlled by the FAA and the aircraft manufacturers. Therefore, the suggested measure is considered legally, technologically, environmentally (i.e., increase in noise impacts) and socially infeasible.

SPAS-PC00050-5

Comment:

Please LAWA, no closer, no bigger, no further.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00051 Turney, Thomas W NewCap Partners, Inc. 7/30/2012

SPAS-PC00051-1

Comment:

Documents are not downloadable from your website. You contact us page does not work at all. Please let me know when these problems are resolved so we can review documents.

Response:

The comment is noted. The SPAS Draft EIR was posted at laxspas.org on July 27, 2012. All of the posted documents were checked by LAWA and found to be downloadable. One of the files posted, "LAX SPAS DEIR Appendix A NOP-Scoping Part 1 or 2", was inadvertently encrypted in a manner that did not enable it to print. A printable version of Appendix A NOP-Scoping Part 1 of 2 was posted at laxspas.org on July 30, 2012. In addition, electronic and hard copies of the document were available for review at six area libraries.

SPAS-PC00052 Edie, Jay None Provided 7/29/2012

SPAS-PC00052-1

Comment:

We are homeowners that reside near the corner of Manitoba and Earldom Ave in Playa del Rey. We have lived in this house for over 27 years.

We have learned to live with the airport as our neighbor. Our house has been sound-proofed and we are only bothered by noise when we are outside, with family or friends, and have learned to stop talking and remain still for the 30 - 45 seconds for a plane to take off before being able to resume our conversation.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Section 4.10.1 of the SPAS Draft EIR for discussion of impacts associated with aircraft noise. Please also see Response to Comment SPAS-PC00008-1 regarding current measures underway to address aircraft noise.

SPAS-PC00052-2

Comment:

We have learned to wash down the ourdoor furniture, our BBQ covers and our deck often to try to mitigate the damage caused by air particulates from the airport operation and aircraft.

We have learned to have the paint ready to do the frequent touch up of paint corrosion caused by airport pollution.

Response:

The content of this comment is similar to comment SPAS-PC00043-2; please refer to Response to Comment SPAS-PC00043-2.

SPAS-PC00052-3

Comment:

We have learned to adjust our travel route when traveling south to avoid areas of traffic conjestion caused by airport traffic on Sepulveda and road closures on Pershing when some traveling dignitary requires stepped up security.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Fixing existing conditions, such as existing traffic, are important issues which are considered by the decision-makers, however fixing/mitigating existing conditions is beyond the scope of the CEQA analysis and this EIR because such conditions are not associated with the proposed alternatives. (See State CEQA Guidelines Sections 15125(a) and 15126.2(a); Watsonville Pilots Association v. City of Watsonville (2010) 183 Cal. App. 4th 1059 ["The FEIR was not required to resolve the [existing] overdraft problem, a feat that was far beyond its scope"].) Such conditions were however included in the baseline in the SPAS Draft EIR for each resource area. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00052-4

Comment:

And on some lovely days and evening even enjoy watching the plans land and take off from our front porch.
So we have learned to pay the price of having an International airport in our backyard and still maintain a quality of life afforded us by our location in the community of Playa del Rey.

That said...

We are very upset to learn that there is still a distinct possibility that the airport will move the north runway EVEN CLOSER to our home, increasing the airport noise we experience, the pollution we endure, and the transportation impacts to our surrounding neighborhood streets.

Response:

The content of this comment is similar to comment SPAS-PC00043-3; please refer to Response to Comment SPAS-PC00043-3.

SPAS-PC00052-5

Comment:

We are all for measures that would keep the LAX a safe airport. After pouring over the current SPAS report and the draft EIR we conclude that there is NOTHING of magnitude to be gained by reconfiguring the north runway. It will NOT make the airport safer NOR more efficient. We OPPOSE this measure.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. The content of this comment is similar to comment SPAS-PC00053-4; please refer to Response to Comment SPAS-PC00053-4. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00052-6

Comment:

Our community has borne the brunt of the quality of life impacts of our International Airport. It is time for the rest of the region to do its share. Why is it not possible to put the intelligence and experience of the "powers-that-be" to work to TRULY developing a regional plan that would spread the pain for whatever gain they are hoping to achieve with measures that ensure the City of Los Angeles can accomodate future air travel needs?

Response:

Please refer to Topical Response TR-SPAS-REG-1 regarding the fact that LAWA, through the LAX Master Plan, the SPAS process, and multiple other efforts, supports the regionalization of air travel demand in Southern California.

SPAS-PC00053 Miller, Malcom None Provided 8/3/2012

SPAS-PC00053-1

Comment:

I have been a homeowner in Playa del Rey for over 30 yrs., living on Earldom Ave. between Redlands and Manitoba. Although there was some airport noise when I moved it, I was attracted to the small town feel and closeness to the ocean. I was able to have friends over and enjoy barbeques in my backyard with little airport noise disruption.

Over the years, as LAX has expanded, I have enjoyed my backyard much less, airport pollution in the neighborhood has greatly increased, congestion has increased, and property values have severely suffered.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00053-2

Comment:

I have adapted and learned to continue enjoying our small town in spite of these changes. I have questioned with Los Angeles desiring the benefits of a renowed International Airport why a more forward looking and innovative plan has not been conceived, rather than piecemeal expansions that shortly become inadequate and need further expansion. In its current location, the airport will continue to be insufficient as travel, size of planes, etc. increase.

Response:

As described in Section 1.1, Project Background, of the Draft EIR, the types of improvements being considered in the SPAS process are related to the LAX Master Plan, which was approved by the City of Los Angeles in December 2004. The LAX Master Plan is designed and intended to establish the overall long-term development framework for LAX. The LAX Master Plan provides for modernization of the runway and taxiway system, redevelopment of the terminal area, improvement of access to the airport, and enhancement of passenger safety, security, and convenience. The SPAS-related improvements are what are referred to as the "Yellow Light Projects" associated with the LAX Master Plan and, consistent with the long-term development plan set forth by LAX Master Plan, are designed in light of the future increase in airport activity to 78.9 million annual passengers at LAX.

SPAS-PC00053-3

Comment:

I am very upset to learn that there is still a distinct possibility that the airport will move the north runway EVEN CLOSER to our home, increasing the airport noise we experience, the pollution we endure, and the transportation impacts to our surrounding neighborhood streets.

Response:

The content of this comment is similar to comment SPAS-PC00043-3; please refer to Response to Comment SPAS-PC00043-3.

SPAS-PC00053-4

Comment:

We are all for measures that would keep the LAX a safe airport and Los Angeles a major international hub. After reviewing the current SPAS report and the draft EIR I conclude that there is not the vision to achieve these goals by reconfiguring the north runway. It will NOT make the airport safer NOR more efficient nor plan for the future. I OPPOSE this measure both as a local resident and a person who has been proud to live in Los Angeles and its vision in so many areas.

Response:

Comment noted. Section 4.7.2, Safety, of the Draft EIR addresses impacts related to aviation safety and efficiency. As addressed in that section, and summarized in Table 4.7.2-16 (and reproduced as Table 1-12 in the Executive Summary), each of the seven SPAS alternatives that involve airfield improvements responds differently to the various safety and efficiency factors analyzed in the section. As delineated therein, those alternatives proposing substantial airfield improvements, particularly those that include the addition of a center parallel taxiway between the runways, were found to be better relative to taxiing and holding aircraft staying clear of object free zones and runway safety area surfaces, and in providing pilots and FAA air traffic controllers more time and distance in which to manage aircraft movements on the airfield, as well as providing pilots with improved visibility down Runway 6R/24L before crossing, than would otherwise occur without such airfield improvements.

With regards to whether and how the various alternatives support the objective (goal) to keep LAX a major international hub, Table 1-2 of the Draft EIR provides a preliminary evaluation of the relationship between the objectives of the proposed project and each of the SPAS alternatives. As indicated therein relative to the objective to maintain LAX's position as the premier international gateway in supporting

and advancing the economic growth and vitality of the Los Angeles region, those alternatives proposing substantial airfield improvements, such as Alternatives 1, 3, and 5, more fully responded to that objective than did the other alternatives.

SPAS-PC00054 Gutierrez, Judy None Provided 9/5/2012

SPAS-PC00054-1

Comment:

Unlike most of our neighbors, we became residents of this area of Playa Del Rey after our homes in San Fernando Valley burned down in 2008. Our decision to move to an area where wildfires could never be part of our lives again, we chose this area based on proximity to the beach and frankly we fell in love with living here.

We've learned to tolerate all the things our other neighbors have talked about - the noise, constant dirt, dust, film on anything left outside and anything near an open window. We are grateful that the previous owner participated in the insulated windows and soundproofing provided by the airport. I know that these improvements must not have been willingly offered to satisfy airport neighbors, but as a result of a consolidated objection to the airport request for more expansion. Thank you previous homeowners for fighting the fight that helps me have a home that can be tolerable when all the windows are closed.

Imagine moving from the hot San Fernando Valley to a new location by the sea. We never left our windows open in the valley, spring and summer were too hot and winter was too cold. Here even with the noise we leave the windows open to enjoy the ocean breeze. The noise is the trade off and we have gotten used to it.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. With respect to "constant dirt, dust, film on anything left outside and anything near an open window," it is assumed that the commentor is referring to "deposition," (i.e., the gravitational fallout of material, both solid and liquid, from the atmosphere). Commonly, this material, called particulate matter, consists of dust and soot that can form deposits or cause discoloration on outdoor surfaces (i.e., building materials, motor vehicles, small water bodies, etc.). Please see Response to Comment SPAS-PC00043-2 regarding pollutant deposition. As indicated in Response to Comment SPAS-PC00043-2, to date, the research results indicate that aircraft do not contribute substantially to deposition. With respect to the comment that soundproofing must have been provided as a result of a "consolidated objection to the airport request for more expansion," as stated on page 4-664 in Section 4.9.3.3 of the SPAS Draft EIR, LAWA conducts soundproofing of eligible properties pursuant to the land use compatibility requirements of the California Airport Noise Standards (California Code of Regulations, Title 21, Subchapter 6, Section 5000 et seq.). LAWA has had a robust sound insulation program in place since 1997, with demonstration projects occurring as early as the 1980s, well in advance of the LAX Master Plan and related Stipulated Settlement.

SPAS-PC00054-2

Comment:

We are FIRMLY OPPOSED to moving the north runway closer to our home!!! The situation now is somewhat tolerable, and if the planes are closer I fear that the decibel levels approved with the previous upgrades no longer be relevant. Even with the windows closed it will become difficult to have any peace.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Sections 4.9.6 and 4.10.1.6 of the SPAS Draft EIR for discussion of the impacts associated with aircraft noise of each of the SPAS alternatives. As stated in LAX Master Plan Mitigation Measure MM-LU-1, LAWA will continue post-insulation noise monitoring to ensure achievement of interior noise levels at or below 45 CNEL. Currently, LAWA conducts post construction noise tests on a random sample of homes to verify the efficacy of the soundproofing installation. To date, all testing has confirmed that interior noise levels have been reduced to 45 CNEL, as required.

SPAS-PC00054-3

Comment:

When airport workers are in runway areas they wear headgear to protect their hearing from the noise. I have a neighbor who currently wears a version of this protection when she works in her yard. As someone who as complete hearing loss in one ear I find myself wondering what kind of protection I should be taking to protect what hearing I have left and that leads me to the following question and statement.

I have 2 points to make about the runway movement:

1. Have studies been made about new decibel level safety for people nearby? If not, why not?

Response:

The comment is noted. Please see Response to Comment SPAS-PC00042-5 regarding the effects of noise on humans related to hearing loss.

SPAS-PC00054-4

Comment:

2. I feel that this airport runway movement is a precursor for having the new super jumbo jets take off from the northern runways. Moving the runway is like the old saying about letting the camel put his head in the tent, once in pretty soon the camel has moved into the tent completely. Move the runways first then super jumbo jets are next. At that point sadly, the neighborhood will not have a say in the matter.

Response:

Comment noted. Section 2.2, Project Objectives, of the SPAS Draft EIR specifically acknowledges that LAWA is seeking to provide north airfield improvements that support the safe and efficient movement of aircraft at LAX, including the largest aircraft types currently in service and anticipated for the future, in all weather conditions. These aircraft types include Aircraft Design Group (ADG) V aircraft, such as the Boeing 747-400, and ADG VI aircraft, such as the Airbus A380. Those aircraft types can, and do, currently operate (i.e., take-off and land) on the north airfield (See Section 2.3.1 of the SPAS Draft EIR). The airfield improvements proposed under the various alternatives are intended to enhance the safety and efficiency of such operations, both now and into the future. It is anticipated that ADG V and VI aircraft will continue to operate at LAX, irrespective of whether any of the SPAS alternatives are approved, but would do so without the safety and efficiency improvements described in the Draft EIR if no airfield improvements are implemented. The potential impacts associated with each of the SPAS alternatives, including the operation of ADG V and VI aircraft on the north airfield, are evaluated in the SPAS Draft EIR.

SPAS-PC00055 Ueberroth, Peter V Contrarian Group, Inc. 8/27/2012

SPAS-PC00055-1

Comment:

I enthusiastically support the efforts to continue the overall modernization of Los Angeles International Airport (LAX). For the millions of visitors who come to Los Angeles each year, our airport offers the first, and often lasting, impression of our city. As a world-class city, we should offer our visitors a world-class unforgettable experience.

This was our goal in 1984 when Mayor Tom Bradley led a successful modernization effort at LAX. The Summer Olympic Games of 1984 showcased Los Angeles to the rest of the world, and we worked hard to leave a positive and lasting impression for the thousands of athletes, journalists and fans who attended. At LAX, this meant the construction of a new, state-of-the art international terminal, renovation of the existing terminals, and a new mode of transportation within the airport through the construction of an upper roadway. Simply put, the Olympic Games provided us a tremendous and rare opportunity to restore LAX as a showpiece within the aviation industry.

Nearly thirty years later, Los Angeles is once again embarked on a massive renovation of our landmark airport and I salute Mayor Villaraigosa, the Airport Commission and its staff for embarking on a multi-billion dollar program. While the projects underway, especially the rebuilding of the Tom Bradley International Terminal, are greatly important to restoring the passenger experience, I know it is only the beginning in your efforts to fully modernize LAX. The projects you are currently considering will play an even more important role in securing LAX's role as the nation's leader in aviation. We need a renovated airfield that adequately accommodates the aircraft fleet currently being built. We need direct and easy public transportation to connect LAX to the rest of the community. We need passenger-friendly, first-class terminals to greet passengers and provide them with a positive first glimpse of Los Angeles.

It is our sincere hope to return the Olympic Games to Los Angeles for a third time. Preliminary plans are already underway for such an endeavor. In the consideration of a Host City's bid, decision-makers will look at a city's airport and infrastructure as one of the determining factors for consideration. I encourage and urge you to continue your efforts to fully modernize LAX now - keeping the Olympics hope alive.

Once again, we are provided with a tremendous opportunity, as what happened a generation ago when LAX accommodated those who came to experience the 1984 Summer Olympics. Like then, it will take the courage and perseverance of our elected officials and the Airport Commission to make this dream a reality. Time after time, we've seen this is a city of courageous people. Now is that time once again.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00056 Whitcomb, Rudolph F None Provided 7/27/2012

SPAS-PC00056-1

Comment:

How on earth could anyone pretend that the operation of a major airport is GOOD for the environment

Response:

The SPAS Draft EIR comprehensively evaluates the environmental impacts that would result from implementation of the SPAS alternatives, including adverse impacts. Significant environmental effects are identified in Section 7.1 of the SPAS Draft EIR.

SPAS-PC00057 Williams, Rendric None Provided 7/29/2012

SPAS-PC00057-1

Comment:

Alternative 1 is the best choice both for the people and city of Los Angeles. The northern runways need a taxiway for safe operations of new age jetliners. As well as LAX is the first piece of land most visitors see when they arrive and leave. It is important we keep it updated so we don't lose business to other cities with brand new facilities. International Airlines want to spend thier big dollars at a state of the art facility. We can turn LAX into an even better aviation center with alternative 1.

Response:

The commentor's support for Alternative 1 is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Chapter 2 of this Final EIR regarding the LAWA Staff-Recommended Alternative, which couples the airfield and terminal improvements associated with Alternative 1 with the ground access components associated with Alternative 9. Regarding enhancements to safety under Alternative 1, please see Table 4.7.2-16 on pages 4-569 and 4-570 in Section 4.7.2 of the SPAS Draft EIR.

SPAS-PC00058 Rodine, Robert L None Provided 7/29/2012

SPAS-PC00058-1

Comment:

I was part of the Stakeholder Group - Business Interests at the outset. I am dismayed that at some point in time communications ceased coming. I look forward to being included. Thank you.

Response:

The Stakeholder Groups referred to by the commentor were convened in conjunction with the LAX Master Plan, which was approved in 2004. As part of this process, the LAX Stakeholder Liaison developed a database of stakeholders who had expressed an interest in the LAX Master Plan. This database was used to notify the public of issues concerning the SPAS process and SPAS Draft EIR. Your contact information has been added to the LAX Stakeholder Liaison database. Please also see Response to Comment SPAS-PC00048-5 concerning public outreach during the SPAS process. The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines 15204(a)).

SPAS-PC00059 Lynch, Debra None Provided 7/31/2012

SPAS-PC00059-1

Comment:

Please send me all LAX updates

Response:

This comment is noted. Your contact information has been added to the LAX Stakeholder Liaison's database. The Stakeholder Liaison Office was created to facilitate public participation in the implementation of projects at LAX. It provides stakeholders with access to information about the project implementation process and serves as a means of communication on issues related to the modernization efforts at the airport. The Stakeholder Liaison's database is used to provide stakeholders and interested individuals with informational briefings on projects at LAX. (See page 4-2 in Section 4.2.2 of the Preliminary LAX SPAS Report.)

SPAS-PC00060 Teplitz, Richard None Provided 8/16/2012

SPAS-PC00060-1

Comment:

NASA has shown that there is virtually no benefit to moving the north runway. Why destroy a community for virtually no benefit? Because the unions and Chamber of Commerce all located elsewhere want to? We can hire lawyers too.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Response to Comment SPAS-PC00044-1 and Section 4.7.2 of the SPAS Draft EIR for a discussion of the North Airfield Safety Study (NASS) and several other safety studies completed for the north airfield. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00061 Parvenu, Andre None Provided 8/17/2012

SPAS-PC00061-1

Comment:

Excellent set of maps. Good use of information technology to display the various alternatives.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00062 Rothman, Jeffrey None Provided 8/25/2012

SPAS-PC00062-1

Comment:

E-mail is cabra_bom_da_peste@yahoo.com I have been a Westchester resident for 29 years. During this time I am concerned re additional development in the airport owned and airport adjacent area along Westchester Parkway. Currently run or ride a bicycle. Building of additional parking areas and transport facilities will increase traffic. Building of additional airport related business facilities in the area will also increase traffic. My concern is that a significant increase in traffic along Westchester Parkway will make this corridor no longer the pleasant and safe place it is to walk run and bike. Jeffrey Rothman

Response:

The comment expresses a concern that additional development on airport-owned land along Westchester Parkway would increase traffic levels and reduce pedestrian and bicycle safety there. As a point of clarification, as indicated on page 5-22 in Chapter 5 of the SPAS Draft EIR, the LAX Northside Plan Update project, which would establish new regulations for development on 340 acres north of LAX, is separate from the SPAS project/alternatives that were analyzed in the SPAS Draft EIR. The environmental analysis of the LAX Northside Plan Update project is in progress and will be circulated for public review once it is complete. The SPAS Draft EIR assumed full development of the LAX Northside Plan project as previously approved in 2004, a background condition in the Future (2025) without Alternatives; thus, the cumulative effects of both projects were considered.

Furthermore, traffic conditions are not expected to increase under project or cumulative conditions, such that they would result in a significant impact to bicycle access along Westchester Parkway. Intersection 123 is the most representative of traffic conditions along Westchester Parkway, and this intersection will not be significantly impacted under project or cumulative conditions. (See Tables 4.12.2-14 and 4.12.2-21 [Alternative 1-2], Tables 4.12.2-15 and 4.12.2-22 [Alternative 3], Tables 4.12.2-16 and 4.12.2-23 [Alternative 4], Tables 4.12.2-17 and 4.12.2-24 [Alternative 8], and Table 4.12.2-18 [Alternative 9].

Furthermore, Westchester Parkway, which was financed and constructed by Los Angeles World Airports, currently provides sidewalks, landscaping, and raised medians. Under Alternatives 1, 4, and 5, a portion of Lincoln Boulevard would be reconfigured to accommodate modifications to Runway 6L/24R, including the existing connection between Westchester Parkway and Lincoln Boulevard. Any necessary changes to Westchester Parkway would be designed and constructed in accordance with City standards. As described in the SPAS Draft EIR, the alternatives and cumulative projects at LAX would be required to comply with the LAX Street Frontage and Landscape Development Plan Update, which provides for the enhancement of pedestrian, bicycle (including bicycle lane standards), and vehicular circulation on streets internal to and surrounding LAX. (See SPAS Draft EIR pages 4-13, 4-694 [Alternative 1], 4-707[Alternative 2], 4-717 [Alternative 3], 4-729 [Alternative 4], 4-739 [Alternative 5], 4-749 [Alternative 6], 4-759 [Alternative 7], 4-769 [Alternative 8], 4-773 [Alternative 9].) As further discussed in the SPAS Draft EIR, the project would be consistent with the City of Los Angeles 2010 Bicycle Plan, including "existing or planned bicycle lanes/paths in the LAX area, including those along Pershing Drive, Imperial Highway, Westchester Parkway…" (See SPAS Draft EIR pages 4-699 [Alternative 1], 4-709 [Alternative 2], 4-721 [Alternative 3], 4-730 [Alternative 4], 4-741 [Alternative 5], 4-751 [Alternative 6], 4-761 [Alternative 7], 4-771 [Alternative 8], 4-774 [Alternative 9].) Impacts associated with operational bicycle access along Westchester Parkway would be less than significant. Construction-related impacts to bicycle facilities are discussed on Draft EIR page 4-1282 of the SPAS Draft EIR.

SPAS-PC00063 Whittman, Richard None Provided 8/27/2012

SPAS-PC00063-1

Comment:

It is essential that there be some kind of Metro/light rail connection that brings passengers from around the city either a) directly to the terminals OR b) directly to a fast and efficient APM service that brings passengers directly to the terminals. This should dramatically reduce the automobile circus in the Central Terminal Area

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Topical Response TR-SPAS-T-1 regarding transit options into LAX.

SPAS-PC00064 Siegel, Howard None Provided 8/25/2012

SPAS-PC00064-1

Comment:

As usual there is no direct connection of any public MetroRail or any other type of rail connection into the airport. Having to get off one public transportation system and then having to get on another is simply stupid. I think Heathrow Express and there is a great system

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Topical Response TR-SPAS-T-1 regarding transit options into LAX.

SPAS-PC00065 Haukohl, Kurt None Provided 8/27/2012

SPAS-PC00065-1

Comment:

Several of the Alternative taxiway layout schemes are problematic specifically recommended against in the FAA Engineering Brief #75 and in newer versions of the FAA AC 150-5300-13 change 17. Direct high speed crossing of a second parallel runway are high incursion points nationally.

Response:

The SPAS Draft EIR includes and evaluates seven alternatives that propose different configurations for potential airfield improvements, the majority (five) of which are consistent with the recommendation in FAA Advisory Circular (AC) 150/5300-13 change 17, dated 9/30/2011, that states "Avoid high speed exits that lead directly onto another runway." and are also consistent with the recommendations in the subsequent AC 150/5300-13A, dated 9/28/2012, that states "Ideally, aircraft exiting the runway via a high speed exit taxiway should continue on the parallel taxiway in the landing direction." Alternatives 1, 3, 5, 6, and 7 each include runway relocation to increase the separation between the two parallel runways in the north airfield and the addition of a parallel center taxiway to which proposed high-speed exits from Runway 6L/24R would connect. Alternatives 2 and 4, in which neither runway is relocated,

are the only alternatives with high-speed exits directly leading to a second parallel runway. Due to insufficient separation between the runways, a parallel taxiway is infeasible.

The commentor fails to specify exactly why he believes the alternatives' taxiway layout schemes are problematic in light of Engineering Brief #75. Nevertheless, contrary to the commentor's suggestion that the SPAS alternative taxiway layouts may be inconsistent with FAA Engineering Brief #75, the high-speed exits for Runway 6L/24R in Alternative 2 are located such that they cross Runway 6R/24L in the last third depending on operational direction per the recommendation of FAA Engineering Brief #75. That is also the case for Alternatives 1, 3, 5, 6, and 7. Alternative 4 represents the airfield that would be reasonably expected to occur if none of the Yellow Light Projects or their identified alternatives are constructed. As such, the runways and associated taxiways would remain in their existing locations. In conclusion, the safety implication of Alternative 2 is that it does improve safety by relocating the high-speed exits to the last third of the runway and by changing the angle of how aircraft would approach and cross Runway 24L. The safety implication for Alternative 4 is there is no safety improvements because no changes are made to the high-speed exits and how aircraft would cross Runway 24L.

Also, the design strategies of Engineering Brief #75 are only recommendations. Key elements of the brief were incorporated into AC 150/5300-13A, with which the proposed alternatives comply. Specifically, please refer to Section 401.b.(5) on page 117 of AC 150/5300-13A for a discussion of the recommendation to limit runway crossings to the outer thirds of the runway.

SPAS-PC00066 Fujita, James None Provided 8/27/2012

SPAS-PC00066-1

Comment:

LAX needs a peoplemover which would link the central terminal area with the Green Line and the Crenshaw Line. LAX needs to work with Metro to make sure that the transfer is simple and painless. A cross-platform transfer would work best. People don't care about bureaucratic jurisdictions but they do want rail to the airport.

Response:

The commentor's support for an APM is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Topical Response TR-SPAS-T-1 regarding transit options into LAX, including linkages to the Green Line and the planned LAX/Crenshaw Transit Corridor, as well as LAWA's coordination with Metro on regional rail issues and the inclusion of APMs in the alternatives. Please also see Chapter 2 of this Final EIR regarding the LAWA Staff-Recommended Alternative, which couples the airfield and terminal improvements associated with Alternative 1 with the ground access components associated with Alternative 9, including a discussion of the rationale behind the selection of the alternatives over the other alternatives evaluated in the SPAS Draft EIR.

SPAS-PC00067 Parks, Donna None Provided 8/27/2012

SPAS-PC00067-1

Comment:

I have friends and relatives who fly into John Wayne or Burbank to avoid the high costs of Ontario airport. Why ??? the airport was built to serve it serves no one- politics at its worst . Someone or LAWA should be accountable for the fact they have there residents and taxpayers going miles out of their way in order to get a "deal ". You can fly from Burbank to Vegas for $49.00 - out of Ontario a joke . Blatant disregard for public - need to revamp the whole LAWA system - starting at the top with the officials who seem to have their heads in the "clouds"

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please refer to Topical Response TR-SPAS-REG-1 regarding the fact that LAWA and the LAX Master Plan, of which SPAS is a part, support a regional approach to accommodating air travel demands in Southern California.

SPAS-PC00068 Rusch, Tim None Provided 8/29/2012

SPAS-PC00068-1

Comment:

update me please

Response:

This comment is noted. Your contact information has been added to the LAX Stakeholder Liaison's database. The Stakehold Liaison Office was created to facilitate public participation in the implementation of projects at LAX. It provides stakeholders with access to information about the project implementation process and serves as a means of communication on issues related to the modernization efforts at the airport. The Stakeholder Liaison's database is used to provide stakeholder and interested individuals with informational briefings on projects at LAX. (See page 4-2 in Section 4.2.2 of the Preliminary LAX SPAS Report.)

SPAS-PC00069 Mitchell, Michael S None Provided 8/29/2012

SPAS-PC00069-1

Comment:

Problems. The central terminal area design does not meet current airport security needs associated with vehicular access to airport facilities. The curb-front and access road system used for drop-off and pick-up of passengers in the terminal area was not built for today's level of traffic. best solution: Access remains the same as it is today The best design is right now for all it's services fly away congestion. Any normal company design knows this. The ITF should not be used much more dangerous than at 8 terminals. It is safe now and the the city is going broke and cannot carry more money going to bonds. the bond market is a bubble now. Note all the cities going bankrupt next door to lax. The ITF is not fair to the local scheduled service companies about 8 of them. This is a way of allowing the off shore monopolies company contracts to push the local companies out of the way and stop competition that keeps the public prices in check. The puc is against monopolies and so is the FAA. %10 of businesses must be small local business is an FAA rule. The local companies like Mickey's Space Ship Shuttle have taken hundreds of thousands of public passengers and they love us. Please do not put us out of business for this terrible design to stop the Clifton Moore design that works so well now. If you want to take only prime time and super shuttle out to the ITF do that but leave the scheduled service at the inter curb. Do not throw the baby out with the bath water on this. You have made a great mistake just designing the fly away bus company the local companies did this for free for 32 years and the way you are doing it is losing 40 million dollars and taking 60 million from local companies that would have made that money if it were not for this terrible design the fly away. Leave the valley schedule and maybe the down town but you have taken all this money over seas for the fly away company is over seas owned and bankrupt. Please have meetings with the local companies for we are left out of the whole planning and this is discrimination. thank you Michael S. Mitchell

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00070 McKinley Jr., James Earl — None Provided — 8/29/2012

SPAS-PC00070-1

Comment:

ONE TIME TRIP FOR VOCATION ON WHEN!

Response:

This is not a comment on the contents of the Draft EIR.

SPAS-PC00071 Teplitz, Rick — None Provided — 8/29/2012

SPAS-PC00071-1

Comment:

The NASA study showed that there is virtually no safety impact by moving the runway north. LAWA has a long-standiing agreement with the residents and stakeholders in the area not to expand north. Don't even think about it.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Response to Comment SPAS-PC00044-1 and Section 4.7.2 of the SPAS Draft EIR for a discussion of the North Airfield Safety Study (NASS) and several other safety studies completed for the north airfield. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00072 Dina, Gregory — None Provided — 8/30/2012

SPAS-PC00072-1

Comment:

I have lived in the communities north of LAX since I arrived in Los Angeles in 2000 to attend LMU. I recently chose to become a homeowner in this area and firmly support the alternatives that DO NOT move runways further north towards Westchester and Playa del Rey and increase the airport's footprint. I am a firm supporter of modernizing LAX and connecting the airport to the region's growing Metro rail network and understand the vital and important role that it plays in the local and regional economy. The recent efforts to upgrade the terminals and improve safety on the runways are long overdue and should be applauded by all resident and visitors of Los Angeles.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00073 Rosen, Stan None Provided 9/2/2012

SPAS-PC00073-1

Comment:

The effects of the impacts of these changes should be assessed over time. That is the developmental path to achieve each alternative will be different depending on the sequence of the implementation. For example busses could be used first on existing streets then on new roadways. This consideration will significantly affect the environmental impacts of each alternative.

Response:

The comment states that the effect of the changes proposed under each SPAS alternative would differ depending on the sequencing of the individual project elements. As discussed on page 2-8 of the SPAS Draft EIR, "The nine SPAS alternatives addressed within this Draft EIR were formulated at a programmatic level of conceptual planning, and no design or engineering plans, or construction phasing plans or schedules, are available for any of the alternatives. In general, however, it is anticipated that all of the improvements proposed under each alternative would be completed by 2025, with construction beginning in 2015." As further discussed on page 2-74 of the SPAS Draft EIR, "[d]epending on the outcome of the SPAS process, additional project-level CEQA review may be required for implementation of the improvements associated with the selected SPAS alternative." A similar programmatic approach was taken with the LAX Master Plan, with project level EIRs prepared for implementing projects, such as the Bradley West Project and the Crossfield Taxiway Project (CFTP).

Section 4.12.2.6 provides analysis of off-airport transportation impacts. Section 4.12.2.6.3 of the SPAS Draft EIR discusses potential construction impacts and applicable LAX Master Plan mitigation measures and commitments, consistent with the program-level analysis presented in the SPAS Draft EIR. As discussed in that section, "The nine alternatives currently being considered for the SPAS project are only at a conceptual level of planning." The SPAS Draft EIR analyzes the traffic impacts associated with the completion of each SPAS alternative relative to Existing (2010) conditions and Future (2025) without Alternatives conditions. Similar to the Bradley West Project, any subsequent project level activities will be reviewed in light of the SPAS Draft EIR to determine whether additional environmental documents must be prepared.

SPAS-PC00074 Johnston, Mark R None Provided 9/3/2012

SPAS-PC00074-1

Comment:

MY MIX OF IMPROVEMENTS ARE AS FOLLOWS; #1 SAFETY- MOVE THE NORTH RUNWAY TO ADVOID OPERATION ISSUES. #2 REPLACE SOME OF CTA PARKING WITH CHECK IN TERMINALS- A TRUELY GRAND ENTRANCE TO LAX. #3 THIS CTA CENTRAL FACILITY NEED TO HAVE THE NORTH/SOUTH LIGHT RAIL STATION SERVING BOTH THE CRENSHAW GRENN LIGHT AND COAST LINES TO SANTA MONICA AND SOUTH TO TORRNACE. #4 A CONSOLIDATED RENTAL CAR FACILITY PLEASE ! (LIKE THE REST OF THE WORLD) #5 PEOPLE MOVER TO CONECT TERMINALS PARKING AND RENTAL CAR CENER. GET RID OF ALL THOSE

SHUTTLE BUSES. #6 BUILD BRADLEY 3 TO THE WESTOF THE CURRENT TERMINAL - ALSO CONECTED BY PEOPLE MOVER.

Response:

To the extent this comment expresses support for a particular alternative, the comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project.

The types of improvements suggested in the six points of the comment are generally reflected in the range of alternatives included and addressed in the SPAS Draft EIR. Regarding point #1, to move the north runway to avoid operational issues, SPAS Alternatives 1, 5, and 6 propose different options for moving Runway 6L/24R, each responding differently to the airfield operations needs of the north airfield, as addressed in the SPAS Draft EIR. Regarding point # 2, to replace some of the CTA parking with check-in terminals, this idea is generally consistent with the design of Alternative 3, although in that case all of the parking within the CTA would be replaced with terminal operations. Regarding point #3, to have a CTA transit station that provides a north-south connection to both the future Metro Crenshaw/LAX and Green Lines extending to Santa Monica to the north and Torrance to the south, all of the SPAS alternatives proposing ground transportation system improvements provide for a connection with the future Metro Crenshaw/LAX Transit Line station, with the exception of Alternative 4. Metro, not LAWA, is the lead agency for the route planning and development of the Green Line extension; the commentor is encouraged to submit comments to Metro regarding how and where that route should be extended. Regarding point #4 for a CONRAC, SPAS Alternatives 3, 4, 8, and 9 all include a proposed CONRAC. Regarding point #5 for a people mover to connect terminals parking and the rental car center (i.e., CONRAC), such a connection is proposed in Alternatives 1, 2, and 8 via an elevated/dedicated busway and Alternatives 3 and 9 via an automated people mover (APM). Regarding point #6, it is unclear as to what the commentor considers to be "Bradley 3 to the west of the current terminal"; however, in the event this refers to the future Midfield Satellite Concourse proposed west of the Tom Bradley International Terminal, that project, which is separate from SPAS, will include a connection to the CTA via an APM or other appropriate system as determined in the detailed planning for that facility. Please see page 5-18 in Chapter 5, Cumulative Impacts, for further discussion of the Midfield Satellite Concourse Program.

SPAS-PC00075 Loreal None Provided 8/24/2012

SPAS-PC00075-1

Comment:

Hi

Hope you are well. I am a Business Development Manager in a leading SEO Agency. I have visited your website and analyzed that it is not ranking on the first page of Google for most of the keywords pertaining to your domain so I was wondering if you would be interested in getting Search engine optimization done for your website.

Let me know if you are interested, I would be happy to send you complete website detail and cost...

I look forward to your mail.

Response:

This is not a comment on the contents of the Draft EIR.

SPAS-PC00076 Davis, Christina V LAX Coastal Area Chamber of Commerce 9/6/2012

SPAS-PC00076-1

Comment:

On behalf of the LAX Coastal Area Chamber of Commerce, we request that an extension of the comment period be given regarding the LAX EIR.

We understand that you are anxious to complete the process, however, the future plans for LAX is not a decision to be taken lightly. In order to properly review these documents, we request that a 90 day extension be granted for public comment. Our intention is to carefully and methodically review the EIR and weigh in with educated comments that thoughtfully address the concerns of the LAX coastal area business community.

For the reasons above, we request an extension of the comment period.

Response:

The commentor's request for an extension of the public comment period for the SPAS Draft EIR is noted. LAWA provided a 75-day review period for the SPAS Draft EIR which ended on October 10, 2012. Section 21091(a) of the Public Resources Code requires that the review period for a Draft EIR that is submitted to the State Clearinghouse for review shall be at least 45 days. (See also State CEQA Guidelines Section 15105.) The review period for the SPAS Draft EIR provided an additional 30 days for public comment beyond the requirements of CEQA.

SPAS-PC00077 Shapiro, Lynne None Provided 9/6/2012

SPAS-PC00077-1

Comment:

I have lived in Marina del Rey in Silver Strand two blocks from the beach since 1987. At no time have I been disturbed by airplane noise until this summer. When I have taken a plane, it has always headed west, out over the ocean and then on to its northern or eastern direction. For the last three or four weeks, I have heard planes as if I lived next to the airport. At first, I was awakened three and four times a night by planes taking off on the half-hour. This week and possibly part of last week, the planes are heading north over the Main Channel and the Marina Peninsula and beach. Seven thousand of us residents are on the west side of the Marina (L.A. City statistics). The current routes are very disturbing. I don't know if the airport is experimenting or changing its fly zones, but I must protest this routing. As a homeowner and property tax payer, I do not want to hear airplanes zooming by every hour on the hour. This is supposed to be a tranquil, recreational community for its residents and for visitors from L.A. County and abroad. I hope that the airport will not make changes in the west-bound, over the Pacific, planes at LAX.

Response:

The comment primarily addresses existing conditions and does not address or comment on the analysis conducted in the SPAS Draft EIR. The content of this comment is similar to comment SPAS-PC00112-1; please refer to Response to Comment SPAS-PC00112-1.

SPAS-PC00078 Ryavec, Mark Venice Stakeholders Association 9/11/2012

SPAS-PC00078-1

Comment:

I am writing to provide comments on the LAX Specific Plan Amendment Study (SPAS) Draft Environmental Impact Report (EIR).

The EIR is deficient in meeting the objective of minimizing the environmental impacts on surrounding communities and in adequately exploring all alternatives to meet the objectives of the LAX SPAS process.

Response:

Consistent with the requirements of CEQA, the SPAS Draft EIR evaluated the potential environmental impacts associated with a broad range of nine alternatives. The Draft EIR delineates the previously identified LAX Master Plan commitments and mitigation measures that serve to reduce impacts of each alternative and identifies new mitigation measures for significant impacts that were not previously addressed in conjunction with the LAX Master Plan. Please see Response to Comment SPAS-PC00078-5 below regarding the additional alternative suggested by the commentor.

SPAS-PC00078-2

Comment:

These deficiencies are evident in both the lack of a thorough analysis of the potential to significantly expand air service at LAWA's Ontario airport and the degree to which such expansion could ameliorate the need for increased capacity at the Westchester facility.

Response:

Please refer to Topical Response TR-SPAS-REG-1 regarding the suggestion to consider and evaluate the expansion of LA/Ontario International Airport as an alternative to the LAX SPAS project.

SPAS-PC00078-3

Comment:

Further, the EIR does not explore to a significant degree alternative(s) that would significantly reduce existing negative impacts on nearby residents.

Response:

The SPAS Draft EIR provides a thorough analysis of nine alternatives, describes the impacts that would occur in areas nearby under each alternative, and recommends feasible mitigation measures for all significant impacts. The SPAS Draft EIR meets the requirements for alternatives analysis under State CEQA Guidelines Section 15126.6. Please see Response to Comment SPAS-PC00078-5 below regarding the additional alternative suggested by the commentor.

SPAS-PC00078-4

Comment:

In regards to Ontario, there does not appear be any analysis in the material presented to the public (as viewed on August 29, 2012 at the Proud Bird Restaurant) or in the written material provided to the public at that time of the potential for expansion at Ontario which could obviate and/or attenuate the

pace and/or degree of increase in annual passengers at LAX that drives the need for physical expansion, with all of its attendant negative effects on residents, traffic and local air quality.

Since expansion of the Ontario facility has the potential to greatly diminish the need for new capacity at LAX, it must be analyzed and presented to the public and decision-makers in the EIR process.

Response:

Please refer to Topical Response TR-SPAS-REG-1 regarding the suggestion to consider and evaluate the expansion of LA/Ontario International Airport as an alternative to the LAX SPAS project.

SPAS-PC00078-5

Comment:

The EIR also does not adequately explore the opportunity presented in Alternative 3 to significantly reduce the current noise impact of airport operations on residents to the north (Westchester) and northwest (Playa del Rey) by moving Runway 24 Left 340 feet to the south, along with the corresponding ability to modernize facilities by the re-construction of Terminals 1, 2 and 3.

I would suggest an Alternative 10 which combines moving Runway 24 Left 340 feet to the south with re-development and expansion of Terminals 1, 2 and 3, as envisioned in Alternative 3, utilizing some of their existing terminal footprint along with a portion of the land now occupied by the Central Terminal Area (CTA) internal access road and by parking structures in CTA just opposite from Terminals 1, 2 and 3. With the anticipated relocation of CTA long term parking capacity to Manchester Square, much of the CTA parking capacity will be redundant and a significant portion of the cleared land could be dedicated to terminal development. This would allow for the replacement - over time - of all gate capacity now provided at Terminals 1, 2 and 3 while providing completely modernized facilities to advance the goal of creating a world class airport at LAX.

One of the arguments advanced against Alternative 3's linear terminal design is that it would not provide for replacement of all gates currently provided at Terminals 1, 2 and 3. The use of a modest portion of land now used for the parking structures, along with relocation of the LAX access road southward within the CTA, would permit development of an equal number of gates at the new terminals.

Such a configuration would still allow for an internal access roadway, though narrower than the current one, dedicated to shuttles, buses, taxis, police and fire safety vehicles and possibly private vehicles for departures and arrivals and access to short term (hourly) parking, and also one (or two) linear trains or bus lines (instead of the proposed u-shaped design), similar to trains in many other airports - they do not turn-around but rather simply go back and forth on a relatively straight track.

Response:

The main feature of the alternative suggested in the comment is to essentially shift the existing configuration of Terminals 1, 2, and 3 southward in order to accommodate relocating Runway 6R/24L southward by 340 feet and not require the demolition of the concourses for Terminals 1, 2, and 3, as would otherwise occur under SPAS Alternative 3. This concept would allow the retention of more aircraft gates for Terminals 1, 2, and 3 and reduce the gate "imbalance" that would occur under Alternative 3 (i.e., the replacement of the pier concourses at Terminals 1, 2, and 3 with a linear concourse under Alternative 3 would result in substantially fewer gates on the north side of the CTA compared to the south side of the CTA, which, in turn, would require a lot more taxiing of aircraft between the north airfield and gates on the south side of the CTA than would otherwise occur if more gates were on the north side of the CTA). This alternative is considered infeasible for the following reasons. The ability to shift Terminals 1, 2, and 3, including the terminal functions, concourse areas, and airfield operations area (AOA including the gate apron/ramp areas and aircraft taxilanes between the concourses), southward is substantially limited by the presence of the existing key airport operations infrastructure, such as the air traffic control tower (ATCT) and the central utility plant (CUP), and the LAX Theme Building, a historic monument, located along the central east-west axis of the CTA. The distances between the southern edge of the buildings comprising Terminals 1, 2, and 3 to the aforementioned facilities are approximately 350 feet to the CUP, 400 feet to the ATCT, and 250 feet to

the Theme Building. These dimensions do not include the width of the upper (departures) and lower (arrivals) levels curbside roadways and main travel (through) lanes that front the terminals and collectively, including sidewalks and bus/shuttle passenger islands, extend approximately 125 feet southward. As such, the maximum distance that the terminal complex could be shifted southward without requiring demolition and/or relocation of one or more of the subject facilities is approximately 125 feet, which is only about one-third the distance needed to retain most, if not all, of the existing aircraft gates for Terminals 1, 2, and 3. This dimension assumes that future development of a linear bus or train system within the CTA, as suggested in the comment, would occur above the relocated upper and lower roadways, and not adjacent to them. The base of the terminals' lower level is approximately 15-20 feet below the elevation of the aircraft gate ramp/apron area, which means that a substantial amount of engineered fill would be required in order to extend the airfield operations area southward. In conjunction with shifting Terminals 1, 2, and 3 southward along with World Way North (the roadway that fronts the terminals), all of the major utilities located beneath World Way North would need to be relocated. Additionally, the southward realignment of World Way North, including both the upper level roadway and the lower level roadway, would require demolition and realignment/reconstruction of most, if not all, of the roadway ramps located to the east that connect with World Way North, including at Sepulveda Boulevard and Century Boulevard, and the airport return road. The basic nature and locations of the aforementioned improvements under this alternative occurring in the heart of the CTA suggest that construction would require numerous temporary closures of CTA facilities and roadways, and substantial disruptions to the day-to-day operation of the CTA.

Also, the environmental benefits associated with this alternative concept would be very limited compared to the impacts of other alternatives addressed in the SPAS Draft EIR, and those limited benefits would be more than offset by substantially greater construction impacts than under all other alternatives. Under CEQA, an EIR must focus on alternatives that can avoid or substantially lessen a project's significant environmental effects. (State CEQA Guidelines Section 15126.6(b)).

The environmental benefits of this alternative would be generally limited to reduced airfield-related operational air pollutant emissions, as compared to Alternative 3. As noted above, this concept would allow the retention of more aircraft gates for Terminals 1, 2, and 3 than would otherwise occur under Alternative 3 and would reduce the gate "imbalance." In so doing, the amount of aircraft taxiing required under this concept would be reduced, compared to Alternative 3, and could be generally comparable to that of Alternative 7, which relocates Runway 6R/24L 100 feet southward, but maintains Terminals 1, 2, and 3. As indicated in Table 4.2-13 of the SPAS Draft EIR, the airfield-related emissions associated with Alternative 7 would be less than those of Alternative 3, but generally greater than the emissions associated with Alternatives 1, 2, 5, and 6.

For these reasons, the commentor's suggested alternative was not evaluated in detail in the SPAS Draft EIR.

SPAS-PC00078-6

Comment:

With LAWA poised to spend billions of dollars on long overdue modernization, there should be more focus to assure that a significant priority is given in these expenditures to mitigating the current effects of operations on the long suffering residents living around LAX. The noise reductions from the relocation southward of Runway 24 Left would provide that palpable relief, especially to the Westchester and Playa del Rey communities. Expansion of the Ontario facility would slow the growth in ground and air traffic at LAX, again to the benefit of residents in the entire surrounding area.

Response:

While a southward relocation of Runway 6R/24L could provide some aircraft noise reduction in the areas of Westchester and Playa del Rey, the overall aircraft noise impacts would not be reduced, but rather would be shifted to the existing communities to the east, southeast, and south of the airport. As summarized in Table 1-16 of the SPAS Draft EIR, and further addressed in Section 4.9, Land Use and Planning, and Section 4.10.1, Aircraft Noise, of the SPAS Draft EIR, there would be more residential units newly exposed to 65 CNEL by moving Runway 6R/24L southward than would occur in moving Runway 6L/24R northward, and the total residential population newly exposed to 65 CNEL would be

lowest under Alternative 5 (i.e., relocate Runway 6L/24R 350 feet northward) than under any other alternative. Relative to a 1.5 CNEL increase above 65 CNEL, which includes areas currently exposed to >65 CNEL, the total residential units and residential population exposed to such an increase is consistently higher for alternatives that move Runway 6R/24L southward (Alternatives 3 and 7) than for alternatives that move Runway 6L/24R northward (Alternatives 1, 5, and 6). Similarly, to the extent that there is a shift in aviation activity from LAX to Ontario International Airport, any associated reduction in aircraft noise impacts around LAX would be accompanied by a corresponding increase in aircraft noise impacts around Ontario International Airport, as discussed in Chapter 6, Evaluation of Amendments to the LAX Specific Plan, of the SPAS Draft EIR.

SPAS-PC00078-7

Comment:

My thanks to the Alliance for a Regional Solution to Airport Congestion for its June 17, 2008 Runway 24 Left Realignment Proposal, which is combined here with re-deployment of Central Terminal Area parking lands made available by expected development of the new long term parking facility at Manchester Square.

Thank you for consideration of my views on this matter.

Response:

Please see Response to Comment SPAS-PC00130-814 regarding LAWA's review of the ARSAC alternative concept.

SPAS-PC00079 Garner, Bryan A LawProse Inc. 9/12/2012

SPAS-PC00079-1

Comment:

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Lesson # 86

What's wrong with underlining in briefs, contracts, and other legal documents?

ANSWER: Underlining is a holdover from the era of typewriters. It's crude and unsightly. Why else would you recoil from a published book that contained underlining? Admit it: you would. Any publisher that typeset a book with underlining would seem like a fly-by-night operation.

Underlining obscures part of some characters: the descenders on the lowercase letters g, j, p, q, and y. It also bumps into commas and semicolons. On the word-processors we use today, the underline is ridiculously close to the baseline of the type. And it's too thick --thicker than the strokes of most fonts we use for office documents.

All this is more than just bad aesthetics. Underlining hurts legibility: underlined text is noticeably harder to read, especially in big doses. The obscured letters and punctuation require more effort to see.

But if it's unsightly, doesn't that draw the eye and create emphasis? Well, it does that all right. But emphasis should not create negative attention.

While wonderful in their day, typewriters were limited to a single type, invariably roman. Instead of the elegant italics that typographers used as complementary fonts, typists had a key for underscoring. That was the only way (besides using all-caps) to show emphasis.

But those days are gone forever. So should be underlining.

Sources: Garner's Modern American Usage 271 (3d ed. 2009). The Redbook: A Manual on Legal Style 69-70 (2d ed. 2006).
Making Your Case: The Art of Persuading Judges 122 (2008). Matthew Butterick, Typography for Lawyers 78-79 (2010).

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Response:

This is not a comment on the contents of the Draft EIR.

SPAS-PC00080 Kurkowski, Yoshie The Sheppard 9/13/2012

SPAS-PC00080-1

Comment:

My name is Yoshie Kurkowski and I attended SPAS meeting back in Aug 28. I would like to know what is the name of a gentleman who talked about Olympics. If you can let me know who he was would be great. I went to spasvirtualmeeting website as well as laxspas.org but I could not figure out where the information I was looking for.

Response:

Lists that identify all of the commentors on the SPAS Draft EIR are provided in Chapter 4 of this Final EIR. The text of all comments received, including comments pertaining to the potential for the City of Los Angeles to host a future Olympics, is provided throughout this chapter of the Final EIR. In addition, copies of all of the comments received, in their original formats, are provided in Attachment 5. Videotaped comments were transcribed; this transcription is provided in Attachment 5.

SPAS-PC00081 Easwaran, Kenny University of Southern California 9/15/2012

SPAS-PC00081-1

Comment:

In studying the 9 proposed alternatives, it appears to me that only Alternative 3 fully addresses the ground transportation issues facing the airport. Given the increasing importance of public transportation in Los Angeles, and the increasing need for reduced reliance on personal automobiles for the world, as gasoline prices continue to increase and global warming advances, it seems more likely that travel by public transportation is more likely to exceed expectations in decades to come rather than fall short. This makes it essential to allow better connections to light rail stations and intermodal transportation centers than may be planned for.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Topical Response TR-SPAS-T-1 regarding transit options into LAX. As noted in the topical response, all of the SPAS alternatives, except for Alternative 4, provide connectivity with regional transit.

SPAS-PC00081-2

Comment:

Although Alternatives 1, 2, 8, 9 all make some attempt to connect the new Metro station at Aviation/Century to the terminal area, only Alternative 3 improves the connection to the existing Green Line station at Aviation/LAX. Additionally, Alternative 3 places the intermodal transportation center close to the intersection of two major interstates, rather than at a great distance from them - this will allow for increased bus service, as demand grows.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Currently, free shuttle service, operated approximately every 12 to 15 minutes, 24 hours a day, is provided to assist travelers in getting from/to the Metro Green Line Aviation Station. This shuttle service would be discontinued under all of the SPAS alternatives, except Alternative 4. Under Alternative 3, a pedestrian connection would be constructed between the ITC and the Green Line Aviation Station. Under the other alternatives, connectivity to public transit would occur via the LAX dedicated busway or APM, with a stop/connection at the future Metro Aviation/Century Station. It should be noted that this stop would provide connectivity with the Metro Green Line, as the Metro Green Line will be extended to the north on a shared right-of-way with the Crenshaw/LAX Transit Corridor, Please also see Topical Response TR-SPAS-T-1 regarding transit options into LAX.

SPAS-PC00081-3

Comment:

Alternative 9 additionally falls short in improvements for Green Line passengers, because it includes no busway, and thus passengers coming on the shuttle from the Green Line will have a substantially worse experience, and may be forced to drive personal cars instead.

Response:

The commentor's concerns about Alternative 9 are noted, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Alternative 9 would provide connectivity to Green Line passengers via the APM, which would stop at the future Metro Aviation/Century Station. Metro passengers would then be transported between the CTA and the future Metro station via an APM system, avoiding any roadway congestion entering the CTA. As noted in Response to Comment SPAS-PC00081-2, connectivity at the Metro Aviation/Century Station would serve Green Line passengers, as the Metro Green Line will be extended to the north on a shared right-of-way with the Crenshaw/LAX Transit Corridor. Please also see Topical Response TR-SPAS-T-1 regarding transit options into LAX.

SPAS-PC00081-4

Comment:

I understand that Alternative 3 involves major changes to the runways, which necessitates a total restructuring of the terminal facilities, which is why private automobile access to the terminal area is eliminated. However, it seems to me that even without such a radical restructuring of the runways and terminal facilities, it may become important to reduce or eliminate private automobile access to the terminal area. Even on alternatives 1, 2, 8, or 9, it may be useful to consider imposing a congestion charge on all private vehicles that enter the terminal area, to help encourage people to use public transit or parking facilities, and pick up travelers at the transportation centers. At the moment, the worst aspect of the airport experience is in waiting for half an hour in the smoggy roadway, either waiting for a bus, or waiting in a car to exit the area. This experience can be greatly improved, with or without the radical restructuring of the airport involved in Alternative 3.

Response:

All of the SPAS alternatives seek to reduce the private automobile traffic (POV) in the Central Terminal Area (CTA) by providing: (1) kiss-and-ride facilities off-airport; (2) better connection to the CTA from facilities located outside the CTA using either a busway or an APM; and (3) additional parking outside the CTA that would encourage passengers to park in these facilities, with transport to the CTA using the busway or the APM. Please see Section 4.12.1 and 4.12.2 of the SPAS Draft EIR for a discussion of the impacts to on and off-airport traffic under each of the alternatives. As discussed on page 4-1100 in Section 4.12.1.7.2 of the SPAS Draft EIR, only 5 percent of the POV's were reassigned from the airport's CTA to kiss-and-ride facilities. Table 4.12.1-15 on page 4-1103 of the SPAS Draft EIR shows that the volume of kiss-and-ride passengers during the arrivals level peak hour is equal to 2.55 percent of the total passenger mode share, which represents, as discussed above, 5 percent of passengers that arrive at the airport via private vehicles. However, this percentage may be much greater as passengers recognize the higher level of convenience in using these facilities. The SPAS on- and off-airport transportation analyses made conservative assumptions in reassigning traffic to facilities located outside the CTA in order to present a worst-case scenario in the CTA.

Consideration was given to congestion pricing alternatives as part of the assessment of potential CTA access improvements presented in Option 1 on page 21 in Appendix E2-1 of the Preliminary LAX SPAS Report; however, additional delays caused by revenue collection were expected to result in increased congestion on CTA roadways and extending onto off-airport roadways. If congestion pricing were to be implemented, the on-airport roadway system would need to include sufficient space to accommodate queuing vehicles waiting to pay their toll, as well as escape routes for drivers unwilling to pay to access the CTA. Due to space constraints within the CTA, this is infeasible. While electronic toll collection would, in theory, improve the flow of traffic entering the CTA, it is unlikely that the vast majority of motorists would purchase a transponder for their vehicle to automatically deduct their entrance fee into the CTA, resulting in delays and increased vehicle congestion accessing the CTA. Dedicated conveyance systems, such as an elevated busway provided in Alternatives 1, 2, and 8, or an APM system provided in Alternatives 3 and 9, are intended to offer passengers more time-certain travel time options to the CTA. They also seek to incentivize passengers to use these facilities by choice based on convenience rather than by imposing penalties on use of CTA roadways.

As indicated in Section 4.12.1 of the SPAS Draft EIR, with implementation of the SPAS alternatives, on-airport traffic impacts related to curbsides and to departures and arrivals level roadways would be less than significant for Alternatives 1, 2, 4, 8, and 9. All of these alternatives would, however, result in a significant and unavoidable impact related to the volume to capacity level at one intersection within the CTA. Alternatives 1, 2, 8, and 9 would also result in significant and unavoidable construction-related impacts to the on-airport transportation system. No on-airport traffic impacts would occur under Alternative 3 because, under that scenario, the CTA would be closed to private vehicles. Alternatives 5, 6, and 7 focus on airfield and terminal improvements that, in themselves, would not effect on-airport traffic, but would be coupled with the ground transportation improvements proposed under Alternatives 1, 2, 8, or 9, the impacts of which are summarized above.

SPAS-PC00081-5

Comment:

Thus, I strongly support Alternative 3 on the basis of the ground transportation features it includes. If this alternative is ruled out on the basis of other features, then I support a version of Alternatives 1, 2, or 8, with the addition of some sort of surcharge or other incentive for private automobiles to avoid the center terminal area. This is the best way to serve passengers coming from the Green Line as well as the future Crenshaw Line, and to improve access to the terminals for all passengers, and not just those who can afford to use a personal automobile in a future of ever-increasing gasoline prices.

Response:

The commentor's support for Alternative 3 or, secondarily, Alternatives 1, 2, or 8, is noted, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Chapter 2 of this Final EIR regarding the LAWA Staff-Recommended Alternative, which couples the airfield and terminal improvements associated with Alternative 1 with the ground access components associated with Alternative 9. Please see Response to Comment SPAS-PC00081-4 regarding reduction of private automobile traffic in the CTA under the SPAS alternatives and consideration of congestion pricing.

SPAS-PC00082 Garner, Bryan A LawProse Inc. 9/17/2012

SPAS-PC00082-1

Comment:

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Lesson # 87

What are the rules on indenting?

ANSWER: The first rule of indenting is to change your word-processor's default tab setting.

Half-inch tabs are a sure sign of a dysfunctional layout. They jump out at you as soon as you pick up a document and see "A." half an inch from the left margin, followed by another half inch before the text begins. The problem builds when writers use cumulative indents, especially for headings. After a few levels of hierarchy we get a pile-up: lines of boldface heading crammed in toward the right margin followed by flush-left text. So start by setting your tab stops for a quarter of an inch.

The second rule is to learn how to create proper hanging indents for numbered and bulleted lists. The number or bullet is to the left of the copy (though not necessarily on the left margin--the whole list can itself be indented). Just to the right of the number or bullet is the text in the list, with all lines indented to the same point.

The third rule of indenting is to avoid cumulative indents by limiting the levels of hierarchy in your headings: two or three should do it. Even then, you can create a better-looking page by keeping all headings flush left and using other typographical elements to show the hierarchy--as demonstrated on pages 308-11 of The Winning Brief.

Sources: Garner's Modern American Usage 271 (3d ed. 2009).
The Redbook: A Manual on Legal Style 81-82, 84-85 (2d ed. 2006).
Matthew Butterick, Typography for Lawyers 94-96 (2010).
The Winning Brief 308-11 (2d ed. 2004).

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Response:

This is not a comment on the contents of the Draft EIR.

SPAS-PC00083 Klein, Ellen None Provided 9/17/2012

SPAS-PC00083-1

Comment:

I want to give my opinion on the SPAS EIR:
I would like to adopt Alternative 2, plus Alternative 9 with a realistic train service plan that includes all the terminals.

This position has been taken by the Neighborhood Council of Westchester/Playa and ARSAC (Alliance for a Regional Solution to Airport Congestion). I heartily support this position and strongly urge that you

also encourage its adoption. Alternative 2 does NOT move 24R closer to our communities and Alternative 9 includes a Consolidated Rental Auto Facility (CONRAC).

All the alternatives would enable LAX to handle the projected traffic in 2025: 78.9 Million Annual Passengers (MAP). Therefore, there would be no gain in passenger capacity from moving 24R North. The impact to the community is completely unnecessary both from a neighborhood view and an airport safety view.

Alt. 2 is the most economical, efficient, and environmentally sound choice. It is also the least intrusive into the neighborhoods. It does include realigning some taxiways as noted in the North Airfield Safety Study. Improvements and extensions to the east end of 24L are also included which would allow the New Larger Aircraft (such as the A380) easier take off from that runway.The North Airfield Safety Study concluded that the

The North Airfield is safe AS IT IS to handle the future estimated air traffic. The study did recommend taxiway realignment that is included in Alt. 2.

If 24R was moved as far north as LAWA actually wants to move it, the Delta building and probably the Paradise Building would have to be removed. A valid question is what market value was used in LAWA's estimates? LAWA has assumed that the In-N-Out and Parking Spot would not be in an FAA protective or buffer zone because pilots would land midway down 24R (which would be extended West to Pershing). Many pilots like to land as soon as their assigned runway is available, not midway down it.

If 24R were to be moved as far north as LAWA actually wants it moved, at least 500 jobs would be lost. Some businesses might also be lost. The business district only recently recovered from losing 10,000 customers from previous LAX expansions. Also, property values of good neighbors would go down. Many Westchester residents have been there for over 60 years and don't deserve this from our neighbor.

Modernizing the airport: improving the elevators, escalators, bathrooms, signage, roadways, etc. would provide more jobs that moving the runway. And it would greatly improve the passengers' experience of traveling through LAX.

There are some extremely expensive issues in moving the runway North:

- Filling in the Manchester Tunnel. This is the tunnel that was originally built to connect the North communities to the South, by tunneling underneath LAX. It was to be part of the never-authorized Laurel Canyon Freeway that was being considered back in the late 1950s and early 1960s. It starts. where Lincoln turns East, near the apartment complex, and runs South to within 50 ft of 24L. The last time it was inspected (after a very dry season) there was water in the tunnel. LAWA has recommended filling the tunnel with sand (a glorious recipe for sink holes!), or taking the top off the tunnel and filling it with dirt. (The tunnel is about 35 ft down and 4 to 6 lanes wide. We all remember how long Playa Vista had a huge mound of dirt to compress the ground.) This would mean closing both runwas for some time, putting an undue amount of traffic on the South Airfield. A recommendation from a worker familiar with tunnel problems is that the tunnel be filled in with a special foam that was developed to handle this problem of filling in a hole to withstand heavy weights landing over it. The cost could run into the millions, possibly billions.
- Moving affected sewers. Other city departments have stated that the sewers cannot be moved
- Property acquisition. As noted above.
- Enclosing the Argo Flood Control Channel. This channel is required as a drain for a flood control plain and, as such, should not be enclosed. It is under the jurisdiction of the Army Corps of Engineers and LAWA does not have any approval as of the DEIR date to make changes to the channel.

PLEASE DO NOT CONSIDER any Alternative that involves movin the runway. MODERNIZE, CONSOLIDATE, but don't EXPAND!!

Response:

The contents of this comment are similar to comment SPAS-PC00128-2; please refer to Response to Comment SPAS-PC00128-2.

SPAS-PC00084 Ward, Brian None Provided 9/18/2012

SPAS-PC00084-1

Comment:

There is an incredible amount of material available for study, and I will not pretend that I have reviewed it all. I have lived in Westchester in the past at the Park West apartments which border Northside Development land. I am also a stakeholder in this debate, as I work for one of the airlines at LAX. I am old enough and lived here long enough to remember when the city bought up land bordering the north field in the seventies, force majure, to create space for further expansion and/or a buffer zone. It is time that the city of LA cashes in on that investment, and use the land for the maximum benefit of LAX. This is not the time in history that groups like ARSEC and environmentalists should have the green, leftest luxury of stopping expansion when we have so much unemployment and stagnant economic conditions. The city needs the revenue and people need the jobs that LAX provides. Current Master Plan D reduction in size (gates) and senseless destruction of terminals 1,2, and 3 should absolutely not be implemented; what were people like Villaragosa, Rosendahl and the City Council thinking when they caved to the special interests of a small, vocal group of rebels in Westchester?! Absolute spineless weakness! Let me bring up an interesting historical perspective: westside middle-class communities like El Segundo and Westchester were practically built by the prosperity created by the aviation industry. Many of the whiners in these communities who fight against LAX expansion are ironically the sons and daughters of that aeronautical generation's workers and have had the lifestyle they have and ability to live here only because of Socal's aviation past! Let's get real with our current economic reality and provide jobs for construction now and aviation employees in the near future. Move 24R far enough north to build the center taxiway (for safety, capacity, traffic balance, large size category aircraft like the A380). Do NOT destroy current terminals 1,2, and 3. Follow through with the second phase of Bradley expansion for additional gates. Develop remaining northside properties with warehouse industry (preferably aviation related) for a noise buffer. And do whatever is necessary in the road access situation to hook into the metro train and external parking lots. Green considerations should be the last consideration. This airport is a huge, beneficial economic engine and should serve our citizens for decades to come. Ontario will come back on its own when the lingering effects of the real estate bubble/foreclosures wane. Palmdale is out of the question. LA residents (even SF Valley) have made it clear for years that nobody wants to go all the way out there to take a flight. Makes no sense for LAX's hub-and-spoke airlines to fragment traffic away from their hub business model and they are the 800 pound gorilla stakeholder customers who pay the bills. Top foreign airlines (eg transpacific) have no interest at all in serving satellite airports with widebodies either. MAN UP over there at LAWA and push the development through, force majure like in the past if necessary; we need it! We've spent enough precious taxpayer money already on studies. It's time to get it done. Have we become so paralyzed now that we can no longer complete major infrastructure projects without melting down internally? I watch chinese cities build entire airports in the time it takes us to perform a ridiculous environmental impact study!

Response:

The comment, including the commentor's support for alternatives that would move Runway 6L/24R to the north and provide for a centerfield taxiway (i.e., Alternatives 1, 5, and 6), is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Chapter 2 of this Final EIR regarding the LAWA Staff-Recommended Alternative, which couples the airfield and terminal improvements associated with Alternative 1 with the ground access components associated with Alternative 9, including a discussion of the rationale behind the selection of the alternatives over the other alternatives evaluated in the SPAS Draft EIR. Please see Responses to Comments SPAS-PC00168-1 and SPAS-PH300015-1 regarding the LAX Northside Plan Update. Please see Topical Response TR-SPAS-T-1 regarding transit options into LAX and Topical Response TR-SPAS-REG-1 regarding the use of regional airports.

It should be noted that studies associated with LAX development plans, including SPAS and the SPAS Draft EIR, are funded by airport funds, not by general tax dollars.

SPAS-PC00085 Edelman, Lynn None Provided 9/19/2012

SPAS-PC00085-1

Comment:

Please STOP this project instead:

Adopt Alternative 2, plus Alternative 9 and a realistic train service plan that includes all the terminals

The reasons I am opposed to moving the north runway include:

* Any of the runway alternatives (1-7) would result in the same number of passengers that LAX can accommodate. All the alternatives would enable LAX to handle the projected traffic in 2025: 78.9 Million Annual Passengers (MAP). Therefore, there would be no gain in passenger capacity from moving 24R North.
* Alt. 2 is the most economical, efficient, and environmentally sound choice. It is also the least intrusive into the neighborhoods. It does include realigning some taxiways as noted in the North Airfield Safety Study. Improvements and extensions to the east end of 24L are also included which would allow the New Larger Aircraft (such as the A380) easier take off from that runway.
* The North Airfield Safety Study concluded that the North Airfield is safe AS IT IS to handle the future estimated air traffic. The study did recommend taxiway realignment that is included in Alt. 2.
* If 24R was moved as far north as LAWA actually wants to move it, the Delta building and probably the Paradise Building would have to be removed. A valid question is what market value was used in LAWA's estimates? (People who have plowed through the Acquisitions section say that it seems low.) LAWA has assumed that the In-N-Out and Parking Spot would not be in an FAA protective or buffer zone because pilots would land midway down 24R (which would be extended West to Pershing). Many pilots like to land as soon as their assigned runway is available, not midway down it.
* If 24R were to be moved as far north as LAWA actually wants it moved, at least 500 jobs would be lost. Some businesses might also be lost. The business district only recently recovered from losing 10,000 customers from previous LAX expansions.
* Modernizing the airport: improving the elevators, escalators, bathrooms, signage, roadways, etc. would provide more jobs that moving the runway. And it would greatly improve the passengers' experience of traveling through LAX.
* Adding a Centerfield taxiway (between the runways) does NOT create a Group 6 airfield. It does, however, decrease the space between the wings of aircraft on a runway and the Centerfield taxiway. (Group 6 refers to the class of New Larger Aircraft, such as the A380.)
* According to LAWA's figures, Group 6 aircraft in 2025 will be just 1.6% of total air traffic. It seems ridiculous to go through so much upheaval, not to mention cost, for such a small number. The Airbus A380 has been landing and taking off with no trouble.

There are some extremely expensive issues in moving the runway North:

* Filling in the Manchester Tunnel. This is the tunnel that was originally built to connect the North communities to the South, by tunneling underneath LAX. It was to be part of the never-authorized Laurel Canyon Freeway that was being considered back in the late 1950s and early 1960s. It starts. where Lincoln turns East, near the apartment complex, and runs South to within 50 ft of 24L. The last time it was inspected (after a very dry season) there was water in the tunnel. LAWA has recommended filling the tunnel with sand (a glorious recipe for sink holes!), or taking the top off the tunnel and filling it with dirt. (The tunnel is about 35 ft down and 4 to 6 lanes wide. We all remember how long Playa Vista had a huge mound of dirt to compress the ground.) This would mean closing both runwas for some time, putting an undue amount of traffic on the South Airfield. A recommendation from a worker familiar with tunnel problems is that the tunnel be filled in with a special foam that was developed to handle this

problem of filling in a hole to withstand heavy weights landing over it. The cost could run into the millions, possibly billions.
* Moving affected sewers. Other city departments have stated that the sewers cannot be moved.
Property acquisition. As noted above.
* Enclosing the Argo Flood Control Channel. This channel is required as a drain for a flood control plain and, as such, should not be enclosed. It is under the jurisdiction of the Army Corps of Engineers and LAWA does not have any approval as of the DEIR date to make changes to the channel.

The DEIR includes 7 alternatives that involve the runways and 2 alternatives that involve other issues such as the Consolidated Rental Auto Facility (CONRAC). (Analyses are from ARSAC.) Alt. 1: Moves 24R 260 ft North and 600 ft West. Moves 24L 1250 ft East. Adds a Centerfield Taxiway.
- Displaces businesses and homes
- Risky construction factors; could be very costly in time and delays
- Fixes little traffic or Central Terminal Access (CTA) - Impacts major underground utilities, sewer, and tunnel
Alt.2: Leaves Runways in current location. Reconfigures taxiways. Adds new terminal and extends Bradley and Mid-Course terminals North
- Most affordable. Most efficient. Most environmentally sound. Less impact to communities.
- Does little for CTA traffic and access Alt. 3: City approved Alt. D. Extends 24R 1495 ft West. Moves 24L 340 ft South and adds Centerfield taxiway. Ground Transportation Center in Manchester Square with a baggage tunnel to the CTA. CTA closed to car traffic. Integrated Transportation Center in Continental City (Aviation/Imperial).
- Not affordable. Cost has risen from $12 billion in 2004 to over $100 billion in 8 years
Alt. 4: Alt. D Green Light projects + 24R left as is. 24L moves 835 ft East. No Centerfield taxiway. Argo Flood Channel partially enclosed. CONRAC in Manchester Square. No terminal, taxiway, or taxilane changes.
- Does little for CTA traffic and access Alt. 5: Moves 24R 350 ft North and 604 ft West, and widens it to 200 ft. Adds Centerfield taxiway. Lincoln Blvd moved sub terrain & new Sepulveda connect. Fully encloses all 9857 ft of the Argo Channel. Compatible with ground access in Alts. 1, 2, 8 & 9.
- Greatest impacts to businesses and residents
- Major move of flight path North (heavily impacting Westchester and Inglewood)
- Risky construction factors, could be very costly in time and delays
- Does little for traffic and CTA access.
Alt. 6: Moves 24R 100 ft North. Moves 24L 1250 East. Adds Centerfield taxiway. Reconfigures taxiways & taxilanes. Lincoln Blvd moved sub terrain & new Sepulveda connect. -Does little for traffic and CTA access. Eliminates all remote gates. Compatible with ground access in Alts 1, 2, 8 & 9.
- Impacts businesses & residents Adds new terminal and extends Bradley and Mid-Course terminals North
- Moves flight path North
- Risky construction factors, could be very costly in time and delays Alt. 7: 24R no extension or widening. 24L moves 1250 ft East. Adds Centerfield taxiway. Reconfigures
taxiways & taxilanes. All remote gates eliminated. No business district impact. Adds new terminal and extends Bradley and Mid-Course terminals North. Compatible with ground access in Alts 1, 2, 8 & 9.
- Avoids construction risks of tunnel, roadways, sewers Alt. 8: Has CONRAC in Lot C with bus service into CTA. Parking moved to Manchester Square
- Only partially addresses CTA traffic
Alt. 9: Moves CONRAC to Manchester Square with a people mover that goes into CTA
- Creation of people mover that could service amount of people traffic and length required to transport from Manchester Square into CTA problematic.
- Once people mover in place, CTA traffic would be reduced.
Thank you for your attention to my objections.

Response:

The contents of this comment are similar to comments SPAS-PC00128-2 and SPAS-PC00128-5; please refer to the responses to these comments.

SPAS-PC00086 Sandoval, Paula None Provided 9/19/2012

SPAS-PC00086-1

Comment:

As a 20+ year resident of Playa Del Rey and Westchester, I continue to have concerns on the effects LAWA proposed plans will have on our community. After a detailed review, we strongly support that you

Adopt Alternative 2, plus Alternative 9 and a realistic train service plan that includes all the terminals.

This position has been taken by the Neighborhood Council of Westchester/Playa and ARSAC (Alliance for a Regional Solution to Airport Congestion). I heartily support this position and strongly urge that you also encourage its adoption. Alternative 2 does NOT move 24R closer to our communities and Alternative 9 includes a Consolidated Rental Auto Facility (CONRAC).

Some grounds on why I am taking this position are noted below.

* Any of the runway alternatives (1-7) would result in the same number of passengers that LAX can accommodate. All the alternatives would enable LAX to handle the projected traffic in 2025: 78.9 Million Annual Passengers (MAP). Therefore, there would be no gain in passenger capacity from moving 24R North.
* Alt. 2 is the most economical, efficient, and environmentally sound choice. It is also the least intrusive into the neighborhoods. It does include realigning some taxiways as noted in the North Airfield Safety Study. Improvements and extensions to the east end of 24L are also included which would allow the New Larger Aircraft (such as the A380) easier take off from that runway.
* If 24R were to be moved as far north as LAWA actually wants it moved, at least 500 jobs would be lost. Some businesses might also be lost. The business district only recently recovered from losing 10,000 customers from previous LAX expansions.
* Modernizing the airport: improving the elevators, escalators, bathrooms, signage, roadways, etc. would provide more jobs that moving the runway. And it would greatly improve the passengers' experience of traveling through LAX.

There are some extremely expensive issues in moving the runway North that completely affect our community:

* Filling in the Manchester Tunnel. This is the tunnel that was originally built to connect the North communities to the South, by tunneling underneath LAX. It was to be part of the never-authorized Laurel Canyon Freeway that was being considered back in the late 1950s and early 1960s. It starts. where Lincoln turns East, near the apartment complex, and runs South to within 50 ft of 24L. The last time it was inspected (after a very dry season) there was water in the tunnel. LAWA has recommended filling the tunnel with sand (a glorious recipe for sink holes!), or taking the top off the tunnel and filling it with dirt. (The tunnel is about 35 ft down and 4 to 6 lanes wide. We all remember how long Playa Vista had a huge mound of dirt to compress the ground.) This would mean closing both runwas for some time, putting an undue amount of traffic on the South Airfield. A recommendation from a worker familiar with tunnel problems is that the tunnel be filled in with a special foam that was developed to handle this problem of filling in a hole to withstand heavy weights landing over it. The cost could run into the millions, possibly billions.
* Moving affected sewers. Other city departments have stated that the sewers cannot be moved.

* Property acquisition. As noted above.

* Enclosing the Argo Flood Control Channel. This channel is required as a drain for a flood control plain and, as such, should not be enclosed. It is under the jurisdiction of the Army Corps of Engineers and LAWA does not have any approval as of the DEIR date to make changes to the channel.

The DEIR includes 7 alternatives that involve the runways and 2 alternatives that involve other issues such as the Consolidated Rental Auto Facility (CONRAC). (Analyses are from ARSAC.)

Alt. 1: Moves 24R 260 ft North and 600 ft West. Moves 24L 1250 ft East. Adds a Centerfield Taxiway.
- Displaces businesses and homes
- Risky construction factors; could be very costly in time and delays
- Fixes little traffic or Central Terminal Access (CTA)
- Impacts major underground utilities, sewer, and tunnel

Alt.2: Leaves Runways in current location. Reconfigures taxiways. Adds new terminal and extends Bradley and Mid-Course terminals North
- Most affordable. Most efficient. Most environmentally sound. Less impact to communities.
- Does little for CTA traffic and access

Alt. 3: City approved Alt. D. Extends 24R 1495 ft West. Moves 24L 340 ft South and adds Centerfield taxiway. Ground Transportation Center in Manchester Square with a baggage tunnel to the CTA. CTA closed to car traffic. Integrated Transportation Center in Continental City (Aviation/Imperial).
- Not affordable. Cost has risen from $12 billion in 2004 to over $100 billion in 8 years

Alt. 4: Alt. D Green Light projects +. 24R left as is. 24L moves 835 ft East. No Centerfield taxiway. Argo Flood Channel partially enclosed. CONRAC in Manchester Square. No terminal, taxiway, or taxilane changes.
- Does little for CTA traffic and access

Alt. 5: Moves 24R 350 ft North and 604 ft West, and widens it to 200 ft. Adds Centerfield taxiway. Lincoln Blvd moved sub terrain & new Sepulveda connect. Fully encloses all 9857 ft of the Argo Channel. Compatible with ground access in Alts. 1, 2, 8 & 9.
- Greatest impacts to businesses and residents
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Alt. 6: Moves 24R 100 ft North. Moves 24L 1250 East. Adds Centerfield taxiway. Reconfigures taxiways & taxilanes. Lincoln Blvd moved sub terrain & new Sepulveda connect. -Does little for traffic and CTA access. Eliminates all remote gates. Compatible with ground access in Alts 1, 2, 8 & 9.
- Impacts businesses & residents Adds new terminal and extends Bradley and Mid-Course terminals North
- Moves flight path North
- Risky construction factors, could be very costly in time and delays

Alt. 7: 24R no extension or widening. 24L moves 1250 ft East. Adds Centerfield taxiway. Reconfigures taxiways & taxilanes. All remote gates eliminated. No business district impact. Adds new terminal and extends Bradley and Mid-Course terminals North. Compatible with ground access in Alts 1, 2, 8 & 9.
- Avoids construction risks of tunnel, roadways, sewers

Alt. 8: Has CONRAC in Lot C with bus service into CTA. Parking moved to Manchester Square
- Only partially addresses CTA traffic

Alt. 9: Moves CONRAC to Manchester Square with a people mover that goes into CTA
- Creation of people mover that could service amount of people traffic and length required to transport from Manchester Square into CTA problematic.
- Once people mover in place, CTA traffic would be reduced.

I truly appreciate your reading through this and consideration of Alternatives 2 complimented with 9. Our community greatly appreciates your support.

Response:

The contents of this comment are similar to comments SPAS-PC00128-2, SPAS-PC00128-5, and SPAS-PC00130-46; please refer to the responses to these comments.

SPAS-PC00087 Dosch, Richard The LA Loop 9/19/2012

SPAS-PC00087-1

Comment:

Suggestions:

* Consistency for airline terminology on flight update screens from one airline/terminal to another
* More seats in baggage claim areas for terminals
* Food outlet in each terminal before security screening
* Prevent airport personnel vehicles from occupying passenger pick-up spaces along curb outside of baggage claim
* GET MORE CASHIERS IN THE LIMO AND BUS HOLDING LOT!!!!!!! Whoever is responsible for the lack of cashiers is a real jackass! Cars wind around within the lot and then overflow into a long line on the street. This is bullshit and shows a gross lack of concern on the part of the airport for the efficient service of those vehicles and their passengers - remember - you are charging them money and providing deplorable service!
* More obvious directions for passengers between T5, T6, T7 and T8 when flights land in one of those terminals and then the pax has to go to another terminal for luggage. Whatever is there is not adequate.
* Have cashiers at terminal parking garages say thank you when customers pay their fee. As of now less than 50% say thank you.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00088 Dunagan, Bob None Provided 9/20/2012

SPAS-PC00088-1

Comment:

I simply cannot support this gross misuse of precious public resources.

I would like to issue a challenge to you folks on the other side. Allow our group to PAINT -on the ground and across the buildings that would be torn down or evacuated - a three foot wide RED stripe and allow the citizens to get the taste of what lawa wants to take. Then I would like to see an accurate, weighted by experience, budget of what this mess will cost, how all of the actions are going to be paid for and by whom, and why. I sincerely doubt that anyone on your side really knows.

You folks should be ashamed of yourselves, but somehow, I don't think you are.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the

adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)). The property acquisition that would be required under Alternatives 1, 2, 3, 4, 8, and 9 is shown in Figures 2-11, 2-12, 2-13, and 2-14 and listed in Table 2-4 and Table 2-5 in Section 2.3.1.11 of the SPAS Draft EIR. In addition, Table 4.9-5 in Section 4.9 of the SPAS Draft EIR presents a comparison of acquisition areas by land use for the applicable SPAS alternatives. As noted in Table 4.9-5, no acquisition is proposed for Alternatives 5, 6, and 7 since these alternatives focus on airfield and terminal components only, although acquisition would be required for the ground access components with which these alternatives would be paired.

Please see Response to Comment SPAS-PC00130-730 regarding the treatment of economic conditions in an EIR, including costs of proposed improvements. As indicated in that response, CEQA does not require purely social or economic impacts to be analyzed in an EIR. (State CEQA Guidelines Section 15064(e).) Nevertheless, rough-order-of-magnitude cost estimates for the alternatives were developed as part of SPAS. The cost estimates are discussed in Chapter 8 of the Preliminary LAX SPAS Report, with detailed information provided in Appendix G. Please see Response to Comment SPAS-PC00096-2 regarding funding sources for SPAS improvements.

SPAS-PC00089 Hench, Cyndi Neighborhood Council of Westchester Playa 9/4/2012

SPAS-PC00089-1

Comment:

The Neighborhood Council of Westchester/Playa supports a modern and revitalized LAX. After considering the Specific Plan Amendment Study Draft Environmental Impact Report ("SPAS" or "Study") that details the possible options for improvements at LAX we are excited to support a combination of Alternative 2 and Alternative 9 for the following reasons:

- Combining Alternative 2 and 9 fulfills SPAS goal to have airfield, terminal and transportation improvements.
- Alternatives 2 and 9 are the most affordable design options to ensure that LAX capacity needs are met to protect the economy and tourism.
- Independent evaluators have shown these alternatives to allow for safe operation of all aircraft at LAX.
- The analysis presented in the Study shows that Alternative 2 is superior to all others in airport operational efficiency.
- The analysis also shows that Alternatives 2 is clearly the environmentally superior alternative to the others when air quality and environmental impacts are considered.
- These alternatives will bring $10.5 billion dollars in investment to LAX and the City of Los Angeles.
- The combination of Alternative 2 and 9 provides permanent long-term job opportunities by creating a state-of-the-art passenger facility and transportation system that requires ongoing maintenance and support thus strengthening the Southern California economy.
- Funding for these upgrades will make this the largest project in Los Angeles history. Knowing that funding sources are limited, we encourage LAWA to invest in the infrastructure that will improve the passenger experience and address the transportation issues that surround LAX.

As the first line of welcome to travelers to Los Angeles, the Neighborhood Council of Westchester/Playa is excited to see improvements made to LAX that will modernize and revitalize the nation's #1 origination-destination and third busiest airport in the country. We believe that these alternatives will invest in Los Angeles' economy and build an airport that we can be proud of - that maintains and increases safety, efficiency, and community.

Response:

The commentor's support for Alternatives 2 and 9 is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Chapter 2 of this Final EIR regarding the LAWA Staff-Recommended Alternative, which couples the airfield and terminal improvements associated with Alternative 1 with the ground

access components associated with Alternative 9, including a discussion of the rationale behind the selection of these alternatives over the other alternatives evaluated in the SPAS Draft EIR.

It should be noted that the combination of Alternatives 2 and 9 is not the lowest cost design option (see Table 8-2 in Chapter 8 of the Preliminary LAX SPAS Report).

As discussed on pages 1-10 and 1-11 in Section 1.2.1 of the SPAS Draft EIR, one of the objectives associated with the completion of the SPAS process is to provide north airfield improvements that support the safe and efficient movement of aircraft at LAX. This includes adding implementing improvements that are consistent with FAA design standards and providing sufficient areas at the ends of the runways for holding arriving flights and sequencing departing aircraft, among others. Table 4.7.2-16 in Section 4.7.2 provides a summary of how each alternative relates to safety and efficiency enhancements to the north airfield, and Table 1-2 in Chapter 1 provides a preliminary evaluation of how each alternative responds to the objectives of the SPAS. As indicated in Table 1-2, Alternative 2 would only partially meet this objective. All of the other airfield improvements alternatives would meet this objective to a greater extent than Alternative 2, with the exception of Alternative 4. Regarding the efficiency of the SPAS alternatives specifically, it is inaccurate to conclude that one alternative would be more efficient than another, because a number of variables are associated with assessing airfield efficiency. For example, as indicated in Table 17 of Appendix F-2 of the Preliminary LAX SPAS Report, Alternative 2 would have greater average all weather delay than would Alternative 1 (5.38 minutes per operation compared to 5.20 minutes per operation). However, Alternative 2 would have the lowest unimpeded taxi time among Alternatives 1 through 4, as well as the lowest total average all weather delay time. The differences between Alternatives 1 and 2 are very slight; the total average all weather delay plus unimpeded taxi time associated with Alternative 2 is only 3 seconds (0.05 minutes) less than that associated with Alternative 1. There are other measures of airfield efficiency besides delay and unimpeded taxi time, such as the ability to operate without operational restrictions, modifications of standards, and waivers from the Federal Aviation Administration (FAA); airfield geometry that provides more time and options for FAA air traffic controllers to handle aircraft exiting the runway; taxiways that are designed for the largest aircraft; and aircraft holding areas near the end of runways to improve the ability for sequencing departures. A summary of safety and efficiency enhancements to north airfield operations under each of the SPAS alternatives is provided in Table 4.7.2-16 on pages 4-569 and 4-570 of the SPAS Draft EIR. As indicated in the table, with the exception of Alternative 4, all of the alternatives would reduce the need for special operations restrictions, modifications of standards, and waivers from FAA. However, Alternative 2 is not superior to the other alternatives in this regard; only Alternative 5 would meet the minimum design requirements for a full Aircraft Design Group (ADG) VI north airfield. By not including a centerfield taxiway, Alternative 2 is the only airfield alternative, besides Alternative 4, that would only provide sufficient space to hold ADG IV aircraft or smaller on crossing taxiways, whereas the other alternatives would accommodate ADG V or VI aircraft. With the absence of a centerfield taxiway, Alternative 2 would also not provide FAA air traffic controllers with as many options for handling aircraft exiting the runway. Alternatives 3 and 5 are the only alternatives that would enable Taxilane D to accommodate ADG VI aircraft. All of the alternatives except for Alternative 4 would improve the ability to sequence departures.

Regarding safety associated with the alternatives, please see Response to Comment SPAS-PC00149-2 regarding a summary of the project objectives associated with the north airfield improvements, as well as the conclusions of NASS relative to the safety enhancements associated with reconfiguration of the north airfield. As noted in that response, although the LAX north airfield is extremely safe under the current configuration, and would continue to be safe with the no runway separation configuration under Alternative 2, separation of the runways would substantially increase airfield safety and reduce the risk of a fatal runway collision.

As noted in Section 1.5 of the SPAS Draft EIR, and by the commentor, Alternative 2 is identified as the environmentally superior alternative in the SPAS Draft EIR. However, the commentor supports Alternative 2 combined with the ground access components of Alternative 9. The designation as the environmentally superior alternative does not apply when Alternative 2 is paired with the ground access elements of Alternative 9. While this combination of alternatives would have fewer impacts than other alternatives or combinations for some environmental topics (such as on-airport transportation impacts, where, as indicated in Table 4.12.1-43 and discussed on page 4-1171 of the SPAS Draft EIR, the ground access improvements associated with Alternative 9 would significantly impact fewer on-airport

roadway link than would Alternatives 1, 2, 4, and 8), the impacts would be greater for other environmental topics. For example, this combination (i.e., Alternatives 2 plus 9) would significantly impact more off-airport intersections than would all of the other ground access alternatives (with the exception of Alternative 8, whose significant impacts would be the same), and would have greater construction-related air quality impacts than some of the other alternatives, including greater construction-related impacts than Alternative 2 not in combination with Alternative 9. Operational emissions from Alternative 2, coupled with the ground access components of Alternative 9, would be environmentally superior in good weather conditions, but would not be the environmentally superior alternative in poor weather conditions. In addition, as indicated in Tables 1-17 and 1-18 of the SPAS Draft EIR, Alternative 2 would have the second highest impacts of all the alternatives relative both to population newly exposed to 65 CNEL and to population that would experience a 1.5 dBA CNEL increase over 65 CNEL due to aircraft noise.

SPAS-PC00090 Hyra, J.A. None Provided 9/8/2012

SPAS-PC00090-1

Comment:

Please do not move the runway north. It will negatively impact our community and is not needed for safety.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Response to Comment SPAS-PC00149-2 regarding a summary of the project objectives associated with the north airfield improvements, as well as the conclusions of North Airfield Safety Study (NASS) relative to the safety enhancements associated with reconfiguration of the north airfield.

SPAS-PC00091 Wong, Ben Southern California Edison Company 8/31/2012

SPAS-PC00091-1

Comment:

Southern California Edison (SCE) appreciates the opportunity to provide comment on the above referenced project.

Southern California Edison Company's rights-of-ways and fee-owned properties are purchased for the exclusive use of SCE to operate and maintain its present and future facilities. Any proposed use will be reviewed on a case-by-case basis by SCE's Operating Department. Approvals or denials will be in writing based upon review of the maps provided by the developer and compatibility with SCE right-of-way constraints and rights. In the event the project proposes to impact SCE facilities or its land related rights, please forward five (5) sets of project plans, and a PDF copy of the same, depicting SCE's facilities and its associated land rights to the following location for review as noted above:

Real Properties Department
Southern California Edison Company
2131 Walnut Grove Avenue
G.O.3 - Second Floor
Rosemead, CA 91770

Please be advised if development plans result in the need to build new or relocate existing SCE electrical facilities that operate at or above 50 kV, the SCE construction may have environmental consequences subject to CEQA review as required by the California Public Utilities Commission

(CPUC). If those environmental consequences are identified and addressed by the local agency in the CEQA process for the larger project, SCE may not be required to pursue a later, separate, mandatory CEQA review through the CPUC's General Order 131-D (GO 131-D) process. If the SCE facilities are not adequately addressed in the CEQA review for the larger project, and the new facilities could result in significant environmental impacts, the required additional CEQA review at the CPUC could delay approval of the SCE power line portion of the project for two years or longer.

Response:

This comment is noted. The SPAS Draft EIR is a programmatic document. Project-level impacts associated with the need to build new or relocate existing Southern California Edison electrical facilities will be assessed in future CEQA documents prepared for individual project components.

SPAS-PC00092 Hyde, Shaunta The Boeing Company 8/28/2012

SPAS-PC00092-1

Comment:

Boeing's Commercial Airplanes division manufactures the 747-8 the largest commercial aircraft built in the United States and the longest passenger aircraft in the world.

The 747-8 has a wingspan of 224 ft 7 in and is 250 ft 2 in long. This aircraft requires a Group VI airfield. Currently, Boeing customers have begun flying 747-8 into Los Angeles International Airport (LAX), which is not a Group VI airfield-nor is it even a Group V airfield in all weather conditions. Operating the 747-8 today at LAX requires special airfield operational accommodations.

We recently reviewed a report which stated that the Los Angeles International Airport generated $37.9 billion dollars in direct economic impact the Southern California economy. This underlies the importance of commercial aviation from international trade to passenger spending.

Given this background, we have a significant interest in the current Specific Plan Amendment Study Process (SPAS) underway at LAX and specifically the reconfiguration of the North Airfield. Boeing urges Los Angeles Airport and City Officials to select the necessary alternatives under SPAS to make LAX a Group V and Group VI airfield in all weather conditions.

We trust that the City will work to find a balance with these interests while ensuring that LAX doesn't lose its position as a major international airport able to accommodate the world's newest aircraft.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00094 Boxer, Aviva None Provided 9/10/2012

SPAS-PC00094-1

Comment:

My family lives on the top of the hill near Pershing and Manchester in Playa del Rey. I have lived here since 1980. I would like my concerns to be noted in the EIR.

Response:

The comment is noted. Please see Response to Comment SPAS-PC00094-2 below.

SPAS-PC00094-2

Comment:

I am concerned about the safety issue of the residents that live on the northwest side of the airport. As you expand your runway northwards we will be hemmed in during a natural disaster like an earthquake, tsunami or hurricane. We have no place to go and we are hemmed in if you take away Weschester Parkway. Presently we are hemmed in by the Pacific Ocean to the West, the liquifaction of Culver Blvd and Ballona Creek to the North, the Hyperion Treatment plant to the south, and the airport to the east. We have no place to escape in the event of an emergency. While we are a small community because the bulk of our community land has been purchased by the airport, we are human beings who deserve the same rights and protections as the rest of the Los Angeles residents. Please consider the other plan that uses the south runway as an option to preserve our lives in the case of some natural disaster. This emergency plan has not been considered in the documents I ave read. So if you could please address this concern, I would appreciate it. Thank you.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project.

Impacts related to emergency response are addressed in Sections 4.7.3, 4.11.1, 4.11.2 of the SPAS Draft EIR. As discussed on page 4-597 in Section 4.7.3.6 of the SPAS Draft EIR, implementation of Alternatives 1, 2, 3, 4, 8, and 9 would alter ground access to, from, and around LAX. A lack of adequate access could impair the effective implementation of emergency response activities by impeding the movement of emergency vehicles. During construction, local roadway and/or lane closures would occur for varying periods; however, roadway access would be maintained through detours and diversions. Since local access would be adequately maintained, and emergency access would be coordinated and ensured through LAX Master Plan Commitments C-1, ST-9, ST-12, ST-14, ST-17, ST-18, ST-19, ST-21, and ST-22, the implementation of emergency response activities would not be impaired, and impacts would be less than significant under Alternatives 1, 2, 3, 4, 8, and 9. As Alternatives 5 through 7 do not include proposed ground access improvements, there would be no impacts related to the impairment of the implementation of emergency response activities under these alternatives by themselves. Please see Response to Comment SPAS-PC00130-217 for further discussion of emergency response plans and services.

The potential for the SPAS alternatives to expose people or structures to hazards associated with geology and soils, including seismic-related hazards, was addressed in Section VI of the Initial Study included in the 2010 LAX SPAS EIR Notice of Preparation (NOP) provided as Appendix A of the SPAS Draft EIR. As explained therein, while the site is located within the seismically active southern California region, it is not located within an Alquist-Priolo Special Study Zone. Geotechnical literature indicates that the Charnock Fault, a potentially active fault, may be located near or through eastern portions of LAX property. However, as stated in Section 4.22 of the LAX Master Plan EIR, recent evaluation indicates that the Charnock Fault is considered to have low potential for surface rupture independently or in conjunction with movement on the Newport-Inglewood Fault Zone, which is located approximately three miles east of LAX. The Initial Study also indicates that the LAX site has a very low susceptibility to liquefaction. Therefore, impacts to people or structures resulting from rupture of a known earthquake fault are considered less than significant, and no mitigation measures are required. In accordance with Sections 15063(c)(3)(A) and 15128 of the State CEQA Guidelines, the potential for impacts associated with geology and soils, including seismic-related hazards, was not discussed in detail in the SPAS Draft EIR, as it was determined not to be significant.

As discussed on page 4-599 of the SPAS Draft EIR, as indicated in the 2010 LAX SPAS EIR NOP/Initial Study, the project site is located approximately one-half mile east of the Pacific Ocean and is not delineated as a potential inundation or tsunami impacted area in the City of Los Angeles Inundation and Tsunami Hazard Areas map. Mudflows are not a risk as the project site is located on, and is surrounded by, relatively level terrain and urban development. In accordance with Sections

15063(c)(3)(A) and 15128 of the State CEQA Guidelines, therefore, impacts related to inundation by seiche, tsunami, and mudflow were not discussed in detail in the SPAS Draft EIR, as no impacts would occur, and no mitigation measures are required.

Please see Response to Comment SPAS-PC00130-287 regarding property acquisition associated with the SPAS alternatives. None of the SPAS alternatives propose the removal or realignment of Westchester Parkway.

SPAS-PC00095 Klein, Lee The California Native 9/17/2012

SPAS-PC00095-1

Comment:

I want to give you my opinion on the SPAS EIR: I would like to adopt Alternative 2, plus Alternative 9 with a train service plan that includes all the terminals.

This position has been taken by the Neighborhood Council of Westchester/Playa and ARSAC (Alliance for a Regional Solution to Airport Congestion). I heartily support this position and strongly urge that you also encourage its adoption. Alternative 2 does NOT move 24R closer to our communities and Alternative 9 includes a Consolidated Rental Auto Facility (CONRAC).

All the alternatives would enable LAX to handle the projected traffic in 2025: 78.9 Million Annual Passengers (MAP). Therefore, there would be no gain in passenger capacity from moving 24R North. The impact to the community is completely unnecessary both from a neighborhood view and an airport safety view.

Alt. 2 is the most economical, efficient, and environmentally sound choice. It is also the least intrusive into the neighborhoods. It does include realigning some taxiways as noted in the North Airfield Safety Study. Improvements and extensions to the east end of 24L are also included which would allow the New Larger Aircraft (such as the A380) easier take off from that runway. The North Airfield Safety Study concluded that the

The North Airfield is safe AS IT IS to handle the future estimated air traffic. The study did recommend taxiway realignment that is included in Alt. 2.

If 24R was moved as far north as LAWA actually wants to move it, the Delta building and probably the Paradise Building would have to be removed. A valid question is what market value was used in LAWA's estimates? LAWA has assumed that the In-N-Out and Parking Spot would not be in an FAA protective or buffer zone because pilots would land midway down 24R (which would be extended West to Pershing). Many pilots like to land as soon as their assigned runway is available, not midway down it.

If 24R were to be moved as far north as LAWA actually wants it moved, at least 500 jobs would be lost. Some businesses might also be lost. The business district only recently
recovered from losing 10,000 customers from previous LAX expansions. Also, property values of good neighbors would go down. Many Westchester residents have been there for over 60 years and don't deserve this from our neighbor.

Modernizing the airport: improving the elevators, escalators, bathrooms, signage, roadways, etc. would provide more jobs that moving the runway. And it would greatly improve the passengers' experience of traveling through LAX.

There are some extremely expensive issues in moving the runway North:

Filling in the Manchester Tunnel. This is the tunnel that was originally built to connect the North communities to the South, by tunneling underneath LAX. It was to be part of the never-authorized Laurel Canyon Freeway that was being considered back in the late 1950s and early 1960s, It starts.

where Lincoln turns East, near the apartment complex, and runs South to within 50 ft of 24L. The last time it was inspected (after a very dry season) there was water in the tunnel. LAWA has recommended filling the tunnel with sand (a glorious recipe for sink holes!), or taking the top off the tunnel and filling it with dirt. (The tunnel is about 35 ft down and 4 to 6 lanes wide. We all remember how long Playa Vista had a huge mound of dirt to compress the ground.) This would mean closing both runways for some time, putting an undue amount of traffic on the South Airfield. A recommendation from a worker familiar with tunnel problems is that the tunnel be filled in with a special foam that was developed to handle this problem of filling in a hole to withstand heavy weights landing over it. The cost could run into the millions, possibly billions.
Moving affected sewers. Other city departments have stated that the sewers cannot be moved.
Property acquisition. As noted above.
Enclosing the Argo Flood Control Channel. This channel is required as a drain for a flood control plain and, as such, should not be enclosed. It is under the jurisdiction of the Army Corps of Engineers and LAWA does not have any approval as of the DEIR date to make changes to the channel.

PLEASE DO NOT CONSIDER any Alternative that involves movin the runway. MODERNIZE, CONSOLIDATE, but don't EXPAND!!

Response:

The contents of this comment are similar to comment SPAS-PC00128-2; please refer to Response to Comment SPAS-PC00128-2.

SPAS-PC00096 Wexler, Adelle The Guilded Cage 9/14/2012

SPAS-PC00096-1

Comment:

The Guilded Cage is a small boutique in Westchester staffed entirely by volunteers, and which is sponsored by a 501(c) (3) charity, the Westchester Mental Health Guild, which devotes all its net proceeds to the Airport Marina Counseling Service, which in turn provides low-cost mental health counseling to our community. The Guilded Cage has operated in Westchester for 37 years. As an entity affected by the alternatives proposed in the recent Draft Environmental Impact Report (DEIR) or the proposed Specific Plan Amendment Study at LAX (the SPAS), the Guilded Cage is providing comments on those alternatives.

Initially, we are dismayed that the expressed Project Objectives for the SPAS (pages 1-10 through 1-13) do not include the goal of regionalizing Southern California air traffic. Only an aggressive regional approach to air transportation will mitigate the safety concerns, noise, congestion and air pollution currently impacting Westchester and other communities near LAX, at the same time continuing the economic benefits of the airport for all of Southern California. Regionalization should have been one of the Project Objectives, and the DEIR should have discussed how each alternative will help to accomplish that objective.

Response:

Please refer to Topical Response TR-SPAS-REG-1 regarding the fact that LAWA, through the LAX Master Plan, the SPAS process, and multiple other efforts, supports the regionalization of air travel demand in Southern California, and that it is not necessary or appropriate to include regionalization as a project objective for SPAS.

SPAS-PC00096-2

Comment:

Many of the alternatives discussed are prohibitively expensive and there is no discussion of the source of funding for them.

Response:

LAWA has determined that each of the alternatives discussed in the SPAS Draft EIR and Preliminary LAX SPAS Report is potentially feasible. (See State CEQA Guidelines Section 15126.6.) CEQA does not require an analysis of cost or project funding. (State CEQA Guidelines Section 15131; Pub. Resources Code Section 21068.)

Nevertheless, LAWA provided a detailed account of the financial requirements of each of the alternatives in the Preliminary LAX SPAS Report. Chapter 8 of the Preliminary LAX SPAS Report, which was published concurrent with, and distributed along with the SPAS Draft EIR, provides a financial analysis of each SPAS alternative. As indicated in Section 8.6 of that chapter, the proposed SPAS improvements would be funded with a combination of FAA Airport Improvement Program grants, TSA funds, passenger facility charges, general airport revenue bonds, and other state/federal grants. No general tax dollars would be used to pay for any of the proposed on-airport improvements. General airport revenue bonds are repaid from airport revenues generated from airport users. The bonds are guaranteed only by the revenues from the airport and are not backed by the City of Los Angeles or the State of California. The SPAS financial analysis addresses impacts relative to the estimated costs of each alternative affecting the existing and future bond debt of the airport and causing increases in the passenger airline cost per enplaned passenger. The analysis concluded that Alternative 4 would have the least financial impact and Alternative 3 would have the greatest financial impact.

SPAS-PC00096-3

Comment:

Although LAWA needs to modernize, we do not favor any expansion. It would make more sense to devote funds to developing facilities at Ontario and Palmdale that can relieve some of the burden of regional air transportation from this portion of Southern California. Given the possibilities of a terrorist attack on or a major earthquake near LAX, the economy of this region needs to have other airport facilities.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Topical Response TR-SPAS-REG-1 regarding the regionalization of air travel demand in Southern California, which includes a discussion of LA/Ontario International Airport and Palmdale Regional Airport.

SPAS-PC00096-4

Comment:

We favor a combination of Alternatives 2 and 9, which we believe would modernize the airport and improve the airfield and ground transportation without unduly harming Westchester and other nearby communities. Alternative 2 is recognized as the "environmentally superior alternative" (page 1-103). It also appears to us, particularly when combined with Alternative 9, to be the most affordable option.

We support the airfield improvements in Alternative 2, which does not relocate the north runways, but instead lengthens Runway 6R/ 24L, and modifies and improves taxiways. Alternative 2 is preferable given that the DEIR shows that larger Group 5 and 6 aircraft can be acceptably handled by these modifications to the airfield with no additional runway spacing (pages 4-514-515). A 2010 North Runway Safety Study (NASS) conducted by an expert panel under the auspices of the North Airfield Safety Advisory Committee unanimously concluded that the North Runway Complex is extremely safe, even with future projected traffic levels (pages 4-505). The NASS also recommended the taxiway realignment that is included in Alternative 2.

Response:

The commentor's support for Alternatives 2 and 9 is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Chapter 2 of this Final EIR regarding the LAWA Staff-Recommended Alternative, which couples the airfield and terminal improvements associated with Alternative 1 with the ground access components associated with Alternative 9, including a discussion of the rationale behind the selection of these alternatives over the other alternatives evaluated in the SPAS Draft EIR. Please see Response to Comment SPAS-PC00089-1 for an explanation of why Alternative 2 coupled with the ground access components of Alternative 9 is not the environmentally superior alternative. Please see Response to Comment SPAS-PC00130-730 regarding the treatment of economic impacts in an EIR. As noted in that response, CEQA does not require an analysis of cost or project funding. (State CEQA Guidelines Section 15131; Pub. Resources Code Section 21068.) Nevertheless, Chapter 8 of the Preliminary LAX SPAS Report provides a financial analysis of each alternative. As identified in Table 8-2 of the Preliminary LAX SPAS Report, the combination of Alternatives 2 and 9 is not the lowest cost alternative.

Table 4.7.2-16 in Section 4.7.2 of the SPAS Draft EIR provides a summary of how each alternative relates to safety and efficiency enhancements to the north airfield. Please also see Responses to Comments SPAS-PC00130-3 and SPAS-PC00089-1 regarding efficiency associated with Alternative 2 compared to other airfield alternatives.

Please see Response to Comment SPAS-PC00130-68 regarding conclusions of the NASS relative to north airfield safety.

SPAS-PC00096-5

Comment:

In addition, we note that the DEIR does not explore all the other safety measures that could be taken to improve airfield safety. Therefore, please address the following items in the final EIR to determine whether they would be adequate to address any remaining perceived safety issues:

- Fully staffed tower and TRACON offices,
- Updated and efficient equipment installed in the tower,
- Improved communications between tower and cockpit,
- GPS ground-tracking system installed,
- More space between aircraft, and
- Compliance with the LAX preferential runway noise abatement plan.

Response:

The FAA and LAWA have worked together in recent years to deploy new technologies and enhanced training to improve airfield safety at LAX. Pages 4-501 and 4-502 of the SPAS Draft EIR, provides a summary of these recent and ongoing improvements, including the installation of runway status lights. Please note that the measures suggested in the comment are within the control and jurisdiction of the FAA, not LAWA. Additionally, while these measures may help enhance airfield safety at LAX, they do not directly address the safety problem identified and studied in the SPAS (i.e., that the current LAX airfield design is outdated and does not meet design standards for ADG V and ADG VI aircraft). As discussed on pages 1-10 and 1-11 in Section 1.2.1 of the SPAS Draft EIR, one of the SPAS project objectives is to provide north airfield improvements that support the safe and efficient movement of aircraft at LAX. This includes adding improvements that are consistent with FAA design standards and providing sufficient areas at the ends of the runways for holding arriving flights and sequencing departing aircraft, among others. Table 4.7.2-16 in Section 4.7.2 provides a summary of how each alternative relates to safety and efficiency enhancements to the north airfield, and Table 1-2 in Chapter 1 provides a preliminary evaluation of how each alternative responds to the objectives of the SPAS.

An evaluation of airfield safety considerations associated with each of the airfield improvement options (i.e., Alternatives 1 through 7) is presented in Section 4.7.2, the results of which are summarized in Table 1-12 of the SPAS Draft EIR. The ultimate determination of whether to select one of the SPAS

alternatives and the rationale for such a determination is left to the decision-makers. This comment will be provided to them for their review prior to making a decision.

SPAS-PC00096-6

Comment:

Among other things, Alternative 2 would have the least impact on road traffic noise (page 4-942). Alternative 2 would not require modifications to Lincoln Boulevard or the Argo Drainage Channel that would be required under other options, so it should not take as long or be as expensive as the alternatives that would move the runways north.

Response:

The commentor's support for Alternative 2 is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. The comment that Alternative 2 would not require modifications to Lincoln Boulevard or the Argo Drainage Channel and, therefore, would likely take less time to construct and would be less expensive than alternatives that would move Runway 6L/24R north is noted. Please see Chapter 2 of this Final EIR regarding the LAWA Staff-Recommended Alternative, which couples the airfield and terminal improvements associated with Alternative 1 with the ground access components associated with Alternative 9, including a discussion of the rationale behind the selection of these alternatives over the other alternatives evaluated in the SPAS Draft EIR. It should be noted that impacts associated with road traffic noise would be the same under Alternatives 1 and 2. Impacts associated with road traffic noise under each alternative would vary by receptor. As indicated on page 4-942 of the SPAS Draft EIR, overall, Alternatives 1 and 2 would have the second lowest maximum road traffic increase in noise (1.6 dBA CNEL) of all of the alternatives, the lowest maximum increase being under Alternatives 8 and 9 (1.5 dBA CNEL).

SPAS-PC00096-7

Comment:

We support the combination of Alternatives 2 and 9 because we believe that the Consolidated Rental Car center project in Alternative 2 combined with the Automated People Mover (APM) from Alternative 9, would take rental car shuttles off the road, improve traffic, and provide a great convenience to the traveling public. We expect that the APM in Alternative 9 would prove to be less cumbersome for travelers than would the elevated bus way proposed in Alternative 8, for the simple reason that stepping onto an APM with one's luggage is simpler than getting onto a bus with luggage.

However, we are concerned with the drawings of the APM which suggests that it dead-ends at Terminal 7. We believe it should be a loop design that does not end, rather than having an endpoint.

Response:

The commentor's support for Alternatives 2 and 9 is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Chapter 2 of this Final EIR regarding the LAWA Staff-Recommended Alternative, which couples the airfield and terminal improvements associated with Alternative 1 with the ground access components associated with Alternative 9, including a discussion of the rationale behind the selection of these alternatives over the other alternatives evaluated in the SPAS Draft EIR.

Alternative 2 does not include a CONRAC; however, a CONRAC is a feature of Alternative 9. The APM proposed as a part of Alternative 9 is depicted and described in Chapter 2 of the SPAS Draft EIR, and has been evaluated in the SPAS Draft EIR at a program level of planning. Alternative 9 does not define the final APM system alignment or station locations within the CTA. Should Alternative 9 be selected for implementation, specific APM designs would be evaluated in project-level design and environmental review. Please also see SPAS-PC00183-3 regarding the convenience of a bus compared to an APM.

SPAS-PC00096-8

Comment:

We oppose the three alternatives that propose to move Runway 6L/24R north (Alternative 1: 260 feet north, Alternative 5: 350 feet north, Alternative 6: 100 feet north). It already has been demonstrated that further runway separation is unnecessary for safety (page 4-505). In negating the safety rationale for revisiting the separation distance of Runways 24-L and 24-R, the expert panel also negated any legitimate argument that Westchester and the other communities near LAX must simply tolerate all the adverse impacts of runway movement because of safety concerns.

Response:

The comment regarding opposition to Alternatives 1, 5, and 6 is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. It has not been demonstrated that further runway separation is unnecessary for safety, as suggested in the comment. The commentor's citation to page 4-505 of the SPAS Draft EIR refers to the North Airfield Safety Study (NASS) completed in 2010, whereby an academic panel, in reviewing the results of the analysis completed by NASA Ames, offered their opinion that, based on safety grounds alone, it would be hard to argue for reconfiguring the north airfield. The NASS did determine that improvements to, and reconfiguration of, the north airfield would reduce the risk of a fatal runway collision. The opinion of the academic panel is not shared by the Federal Aviation Administration, the federal agency responsible for the safety of civil aviation. Additional discussion of the NASS and several other safety studies completed for the north airfield is provided in Section 4.7.2 of the SPAS Draft EIR.

SPAS-PC00096-9

Comment:

Given that the DEIR predicts an increase in the size of the noise contour over Westchester from these runway movements (page 4-829 (Alt. 1); page 4-881-2 (Alt. 5); page 4-897 (Alt. 6)), we oppose them because it appears that the primary reason to expand LAX in these ways would be to increase the capacity of the airport. Particularly when the NASS concluded that the existing configuration would not unduly impact operational efficiency at LAX, it is unnecessary to adopt any of these plans to move the north runways. We relied upon the promise of Mayor Villaraigosa to work to increase regionalization of air travel in Southern California, and all of these proposals are inconsistent with that promise and would be extremely disruptive to our Westchester community.

Response:

The commentor's opposition to Alternatives 1, 5, and 6 is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Response to Comment SPAS-PC00130-328 regarding the fact that the airfield improvements proposed under the SPAS alternatives are intended and designed to address the problems associated with the current outdated design of the airfield. Please refer to Response to Comment PC00130-168 regarding the NASS and the opinion of the academic panel involved in that study.

Airfield capacity is not identified as a problem in either the Preliminary LAX SPAS Report or the SPAS Draft EIR, and none of the airfield improvements are proposed to increase the capacity of the airport. The SPAS alternatives provide potential modernizations and improvements designed for a practical capacity of 78.9 MAP. 78.9 MAP is a conservative growth assumption consistent with the Southern California Association of Governments 2012 Regional Transportation Plan/Sustainable Communities Strategy. (See footnote 670 on page 4-1048 of the SPAS Draft EIR.) Therefore, based upon the SCAG RTP/SCS, growth in airport use would naturally grow to 78.9 MAP, with or without any improvements. The SPAS alternatives are designed to provide improvements that will accommodate this increase in passengers, not to promote further growth. Additionally, as provided in Section 1.1.2 of the SPAS Draft EIR, the SPAS amendments are designed to create conditions that encourage airlines to go to other airports in the region, particularly those owned and operated by LAWA.

SPAS-PC00096-10

Comment:

The DEIR says that impacts associated with the change of uses within the Runway Protection Zones (RPZ) under these three alternatives can be considered "less than significant" (page 1-77) when it is clear that Westchester businesses not currently located within an RPZ would be located within it and may need to be destroyed (see, for example, page 4-516). In at least some of these maps, our store falls within the RPZ. LAWA appears to assume that very little of the existing Westchester business district would not have to be purchased by the airport even though much of it would fall into the RPZ because it is assumed that pilots will land mid-runway on Runway 24R. However, there is no guarantee that pilots will land mid-runway or that the FAA will agree that telling them to do so is an adequate protection for the businesses that will be within the RPZ. It is our understanding that the FAA will no longer "grandfather" existing structures, but instead will insist that they be cleared not only from the Runway Safety Area (RSA) but also from the RPZ. The DEIR recognizes these as incompatible uses under FAA design recommendations (page 4-522), and recognizes that FAA may require that these structures be removed. Where would you have us relocate and who would bear the expense of such relocation?

Response:

The contents of this comment pertain to the same concerns expressed in comment SPAS-AL00007-26; please refer to Response to Comment SPAS-AL00007-26.

SPAS-PC00096-11

Comment:

In addition, these three alternatives also would be prohibitively expensive. The DEIR seems to assume that the FAA would not require that these businesses would be destroyed or relocated, but we did not see any guarantee that the FAA would allow them to remain where they are. Do you have such a guarantee? In addition, it is not at all clear that these businesses should remain in the RPZ. Please explain how our shop and the nearby businesses would be safe if we remain in the RPZ.

Response:

As discussed on page 4-512 in Section 4.7.2.6.1 of the SPAS Draft EIR, there are various potential options for dealing with incompatible structures or land uses within an RPZ including: (1) doing nothing (i.e., for low-risk objects); (2) placing high-visibility markings and lighting on the object to make it highly visible to pilots and indicating such objects on avigation maps; (3) lowering, reducing, or removing the object, and; (4) modifying an approach or departure procedure to allow aircraft to safely navigate around or above an object that penetrates a Part 77 surface. The most appropriate option(s) would be determined in conjunction with detailed airfield improvement engineering and would be subject to FAA review and concurrence prior to FAA approval of an ALP amendment for such an airfield modification.

Section 4.7.2 of the SPAS Draft EIR, specifically pages 4-522 through 4-526, addresses changes in the potential secondary or indirect impacts associated with the modification or removal of structures or uses within the RPZ, if required in the future. The subject analysis includes discussion of potential measures to reduce impacts. Given that neither the need for, or nature of, actions to modify or remove existing structures or uses have been determined and will not be known until sometime in the future, it would be premature and speculative to reach a final significance conclusion at this time. While CEQA requires a lead agency to use its best efforts to find out and disclose all that it reasonably can, if, after thorough investigation, a lead agency finds that a particular impact is too speculative for evaluation, it should note its conclusion and terminate discussion of the impact. (State CEQA Guidelines Sections 15144-15145.)

SPAS-PC00096-12

Comment:

We did not find cost estimates in the DEIR for the purchase of the properties within the Westchester Central Business District along Sepulveda Boulevard south of La Tijera Boulevard. Precisely which businesses in the Westchester Business District would need to be relocated, and what buildings demolished?

Do the cost estimates included in the DEIR for this alternative include the cost of purchasing the very profitable properties that likely would need to be purchased at great expense to LAWA and Los Angeles? How was the market value determined for this analysis?

Response:

Please see Response to Comment SPAS-AL00007-28 regarding the potential for property acquisition and changes in the RPZ to have an impact on the Westchester Business District.

SPAS-PC00096-13

Comment:

In addition, moving the runway north would require astronomically expensive modifications to the Argo Drainage Channel, the Manchester Tunnel and Lincoln Boulevard. In addition, sewer lines may have to be moved. Where does the DEIR analyze these impacts of each of these alternatives?

Response:

The content of this comment is similar to Comment SPAS-PC00130-568; please see Response to Comment SPAS-PC00130-568. The impacts associated with modifications to the Argo Drainage Channel and Lincoln Boulevard are evaluated throughout the SPAS Draft EIR. Please see Topical Response TR-SPAS-LR-1 regarding realignment of Lincoln Boulevard. As indicated in the topical response, realignment of Lincoln Boulevard is not anticipated to interfere with the major outfall sewers that run beneath LAX. Please see Response to Comment SPAS-PC00130-579 regarding the north airfield abandoned tunnel segment (referred to by the commentor as the Manchester Tunnel). There would be no impacts associated with filling this tunnel segment.

SPAS-PC00096-14

Comment:

We do not see an adequate discussion in the DEIR of the following questions:

- Realistic costs for all proposals should take into account negotiations over the purchase of businesses, as well as potential litigation.

Response:

Please see Response to Comment SPAS-PC00130-730 regarding the treatment of economic conditions in an EIR, including costs associated with project implementation. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)). Nevertheless, as noted in Response to Comment SPAS-PC00130-931, no acquisition is proposed within the Westchester Business District. Therefore, there would be no costs associated with purchase, demolition, or relocation of land uses within Westchester, or litigation related to same.

SPAS-PC00096-15

Comment:

- What would be the amounts lost to the City from the loss of this tax base and purchasing capability of dislocated businesses and residences?

Response:

Please see Response to Comment SPAS-PC00130-730 regarding the treatment of economic conditions in an EIR, including costs associated with project implementation. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)). Nevertheless, as noted in Response to Comment SPAS-PC00130-931, no acquisition is proposed within the Westchester Business District. Therefore, there would be no impacts to the tax base or purchasing capability of dislocated business or residences within Westchester.

SPAS-PC00096-16

Comment:

- How many employees would lose jobs under each proposal due to destruction of the business district?

Response:

Regarding analysis of property acquisition impacts on the Westchester Business District associated with the RPZ, please see Responses to Comments SPAS-AL00007-26 and SPAS-PC00130-931. No acquisition is proposed within the Westchester Business District, as shown in Figure 2-11 and listed in Table 2-4 in Section 2.3.1.11 of the SPAS Draft EIR.

CEQA does not require job losses to be analyzed in an EIR, as these are economic rather than physical environmental impacts. (State CEQA Guidelines Section 15064(e).) Nevertheless, it is not proposed or certain that business would be displaced or jobs lost due to changes in RPZs. As discussed in Section 4.7.2.6.1 of the SPAS Draft EIR, there are various potential options for dealing with incompatible structures or land uses within an RPZ including: (1) doing nothing (i.e., for low-risk objects); (2) placing high-visibility markings and lighting on the object to make it highly visible to pilots and indicating such objects on avigation maps; (3) lowering, reducing, or removing the object, and; (4) modifying an approach or departure procedure to allow aircraft to safely navigate around or above an object that penetrates a Part 77 surface. The most appropriate option(s) would be determined in conjunction with detailed airfield improvement engineering and would be subject to FAA review and concurrence prior to FAA approval of an ALP amendment for such an airfield modification. Such information would be developed during project-specific CEQA review should an alternative calling for shifting Runway 6L/24R northward be selected. It is appropriate for a first-tier program level EIR to defer detailed descriptions and impact analysis of individual projects in the program to future project-level CEQA documents. (State CEQA Guidelines Section 15383; Koster v. County of San Joaquin (1996) 47 Cal.App.4th 29, 37.)

In the event that it is determined in the future that relocation of an existing business is necessary, impacts associated with acquisition of the property and relocation of the business would be addressed in future project-specific CEQA documents, and by LAX Master Plan Commitment RBR-1 and LAX Master Plan Mitigation Measure MM-RBR-1.

SPAS-PC00096-17

Comment:

- What would it cost to soundproof the homes, schools, and businesses impacted by the new noise contours?

Response:

CEQA does not require analysis of purely economic impacts in an EIR. (See State CEQA Guidelines Sections 15131(a) and 15064(e) ["Economic or social effects of a project shall not be treated as significant effects on the environment."].) As summarized in Section 4.9.7 of the SPAS Draft EIR, those residential and non-residential noise-sensitive facilities newly exposed to noise levels of 65 CNEL or higher would be eligible for sound insulation under the ANMP and through implementation of LAX Master Plan Mitigation Measure MM-LU-1. Commercial uses are not considered noise-sensitive under the ANMP and therefore would not be eligible for sound proofing. The costs of soundproofing homes and schools varies, depends on the size of the structure, the number of window and door openings, the type of ventilation, and, for certain schools, individual agreements with affected school districts. Please see Response to Comment SPAS-PC00130-730 for additional details regarding the treatment of economic conditions in an EIR, which includes costs of project-related improvements such as mitigation.

SPAS-PC00096-18

Comment:

- Under each alternative, what would be the cost of filling in the tunnels under the North Airfield and addressing the seepage problems from the natural aquifer which causes sink holes, and what would be a reasonable schedule to accomplish these tasks?

Response:

Please see Response to Comment SPAS-PC00130-568 regarding the cost to fill the north airfield abandoned tunnel segment and Response to Comment SPAS-PC00130-51 regarding sink holes. Relative to the schedule for project implementation, as stated on page 2-8 of the SPAS Draft EIR, the nine SPAS alternatives addressed within the SPAS Draft EIR were formulated at a programmatic level of conceptual planning, and no design or engineering plans, or construction phasing plans or schedules, are available for any of the alternatives. Please see Responses to Comments SPAS-PC00130-142 and SPAS-PC00130-235 for a discussion of the appropriateness of the programmatic review conducted for the SPAS project.

SPAS-PC00096-19

Comment:

- Under each alternative, what would be the costs for relocating/realigning/reinforcing Lincoln and Sepulveda Boulevards, including the Sepulveda Tunnel? Because these endeavors would involve other agencies such as Caltrans, what do you expect will be a realistic schedule?

Response:

Please see Response to Comment SPAS-PC00130-568 regarding the costs associated with the realignment of Lincoln Boulevard. Sepulveda Boulevard and the Sepulveda tunnel would not be relocated, realigned, or reinforced under the SPAS alternatives. Relative to the schedule for project implementation of the Lincoln Boulevard realignment, please see Response to Comment SPAS-PC00096-18.

SPAS-PC00096-20

Comment:

- Who would pay for the costs associated with the various proposals for reconfiguration?

Response:

Please see Response to Comment SPAS-PC00096-2 regarding funding sources for SPAS improvements.

SPAS-PC00096-21

Comment:

We also oppose Alternative 3 because it unnecessarily proposes to move Run 6R/24L 340 feet south, at what would necessarily be an astronomical expense, including demolition of three terminals and extensive central terminal construction, because, as discussed above, the separation of the North runways by this amount of distance is simply unnecessary for either airfield safety or efficiency. In any event, there does not seem to be a cost analysis for the displacement of the newly included businesses that would be located within the Alternative 3 RPZ.

Response:

The commentor's opposition to Alternative 3 and the reasons for that opposition are noted and are hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project.

Regarding the comment that the SPAS Draft EIR does not include a cost analysis for displacement of businesses newly included in an RPZ, no acquisition of property located within RPZ areas is proposed as part of the SPAS project nor is it certain that acquisition of such property would be required in the future.

As discussed in Section 4.7.2.6.1 of the SPAS Draft EIR, there are various potential options for dealing with incompatible structures or land uses within an RPZ including: (1) doing nothing (i.e., for low-risk objects); (2) placing high-visibility markings and lighting on the object to make it highly visible to pilots and indicating such objects on avigation maps; (3) lowering, reducing, or removing the object, and; (4) modifying an approach or departure procedure to allow aircraft to safely navigate around or above an object that penetrates a Part 77 surface. The most appropriate option(s) would be determined in conjunction with detailed airfield improvement engineering and would be subject to FAA review and concurrence prior to FAA approval of an ALP amendment for such an airfield modification. While CEQA requires a lead agency to use its best efforts to find out and disclose all that it reasonably can, if, after thorough investigation, a lead agency finds that a particular impact is too speculative for evaluation, it should note its conclusion and terminate discussion of the impact. (State CEQA Guidelines Sections 15144-15145.)

SPAS-PC00096-22

Comment:

We do not think Alternative 7, which proposes a 100 foot southward movement for Runway 6R/24L, is as problematic as some of the other alternatives, in that it seems to accomplish the same airfield changes as Alternative 3, but in a much less costly manner. The DEIR states that Alternative 7 will increase runway separation from 700 to 800 feet, while Alternative 3 will increase it to 1040 feet. In both cases, the changes would not affect the existing abilities relative to simultaneous arrivals and departures (page 4-533 and page 4-563). However, given that Alternative 2 is the "environmentally superior" alternative and accomplishes the project objectives, we see no reason for the additional costs that Alternative 7 would be likely to entail.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00096-23

Comment:

We have no objection to Alternative 4, which represents what would happen if all non-yellow light improvements identified in the Alt. D Master Plan were implemented, but we do not consider it preferable to Alternative 2. Alternative 4 proposes the same extension of Runway 6R/24L and Taxiway E as Alternative 2, coupled with a Consolidated Rental Car facility and new parking lot. However, because Alternative 4 would not meet design standards for Group 5 and 6 aircraft or reduce the need for FAA waivers, it does not appear to us to accomplish as many of LAWA's goals as would Alternative 2.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00096-24

Comment:

We appreciate the need to modernize LAX. Modernizing the airport, including such things as improving the upper roadway, the signage, the elevators, and restrooms will accomplish more to improve the travelling public's experience with LAX than will moving the north runway.

In the end, however, we believe that these Alternatives are in fact all piecemeal solutions that never will result in our city having the world-class airport that we all desire. If LAWA truly desires the airport we all deserve, the city must realize that LAX is not the location for it, because of the geographic constraints here. The best alternative is for Los Angeles to develop an airport where there is space for such an airport, and at the same time, build mass transit from downtown that goes directly into that airport.

Please let us know if you have any questions regarding our position on these matters.

Response:

The commentor's acknowledgement that improvements such as related to the CTA upper level roadway, signage, elevators, and restrooms will accomplish more to improve the traveling public's experience with LAX than will moving the north runway is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project.

Section 2.3.2.1 of the SPAS Draft EIR considered and rejected as infeasible the concept of an alternative location. The SPAS Draft EIR does not evaluate in detail an alternative calling for the development of an airport at a location with the space to avoid geographic constraints such as those at LAX and building mass transit from downtown that goes directly into that airport because such an alternative would not respond to the project objectives presented in Section 2.2 of the SPAS Draft EIR. Also, it is reasonable to anticipate that the development of such a replacement system would take many years, if not decades. The operation of LAX would continue while such a replacement system is pursued and developed, and the need to address the problems at LAX that are addressed in the project objectives would remain. Again, implementation of the suggested alternative would not respond to the project objectives of SPAS. Notwithstanding, the comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project.

SPAS-PC00097 Cunningham, Kim G None Provided 9/24/2012

SPAS-PC00097-1

Comment:

As residents of Playa del Rey for more than 20 years, this will confirm our support of Alternatives #2 and #9 contained in the SPAS Draft EIR.

Response:

The commentor's support for Alternatives 2 and 9 is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Chapter 2 of this Final EIR regarding the LAWA Staff-Recommended Alternative, which couples the airfield and terminal improvements associated with Alternative 1 with the ground access components associated with Alternative 9, including a discussion of the rationale behind the selection of these alternatives over the other alternatives evaluated in the SPAS Draft EIR.

SPAS-PC00097-2

Comment:

We are already acutely aware of the noise, pollution and congestion issues that occur on a day-to-day basis.

Response:

This comment is noted. The Draft EIR addresses noise impacts in Section 4.10, Noise, and Section 4.9 Land Use and Planning; air quality impacts in Section 4.2, Air Quality, and Section 4.6, Greenhouse Gases; and traffic impacts in Section 4.12.1, On-Airport Transportation, and 4.12.2, Off-Airport Transportation. Supporting technical data and analyses are provided in Appendix C, Appendix F, Appendix G1, Appendix I, Appendix J1, Appendix J2, Appendix J3, Appendix K1, and Appendix K2 of the Draft EIR.

SPAS-PC00097-3

Comment:

We are in favor of the above Alternatives as the only viable solution to these issues from an environmental, economic, and efficiency standpoint.

Response:

The commentor's support for Alternatives 2 and 9 is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Chapter 2 of this Final EIR regarding the LAWA Staff-Recommended Alternative, which couples the airfield and terminal improvements associated with Alternative 1 with the ground access components associated with Alternative 9, including a discussion of the rationale behind the selection of these alternatives over the other alternatives evaluated in the SPAS Draft EIR.

The combination of Alternatives 2 and 9 is not the only viable solution to addressing environmental, economic, and efficiency issues. LAWA has identified and comprehensively evaluated nine alternatives that each respond differently to environmental and airfield safety and efficiency issues, as presented throughout Chapter 4 of the SPAS Draft EIR, and to cost issues, as presented in Chapter 8 of the Preliminary LAX SPAS Report. The commentor provides no basis for concluding that the combination of Alternatives 2 and 9 is the only viable solution to addressing these issues.

The SPAS Draft EIR identifies a comprehensive set of applicable LAX Master Plan commitments and mitigation measures, as well as SPAS-specific mitigation measures, that would reduce or eliminate significant impacts associated with all of the SPAS alternatives. Therefore, all of the alternatives are viable from an environmental standpoint. Moreover, as noted in Chapter 8 of the Preliminary LAX SPAS Report, all of the SPAS alternatives are viable from an economic standpoint. Regarding enhancements to the efficiency of the airfield under each alternative, please see Table 4.7.2-16 on pages 4-569 and 4-570 in Section 4.7.2 of the SPAS Draft EIR. As indicated in that table, the SPAS alternatives achieve substantial enhancements to efficiency; the degree to which efficiency is enhanced varies between the alternatives.

SPAS-PC00098 Garner, Bryan A LawProse Inc. 9/25/2012

SPAS-PC00098-1

Comment:

Lesson #88

What are the rules on initial capitals?

ANSWER: Most of the first letters of words in the titles of books, articles, songs, etc. are capitalized. The exceptions are articles or prepositions of four or fewer letters (unless they begin the title). So The Great Escape and Much Ado About Nothing, but Hope Is the Thing with Feathers.

Proper names are always capitalized. People's titles and ranks are usually treated as ordinary nouns and capitalized as proper nouns only when they accompany a person's name (Justice Ruth Bader Ginsburg) or are used as a direct form of address ("If I may say so, Judge, my opponent's statement is misleading"). Other proper nouns and adjectives are used in those of businesses (Purity Bakery, Inc.), trademarked business products (Kleenex; Mountain Dew); educational institutions (Matlock High School; the University of Arizona); government bodies and agencies (Department of Motor Vehicles; Homeland Security); public or private organizations (Peoria Chamber of Commerce; Lowell Street Coffee Klatch). Adjectives derived from proper nouns, such as nationalities, languages, or religions, are also capitalized (Australian-rules football; Hindi songbook; Jewish holiday).

Legal writers follow some additional rules. Constitution is capitalized when referring to the United States Constitution or even to a particular state constitution (but the adjective constitutional is lowercase). So revered is our Constitution that its parts, when written out in full, are capitalized: Article, Section, and Amendment (as well as Due Process Clause). But when abbreviated, such terms usually aren't capitalized (eg., art. III); consult the Bluebook or your local style guide.

A prosecuting entity's name such as State or People is capitalized when used as part of or as a shortened form of a full name: State of New Mexico, People of New York. When referring to a prosecuting entity, State or People may be used as the short form of reference, e.g.: "The State claimed that Martin was driving the car"; "Livingston objected that the People's evidence was insufficient."

Source: The Redbook: A Manual on Legal Style (2d ed. 2006).

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(1:00 - 2:30 p.m.)
Advanced Transactional Drafting
(3:00 - 4:30 p.m.)
Register now. Space is limited.

Response:

This is not a comment on the contents of the Draft EIR.

SPAS-PC00099 Leiweke, Timothy J AEG 8/27/2012

SPAS-PC00099-1

Comment:

AEG would like to applaud your efforts to "Fix LAX Now" and modernize the most important gateway to our city.

AEG proudly hosts over 15 million attendees at sporting events and concerts in Los Angeles each year and many of those attendees are visitors who fly into LAX. We appreciate the improvements being made at the airport today, but so much more needs to be done and we know that the major modernization plans will not be started until the Specific Plan Amendment process is completed and a decision is made on the configuration of the north airfield.

We urge you to act expediently and plan for the next 50 years. It has been 28 years since LAX was a showplace for the 84 Olympics and it needs to be that again.

Thank you for your dedication to building a better airport for our citizens and visitors.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00100 Garner, Bryan A LawProse Inc. 10/2/2012

SPAS-PC00100-1

Comment:

Lesson #89
When should all-caps text be used?

ANSWER: When you need to emphasize particularly important information in text, all-caps will do the job, but you should never use all-caps for more than just a few words, as in a title: THE OLD MAN AND THE SEA, for example, on a billboard.

Less defensible is the quasi-shouting notice that says, "This product is sold AS IS, and comes with NO WARRANTY."

In dialogue or a quotation, a word or sentence in all-caps shows that the speaker's tone was vehement or angry, or that the speaker is ranting: "I demand JUSTICE for the deceased! JUSTICE for the family! JUSTICE for the community!" But using all-caps for less-important speech dilutes its effectiveness.

In a document with section headings, all-caps may help the headings stand out above the text, but only if the headings are short. For instance: CONDITIONS FOR PAROLE is easy to read. But THE STATE REQUIRES THE PETITIONER TO MEET FOUR CONDITIONS BEFORE PAROLE MAY BE GRANTED is not. And because good point headings in a brief often contain 15 to 35 words, all-caps text is highly inadvisable for them.

Finally, all-caps is acceptable for acronyms and intialisms, such as NASA and SUV. But if the acronym or initialism is one that has become an ordinary word, then don't use all-caps (as with radar and scuba).

Source: The Redbook: A Manual on Legal Style 64-65 (2d ed. 2006).

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Advanced Legal Writing & Editing (8:30 a.m. - noon)

The Winning Oral Argument (1:00 - 2:30 p.m.)

Advanced Transactional Drafting (3:00 - 4:30 p.m.)

Register now. Space is limited.

Response:

This is not a comment on the contents of the Draft EIR.

SPAS-PC00101 Shapiro, Lynne None Provided 9/28/2012

SPAS-PC00101-1

Comment:

I attended the Westchester Neighborhood Council community meeting last night. I hope that your DEIR and subsequent EIR's include the environmental impact
of airplanes in the sky over the Marina Peninsula. I have lived here for twenty-five years. This summer LAX flights are not going out to sea but rather going north

over Ballona, the Main Channel and the Marina Peninsula. Thousands of us live here in apartments, condos and single family homes. The noise degradation is
measurable and increasing. This has an impact on birds and humans. I have twenty minutes or so of peace, and then the flights start in and are constant for
some thirty to forty minutes. The planes fly low and are close to our homes, and their noise is insufferable. Although I have always appreciated LAX, I oppose
your three mile expansion plan and feel it will be extremely detrimental to Westchester, Playa del Rey and, with respect to flight noise, Marina del Rey.

Response:

Flight tracks under existing conditions are provided in SPAS Draft EIR Appendix J1-1 (Figure 1) of the SPAS Draft EIR. As shown therein, flights generally do not go over the main channel in Marina del Rey. The commentor appears to be referring to high aircraft noise levels resulting from early turns over the Marina. Please see Response to Comment SPAS-PC00112-1 regarding early turns.

Regarding other noise impacts on noise-sensitive uses associated with exposure to existing or future high noise levels of 65 CNEL or greater, these impacts were analyzed in Sections 4.9 and 4.10.1 of the SPAS Draft EIR. As shown in Figure 4.10.1-12 of the SPAS Draft EIR, the Marina Peninsula is not located within areas of existing high noise levels as designated by the 65 CNEL noise contour. As also depicted in Figures 4.9-7, 4.9-8, 4.9-9, 4.9-10, 4.9-11, 4.9-12, and 4.9-13 of the SPAS Draft EIR, the Marina Peninsula would not be newly exposed to high noise levels under Alternatives 1 through 7. Furthermore as shown in Figures 4.10.1-13, 4.10.1-16, 4.10.1-19, 4.10.1-22, 4.10.1-27, 4.10.1-30, and 4.10.1-33 of the SPAS Draft EIR, the Marina Peninsula would not be exposed to high single event aircraft noise levels associated with nighttime awakening under existing or as a result of the SPAS project. However, please see Response to Comment SPAS-PC00008-1 regarding current measures underway to address aircraft noise. Please also see Responses to Comments SPAS-PC00042-5 and SPAS-PC00130-938 regarding the effects of noise on humans.

Potential noise impacts on birds resulting from aircraft noise were analyzed in Section 4.3.6 of the SPAS Draft EIR. As concluded therein, aircraft noise impacts on birds under Alternatives 1 through 7 would be less than significant.

The comment also suggests LAWA has a "three mile expansion plan." Some improvements--including Runway 6L/24R and Lincoln Boulevard--would be located up to several hundred feet closer to communities that are located north of the airport, but there would be no northerly movement of the existing airport property line. As described in Section 2.3.1.11 of the SPAS Draft EIR and illustrated in Figures 2-11 through 2-14, acquisition would be limited to parcels near the Century Boulevard corridor and would vary with each alternative. The acquisition areas are located adjacent to existing airport property and do not represent a change in the property line of more than 1,500 feet. Furthermore, as stated on page 1-13 of the SPAS Draft EIR, the project would not change the potential for passenger growth at LAX; rather, future passenger activity is forecast to reach 78.9 MAP at LAX with or without the SPAS alternatives.

SPAS-PC00102	**None Provided, Marco**	**None Provided**	**9/28/2012**

SPAS-PC00102-1

Comment:

Hi Madeline,
The general consensus is to adopt alternative 2 &/or 9.
Modernize - No Expansion
There is another meeting on Monday October 1 - 7-9pm
@ LA TIJERA United Methodist Church
7400 Osage Ave, in Westchester.

You can see the different alternatives online at http://www.laxspas.org/LAX_Solutions.aspx
You can submit comments until October 10th at spaseircomments@lawa.org
There were two cameras recording; but, I didn't get which websites they would posted at.
I just looked thru youtube and didn't find anything; but, it does take a long while to record a long 2 hour video
like that. Probably a couple of days.
Ciao,
Marco

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. It is noted that a town hall meeting held by the Neighborhood Council of Westchester/Playa (NCWP) to discuss the SPAS Draft EIR was held at the Westchester Enriched Sciences Magnets School on Thursday, September 27, 2012. In addition to presentations provided by representatives of community groups, at the invitation of the NCWP, LAWA staff were present at this town hall meeting and gave a presentation providing an overview of the SPAS project and associated Draft EIR.

SPAS-PC00102-2

Comment:

Thanks for invite. I was not able to attend. Is anyone available to put out an e-mail summary of the meeting? Madeline Wright

Response:

The comment in noted. Please see Response to Comment SPAS-PC00102-1 above regarding the September 27, 2010 town hall meeting on the SPAS Draft EIR held by NCWP.

SPAS-PC00102-3

Comment:

Don't forget!
Airport Expansion Town Hall
Thursday, September 27th between 7 & 9 PM, at Westchester High School.
Councilman Bill Rosendahl & Congress Woman Maxine Waters are going to be there. Plus, I have invited Congressional Candidate Bob Flores to be there!

Response:

The comment is noted. Please see Response to Comment SPAS-PC00102-1 above regarding the September 27, 2010 town hall meeting on the SPAS Draft EIR held by NCWP.

SPAS-PC00102-4

Comment:

Some of you know that I majored in Airport Planning & Management; and, I'd like to share with you some of my thoughts and suggestions for the Airport "Modernization":

First Problem
Inside Terminal Congestion - The terminals are too small and aren't big enough. They are no match against the ever larger aircraft being used. They were built and designed during the 707 & DC-8 Days. They've been too small ever since 747's came out.
Real Estate is at a premium. We won't be getting any more of it.
Solution: Create multi-level terminals.
Separate arrival passengers from departure passengers, possibly even add a business class & first class levels?

Response:

Terminal improvement plans for LAX take into account larger aircraft that are within the current and anticipated aircraft fleet mix for LAX. For example, the new concourses and gates currently under construction in the Bradley West Project at LAX include several new gates, boarding bridges, and passenger holdrooms designed to accommodate Aircraft Design Group (ADG) VI aircraft, such as the Airbus A380. Existing and planned terminal improvements at LAX are multi-level, with the lower level(s) being used to accommodate arriving passengers and the upper level(s) being used to accommodate departing passengers. That is also the case relative to the upper and lower level roadways within the CTA.

Please see Chapter 2 of the SPAS Draft EIR for a description of how these concepts are built into the SPAS alternatives.

SPAS-PC00102-5

Comment:

Second Problem
Outside Terminal & Traffic Congestion - In some of my airport planning classes, the general consensus was to adopt the Orlando Airport model, for vehicle traffic; which consists of 4 levels; but, their passenger levels are much lower than LAX; and highly dependent on rental car traffic.
LAX currently has 2 levels for vehicles - arrival & departures; and that's it. How can anyone say it's adequate with a straight face? I actually heard the head of the taxi-cabs say so.
The Orlando MCO Airport divides vehicle traffic into 4 levels, and to add to that, I was thinking of possibly even exploring 5 levels, by combining the Orlando Model WITH the LAX Model.
a) Level for taxis & limousines - possibly directly serving a first class & business class level?
b) Level for busses & vans
c) Level for rental cars
d) Level for arrival passengers being picked up by private cars
e) Level for departure passengers being picked up by private cars

Response:

Given the highly developed and constrained nature of the area within the CTA and areas immediately east of the CTA, where there are ramps and connections between the CTA roadways and surrounding roadways such as Century Boulevard and Sepulveda Boulevard, it is not logistically feasible to construct a four- or five-level roadway system as suggested by the commentor, and such construction would likely have costs out of proportion to any benefit potentially achieved. In addition to the infeasibility of constructing such a roadway system, it is also logistically infeasible to modify all of the terminals within the CTA to add two or three additional levels in order to meet/match the elevation of each roadway level. Moreover, such a multi-level roadway system is not needed to avoid or substantially reduce significant environmental impacts, nor is there any evidence that it would do so. The SPAS Draft EIR analysis of the on-airport transportation system presented in Section 4.12.1 concludes that with the exception of one intersection under future cumulative conditions and one to five roadway links (depending on the alternative) under future cumulative conditions, implementation of the SPAS alternatives would not result in significant impacts to the on-airport transportation system. For these reasons, the commentor's suggested alternative was not evaluated in detail in the SPAS Draft EIR.

SPAS-PC00102-6

Comment:

Third Problem
Connecting Flights & Terminal Transfers - Right now, if you land at LAX on a Southwest Airlines Flight and then need to transfer to the Tom Bradley Terminal for an international flight, all anyone can say is "Good Luck". If we adopt an "Arrival Level", in the terminals, I was thinking that this level should be

equipped with moving walk-ways; and, then moving walk-ways should connect all of the terminals. This way, it would much easier for passengers to go from Terminal 1 to Terminal 6 or vice-versa.
Hope to see you there and submit your comments.
Marco

Response:

As indicated in Response to Comment SPAS-PC00102-4, LAX is already multi-level with arrivals on the lower level and departures on the upper level. Regarding connecting flights and terminal transfers, most airlines provide the gates nearby within the same terminals for connecting flights scheduled through that same airlines. In the event that a connecting flight requires a passenger to transfer to another terminal, LAWA provides free shuttle buses that run on a regular and frequent basis throughout the CTA stopping at each terminal. This existing system is considered to be far more effective and efficient than moving walkways in transporting passengers between terminals, especially in a situation like the example given by the commentor (i.e., transporting a passenger from Terminal 1, where Southwest Airlines operates, to Tom Bradley International Terminal (TBIT) at the other end of the CTA). In looking closer at this example, the distance between Terminal 1 and TBIT is 0.5 mile. A high-speed moving walkway such as that currently employed at Pearson International Airport in Toronto, Canada operates at a passenger entrance/exit speed of 1.2 miles per hour (mph) and accelerates to 4.3 mph. A moving walkway between Terminal 1 and TBIT would actually be three separate segments, with each segment beginning and ending at each intervening terminal (i.e., one segment between Terminals 1 and 2, a second segment between Terminals 2 and 3, and the third segment between Terminal 3 and TBIT), given that passengers would have to exit one segment and walk across to board the next segment. Assuming an average travel speed of 3 mph, it would take approximately 10 minutes to travel by moving walkway between Terminal 1 and TBIT. This does not include any additional time that would be required for passengers to gather luggage and walk through any crowds in front of terminals when transferring from one walkway segment to the next. On the other hand, boarding a free shuttle bus at Terminal 1 and traveling at an average speed of 15-20 mph to TBIT, with one-minute stops at Terminals 2 and 3 on the way, would take less than half that amount of time (i.e., approximately 4-5 minutes). Also, the handling of luggage taking a shuttle would occur only twice; once when boarding the shuttle and once when alighting from the shuttle, as opposed to handling luggage six times when entering and exiting three segments of a moving walkway. In addition to the operational disadvantages of a moving walkway compared to a shuttle, there would be the adverse impacts associated with constructing a moving walkway system within the CTA, which would require several temporary closures and narrowing of existing walkways within the CTA during construction. In light of the reasons above, the commentor's suggested alternative was not evaluated in detail in the SPAS Draft EIR.

SPAS-PC00103 Wicks, Douglas None Provided 10/4/2012

SPAS-PC00103-1

Comment:

It is a no- brainer that LAX needs to be modernized. Every time I visit another city with a contemporary and efficient airport, I always rue my eventual return to ours. Alternatives 2 (taxiway reconfiguration/terminal and ground transport improvements) and 9 (ground transport improvements) provide jobs and benefit the local economy. As a Westchester resident, I am not against improving a vital engine to our local economy. But, I am opposed to the unnamed advocates (airline industry? LAWA Exec. Director Gina Marie Lindsey?) of moving the north runway. The suggestion that it would decrease noise pollution is laughable. And, we know from the Nasa-Ames study, that runway safety would not improve. Expanding the runways to accommodate hugh air busses serves the interests of the airlines. It does not serve the interests of OUR COMMUNITY.

Response:

The commentor's support for Alternatives 2 and 9 is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Chapter 2 of this Final EIR regarding the LAWA Staff-Recommended Alternative,

which couples the airfield and terminal improvements associated with Alternative 1 with the ground access components associated with Alternative 9, including a discussion of the rationale behind the selection of these alternatives over the other alternatives evaluated in the SPAS Draft EIR.

As indicated in Section 4.9 of the SPAS Draft EIR, all of the SPAS alternatives would result in increased aircraft noise compared to baseline conditions. This is due to increases in aircraft operations over time, which would occur with or without the SPAS alternatives, as stated on page 1-13 of the SPAS Draft EIR. However, when comparing impacts in 2025, alternatives that would move Runway 6L/24R northward would reduce exposure to noise impacts compared to alternatives that do not move this runway. Please see Response to Comment SPAS-PC00149-2 regarding the SPAS Draft EIR findings relative to aircraft noise impacts on surrounding communities. As indicated in that response, while it is true that those alternatives involving the relocation of Runway 6L/24R northward (i.e., Alternatives 1, 5, and 6) would result in increased aircraft noise impacts to areas immediately north and northeast of the airport, there would be an accompanying decrease in aircraft noise impacts to areas east, southeast, and south of the airport. Overall, the alternatives that would relocate Runway 6L/24R north would result in the lowest residential population exposed to a 1.5 CNEL increase above 65 CNEL and, along with Alternative 3, would result in the lowest number of people newly exposed to 65 CNEL. For a figure that illustrates the noise contours associated with Alternatives 1 and 5 (which would relocate Runway 6L/24R to the north) and Alternative 2, please see Response to Comment SPAS-PC00128-2. Please also see Response to Comment SPAS-PC00149-2 regarding safety related to the north airfield.

SPAS-PC00104 Kesting, Rachel None Provided 10/1/2012

SPAS-PC00104-1

Comment:

COMMENT- RESIDENT-Westchester
I am concerned for the particulate matter and emissions in all alternatives, as stated in the report.

My concern:
Qualified health organizations, such as the AMerican Lung Association, AAAAI.org-Assoc. of Allergy, Asthma
and Immunology, have NOT reviewed the LAX SPAS Alternative report.

If this is false, can you direct me to the organizations, regarding lung disease or COPD, that have reviewed the LAX expansion alternatives?

The document EIR states that
"during project operations all of the alternatives would result in significant emissions of sulfur dioxide and
particulate matter (i.e. PM10 and PM2.5)."

"during operations all of the SPAS alternatives would result in significant air pollutant concentrations for nitrogen dioxide and particulate matter (i.e. PM10 and PM2.5)."

Thank you.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Response to Comment PC00130-358 regarding the extensive efforts LAWA undertook to make the public, including public organizations, aware of the availability of the SPAS Draft EIR for review and comment. LAWA has no way of knowing what organizations have actually reviewed the SPAS Draft EIR or Preliminary LAX SPAS Report.

SPAS-PC00105 Camino, Julie None Provided 10/2/2012

SPAS-PC00105-1

Comment:

I am a concerned resident of Westchester and I am very interested in your plans for renovating LAX.

I understand that there are many options presented in the Specific Plan Amendment Study and I wonder which Alternative LAWA favors? What is LAWA gaining from their favored Alternative? Why is this plan better than the other Alternatives? How will residents of Westchester/El Segundo/Playa del Rey be impacted by this favored Alternative? Specifically what are the environmental impacts, including noise pollution and air pollution, for these areas?

Response:

Please see Chapter 2 of this Final EIR regarding the LAWA Staff-Recommended Alternative, which couples the airfield and terminal improvements associated with Alternative 1 with the ground access components associated with Alternative 9, which includes an APM. Chapter 2 identifies the environmental impacts, including those associated with noise and air pollution, associated with the LAWA Staff-Recommended Alternative.

SPAS-PC00105-2

Comment:

Should any Alternative move forward and there are expected detriments to the surrounding community, how will the community be compensated for these detriments? Noise pollution? Air pollution? Property values decreasing? Quality of life decreasing?

Response:

Table 1-6 in Chapter 1 of the SPAS Draft EIR presents the existing LAX Master Plan commitments and mitigation measures, as well as proposed SPAS-specific mitigation measures that would reduce or avoid environmental impacts in surrounding communities, including air quality and noise impacts. Pursuant to Public Resources Code Section 21081.6(a), LAWA would adopt a mitigation monitoring and reporting program (MMRP) in connection with the approval of any of the SPAS alternatives. The MMRP would define what agency is responsible for each adopted mitigation measure and commitment, when that measure or commitment would be implemented, and what criteria would be used to determine whether the measure or commitment is being implemented and is effective. The MMRP is a means to ensure compliance with mitigation measures and commitments during project implementation.

Regarding property value impacts, CEQA does not require property value impacts or other purely social or economic impacts to be analyzed in an EIR (CEQA Guidelines Section 15064(e)). Please see Response to Comment SPAS-PC00189-4 for further discussion about impacts on property values.

CEQA does not require that impacts on "quality of life" be assessed, since "quality of life" is a subjective social issue. The SPAS Draft EIR does however evaluate physical impacts on the environment associated with over 20 topical issues and how such impacts affect residents in surrounding communities.

SPAS-PC00105-3

Comment:

I recently learned that in the earlier stages of LAX's renovation, there was a lawsuit brought against LAWA by the community and eventually there was a settlement. In that settlement LAWA was required to do certain things in the community that are still outstanding. When will these things be completed?

How can this community in good faith work with LAWA if there is no follow thru on previously agreed terms?

Response:

Although not specifically stated, it appears that the commentor is referring to the LAX Master Plan Stipulated Settlement. The comment does not indicate what "certain things in the community are still outstanding" therefore, it is not possible to provide a specific response. Comments regarding LAWA's compliance with the Stipulated Settlement require legal conclusions that are beyond the scope of what is required by CEQA. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00105-4

Comment:

In closing, I'd like to join the community in a compromise with LAWA and support Alternative #2 in conjunction with Alternative #9. I understand that LAWA has objectives with LAX and I can only hope that "Minimizing Environmental Impacts on Surrounding Communities" is the top priority while achieving all other objectives.

Response:

The commentor's support for Alternatives 2 and 9 is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Chapter 2 of this Final EIR regarding the LAWA Staff-Recommended Alternative, which couples the airfield and terminal improvements associated with Alternative 1 with the ground access components associated with Alternative 9, including a discussion of the rationale behind the selection of these alternatives over the other alternatives evaluated in the SPAS Draft EIR. Please see Response to Comment SPAS-AL00007-54 regarding the SPAS project objective of minimizing environmental impacts on surrounding communities.

SPAS-PC00105-5

Comment:

I look forward to hearing back from you and reviewing your responses to my questions.

Response:

The comment is noted. Please see Responses to Comments SPAS-PC00105-1 through SPAS-PC00105-4 above. Responses to comments will be included in the Final EIR consistent with State CEQA Guidelines Sections 15088 and 15132.

SPAS-PC00106 Owens, John None Provided 10/4/2012

SPAS-PC00106-1

Comment:

We have resided in Westchester 46 years and observed LAX outgrow its limited location years ago to the detriment of the surrounding area and the citizenry. It should have been relocated to Ontario at a time it could have been practical. It is now beyond that for all practical purposes,

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required

because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00106-2

Comment:

but now LAX is attempting to further expand its footprint by moving runway 6L/24R North of its present location to cause more noise and dirt pollution as well as general inconvenience to the residents and business establishments in Westchester. Enough already!

Response:

The comment noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Relocation of Runway 6L/24R to the north would not result in an expansion of the airport boundary. Relocation of the runway and the related realignment of Lincoln Boulevard would require the relocation of the perimeter fence; however, this would occur entirely within airport property and would not affect any homes or businesses.

The SPAS Draft EIR addresses impacts associated with aircraft noise, road traffic noise, and construction traffic and equipment noise in Sections 4.10.1, 4.10.2, and 4.10.3, respectively. The impacts associated with each of these categories of noise are summarized below.

As indicated in Section 4.10.1 of the SPAS Draft EIR, Alternatives 1 through 7 would result in some residential uses and non-residential noise-sensitive facilities being newly exposed to noise levels of 65 CNEL or higher or increases of 1.5 CNEL or higher within the 65 CNEL or higher noise contours. With implementation of LAX Master Plan mitigation measures, these impacts would be less than significant. However, interim impacts prior to the completion of mitigation, impacts on residential uses with outdoor habitable areas, and impacts on parks would remain significant and unavoidable. Alternatives 8 and 9 focus on ground access improvements that, in themselves, would not result in aircraft noise exposure but would be coupled with the airfield improvements proposed under Alternatives 1, 2, 5, 6, or 7, the impacts of which are summarized above. None of the alternatives would result in a significant impact relative to sleep awakenings.

Concerning road traffic noise, as indicated in Section 4.10.2 of the SPAS Draft EIR, impacts related to ground access improvements proposed under Alternatives 1, 2, 3, 4, 8, and 9 would be less than significant as the incremental changes in road traffic noise levels under each of these alternatives would be less than a 3 dBA increase in CNEL. Alternatives 5, 6, and 7 do not include ground access improvements and would therefore not affect road traffic noise levels at off-site noise-sensitive uses.

Regarding construction traffic and equipment noise, as indicated in Section 4.10.3 of the SPAS Draft EIR, due to the periodic nature and limited incremental increase on area roadways, none of the alternatives would result in significant impacts related to construction traffic noise. However, all of the alternatives would result in significant impacts from construction equipment noise with the potential to effect sensitive receptors such as residential and school uses. The sources of those impacts differ by alternative, but can be generally characterized as temporary impacts associated with airfield improvements, ground access system improvements, and construction staging areas. While LAX Master Plan commitments and mitigation measures would reduce construction equipment noise impacts associated with all of the SPAS alternatives, it cannot be definitively concluded that all construction equipment noise impacts would be reduced to levels that are less than significant and these impacts are considered to be significant and unavoidable.

The SPAS Draft EIR addresses air quality impacts associated with the SPAS alternatives, including Alternatives 1, 5, and 6 which propose a northward relocation of Runway 6L/24R, in Sections 4.2. As indicated therein, even after mitigation, construction activities would result in significant and unavoidable air quality impacts under all of the alternatives. Specifically, under all of the alternatives except for Alternative 4, construction emissions of carbon monoxide (CO), volatile organic compounds (VOC), oxides of nitrogen (NOx), particulate matter with an equivalent aerodynamic diameter of 10 micrometers (PM10), and particulate matter with an equivalent aerodynamic diameter of 2.5 micrometers (PM2.5)

would be significant and unavoidable. Under Alternative 4, significant and unavoidable construction emissions would occur for NOx and PM10. Under all of the alternatives, even after mitigation, construction-related concentrations of nitrogen dioxide (NO2) and PM10 would be significant and unavoidable.

Operation of the airport would also result in significant and unavoidable impacts to air quality. Even after mitigation, operational emissions of sulfur dioxide (SO2), PM10, and PM2.5 would be significant and unavoidable under all of the alternatives. Operational concentrations of NO2, PM10, and PM2.5 would also be significant and unavoidable under all of the alternatives.

SPAS-PC00106-3

Comment:

We attended the informational meeting at Proud Bird and collected the handouts including the SPAS study. We do not agree with any of the alternatives to move 6L/24R any distance North of its present location. Just because the North boundary fence is not moved per some speaking representative of an airport service company does not mean that the footprint is not enlarged to the further detriment of the community. A combination of alternatives 2 and 9 would seem to take care of the LAX needs at a decent price.

Response:

The commentor's support for Alternatives 2 and 9 is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Chapter 2 of this Final EIR regarding the LAWA Staff-Recommended Alternative, which couples the airfield and terminal improvements associated with Alternative 1 with the ground access components associated with Alternative 9, including a discussion of the rationale behind the selection of these alternatives over the other alternatives evaluated in the SPAS Draft EIR.

SPAS-PC00106-4

Comment:

As an aside, you should figure out a way to keep all the livery, hotel,car rental vans, buses,etc off the central terminal area and provide common shuttle service to the intermodal facility. Leave the central terminal area and garages as is for private vehicles and taxis.

Response:

As indicated in Section 2.3, Project Characteristics, of the SPAS Draft EIR, arriving passengers for those alternatives that include the ITF (i.e., Alternatives 1, 2, 8, and 9) would travel from the CTA to the ITF to board door-to-door shuttles or scheduled buses. This would reduce the amount of shuttle and bus traffic within the CTA, although departing passengers using such transportation would continue to be brought into the CTA. Additionally, under Alternatives 8 and 9, which propose a CONRAC, the amount of rental car company shuttle traffic within the CTA would be reduced, given that the CONRAC would utilized a single consolidated shuttle system. Under Alternative 3, the CTA would be closed to all vehicles except the LAWA FlyAway buses, airport security and operations vehicles, and other authorized vehicles. Under Alternative 4, all shuttles and buses would continue to have access to and from the CTA. The commentors' suggestion that all the livery, hotel, car rental vans, buses, etc. be kept out of the CTA, and access be allowed only for private vehicles and taxis, is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project.

SPAS-PC00107 Walker, Robert W United 7/27/2012

SPAS-PC00107-1

Comment:

As you are aware, United has worked closely with LAWA and other carriers operating at Los Angeles International Airport (LAX) regarding the airport's efforts to improve performance and operational efficiency at LAX in the most cost-effective manner. We support LAWA's efforts to date and we will continue to work closely together towards achieving this mutually-beneficial goal.

Though we can specifically state that we are opposed to the Master Plan Alternative D for the North Airfield in that it is not a cost-effective approach to developing the North Airfield, we are aligned on the concept of replacement or rehabilitation of the North Airfield runways and taxiways to meet current FAA design standards.

We look forward to reviewing the Specific Plan Amendment Study and working with your team and the other LAX carriers to better understand the North Airfield options. We anticipate that this collaborative effort will ultimately yield a consensus agreement on the best approach to the North Airfield development.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00108 Haythorn, Joseph D None Provided 9/20/2012

SPAS-PC00108-1

Comment:

From the outset of the process to explore development of the facility at LAX, it appears that LAWA has been acting in a duplicitous manner toward the citizens of Westchester and Playa del Rey. Inglewood has been treated in similar way. The idea that the northernmost runway could be moved further north without much significant community resistance is so preposterous that it can only be taken as a negotiating position. Obviously, if LAWA were to pursue moving the runway, an additional group of houses, condominiums, apartments, schools, and businesses would need to be condemned. Any remaining outside the condemned area would surely bring actions for diminished value. The violation of the consent decree from the last condemnation would serve as the basis of the action, but even without that the property owners would be successful in stopping the development resulting in no activity or, at worst, delaying any construction for years and ultimately receiving compensation forcing the costs of the project far beyond LAWA's predictions.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Response to Comment SPAS-PC00130-636 regarding property acquisition in Westchester. No property acquisition is anticipated as a result of the relocation of Runway 6L/24R to the north. Please see Response to Comment SPAS-PC00189-4 regarding impacts to property values; property values impacts are purely economic impacts not required to be analyzed under CEQA. (State CEQA Guidelines Section

15064(e).). It is speculative to predict whether lawsuits would be filed if a SPAS alternative involving moving the north runway further north is selected for implementation, and whether such lawsuits if filed would result in project delays and cost increases.

SPAS-PC00108-2

Comment:

The recent charade of the Northside development project meetings and "negotiations" are a further indication that LAWA is either not serious about the alternatives which involve moving runways north, or intending to lull the neighbors into a false sense of security. Neither reflects well as to whether LAWA is a trustworthy party in this project. As LAWA proves again inept and untrustworthy, it is difficult to understand whether the entire process of proposing alternatives is a sham.

Response:

Section 15083 of the State CEQA Guidelines provides that a lead agency may consult with persons or organizations who may be concerned with the environmental effects of a project prior to completing the draft environmental impact report. LAWA has exceeded the requirements of CEQA with the public outreach conducted for the LAX Northside Plan Update. In 2007 and 2008, a broad range of local community members participated in planning workshops regarding the LAX Northside properties. In November 2011, an open house was held that gave participants an opportunity to review project exhibits and discuss ideas with LAWA staff and consultants. In February 2012, targeted outreach was conducted with residents north of the LAX Northside area to discuss design concepts. Formal public scoping meetings were held on April 18 and 21, 2012 to obtain input on the scope of the Draft EIR. In June 2012, two workshops were conducted to further refine urban design concepts. Finally, smaller-scale meetings have been held with community leaders and organizations throughout the process to share ideas and receive input.

The LAX Northside Plan Update will be consistent with, and take into account as necessary, the SPAS study, as well as any other concurrent LAWA projects. For example, the LAX Northside Plan Update will take into account the most restrictive SPAS options for the north airfield, and will be consistent with any potential future changes considered for the airport.

No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00108-3

Comment:

Community partners have demonstrated that the safety claims are so exaggerated they may be dismissed. The statement that noise would not be worse if the runways are moved may be technically true but the noise would be closer to the residences, schools, and businesses so louder there. To actually claim otherwise again demonstrates that LAWA is not dealing seriously.

So I am left to speculate as to whether LAWA is lying or inept. In either case, my only alternative at this point is to seek counsel unless LAWA begins to address this business honestly with a clear understanding of the consequences of their actions.

Response:

Please see Response to Comment SPAS-PC00149-2 regarding safety related to the north airfield and explanations of the SPAS Draft EIR findings relative to aircraft noise impacts on surrounding communities. Please also see Sections 4.7.2 and 4.10 of the SPAS Draft EIR for the safety and noise analyses for the SPAS alternatives, respectively.

Also, please note that the comment presents personal opinions about safety and noise impacts that are not supported by facts or evidence.

SPAS-PC00108-4

Comment:

I still believe that the best alternative has not been considered, to close the interior parking and access roads, construct two or three north-south terminals with access by passengers from a subterranean mall, as at the airports in Atlanta or Denver. Passengers would enter the facility east of the airport at Manchester Square or the area now with derelict warehouses between the two points.

Response:

The key features in the alternative recommended by the commentor are, for the most part, comparable to those in SPAS Alternative 3, whereby the CTA would be closed to private vehicles and parking, the existing CTA parking structures would be replaced by terminal/passenger processing facilities, and the main public entrance to LAX would be through the Ground Transportation Center at Manchester Square and, to a lesser extent, the Intermodal Transportation Center at Continental City. The main difference between the commentor's alternative and SPAS Alternative 3 would be that an aboveground Automated People Mover (APM) system would transport passengers to and from the CTA instead of them taking access through a subterranean mall. Constructing such a subterranean mall for passenger access between the LAX CTA and Manchester Square would be logistically infeasible because it would require the demolition/removal of numerous major hotels, a major office building, parking structures, and other uses along the one-mile-long stretch of Century Boulevard and 98th Street between Manchester Square and Sepulveda Boulevard, it would require the excavation and export of approximately 4 million cubic yards of earth to create a single-level subsurface cavity approximately one mile long, 1,000 feet wide and 20 feet deep, and it would require relocation of all underground utilities within that area, and construction of new uses underground. Further, a subterranean mall would have significant construction-related air quality impacts, and would not provide as quick and efficient transport of passengers as an APM. Specifically, a passenger traveling between Manchester Square and the CTA would take approximately 20-30+ minutes to walk non-stop through a mile-long underground mall at an average walking speed of 2-3 miles per hour, compared to approximately 4-5 minutes to travel that same distance by elevated bus or APM at 20-25+ miles per hour with a short stop at the ITF, as proposed under all SPAS alternatives except Alternative 4.

SPAS-PC00108-5

Comment:

Otherwise I agree with the Neighborhood Council of Westchester Playa that alternatives 2 and 9 appear to be the only reasonable ones. The other would receive such opposition as to block all construction. If LAWA is actually intent on ignoring their prior consent agreements, there is really no reason to bother negotiating.

I further agree with the Neighborhood Council of Westchester Playa that we do support intelligent development of LAX, it is a shame any development is relegated to the abilities of the existing management of LAWA.

Response:

The commentor's support for Alternatives 2 and 9 is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Chapter 2 of this Final EIR regarding the LAWA Staff-Recommended Alternative, which couples the airfield and terminal improvements associated with Alternative 1 with the ground access components associated with Alternative 9, including a discussion of the rationale behind the selection of these alternatives over the other alternatives evaluated in the SPAS Draft EIR. The comment regarding LAWA's compliance with "prior consent agreements" requires legal conclusions that are beyond the scope of what is required by CEQA.

SPAS-PC00109 Inamoto, Sharon None Provided 10/5/2012

SPAS-PC00109-1

Comment:

I have been a resident of Playa del Rey and Westchester for over 20 years and LOVE our community. Please don't ruin our neighborhood by making the noise any worse than it is and not to mention the detriment to our health. You would also lower the value of our property. Please don't make me move from my community!

Response:

The comment noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project.

The SPAS Draft EIR addresses impacts associated with aircraft noise, road traffic noise, and construction traffic and equipment noise in Sections 4.10.1, 4.10.2, and 4.10.3, respectively. The impacts associated with each of these categories of noise are summarized below.

As indicated in Section 4.10.1 of the SPAS Draft EIR, Alternatives 1 through 7 would result in some residential uses and non-residential noise-sensitive facilities being newly exposed to noise levels of 65 CNEL or higher or increases of 1.5 CNEL or higher within the 65 CNEL or higher noise contours. With implementation of LAX Master Plan mitigation measures, these impacts would be less than significant. However, interim impacts prior to the completion of mitigation, impacts on residential uses with outdoor habitable areas, and impacts on parks would remain significant and unavoidable. Alternatives 8 and 9 focus on ground access improvements that, in themselves, would not result in aircraft noise exposure but would be coupled with the airfield improvements proposed under Alternatives 1, 2, 5, 6, or 7, the impacts of which are summarized above. None of the alternatives would result in a significant impact relative to sleep awakenings. Under Alternatives 1 through 7, significant impacts would occur with an additional school being newly exposed to the 55 dBA Lmax. Each alternative would also result in significant impacts due to sustained interruption of classroom teaching at newly exposed schools through interior noise levels in excess of 35 dBA Leq(h). Implementation of LAX Master Plan mitigation measures would ultimately reduce impacts to these schools to a level that is less than significant. However, interim impacts prior to completion of mitigation measures would remain significant and unavoidable.

Concerning road traffic noise, as indicated in Section 4.10.2 of the SPAS Draft EIR, impacts related to ground access improvements proposed under Alternatives 1, 2, 3, 4, 8, and 9 would be less than significant as the incremental changes in road traffic noise levels under each of these alternatives would be less than a 3 dBA increase in CNEL. Alternatives 5, 6, and 7 do not include ground access improvements and would therefore not affect road traffic noise levels at off-site noise-sensitive uses.

Regarding construction traffic and equipment noise, as indicated in Section 4.10.3 of the SPAS Draft EIR, due to the periodic nature and limited incremental increase on area roadways, none of the alternatives would result in significant impacts related to construction traffic noise. However, all of the alternatives would result in significant impacts from construction equipment noise with the potential to effect sensitive receptors such as residential and school uses. The sources of those impacts differ by alternative, but can be generally characterized as temporary impacts associated with airfield improvements, ground access system improvements, and construction staging areas. While LAX Master Plan commitments and mitigation measures would reduce construction equipment noise impacts associated with all of the SPAS alternatives, it cannot be definitively concluded that all construction equipment noise impacts would be reduced to levels that are less than significant and these impacts are considered to be significant and unavoidable.

The SPAS Draft EIR addresses air quality impacts associated with the SPAS alternatives, including Alternatives 1, 5, and 6 which propose a northward relocation of Runway 6L/24R, in Sections 4.2. As

indicated therein, even after mitigation, construction activities would result in significant and unavoidable air quality impacts under all of the alternatives. Specifically, under all of the alternatives except for Alternative 4, construction emissions of carbon monoxide (CO), volatile organic compounds (VOC), oxides of nitrogen (NOx), particulate matter with an equivalent aerodynamic diameter of 10 micrometers (PM10), and particulate matter with an equivalent aerodynamic diameter of 2.5 micrometers (PM2.5) would be significant and unavoidable. Under Alternative 4, significant and unavoidable construction emissions would occur for NOx and PM10. Under all of the alternatives, even after mitigation, construction-related concentrations of nitrogen dioxide (NO2) and PM10 would be significant and unavoidable.

Operation of the airport would also result in significant and unavoidable impacts to air quality. Even after mitigation, operational emissions of sulfur dioxide (SO2), PM10, and PM2.5 would be significant and unavoidable under all of the alternatives. Operational concentrations of NO2, PM10, and PM2.5 would also be significant and unavoidable under all of the alternatives.

Related to health concerns, as indicated in Section 4.7.1 of the SPAS Draft EIR, incremental cancer risks and incremental chronic non-cancer health hazards within the study area under all the alternatives would be less than significant for all receptor types (i.e., child resident, school child, adult resident, adult worker). Additionally, under all the alternatives, health effects to on-airport workers would be less than significant. Incremental acute non-cancer health hazards at small areas at or near the LAX fence-line under all the alternatives would be slightly above the threshold of significance and are considered to be significant and unavoidable for all analyzed receptor types (i.e., residents, recreational users, school child, off-site adult workers). The primary toxic air contaminant of concern contributing to this impact is associated with emissions of acrolein from aircraft operations, which would occur in 2025 even in the absence of SPAS. It should be noted that, with the exception of Alternative 3, acute non-cancer health hazard impacts in 2025 would be lower under the SPAS alternatives than if no airfield improvements were implemented. Moreover, these significant impacts would occur at or near the fence-line; it is expected that actual impacts in the community would be less than significant.

Regarding concerns related to property values, please see Response to Comment SPAS-PC00189-4; note that property value impacts are purely economic impacts that are not required to be analyzed under CEQA. (State CEQA Guidelines Section 15064(e)). No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00110 Cassman, Mary Ellen None Provided 10/7/2012

SPAS-PC00110-1

Comment:

I heartily support the position of the Westchester Neighborhood Council, and countless other community groups, that LAX adopt Alternatives 2 and 9, with a realistic train service plan that includes all the Terminals.

Thank you for your consideration.

Response:

The commentor's support for Alternatives 2 and 9 is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Chapter 2 of this Final EIR regarding the LAWA Staff-Recommended Alternative, which couples the airfield and terminal improvements associated with Alternative 1 with the ground access components associated with Alternative 9, including a discussion of the rationale behind the

selection of these alternatives over the other alternatives evaluated in the SPAS Draft EIR. Please see Topical Response TR-SPAS-T-1 regarding transit options into LAX.

SPAS-PC00111 Chesney, Tom Westchester Neighbors Association 10/8/2012

SPAS-PC00111-1

Comment:

Our neighborhood organization represents the Westchester Community in the 90045 area. Our focus is on maintaining and improving the quality of life for those who live and work in the community. As an organization we support modernizing the airport and turning it into a world class destination for the global community. Our position is let's upgrade the terminals, do the taxiway fixes, and complete the installation of the runway status lights. This direction will provide the improvements we need and provide long term jobs for many. Also, it has been conclusively shown that LAX's current geometry provides more than adequate safety and moving runways will be extremely expensive and not accomplish what really needs to be done.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Please see Response to Comment SPAS-PC00130-168 regarding various safety studies related to the north airfield, including the North Airfield Safety Study. Also, please see Section 4.7.2 of the SPAS Draft EIR. Section 4.7.2 discusses safety impacts of the proposed alternatives, including the "no-project" alternative, Alternative 3.

SPAS-PC00111-2

Comment:

After thoroughly reviewing the report we find it is inadequate in fully addressing the key issues and uses old and flawed data to draw conclusions. These include:

Response:

The comment is noted, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Responses to Comments SPAS-PC00111-3 through SPAS-PC00111-7 below regarding how the EIR addresses specific issues identified by the commentor. The commentor does not identify any specific "old and flawed data" that the SPAS Draft EIR allegedly used to draw conclusions.

The SPAS Draft EIR provides a thorough analysis of nine alternatives, describes the impacts that would occur at the airport and in areas nearby under each alternative, and recommends feasible mitigation measures for significant impacts. The SPAS Draft EIR meets the requirements of CEQA.

SPAS-PC00111-3

Comment:

- Inadequate resolution of traffic congestion within the Central Terminal Area and adjacent communities.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. The impacts to on-airport traffic are analyzed in Section 4.12.1 of the SPAS Draft EIR. The commentor does not provide any factual basis for the conclusion that there is an inadequate resolution of traffic congestion; therefore, no response can be formulated and no further response is required.

SPAS-PC00111-4

Comment:

- Failure to fix traveler ability to navigate LAX with the terminals or between terminals when transferring flights.

Response:

Improvements to travelers' ability to navigate LAX within or between terminals is not a problem that the Yellow Light Projects were designed to address and, thus, is not one of the objectives of the SPAS project. Additionally, this comment addresses alleged issues with existing conditions and does not comment on the analysis provided in the SPAS Draft EIR. Further, while terminal facility improvements are discussed at a program level in the SPAS Draft EIR, specific facility improvements are not yet know, but would be analyzed in further detail in a future project-level environmental review. (See Section 2.3.1 and 2.3.1.10 of the SPAS Draft EIR.)

The ground access improvements proposed under SPAS Alternatives 1, 2, 3, 8, and 9 are designed to reduce traffic congestion within the CTA and provide means to directly access the CTA from facilities outside the CTA (i.e., from the ITF, GTC, or ITC) via a dedicated/elevated busway or an APM system. Implementation of these ground access improvements is intended to improve passengers ability to get to and from terminals within the CTA. In terms of assisting travelers' ability to navigate between terminals when transferring flights, that is largely a matter of how airlines and ticketholder schedule the connecting flights. Such connecting flights are most easily navigated when they are operated by the same airline using the same terminal for both flights, or through alliance airlines with gates and facilities nearby to each other. In terms of what LAWA can do to assist in such navigation between terminals, LAWA personnel in each terminal assist where possible and LAWA has intra-terminal shuttle buses that operate on a frequent and regular basis throughout the day. The commentor's concern about fixing travelers' ability to navigate LAX with the terminals or between terminals when transferring flights is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project.

SPAS-PC00111-5

Comment:

- Concentrates air commerce into LAX, thereby increasing LA Area traffic instead of diffusing traffic.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please refer to Topical Response TR-SPAS-REG-1 regarding the fact that LAWA, through the LAX Master Plan, the SPAS process, and multiple other efforts, supports the regionalization of air travel demand in Southern California. Traffic impacts associated with the SPAS alternatives are addressed in Section 4.12 of the SPAS Draft EIR.

SPAS-PC00111-6

Comment:

- Failure to designate a single, preferred alternative with general details for review and direct response

Response:

Please see Response to Comment SPAS-AL00007-6 regarding the analysis of nine alternatives in the SPAS Draft EIR instead of a single proposed project.

SPAS-PC00111-7

Comment:

- No resolution to the substantial customer base changes to our business district plus the considerable construction impacts that would occur during a protracted rerouting of Lincoln and Sepulveda Boulevards. This one DEIR inadequacy, alone, dictates that our businesses operate to survive rather than for growth and prosperity.

Response:

The commentor provides no explanation or supporting evidence regarding where or how the proposed realignment of Lincoln Boulevard under SPAS Alternatives 1, 5, and 6 would affect the Westchester business district. As shown in Figures 2-1, 2-5, and 2-6 of the SPAS Draft EIR, which delineate the proposed realignment of Lincoln Boulevard under the aforementioned alternatives, the affected segment of Lincoln Boulevard begins over 500 feet west of its intersection with Sepulveda Boulevard (i.e., contrary to the statement in the comment, Sepulveda Boulevard would not be rerouted) and ends just west of its interchange with Westchester Parkway. The entirety of the area surrounding the affected segment of Lincoln Boulevard, both as it exists today and as proposed to be realigned, is vacant land within the LAX Northside area owned by LAWA. There are no Westchester businesses located along the affected segment, nor do any rely on direct access to the affected segment.

Please see Topical Response TR-SPAS-LR-1 for additional discussion regarding other concerns expressed about the proposed realignment of Lincoln Boulevard under Alternatives 1, 5, and 6.

SPAS-PC00111-8

Comment:

We encourage LAWA to adopt as the preferred alternative the environmentally superior plan, Alternative 2 with a Consolidated Rental Car Facility in Manchester Square (Alternative 9) supported by some form of rail mass transit which allows for connection into our business district. This plan, according to DEIR evaluations, addresses the necessary airfield operational efficiency and safety concerns without a centerline taxiway, fixes the taxiways, provides the least calculated time to get to the terminal after landing, presents the least intrusive impacts on local communities, and, at the same time provides the lowest construction cost and construction risks.

We look forward to working with LAWA to improve LAX which is the Los Angeles gateway to the world.

Response:

The commentor's support for Alternatives 2 and 9 is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Chapter 2 of this Final EIR regarding the LAWA Staff-Recommended Alternative, which couples the airfield and terminal improvements associated with Alternative 1 with the ground access components associated with Alternative 9. Please see Topical Response TR-SPAS-T-1 regarding transit options into LAX. Please see Response to Comment SPAS-PC00089-1 for an explanation of why Alternative 2 coupled with the ground access components of Alternative 9 is not the environmentally superior alternative.

Regarding enhancements to the safety and efficiency of the airfield under each alternative, please see Table 4.7.2-16 on pages 4-569 and 4-570 in Section 4.7.2 of the SPAS Draft EIR. As indicated in that table, the SPAS alternatives achieve substantial enhancements to safety and efficiency; the degree to which safety and efficiency is enhanced varies between the alternatives. Please also see Response to Comment SPAS-PC00089-1 regarding efficiency associated with Alternative 2 compared to other airfield alternatives.

Please see Response to Comment SPAS-PC00115-1 regarding the commentor's assertion that Alternatives 2 and 9 would present the least intrusive impact on local communities and provide the lowest construction cost and construction risk.

SPAS-PC00112 Shapiro, Lynne None Provided

SPAS-PC00112-1

Comment:

I have lived in the same location in Marina del Rey for twenty-five years. For twenty-five years I have enjoyed the proximity of LAX. No more! This summer the peace and quiet of the Marina Peninsula (which I overlook) has been replaced by the roaring din of planes taking off and heading north over the Main Channel and the Peninsula and flying at low levels. Sometimes I see as many as 4-6 planes in the air.

The planes used to fly out to sea, make their turns and continue at a higher altitude. Why has this route been changed? It is very disturbing for thirty to forty minutes of every hour. I would appreciate your responding to my question. I have written many office holders without a response.

For me and my neighbors this environmental degradation is very disturbing. Since the ocean is at your disposal, why fly low close to our homes (thousands of apartments, condos and single residences within earshot of these flights)?

If this correspondence is part of any EIR studies, please include it. Again, I would like to know why so many planes are allowed to fly north and if this is to be a permanent change.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Note that the comment addresses existing conditions and does not address or comment on the analysis conducted in the SPAS Draft EIR. LAWA regularly monitors "early turns," when an aircraft on a westerly departure from any of the four LAX runways initiates a turn prior to reaching the shoreline that results in the aircraft flying over the community to either the north or south of the airport. The Federal Aviation Administration (FAA) Air Traffic Control does have the authority to instruct pilots to turn early to ensure the safe operation of the aircraft. The commenter's complaint of regularly occurring "early turns" will be forwarded to the Noise Management Office.

Additional information on LAWA's Early Turn Notification Program can be found on LAWA's website at the following address: http://www.lawa.org/LAXEarlyTurnMR.aspx.

Section 4.10.1.5 of the SPAS Draft EIR addresses "early turn" operations and the preferential runway use policy. The SPAS Draft EIR assumes that pilots of all aircraft departing toward the west shall fly straight until they are past the shoreline before beginning any turns, except for safety reasons as described above. For a more detailed description of the assumptions used for future airspace operating procedures please refer to Appendix F-2 of the Preliminary LAX SPAS Report.

SPAS-PC00113 McArtor, T. Allan Airbus Americas, Inc. 10/8/2012

SPAS-PC00113-1

Comment:

Airbus, a leading aircraft manufacturer, is pleased to provide comments and background on the Specific Plan Amendment Study (SPAS) Draft Environmental Impact Report (EIR).

Airbus has designed the A380, the world's largest commercial airplane, primarily for airports like Los Angeles International (LAX) that need to optimize the usage of constrained resources and to find solutions to reduce noise and carbon footprints.

The A380 has a wingspan of 261 ft 8 in and falls into the Airplane Design Group (ADG)-VI as defined by the FAA. LAX airfield - in particular the north airfield complex - does not comply with ADG-VI standards, while deviations from ADG-V standards even remain. Under the current operational plan at LAX, applicable to all ADG-VI airplanes, A380 flights are primarily handled on the north side of the airfield. The operational plan requires special and time-consuming procedures and accommodations that result from the existing geometrical limitations on the airfield and on the terminal aprons.

Four Airbus customers have started A380 service into LAX, and a fifth one will commence soon. Airbus customers have plans to deploy more A380s into LAX in the immediate and near-term future. As an example, the number of daily A380 flights to and from LAX may grow from the current ten to twenty six by the end of 2015, according to Airbus forecasts. The latter figure only accounts for existing A380 customer airlines.

Further, Airbus' Global Market Forecast calls for a significant and steady increase in the number of very large airplanes that will serve LAX in the next twenty years. It ranks LAX as the top A380 airport in North America in terms of operations.

These plans and forecast will materialize only if LAX modernization incorporates a greater compatibility for ADG-VI airplanes on the north airfield and provides more ADG-VI gates than what is currently or will be provided at the Bradley West terminal.

Airbus is expressing strong concerns that the planning assumptions considered in the Draft EIR underestimate the level and intensity of ADG-VI operations at LAX, with the planning horizon (2025) considering merely an equivalence to Airbus A380 daily operations forecast for 2015.

More broadly, Airbus recommends that the Los Angeles World Airports devise and implement a plan that will remedy operational deficiencies on the north airfield and increase compliance with ADG-VI standards in all weather conditions. Airbus emphasizes the need for such level of compliance on the area located between the Central Terminal Area and runway 06R/24L that includes taxilane/taxiway D, taxiway E and the vehicle service road.

All of the above will result in safer and smoother operations for all operators involved.

We trust the City of Los Angeles will seize this unique opportunity, not only to make necessary improvements to LAX but also to prepare it for the future.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. The SPAS Draft EIR makes reasonable assumptions about the level of ADG VI aircraft operating at LAX in 2025. The 2025 projections, which forecast 78.9 MAP at LAX in 2025, are based upon and consistent with the Southern California Association of Government's Regional Transportation Plan/Sustainable Communities Strategy. (see footnote 670 on page 4-1048 of the SPAS Draft EIR.) Using these projections, a Design

Day Flight Schedule (DDFS) was developed for 2025. (Appendix F-1 of the Preliminary LAX SPAS Report.) The 2025 DDFS was based upon reasonable assumptions, which are provided in Appendix F-1 of the Preliminary LAX SPAS Report, about aircraft fleet mix, load factors, and seating capacity. (See Section 4 of Appendix F-1 of the Preliminary LAX SPAS Report.) As can be seen in comparing Tables 8 and 12 in Appendix F-1, the number of A380 operations at LAX is anticipated to increase from 2 per day in 2009 to 27 per day in 2025. The information presented in Appendix F-1 was developed for the 2025 planning horizon year in the SPAS analysis (i.e., 78.9 MAP in 2025), including the number of A380 operations in 2025, and is not "merely an equivalence to" the daily operations forecast for 2015.

SPAS-PC00114 Lebon, Lucia None Provided 10/8/2012

SPAS-PC00114-1

Comment:

We want to voice our objection to the proposed expansion at Los Angeles International Airport, expanding the Northernmost runway approximately 340 feet closer to Playa Del Rey and our property. This expansion presents health, safety, and environmental risks such as incremental noise, pollution, and traffic; as well as financial implications which will adversely affect the value of property to the residents of Playa Del Rey.

LAWA needs to be concerned with the above-mentioned safety, financial, environmental, and quality of life issues that face the residents of Playa Del Rey and neighboring communities if this expansion goes ahead, rather than with special interest groups that stand to gain from this expansion. Our health and environment is already affected by the pollution from jet fuel that is present on our roofs and patios, which will be increased if the Runway is moved closer. Safety and efficiency at LAX can be achieved without imparting greater impact on local communities such as Playa Del Rey.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Regarding concerns related to property values, please see Response to Comment SPAS-PC00189-4; note that property value impacts are purely economic impacts that are not required to be analyzed under CEQA. (State CEQA Guidelines Section 15064(e)).

The SPAS Draft EIR addresses impacts associated with aircraft noise, road traffic noise, and construction traffic and equipment noise in Sections 4.10.1, 4.10.2, and 4.10.3, respectively. The impacts associated with each of these categories of noise are summarized below.

As indicated in Section 4.10.1 of the SPAS Draft EIR, Alternatives 1 through 7 would result in some residential uses and non-residential noise-sensitive facilities being newly exposed to noise levels of 65 CNEL or higher or increases of 1.5 CNEL or higher within the 65 CNEL or higher noise contours. With implementation of LAX Master Plan mitigation measures, these impacts would be less than significant. However, interim impacts prior to the completion of mitigation, impacts on residential uses with outdoor habitable areas, and impacts on parks would remain significant and unavoidable. Alternatives 8 and 9 focus on ground access improvements that, in themselves, would not result in aircraft noise exposure but would be coupled with the airfield improvements proposed under Alternatives 1, 2, 5, 6, or 7, the impacts of which are summarized above. None of the alternatives would result in a significant impact relative to sleep awakenings.

Concerning road traffic noise, as indicated in Section 4.10.2 of the SPAS Draft EIR, impacts related to ground access improvements proposed under Alternatives 1, 2, 3, 4, 8, and 9 would be less than significant as the incremental changes in road traffic noise levels under each of these alternatives would be less than a 3 dBA increase in CNEL. Alternatives 5, 6, and 7 do not include ground access improvements and would therefore not affect road traffic noise levels at off-site noise-sensitive uses.

Regarding construction traffic and equipment noise, as indicated in Section 4.10.3 of the SPAS Draft EIR, due to the periodic nature and limited incremental increase on area roadways, none of the alternatives would result in significant impacts related to construction traffic noise. However, all of the alternatives would result in significant impacts from construction equipment noise with the potential to effect sensitive receptors such as residential and school uses. The sources of those impacts differ by alternative, but can be generally characterized as temporary impacts associated with airfield improvements, ground access system improvements, and construction staging areas. While LAX Master Plan commitments and mitigation measures would reduce construction equipment noise impacts associated with all of the SPAS alternatives, it cannot be definitively concluded that all construction equipment noise impacts would be reduced to levels that are less than significant and these impacts are considered to be significant and unavoidable.

The SPAS Draft EIR addresses air quality impacts associated with the SPAS alternatives, including Alternatives 1, 5, and 6 which propose a northward relocation of Runway 6L/24R, in Sections 4.2. As indicated therein, even after mitigation, construction activities would result in significant and unavoidable air quality impacts under all of the alternatives. Specifically, under all of the alternatives except for Alternative 4, construction emissions of carbon monoxide (CO), volatile organic compounds (VOC), oxides of nitrogen (NOx), particulate matter with an equivalent aerodynamic diameter of 10 micrometers (PM10), and particulate matter with an equivalent aerodynamic diameter of 2.5 micrometers (PM2.5) would be significant and unavoidable. Under Alternative 4, significant and unavoidable construction emissions would occur for NOx and PM10. Under all of the alternatives, even after mitigation, construction-related concentrations of nitrogen dioxide (NO2) and PM10 would be significant and unavoidable.

Operation of the airport would also result in significant and unavoidable impacts to air quality. Even after mitigation, operational emissions of sulfur dioxide (SO2), PM10, and PM2.5 would be significant and unavoidable under all of the alternatives. Operational concentrations of NO2, PM10, and PM2.5 would also be significant and unavoidable under all of the alternatives.

Related to health concerns, as indicated in Section 4.7.1 of the SPAS Draft EIR, incremental cancer risks and incremental chronic non-cancer health hazards within the study area under all the alternatives would be less than significant for all receptor types (i.e., child resident, school child, adult resident, adult worker). Additionally, under all the alternatives, health effects to on-airport workers would be less than significant. Incremental acute non-cancer health hazards at small areas at or near the LAX fence-line under all the alternatives would be slightly above the threshold of significance and are considered to be significant and unavoidable for all analyzed receptor types (i.e., residents, recreational users, school child, off-site adult workers). The primary toxic air contaminant of concern contributing to this impact is associated with emissions of acrolein from aircraft operations, which would occur in 2025 even in the absence of SPAS. It should be noted that, with the exception of Alternative 3, acute non-cancer health hazard impacts in 2025 would be lower under the SPAS alternatives than if no airfield improvements were implemented. Moreover, these significant impacts would occur at or near the fence-line; it is expected that actual impacts in the community would be less than significant.

Relative to off-airport traffic impacts, as addressed in Section 4.12.2 of the SPAS Draft EIR, the majority of the 200 intersections evaluated within the SPAS off-airport transportation study area would not be significantly impacted under Alternatives 1, 2, 3, 4, 8, and 9; however, significant impacts to some off-airport intersections and/or Congestion Management Plan (CMP) facilities would occur under each of these alternatives. The total number of significantly-impacted intersections and/or CMP facilities would vary slightly among those alternatives. Alternatives 5, 6, and 7 focus on airfield and terminal improvements that, in themselves, would not affect off-airport traffic, but would be coupled with the ground transportation improvements proposed under Alternatives 1, 2, 8, or 9, the impacts of which are summarized above.

Section 4.7.2 of the SPAS Draft EIR addresses impacts related to aviation safety and efficiency. As addressed in that section, and summarized in Table 4.7.2-16, each of the seven SPAS alternatives that involve airfield improvements responds differently to the various safety and efficiency factors analyzed in the section.

With respect to the "jet fuel that is present on our roofs and patios," it is assumed that the commentor is referring to "deposition," (i.e., the gravitational fallout of material (both solid and liquid) from the atmosphere). Commonly, this material, called particulate matter, consists of dust and soot that can form deposits or cause discoloration on outdoor surfaces (i.e., building materials, motor vehicles, small water bodies, etc.). Please see Response to Comment SPAS-PC00043-2 regarding pollutant deposition. As indicated in Response to Comment SPAS-PC00043-2, to date, the research results indicate that aircraft do not contribute substantially to deposition.

SPAS-PC00115	**Duckworth, Donald R**	**Westchester Town Center Business Improvement District**	**9/29/2012**

SPAS-PC00115-1

Comment:

Our Westchester Town Center Business Improvement District (WTC BID) represents all of the commercial property and businesses owners north of LAX to Manchester Avenue along Sepulveda Boulevard from Sepulveda Westway to Sepulveda Eastway. Our customer base includes the Westchester-Playa Del Rey communities, LAX employees, and the millions of Los Angeles travelers that arrive or depart from the airport. We recognize the symbiotic relationship between the WTC BID and LAX. We enthusiastically support LAX modernization and improvements to the Central Terminal Area and access routes which are long overdue.

We encourage LAWA to adopt the project that ensures the most rapid completion of LAX modernization. Alternative 2 with a Consolidated Rental Car Facility in Manchester Square supported by some form of rail mass transit which allows for connection into our business district should be our preferred alternative. Such a plan, according to DEIR evaluations, would address needed airfield operational efficiency and safety concerns, present the least intrusive impact on the local communities, and, at the same time, provide the lowest construction cost and associated risk.

Response:

The commentor's support for Alternative 2 with a CONRAC in Manchester Square and rail mass transit (i.e., Alternatives 2 and 9) is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Chapter 2 of this Final EIR regarding the LAWA Staff-Recommended Alternative, which couples the airfield and terminal improvements associated with Alternative 1 with the ground access components associated with Alternative 9, including a discussion of the rationale behind the selection of these alternatives over the other alternatives evaluated in the SPAS Draft EIR. Please see Response to Comment SPAS-PC00130-168 regarding conclusions of the NASS relative to north airfield safety. Regarding enhancements to the safety and efficiency of the airfield under each alternative, please see Table 4.7.2-16 on pages 4-569 and 4-570 in Section 4.7.2 of the SPAS Draft EIR. As indicated in that table, the SPAS alternatives achieve substantial enhancements to safety and efficiency; the degree to which safety and efficiency is enhanced varies between the alternatives. Please also see Response to Comment SPAS-PC00089-1 regarding efficiency associated with Alternative 2 compared to other airfield alternatives.

The commentor's assertion that Alternatives 2 and 9 would present the least intrusive impact on the local communities and provide the lowest construction cost is not accurate. As indicated in Tables 1-17 and 1-18 of the SPAS Draft EIR, Alternative 2 would have the second highest impacts of all the alternatives relative to both population newly exposed to 65 CNEL and to population that would experience a 1.5 dBA CNEL increase over 65 CNEL. In addition, the ground access components of this combination would affect more off-airport intersections than would all of the other ground access alternatives (with the exception of Alternative 8, whose impacts would be the same).

Please see Response to Comment SPAS-PC00130-730 regarding the treatment of economic impacts in an EIR. As noted in that response, CEQA does not require an analysis of cost or project funding.

(State CEQA Guidelines Section 15131; Pub. Resources Code Section 21068.) Nevertheless, Chapter 8 of the Preliminary LAX SPAS Report provides a financial analysis of each alternative. As identified in Table 8-2 of the Preliminary LAX SPAS Report, the combination of Alternatives 2 and 9 is not the lowest cost alternative.

The commentor does not identify any risks involved with construction of the SPAS alternatives nor is there any indication as to what constitutes a construction risk; hence, there is no evidence to support the claim that the combination of Alternatives 2 and 9 would have the lowest construction risk.

SPAS-PC00115-2

Comment:

We do not believe that the proposed north runway expansion impacts are adequately addressed in the SPAS DEIR, however. This inadequacy alone deprives WTC BID property and businesses owners of the ability to effectively plan for their future. Therefore, any project alternative that moves the north runway to the north is unacceptable.

Response:

The SPAS Draft EIR provides a thorough analysis of nine alternatives, including those that propose north runway modifications, describes the impacts that would occur at the airport and in areas nearby under each alternative, and recommends feasible mitigation measures for significant impacts. The SPAS Draft EIR meets the requirements of CEQA. The comment does not identify any specific deficiencies in the SPAS Draft EIR analysis of north runway modification impacts.

The commentor's opposition to any alternative moving the north runway to the north is noted, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project.

SPAS-PC00115-3

Comment:

Any planned movement of LAX runways north will clearly encroach upon the WTC BID and, at the least, continue this uncertainty for our properties and businesses for years to come.

Response:

Please see Responses to Comments SPAS-AL00007-26 and SPAS-PC00130-931 regarding the potential for property acquisition and changes in the RPZ to have an impact on the Westchester Business District.

SPAS-PC00115-4

Comment:

Moreover, adverse construction impacts attendant to any runway movement north could substantially degrade our customer base and traffic circulation upon which we critically depend. Such construction impacts would occur during a protracted rerouting of Lincoln and Sepulveda Boulevards and are a major concern.

Response:

As stated on page 2-55 in Chapter 2 of the SPAS Draft EIR, Alternatives 1, 5, and 6 would require the realignment of Lincoln Boulevard between Sepulveda Boulevard and the Lincoln Boulevard/Westchester Parkway interchange. As part of the realignment, approximately 540 feet of roadway would be covered and below grade under Alternative 1, approximately 765 feet under Alternative 5, and approximately 252 feet under Alternative 6. This improvement is not expected to affect the overall north/south through traffic capacity on Lincoln Boulevard nor on Sepulveda Boulevard after construction is complete.

As discussed in Section 4.12.2.6.3 (Construction Impacts) of the SPAS Draft EIR, implementation of any of the SPAS alternatives would result in temporary significant construction-related traffic impacts. There are a number of LAX Master Plan commitments and a mitigation measure specifically designed to reduce such impacts; however, it cannot be concluded at this time that all construction-related traffic impacts would be reduced to a level that is less than significant. As such, construction-related traffic could, at times, result in temporary significant and unavoidable impacts on the streets surrounding LAX. Given the fact that Lincoln Boulevard and Sepulveda Boulevard south of Lincoln Boulevard are controlled by Caltrans (SR-1), construction of this facility is expected to follow the techniques specified in the Caltrans Construction Manual, as well as City requirements, to ensure the safe passage of traffic through and around construction with as little inconvenience and delay as possible and would require coordination between LAWA, Caltrans, the Los Angeles Department of Transportation, the contractor, and California Highway Patrol (CHP). Input from the local City Council office would also be taken into consideration when developing the construction phasing plans. Traffic control plans would include detour routing, changeable message signs, signal timing/phasing changes, a public information campaign regarding the construction, etc.

SPAS-PC00115-5

Comment:

We have experienced such negative impacts from LAX in the past. In the late 1960's, when the north runway (24 Right) was built, thousands of homes and many businesses were removed by LAX, which had a devastating effect. Many major stores and local businesses were forced out of the business district or subsequently left. It took more than 25 years to recover the business base.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00115-6

Comment:

Finally, we have not seen a total project phasing and funding plan. We encourage LAWA to release this information as soon as possible, and suggest that project phasing should express preferences for improving the LAX passenger experience, reducing local traffic gridlock, addressing urgent maintenance projects, and completing taxiway improvements before any runway changes are contemplated.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. The comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR; therefore, no further response is required. (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)). The SPAS Draft EIR is a programmatic document, and no design or engineering plans, or construction phasing plans or schedules, are available for any of the alternatives. Please see Response to Comment SPAS-PC00130-41 regarding phasing, Response to Comment SPAS-PC00096-2 regarding funding sources for SPAS improvements, and Response to Comment SPAS-PC00130-725 regarding the benefits of terminal improvements versus runway improvements.

SPAS-PC00115-7

Comment:

We look forward to working with LAWA to improve LAX, Los Angeles' "window to the world."

Response:

The comment is noted.

SPAS-PC00116 Hughes, Laurie Gateway to LA Business Improvement District 10/3/2012

SPAS-PC00116-1

Comment:

Attached is the EIR Comment Letter from Gateway to L.A..

Thank you for considering our comments and concerns.

We look forward to working with you and your staff to make the LAX area a first-class experience to travelers and workers alike.

Response:

The comment is noted. Please see Responses to Comments SPAS-PC00116-2 through SPAS-PC00116-7 below.

SPAS-PC00116-2

Comment:

I am writing to you today on behalf of the Gateway to L A Business Improvement District (Gateway to LA BID) to provide comment on issues raised in the Specific Plan Amendment Study (SPAS) Draft Environmental Impact Report (EIR) currently in circulation.

Gateway to LA BID represents the hotels and businesses that are the literal gateway to Los Angeles - for many the first experience they have of our city. For that reason we have worked hard to create a sense of identity and place and to ensure that the millions of visitors who stay, work and play in and around LAX have the ability to enjoy our city and experience a clean, safe, and easy to navigate environment.

We appreciate the ongoing engagement and inclusion of a wide variety of stakeholders in the SPAS effort and our members continue to eagerly await the outcome of this very important process.

Specific to the SPAS Draft EIR, we support the following proposals under consideration:

Coordination of transportation - While there are many alternatives for "Stand Alone Ground Transportation Improvements", we believe the most successful and impactful alternative is one that fully integrates ground, light rail, parking, consolidation of shuttle services, and an automated people-mover.

- Alternative 9, which includes the build-out of the Consolidated Rental Car facility (CONRAC) and Employee Parking at Manchester Square will have the most positive impact on the airport, businesses and hotels in and around the area. Connectivity with the Metro Crenshaw/LAX and Green Line stations through the use of APM technology is essential and support location of the Metro Crenshaw/LAX Crenshaw/LAX and Green Line stations at the northeast corner of Century and Aviation Blvds.

We do not support the concept currently under consideration for a bus-way, which would incorporate rubber tire articulated buses versus an elevated fixed rail system. While we understand the cost

differential involved in choosing an APM over buses, we believe an asset as valuable as LAX must support long-term thinking and investment in visionary infrastructure upgrades.

Response:

The commentor's support for Alternative 9 is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Chapter 2 of this Final EIR regarding the LAWA Staff-Recommended Alternative, which couples the airfield and terminal improvements associated with Alternative 1 with the ground access components associated with Alternative 9, including a discussion of the rationale behind the selection of these alternatives over the other alternatives evaluated in the SPAS Draft EIR.

SPAS-PC00116-3

Comment:

- Focus on Traffic Impacts - The Draft EIR identifies 39 intersections which will be negatively impacted by growth in and around the LAX community. Mitigation measures, which we presume will include multi-modal public transportation options as identified above and consolidation of off and on-airport transportation, must continue to be a priority. Transit-Oriented Development, even in the build-out of projects like the CONRAC and in Metro-sponsored bus facilities, must be a high priority and ongoing interagency coordination and cooperation is crucial. Resources must be prioritized to address these issues as project development moves forward.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00116-4

Comment:

Projects like the proposed Century Corridor Streetscape Plan must also be considered and incorporated into LAWA's development efforts.

Response:

LAWA initiated the Century Corridor Streetscape Plan and prepared a draft development plan. However, FAA determined that funding for this project could not be provided using airport funds unless it could be demonstrated that the project met the requirements for use of airport revenue.1 Other projects of this type that have a direct nexus to LAX will be considered on their merits and eligibility as they occur.

1. U.S. Department of Transportation, Federal Aviation Administration, Letter from William C. Withycombe, Regional Administrator, to Lydia Kennard, Executive Director, Los Angeles World Airports, August 24, 2006.

SPAS-PC00116-5

Comment:

- Enhanced Central Terminal Area Circulation - We are supportive of the efforts outlined in the Draft EIR to improve and better manage circulation into and around the Central Terminal Area and to link satellite terminals to the central airport facilities. Any efforts to better manage CTA impacts should be advanced through the SPAS process. Better circulation within the airport will have a positive impact on the ingress

and access points, which will have a meaningful trickle-down impact on the Century corridor and surrounding communities.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)). Sections 4.12.1 and 4.12.2 of the SPAS Draft EIR provide and analysis of the on-airport and off-airport traffic impacts associated with the SPAS alternatives, respectively.

SPAS-PC00116-6

Comment:

- Parking Issues are Key - We believe strongly that a highly functioning airport must include a mix of alternatives for short-term, long-term and employee parking. Many stakeholders have invested significantly in efforts to provide the traveling public with affordable options for off-airport parking, with a strong emphasis on customer service, ease of access, and reliability. As such, we believe the SPAS process must clearly delineate parking responsibilities of LAWA such as employee parking being provided at Manchester Square, from other parking changes, such as NOT moving parking lots B and C. Ensuring an appropriate mix of parking alternatives is key to maximizing options for all LAX stakeholders.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00116-7

Comment:

Nothing is more important to the health and vitality of our region than continued investment in LAX. The importance of the jobs, tourism, positive trade and economic development impacts and the impetus for continued growth of Los Angeles in the world's marketplace depends on a highly functional airport and a thoughtfully developed community to support that engine. The SPAS process is the next step forward in helping to develop a "world-class" airport facility and to create an asset for the 21s1 century.

Gateway to LA is proud to be a partner in this effort and we look forward to the next steps in the modernization and improvement of LAX. Thank you for your consideration of our views.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project.

SPAS-PC00118	**Van Valkenburg, Peter**	**Enterprise Holdings, Inc.**	**10/8/2012**

SPAS-PC00118-1

Comment:

Thank you for taking the time to review with us the LAX Specific Plan Amendment Study ("SPAS") during our meeting at LAX on September 21, 2012.

Please accept this e-mail as formal "Written Comments" on SPAS from the Enterprise, Alamo and National car rental concessions at LAX.

We appreciate being given the opportunity to submit our comments on these potential amendments to the LAX Specific Plan.

The rental car companies ("RACS") have been meeting with LAWA Staff for several years discussing a possible consolidated rental car facility ("ConRAC") at LAX. The two threshold questions we always face with any proposed ConRac project are 1) Is there a viable/feasible location for the proposed ConRac, and 2) Is there a viable/feasible plan of finance for designing, constructing, and operating the proposed ConRac project.

Regarding a viable/feasible location for a proposed ConRac at LAX, we have identified several fatal flaws with the proposed "Lot C" location. In a nutshell, these fatal flaws with the "Lot C" location include: 1) onerous building height restrictions, 2) a bifurcated site (Arbor Vitae runs right through site), and 3) increased construction and operating costs. In turn, we do NOT support locating any proposed future ConRac at the "Lot C" site, and we do NOT support the two SPAS Alternatives (Alternatives' 3 and 4) that include the proposed "Lot C" ConRac site.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00118-2

Comment:

At some point in the future, a ConRac will likely be necessary. For example, once LAX reaches the maximum 78.9 MAP level, a proposed CFC (fully-funded) ConRac project at a viable/feasible location would likely 1) help reduce congestion at the terminal, and 2) provide a better customer service experience for the traveling public at LAX. Assuming LAX reaches maximum capacity and a viable ConRac plan of finance can be identified, we believe that the preferred location for any necessary future ConRac is the Manchester Square site. The Manchester Square site is a preferred location because it does not have any of "Lot C's" fatal flaws, and it has better access to the freeway system. Accordingly, under the aforementioned circumstances, we would expressly support the two SPAS Alternatives (Alternatives' 8 and 9) that include the proposed Manchester Square ConRac site.

Response:

The SPAS Draft EIR analyzed a number of alternatives, including those that proposed construction of a CONRAC, for the impacts at a practical capacity of 78.9 MAP. The results of the analyses related to transportation (i.e., on-airport transportation and off-airport transportation), for those alternatives that include and those that do not include a CONRAC, are discussed in detail in Sections 4.12.1 and 4.12.2.

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. The comment does not provide any factual basis or substantial evidence to support its conclusion that congestion would improve with the addition of a CONRAC. As provided above, the alternatives that include a CONRAC are discussed throughout the SPAS Draft EIR.

SPAS-PC00118-3

Comment:

In summary, our position on the proposed ConRac locations in the proposed SPAS Alternatives is as follows:

-We do not support (under any circumstances) the proposed "Lot C" location (SPAS Alternatives' 3 and 4) for any future ConRac project; and

-We support the proposed Manchester Square location (SPAS Alternatives' 8 and 9) for any necessary, CFC fully-funded, future ConRac project.

Please let me know if you have any questions.

(Please also confirm receipt of these Written Comments.)

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Responses to Comments SPAS-PC00118-1 and SPAS-PC00118-2 above regarding location of the proposed CONRAC facility. It is acknowledged that the comment letter was received on October 8, 2012, prior to the close of the public comment period on the SPAS Draft EIR (October 10, 2012).

SPAS-PC00119 Lay, Al LAX-Area Democratic Club 10/8/2012

SPAS-PC00119-1

Comment:

Regarding SPAS 2012 and the 9 Alternatives:

I strongly urge you to adopt:

1. Alternative 2
2. Alternative 9 (with a realistic train service plan that includes all the terminals)

I believe that these options represent the most reasonable course of action.

Response:

The commentor's support for Alternatives 2 and 9 is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Chapter 2 of this Final EIR regarding the LAWA Staff-Recommended Alternative, which couples the airfield and terminal improvements associated with Alternative 1 with the ground access components associated with Alternative 9, including a discussion of the rationale behind the selection of these alternatives over the other alternatives evaluated in the SPAS Draft EIR. Please see Topical Response TR-SPAS-T-1 regarding transit options into LAX.

SPAS-PC00120 Sirotich, Stephanie D None Provided 10/8/2012

SPAS-PC00120-1

Comment:

I want to voice my objection to the proposed expansion at Los Angeles International Airport, expanding the Northernmost runway approximately 340 feet closer to Playa Del Rey and my property. This expansion presents health, safety, and environmental risks such as incremental noise, pollution, and traffic; as well as financial implications which will adversely affect the value of property to the residents of Playa Del Rey.

LAWA needs to be concerned with the above-mentioned safety, financial, environmental, and quality of life issues that face the residents of Playa Del Rey and neighboring communities if this expansion goes ahead, Rather than with special interest groups that stand to gain from this expansion. My health along with other residents and the environment is already affected by the pollution from jet fuel that is present on our roofs and patios, which will be increased if the Runway is moved closer. Safety and efficiency at LAX can be achieved without imparting greater impact on local communities such as Playa Del Rey.

Response:

The content of this comment is essentially the same as comment SPAS-PC00114-1; please refer to Response to Comment SPAS-PC00114-1.

SPAS-PC00121 Murray, Donna None Provided 10/8/2012

SPAS-PC00121-1

Comment:

I have reviewed the proposed changes to LAX and feel that Alternative 2 with Alternative 9 supporting it should be the preferred plan. These plans improve airside safety by moving and improving taxiways, are the least expensive and quickest to implement, and do the least damage to our community.

Please listen to the public involved, our elected officials and our Neighborhood council. I currently have airport approved windows and insulation and cannot hear my television when planes go over. The quality of life in Westchester will be adversely affected during the implementations of the other Alternatives for both the short-term and long-term.

Alternatives 2 and 9 will meet the capacity needs for LAX providing airfield and transportation improvements.

Response:

The commentor's support for Alternatives 2 and 9 is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Chapter 2 of this Final EIR regarding the LAWA Staff-Recommended Alternative, which couples the airfield and terminal improvements associated with Alternative 1 with the ground access components associated with Alternative 9, including a discussion of the rationale behind the selection of these alternatives over the other alternatives evaluated in the SPAS Draft EIR.

Please see Response to Comment SPAS-PC00149-2 regarding safety related to the north airfield. Please see Response to Comment SPAS-PC00130-730 regarding the treatment of economic impacts in an EIR. As noted in that response, CEQA does not require an analysis of cost or project funding.

(State CEQA Guidelines Section 15131; Pub. Resources Code Section 21068.) Nevertheless, it should be noted that the combination of Alternatives 2 and 9 is not the lowest cost design option (see Table 8-2 in Chapter 8 of the Preliminary LAX SPAS Report). Please see Response to Comment SPAS-PC00115-1 regarding the commentor's assertion that Alternatives 2 and 9 would do the least damage to local communities. It is acknowledged that all of the alternatives would result in increased aircraft noise impacts to areas immediately north and northeast of the airport. Please see Response to Comment SPAS-PC00149-2 regarding the SPAS Draft EIR findings relative to aircraft noise impacts on surrounding communities. As indicated in that response, while it is true that those alternatives involving the relocation of Runway 6L/24R northward (i.e., Alternatives 1, 5, and 6) would result in increased aircraft noise impacts to areas immediately north and northeast of the airport, there would be an accompanying decrease in aircraft noise impacts to areas east, southeast, and south of the airport. Overall, the alternatives that would relocate Runway 6L/24R north would result in the lowest residential population exposed to a 1.5 CNEL increase above 65 CNEL and, along with Alternative 3, would result in the lowest number of people newly exposed to 65 CNEL.

Regarding impacts on quality of life, CEQA does not require purely social or economic impacts to be analyzed in an EIR. (CEQA Guidelines Section 15064(e)). As required by CEQA, the SPAS Draft EIR evaluates physical impacts on the environment associated with over 20 topical issues and how such impacts have the potential to affect residents in surrounding communities.

SPAS-PC00122 Schnabl, Val None Provided 10/8/2012

SPAS-PC00122-1

Comment:

We live in a house on Rindge Ave. in Playa del Rey about one block north of the LAX property. We strongly oppose moving the north runways further north. Instead, we support the 2012 SPAS Alternatives 2 & 9 which would have a tolerable impact on nearby LAX neighbors. I (Val) have lived in Playa del Rey since 1967 (45 years) and my wife has lived in PDR for 31 years. We like it here and want to continue to have an amiable relationship with LAX.

Response:

The commentor's support for Alternatives 2 and 9 is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Chapter 2 of this Final EIR regarding the LAWA Staff-Recommended Alternative, which couples the airfield and terminal improvements associated with Alternative 1 with the ground access components associated with Alternative 9, including a discussion of the rationale behind the selection of these alternatives over the other alternatives evaluated in the SPAS Draft EIR.

SPAS-PC00123 Garner, Bryan LawProse Inc. 10/9/2012

SPAS-PC00123-1

Comment:

Lesson #90

Is it correct to refer to an attorney general or solicitor general as "General So-and-So"?

ANSWER: Not really. The trend has been to address attorneys general and solicitors general as if they were military officers, as in "General Starr, when will the report be available to the public?" Despite its prevalence, this is strictly speaking incorrect. In titles such as attorney general, the word general is not a noun, but a postpositive adjective -- an adjective that follows rather than precedes the noun it modifies. Attorney general and solicitor general are two examples. Other examples include court-martial and

notary public. But no one calls a notary public simply "public." The word general in attorney general is every bit as much adjectival as it is in general counsel.

The practice of using general as a title appears to have been popularized by then-Justice William Rehnquist, who was otherwise known as a stickler for grammar. He used the term in this way as early as 1980. Meanwhile, the Chief Justice in that era, Warren Burger, fastidiously addressed the Solicitor General as "Mr. Solicitor General." But from the outset of his chiefship, Chief Justice Rehnquist used general as a title, undoubtedly helping to spread the linguistic innovation. Lamentably the practice has continued with Chief Justice Rehnquist's successor and has been adopted by other members of the Court as well. Even transcript references to the Solicitor General now simply state "General Clement," "General Kneedler," and "General Verrilli." Although the practice of militarizing high legal offices will likely persist, the sticklers will abstain (correctly) from using "General" in this way.

Incidentally, the Surgeon General is a uniformed officer of the Public Health Service Commissioned Corps -- not a general, though, but a vice admiral.

On the other hand, if Supreme Court justices are saying it, perhaps it's correct de jure, though not de facto. As Justice Robert H. Jackson once declared: "We are not final because we are infallible, but we are infallible only because we are final."

Postscript: The rhetorical term for Jackson's figure of speech there -- reversing parallel words in adjoining clauses -- is chiasmus.

Source: Garner's Dictionary of Legal Usage 387 (3d ed. 2011).

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Response:

This is not a comment on the contents of the Draft EIR.

SPAS-PC00124	**Alpern, M.D., Kenneth S**	**None Provided**	**10/9/2012**

SPAS-PC00124-1

Comment:

The following comments do not represent either the opinion or stated support of either the CD11 Transportation Advisory Committee, The Transit Coalition, The Sierra Club, The Mar Vista Community Council or Friends of the Green Line, of which I affiliate with. Although my experience and affiliation with those entities have certainly affected my held views, these views are entirely my own.

Simply put, Alternatives 2 and 9 are the best alternatives for LA and LAX to move into the 21st Century and they merit our collective support.

Simply put, demolishing, relocating and rebuilding the northern airline terminal structures is inevitably more expensive, disruptive and environmentally-impacting than is a refurbishing and modernization of the existing structures, and that latter alternative (part of Alternative 2), merits our collective support.

Simply put, relocation of the northern airfield to the north, and accompanying destruction and razing of the adjacent portion of the commercial district of adjacent Westchester, results in a permanent loss of City revenue and is more expensive, disruptive and environmentally-impacting than is a relocation and modernization of our existing northern runway, and that latter alternative (part of Alternative 2), merits our collective support.

Response:

The commentor's support for Alternatives 2 and 9 is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Chapter 2 of this Final EIR regarding the LAWA Staff-Recommended Alternative, which couples the airfield and terminal improvements associated with Alternative 1 with the ground access components associated with Alternative 9, including a discussion of the rationale behind the selection of these alternatives over the other alternatives evaluated in the SPAS Draft EIR.

Alternatives that would include the northerly relocation of Runway 6L/24R would not require the demolition of the north airfield terminals. Demolition of the Terminal 1, 2, and 3 concourses is only associated with Alternative 3. Under Alternatives 1, 2, 5, 6, and 7, a small portion of the Terminal 1 concourse would be demolished. In addition, all of these alternatives would involve the demolition and relocation of the Terminal 3 concourse to the west. As noted in Response to Comment SPAS-PC00130-931, no acquisition is proposed within the Westchester Business District under any of the SPAS alternatives. Therefore, there would not be a permanent loss of City revenue associated with a loss of businesses within Westchester.

The commentor is not specific in the comment that relocation of the northern airfield to the north is more environmentally impacting than Alternative 2. Please see Response to Comment SPAS-PC00149-2 regarding the SPAS Draft EIR findings relative to aircraft noise impacts on surrounding communities. As indicated in that response, while it is true that those alternatives involving the relocation of Runway 6L/24R northward (i.e., Alternatives 1, 5, and 6) would result in increased aircraft noise impacts to areas immediately north and northeast of the airport, there would be an accompanying decrease in aircraft noise impacts to areas east, southeast, and south of the airport. Overall, the alternatives that would relocate Runway 6L/24R north would result in the lowest residential population exposed to a 1.5 CNEL increase above 65 CNEL and, along with Alternative 3, would result in the lowest number of people newly exposed to 65 CNEL.

SPAS-PC00124-2

Comment:

Simply put, a Consolidated Rental Car Facility with an adjacent Green/Crenshaw Line rail station at/near Century/Aviation is more efficient, cost-effective and more amenable to high-capacity, heavily-utilized car/train/rail/bus/pedestrian intermodal transportation connections than is our current arrangement with car rental and transit connections that aren't pedestrian-friendly and easily accessible, and that former alternative (Alternative 9) merits our collective support.

Response:

The commentor's support for Alternative 9 is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Chapter 2 of this Final EIR regarding the LAWA Staff-Recommended Alternative, which couples the airfield and terminal improvements associated with Alternative 1 with the ground access components associated with Alternative 9.

SPAS-PC00124-3

Comment:

Simply put, a connecting LAX People Mover that is a rail alternative to link the Green/Crenshaw MetroRail Lines, the latter of which just received a $545.9 million loan from the federal government to expedite its construction and lower construction costs, with the Central Terminal Area is the modern, compatible, and commuter-preferred alternative (Alternative 9), and merits our collective support.

Response:

The commentor's support for Alternative 9 is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Chapter 2 of this Final EIR regarding the LAWA Staff-Recommended Alternative, which couples the airfield and terminal improvements associated with Alternative 1 with the ground access components associated with Alternative 9.

SPAS-PC00124-4

Comment:

Simply put, a bus route to connect MetroRail to the Central Terminal Area might have lower capital costs for LAWA, but much higher operating costs as an Automated People Mover rail service need have no drivers and fewer vehicles to pay for and maintain after the initial capital costs (which may come from Metro, should Measure J or other funding measures occur) are accommodated.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00124-5

Comment:

Simply put, the $200 million that County Transportation Measure R (the half-cent sales tax approved by county voters in 2008) assigns to a Green Line connection to LAX was meant only as seed money to properly study and prepare for the next steps of the MetroRail to LAX project that the entire county needs as part of a 21st Century transportation network. Planning and funding efforts to build a comprehensive rail network linkage to LAX merits our collective support.

Simply put, County Transportation Measure J absolutely DOES allow funding and fast-tracking of the Green Line and Crenshaw Line connections to LAX from the Westside, Mid-City and South Bay regions, in addition to fast-tracking and lessening construction costs of other Measure R projects, and it merits our support.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Topical Response TR-SPAS-T-1 regarding transit options to LAX.

SPAS-PC00124-6

Comment:

Simply put, comments by LAWA Executive Director Gina Marie Lindsey that openly support a bus service over a rail Automated People Mover are entirely inappropriate, in that all Alternatives are to be considered and evaluated as to a Locally Preferred Alternative, and based on community input rather than a top-down bias from the LAWA Board and leadership. Ms. Lindsey has the right to state her personal opinion, but should recognize that the voters who chose to tax themselves with Measure R (and who might vote in favor of Measure J as well), and those who weigh in on the LAX SPAS EIR, are the ones who determine any Locally Preferred Alternative.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. The Board of Airport Commissioners has the responsibility for considering selection and approval of a SPAS alternative, including the ground access components of the selected alternative. The SPAS alternatives were presented and evaluated in a manner that fosters informed decision-making and public participation. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00124-7

Comment:

It is my strongly-held belief that Alternatives 2 and 9 represent the Locally Preferred Alternatives that are most cost-effective for the long-term benefit of LA World Airports and the City and County of Los Angeles.

Response:

The commentor's support for Alternatives 2 and 9 is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Chapter 2 of this Final EIR regarding the LAWA Staff-Recommended Alternative, which couples the airfield and terminal improvements associated with Alternative 1 with the ground access components associated with Alternative 9, including a discussion of the rationale behind the selection of these alternatives over the other alternatives evaluated in the SPAS Draft EIR.

SPAS-PC00125	**Hetz, Matthew**	**Los Angeles Council District 11 Transportation Advisory Committee**	**10/9/2012**

SPAS-PC00125-1

Comment:

I live in Westchester, and I support Alternatives 2 and 9. In Westchester we have suffered enough with the past removal of homes and business and a school to accommodate LAX expansion. This is seen by the various vacant lots around the airport along Westchester Parkway, Pershing Ave and Vista del Mar. There is no need to take more homes and businesses in Westchester. Ontario Airport needs to be let go by LAWA and let the Inland Empire increase capacity to take some strain from LAX.

Response:

The commentor's support for Alternatives 2 and 9 is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Chapter 2 of this Final EIR regarding the LAWA Staff-Recommended Alternative, which couples the airfield and terminal improvements associated with Alternative 1 with the ground access components associated with Alternative 9.

A discussion of property acquisition that could occur under the SPAS alternatives is provided in Sections 2.3.1.11 and 4.9.6 of the SPAS Draft EIR. Specifically, the property acquisition that would be required under Alternatives 1, 2, 3, 4, 8, and 9 is shown in Figures 2-11, 2-12, 2-13, and 2-14 and listed in Table 2-4 and Table 2-5 in Section 2.3.1.11 of the SPAS Draft EIR. As indicated in these figures and tables, no residential acquisition or acquisition within Westchester is proposed.

Please refer to Topical Response TR-SPAS-REG-1 regarding the fact that LAWA, through the LAX Master Plan, the SPAS process, and other efforts, supports the regionalization of air travel demand in Southern California. As indicated therein, the LAX Specific Plan amendment proposed as part of SPAS further supports such regionalization. The subject Topical Response also discusses LA/Ontario International Airport.

SPAS-PC00125-2

Comment:

We suffer from the noise and pollution from the airport itself twenty-four hours a day, seven days a week. This includes the annoying and sleep disrupting noise in the middle of the night from jets engines warming up at LAX. I hear this, and I live a little more than one mile north of the airport. Moving the north runway further north would be a disaster to any kind of remaining decent way of life in Westchester.

Response:

The comment noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project.

The SPAS Draft EIR addresses impacts associated with aircraft noise, road traffic noise, and construction traffic and equipment noise in Sections 4.10.1, 4.10.2, and 4.10.3, respectively. The impacts associated with each of these categories of noise are summarized below.

As indicated in Section 4.10.1 of the SPAS Draft EIR, Alternatives 1 through 7 would result in some residential uses and non-residential noise-sensitive facilities being newly exposed to noise levels of 65 CNEL or higher or increases of 1.5 CNEL or higher within the 65 CNEL or higher noise contours. With implementation of LAX Master Plan mitigation measures, these impacts would be less than significant. However, interim impacts prior to the completion of mitigation, impacts on residential uses with outdoor habitable areas, and impacts on parks would remain significant and unavoidable. Alternatives 8 and 9

focus on ground access improvements that, in themselves, would not result in aircraft noise exposure but would be coupled with the airfield improvements proposed under Alternatives 1, 2, 5, 6, or 7, the impacts of which are summarized above. None of the alternatives would result in a significant impact relative to sleep awakenings.

Concerning road traffic noise, as indicated in Section 4.10.2 of the SPAS Draft EIR, impacts related to ground access improvements proposed under Alternatives 1, 2, 3, 4, 8, and 9 would be less than significant as the incremental changes in road traffic noise levels under each of these alternatives would be less than a 3 dBA increase in CNEL. Alternatives 5, 6, and 7 do not include ground access improvements and would therefore not affect road traffic noise levels at off-site noise-sensitive uses.

Regarding construction traffic and equipment noise, as indicated in Section 4.10.3 of the SPAS Draft EIR, due to the periodic nature and limited incremental increase on area roadways, none of the alternatives would result in significant impacts related to construction traffic noise. However, all of the alternatives would result in significant impacts from construction equipment noise with the potential to effect sensitive receptors such as residential and school uses. The sources of those impacts differ by alternative, but can be generally characterized as temporary impacts associated with airfield improvements, ground access system improvements, and construction staging areas. While LAX Master Plan commitments and mitigation measures would reduce construction equipment noise impacts associated with all of the SPAS alternatives, it cannot be definitively concluded that all construction equipment noise impacts would be reduced to levels that are less than significant and these impacts are considered to be significant and unavoidable.

The SPAS Draft EIR addresses air quality impacts associated with the SPAS alternatives, including Alternatives 1, 5, and 6 which propose a northward relocation of Runway 6L/24R, in Sections 4.2. As indicated therein, even after mitigation, construction activities would result in significant and unavoidable air quality impacts under all of the alternatives. Specifically, under all of the alternatives except for Alternative 4, construction emissions of carbon monoxide (CO), volatile organic compounds (VOC), oxides of nitrogen (NOx), particulate matter with an equivalent aerodynamic diameter of 10 micrometers (PM10), and particulate matter with an equivalent aerodynamic diameter of 2.5 micrometers (PM2.5) would be significant and unavoidable. Under Alternative 4, significant and unavoidable construction emissions would occur for NOx and PM10. Under all of the alternatives, even after mitigation, construction-related concentrations of nitrogen dioxide (NO2) and PM10 would be significant and unavoidable.

Operation of the airport would also result in significant and unavoidable impacts to air quality. Even after mitigation, operational emissions of sulfur dioxide (SO2), PM10, and PM2.5 would be significant and unavoidable under all of the alternatives. Operational concentrations of NO2, PM10, and PM2.5 would also be significant and unavoidable under all of the alternatives.

SPAS-PC00125-3

Comment:

We also must contend with airport traffic, which clogs the streets and leaves behind traffic noise and vehicle exhaust fumes. COPD is attributed to vehicle exhaust, and Westchester with the airport traffic and the 405 Freeway does not need more traffic.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project.

Relative to off-airport traffic impacts, as addressed in Section 4.12.2 of the SPAS Draft EIR, the majority of the 200 intersections evaluated within the SPAS off-airport transportation study area would not be significantly impacted under Alternatives 1, 2, 3, 4, 8, and 9; however, significant impacts to some off-airport intersections and/or Congestion Management Plan (CMP) facilities would occur under each of these alternatives. The total number of significantly-impacted intersections and/or CMP facilities would vary slightly among those alternatives. Alternatives 5, 6, and 7 focus on airfield and terminal improvements that, in themselves, would not affect off-airport traffic, but would be coupled with the

ground transportation improvements proposed under Alternatives 1, 2, 8, or 9, the impacts of which are summarized above. Please see Response to Comment SPAS-PC00125-2 above regarding traffic-related noise and air quality impacts.

Related to health concerns, as indicated in Section 4.7.1 of the SPAS Draft EIR, incremental cancer risks and incremental chronic non-cancer health hazards within the study area under all the alternatives would be less than significant for all receptor types (i.e., child resident, school child, adult resident, adult worker). Additionally, under all the alternatives, health effects to on-airport workers would be less than significant. Incremental acute non-cancer health hazards at small areas at or near the LAX fence-line under all the alternatives would be slightly above the threshold of significance and are considered to be significant and unavoidable for all analyzed receptor types (i.e., residents, recreational users, school child, off-site adult workers). The primary toxic air contaminant of concern contributing to this impact is associated with emissions of acrolein from aircraft operations, which would occur in 2025 even in the absence of SPAS. It should be noted that, with the exception of Alternative 3, acute non-cancer health hazard impacts in 2025 would be lower under the SPAS alternatives than if no airfield improvements were implemented. Moreover, these significant impacts would occur at or near the fence-line; it is expected that actual impacts in the community would be less than significant.

SPAS-PC00125-4

Comment:

Moreover, the studies clearly show Alt. 2 is much less costly and disruptive than the other alternatives, some of which would require massive road and utility relocation construction, have much higher costs. With government sinking in debt, careful and wise spending of tax payer money is required.

Response:

The commentor's support for Alternative 2 is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. The comment that Alternative 2 would be less costly than other alternatives and that some of the other alternatives would require roadway relocation is also noted. Please see Chapter 2 of this Final EIR regarding the LAWA Staff-Recommended Alternative, which couples the airfield and terminal improvements associated with Alternative 1 with the ground access components associated with Alternative 9, including a discussion of the rationale behind the selection of these alternatives over the other alternatives evaluated in the SPAS Draft EIR. Please see Topical Response TR-SPAS-LR-1 for a discussion of the Lincoln Boulevard realignment associated with Alternatives 1, 5, and 6, including utility lines in the vicinity of the Lincoln Boulevard realignment. Utility systems that would be affected by the SPAS alternatives have not been determined at this level of planning. Project-level impacts associated with implementation of individual SPAS components will be assessed in future CEQA documents, including impacts associated with utility systems. Please see Responses to Comments SPAS-PC00130-235 and SPAS-PC00130-142 for a discussion of the appropriateness of the programmatic review conducted for the SPAS Project. Please see Response to Comment SPAS-PC00096-2 regarding funding sources for SPAS improvements. As noted in that response, no general tax dollars would be used to pay for any of the proposed on-airport improvements.

SPAS-PC00125-5

Comment:

The expansion of LAX should not have the subtext of a jobs bill, this should not be placed on the backs of the people of Westchester, we have paid enough through past airport deeds and current operations.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. The objectives of SPAS are delineated in Section 2.2 of the SPAS Draft EIR. As noted in that section, there are seven primary objectives for SPAS, only one of which, Objective 3, includes supporting the economic growth and vitality of the Los Angeles region.

SPAS-PC00125-6

Comment:

The north runway has been operating safely for the past years, with the double-deck A380 Airbus jets in daily use. Incorporating the most up-to-date technology for runway safety and reconfiguring runway taxi lanes will further increase safety at LAX.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. As discussed in Section 2.2 of the SPAS Draft EIR, one of the project objectives of SPAS is to provide north airfield improvements that support the safe and efficient movement of aircraft at LAX, including improvements that are consistent with FAA design standards for the largest aircraft currently in service and anticipated for the future at LAX. As described on pages 4-501 and 4-502 of the SPAS Draft EIR, LAX currently employs many of the existing technologies for runway safety and LAWA and the FAA continue to coordinate on the evaluation and implementation of additional technologies.

SPAS-PC00125-7

Comment:

For Alt. 9, a rail line into LAX is long, long overdue. A number of smaller airport throughout the U.S. have rails to the airport, and for LAX to not have it is disgraceful. I am a transit rider since 1992, and light rail is far superior to buses in rider comfort, speed, ease of boarding and disembarking and carrying capacity.

Response:

The commentor's support for Alternative 9 is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Chapter 2 of this Final EIR regarding the LAWA Staff-Recommended Alternative, which couples the airfield and terminal improvements associated with Alternative 1 with the ground access components associated with Alternative 9. Please see Topical Response TR-SPAS-T-1 regarding transit options into LAX.

SPAS-PC00128 Cope, Danna None Provided 10/9/2012

SPAS-PC00128-1

Comment:

Please find attached my comments on the LAX SPAS DEIR.

I look forward to reviewing the Final EIR when it becomes available. However, I note that there is no public review period listed in the LAWA brochure; after the responses to comments/preparation of the Final EIR, the next phase goes directly to BOAC and local approvals. Please clarify this issue: there should be a public review period included.

Thank you.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project.

Unlike a Draft EIR, CEQA does not require a public review period for a Final EIR. However, the lead agency, in this case LAWA, must provide written proposed responses to public agencies on comments made by those public agencies at least 10 days prior to certifying the Final EIR (Public Resources Code Section 21092.5).

In preparing the SPAS Final EIR, LAWA has reviewed all of the comments received, has carefully considered the responses to these comments, and has made a number of revisions to the Draft EIR in response to public comments (see Chapter 5, Corrections and Additions Related to the SPAS Draft EIR). LAWA will post the Final EIR on laxspas.org.

SPAS-PC00128-2

Comment:

After studying the DEIR, my conclusion is that no convincing argument was made in the document to move the northernmost runway (24R) on the North Airfield. Therefore, I earnestly advise that the following action be taken:

Adopt Alternative 2, plus Alternative 9 with a realistic train service plan that includes all the terminals.

This position has been taken by many people and organizations, including the Neighborhood Council of Westchester/Playa.

Questions that are raised by the DEIR and must be fully investigated in the Final EIR include:
- Why go to the expense of moving 24R north, when any of the runway alternatives (1-7) would result in the same number of passengers that LAX can accommodate? All the alternatives would enable LAX to handle the projected traffic in 2025: 78.9 Million Annual Passengers (MAP). Therefore, there would be no gain in passenger capacity from moving 24R North.
- Why is Alt. 2 not the preferred alternative when (by statements in the DEIR) it is the most economical, efficient, and environmentally sound choice? It does include realigning some taxiways as noted in the North Airfield Safety Study (NASS). Improvements and extensions to the east end of 24L and 24R are also incorporated which would allow the New Larger Aircraft (such as the A380) easier operations on the North Airfield. A new terminal at the east end (roughly where the Park One lot currently is located) is included, which will help ease aircraft movement on the North Airfield.
- Why, when the accredited and fully accepted safety report, the North Airfield Safety Study (NASS), concluded that the North Airfield is safe AS IT IS to handle the future estimated air traffic, are expansion alternatives being proposed? The study did recommend taxiway realignment that is included in Alt. 2.
- Why propose so many alternatives, when Alt. 2 is also the least intrusive into the neighborhoods? Alt. 2 would not move flight paths, or increase noise and air pollution into Westchester/Playa del Rey.
- What market value was used in LAWA's estimates for purchasing properties that would be affected by moving 24R as far north as LAWA actually wants to move it (at least 350 feet)? The Delta and Paradise Buildings, as well as all the businesses up to Ralph's in the Westchester Business District would have to be removed. Figures that were listed in the Acquisitions Section are very low.
- Why did LAWA make the erroneous assumption that the In-N-Out and Parking Spot would not be in an FAA protective, safety, or buffer zone because pilots would land midway down 24R (which would be extended West to Pershing)? Most pilots like to land (and do land) as soon as their assigned runway is available, not wait until they are midway down the runway.
- Why wasn't the loss of at least 500 permanent jobs taken into account in discussions of moving 24R north? The business district only recently recovered from losing 10,000 customers and many employees from previous LAX expansions.
- Why didn't the DEIR discuss spending funds on modernizing the airport: improving the terminals, roadways, elevators, escalators, bathrooms, signage, etc., all of which would provide more jobs that moving the runway? Modernizing LAX would greatly improve the passengers' experience of traveling through the airport.
- Why add a Centerline taxiway (between the runways) when it does NOT create a Group 6 airfield and does create safety hazards? A Centerline Taxiway (CLT) decreases the space between the wings of an aircraft on a runway and an aircraft on the CLT. More aircraft would be exposed to the contrail "blast effect" off of the wings of a New Larger Aircraft (NLA) if a CLT were to be jammed into the North Airfield.

In addition, the reduction of incursions on the South Airfield after the addition of a CLT could be credited to the installation of the Runway Status Lights.
- Why go to exorbitant expense of moving 24R, citing the wish to create a Group 6 Airfield, when, according to LAWA's figures, Group 6 aircraft in 2025 will be just 1.6% of total LAX air traffic? This 1.6% figure is based on the original "buy" orders - but very few of the airlines are actually buying their full, original orders. It seems ridiculous to go through so much upheaval, not to mention cost, for such a small number.
- Why blame the NLAs for extensive, expensive changes when the Airbus A380 has been landing and taking off with no trouble on the North Airfield? As noted above, Alt. 2 would extend Runways 24L and 24R to the east, which would ease aircraft traffic on the North Airfield.
- Where were the cost estimates and evaluation of the impact on the South Airfield while the North Airfield is closed for projects that would move the runways?

There are some extremely expensive matters caused by moving the runway North which were not adequately addressed in the DEIR. These items must be completely examined in the Final EIR:
- Filling in the Manchester Tunnel. This is the tunnel that was originally built to connect the North communities to the South. It was to be part of the never-authorized Laurel Canyon Freeway that was being considered back in the late 1950s and early 1960s. It starts where Lincoln turns East, near the Park West apartment complex, and tunnels South under LAX to within 50 feet of 24L. The last time it was inspected (after a very dry season) there was water in the tunnel. LAWA has recommended filling the tunnel with sand (a glorious recipe for sink holes!), or taking the top off the tunnel and filling it with dirt. The tunnel is about 35 ft down and 4 to 6 lanes wide, and 750 feet long. Using 20 feet for the height, 55 feet for the width (5 lanes x 11 ft/lane), and 750 feet for the length, the area to be filled comes to 825,000 cubic feet (20 x 55 x 750=825,000) if just the tunnel is filled with foam. If the ground over the tunnel is also removed, the number jumps to 1,443,750 cubic feet (35 x 55 x 750 = 1,443,750). Filling the space with dirt would require a lengthy compression period. This would mean closing both runways 24L and 24R for some time, putting an undue amount of traffic on the South Airfield. A recommendation from a person who is familiar with tunnel problems is that the tunnel be filled with a special foam that was developed to handle filling in a space so it can withstand heavy weights. The cost could run into the millions, possibly billions. The actual cost of filling the tunnel with dirt or with foam, plus the downtime for the North Airfield must be included in the Final EIR. Impact on the South Airfield from the closure must also be included.
- Moving affected sewers. Other city departments have stated that the sewers cannot be moved. How would LAWA propose to a) protect the sewers and b) protect aircraft from cave-ins?
- Property acquisition. As noted above.
- Enclosing the Argo Flood Control Channel. This channel is required as a drain for the flood control plain and, as such, should not be enclosed. It is under the jurisdiction of the Army Corps of Engineers and LAWA does not have any approval as of the DEIR date to make changes to the channel. Covering the channel with a permeable substance is not practical: no known permeable substance would withstand the weight and impact of aircraft landing or taking off.

Response:

The commentor's support for Alternatives 2 and 9 is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Chapter 2 of this Final EIR regarding the LAWA Staff-Recommended Alternative, which couples the airfield and terminal improvements associated with Alternative 1 with the ground access components associated with Alternative 9, including a discussion of the rationale behind the selection of these alternatives over the other alternatives evaluated in the SPAS Draft EIR. Please see Topical Response TR-SPAS-T-1 regarding transit options into LAX.

Regarding the comment that Alternative 2 is the most economical alternative, as identified in Table 8-2 of the Preliminary LAX SPAS Report, the combination of Alternatives 2 and 9 is not the lowest cost alternative. Please see Response to Comment SPAS-PC00130-730 regarding the treatment of economic impacts in an EIR. As noted in that response, CEQA does not require an analysis of cost or project funding. (State CEQA Guidelines Section 15131; Pub. Resources Code Section 21068.) Regarding the comment that Alternative 2 is the most efficient and environmentally sound choice, please see Response to Comment PC00089-1.

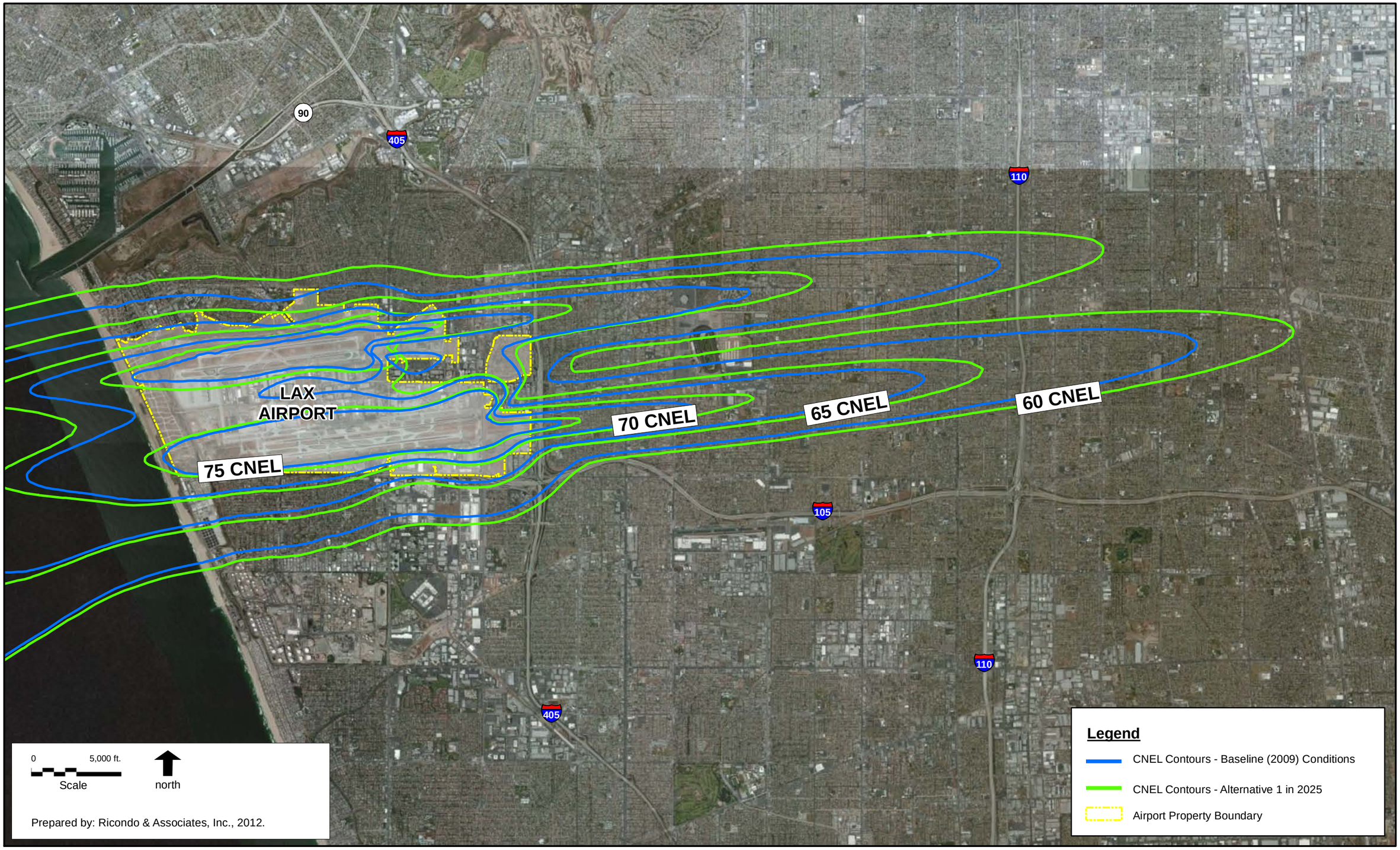
Please see Response to Comment SPAS-PC00149-2 regarding a summary of the project objectives associated with the north airfield improvements. As noted in that response, and in Section 1.2.1 of the SPAS Draft EIR, there are a number of objectives associated with the north airfield improvements, all of which are unrelated to passenger capacity. In addition, Table 4.7.2-16 in Section 4.7.2 of the SPAS Draft EIR provides a summary of how each alternative relates to safety and efficiency enhancements to the north airfield. As indicated in that table, the SPAS alternatives achieve substantial enhancements to safety and efficiency; the degree to which safety and efficiency is enhanced varies between the alternatives. Please also see Response to Comment SPAS-PC00149-2 regarding the conclusions of NASS relative to the safety enhancements associated with reconfiguration of the north airfield.

Please see Section 2.2 of this Final EIR for a discussion of the reasons why LAWA staff recommend implementation of the airfield and terminal improvements associated with Alternative 1, including a discussion of the rationale behind the selection of these alternatives over the other alternatives evaluated in the SPAS Draft EIR.

The assertion that Alternatives 2 and 9 would present the least intrusive impact on the local communities is not accurate. As indicated in Tables 1-17 and 1-18 of the SPAS Draft EIR, Alternative 2 would have the second highest impacts of all the alternatives relative to both population newly exposed to 65 CNEL and to population that would experience a 1.5 dBA CNEL increase over 65 CNEL. In addition, the ground access components of this combination would affect more off-airport intersections than would all of the other ground access alternatives (with the exception of Alternative 8, whose impacts would be the same). Regarding the statement that Alternative 2 would not increase noise in Westchester/Playa del Rey, as indicated on pages 4-710 through 4-716, and illustrated in Figure 4.9-8 of the SPAS Draft EIR, Alternative 2 would result in noise impacts in Westchester and Playa del Rey. This is due to increases in aircraft operations over time, which would occur with or without the SPAS alternatives, as stated on page 1-13 of the SPAS Draft EIR. However, the differences in the noise contour associated with Alternative 2 and the contours associated with the alternatives involving the relocation of Runway 6L/24R northward (i.e., Alternatives 1, 5, and 6) occur to the northeast and east of the airport. Differences in the contours in Playa del Rey and the western portion of Westchester are very slight, as can be seen in comparing the areas newly exposed to 65dB CNEL in Figure 4.9-8 of the SPAS Draft EIR with Figures 4.9-7, 4.9-11, and 4.9-12. A composite illustration of the differences in the noise contours associated with Alternatives 1, 2, and 5 is provided in Figure 1. Please also see Response to Comment SPAS-PC00149-2 regarding the SPAS Draft EIR findings relative to aircraft noise impacts on surrounding communities.

Regarding the statement that Alternative 2 would not increase air pollution in Westchester/Playa del Rey, as indicated in Section 4.2 of the SPAS Draft EIR, even after mitigation, construction activities associated with all of the SPAS alternatives, including Alternative 2, would result in significant and unavoidable air quality impacts under all of the alternatives. Specifically, under Alternative 2, construction emissions of carbon monoxide (CO), volatile organic compounds (VOC), oxides of nitrogen (NOx), particulate matter with an equivalent aerodynamic diameter of 10 micrometers (PM10), and particulate matter with an equivalent aerodynamic diameter of 2.5 micrometers (PM2.5) would be significant and unavoidable. Under Alternative 2, even after mitigation, construction-related concentrations of nitrogen dioxide (NO2) and PM10 would be significant and unavoidable. Operation of the airport would also result in significant and unavoidable impacts to air quality. Even after mitigation, operational emissions of sulfur dioxide (SO2), PM10, and PM2.5 would be significant and unavoidable under Alternative 2. Operational concentrations of NO2, PM10, and PM2.5 would also be significant and unavoidable under Alternative 2.

Regarding analysis of property acquisition impacts on the Westchester Business District, please see Response to Comment SPAS-PC00130-931. As noted in that response, no acquisition is proposed north of LAX or within the Westchester Business District, therefore, there would be no loss of permanent jobs in the district. It is unclear what the commentor is referring to by the statement that "figures that were listed in the acquisitions section are very low." The SPAS Draft EIR identifies properties that would be acquired under each alternative in Section 2.3.1.11, however, no costs associated with acquisition are provided in this section. Rough-order-of-magnitude costs associated with land acquisition under the alternatives were included in the financial analysis prepared as part of the Preliminary LAX SPAS Report (see Section 8.5 of that report). If these are the figures referred to by the commentor, no substantiation is provided for the claim that these estimates are very low.



LAX Specific Plan Amendment Study Final EIR	**CNEL Contours Overview Baseline (2009) Conditions and Alternative 1 in 2025**	**Figure 1**

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Regarding analysis of property acquisition impacts on the Westchester Business District specific to the RPZ, please see Responses to Comments SPAS-AL00007-26 and SPAS-PC00130-931. The commentor is mistaken in stating that LAWA assumed that In-N-Out and the Parking Spot structure would no longer be located within the approach RPZ of Runway 24R under the SPAS alternatives. As shown in Figure 4.7.2-4 in Section 4.7.2.6.1 of the SPAS Draft EIR, the parcel of land on which In-N-Out and the Parking Spot are located (west of Sepulveda Boulevard and south of Westchester Parkway) is clearly located inside the Runway 24R approach RPZ and would remain within the RPZ under all of the SPAS airfield alternatives (see Figures 4.7.2-7, 4.7.2-9, 4.7.2-11, 4.7.2-13, 4.7.2-15, 4.7.2-17, and 4.7.2-19 of the SPAS Draft EIR). Regarding the statement that the SPAS Draft EIR assumed that "pilots would land midway down 24R," the SPAS Draft EIR does not provide any indication that pilots would land "midway down 24R." Pilots rely on runway thresholds to land. As indicated on page 1-14 of the SPAS Draft EIR, a displaced threshold is a threshold that is located on a point on the runway other than the designated beginning of the runway to satisfy approach surface criteria and/or RSA length requirements. In other words, a displaced threshold shifts the beginning of that portion of the runway available for landing to a point on the runway beyond the beginning of the runway. (In this context, "threshold" always refers to landing, not the start of takeoff.) Under Alternatives 1, 5, and 6, a displaced landing threshold of 604 feet would be applied to landings on Runway 24R. This landing threshold is not "midway down 24R," which would have a total landing distance available (LDA) of 8,925 feet (see Table 4.7.2-4 of the SPAS Draft EIR). The displaced threshold would apply to all landings on Runway 24R, and would not be at the discretion of the pilot. Please also see Response to Comment SPAS-PC00130-758 regarding the Runway 24R displaced threshold.

Please see Response to Comment SPAS-PC00130-730 regarding the treatment of economic impacts in an EIR. As noted in that response, CEQA does not require an analysis of cost or project funding. (State CEQA Guidelines Section 15131; Pub. Resources Code Section 21068.) However, Chapter 8 of the Preliminary LAX SPAS Report provides estimated costs and an approximation of funding sources for the SPAS alternatives. The analysis considers estimated costs associated with the SPAS alternatives, as well as costs associated with LAX Base Development Projects, which include capital improvements projects planned for LAX between fiscal year 2012 and fiscal year 2025. Please see Response to Comment SPAS-PC00130-725 regarding the economic benefits of terminal improvements versus runway improvements.

Please see Response to Comment SPAS-PC00135-2 regarding the benefits of a centerfield taxiway, including enhanced safety, and Response to Comment SPAS-PC00130-183 regarding a discussion of the SPAS alternative taxiways, which includes a discussion of the standard separations between the runways and the centerfield taxiway. These airfield design separations are based on FAA standards which are meant to preclude the issues listed by the commentor, including issues related to the space between wingtips and contrail blast effects. Please refer to Responses to Comments SPAS-PC00130-160, SPAS-PC00130-446, SPAS-PC00130-1047, and SPAS-PC00130-1048 regarding incursions on the south airfield. Please also see Responses to Comments SPAS-PC00130-259 and SPAS-PC00130-489 regarding runway-taxiway separation standards meant to comply with the FAA's runway incursion mitigation requirements. The commentor did not provide any specific information that would support the claim that the reduction of incursions on the south airfield following the addition of the centerfield taxiway could be credited to the installation of the Runway Status Lights.

The commentor's statement that moving Runway 6L/24R would be an "exorbitant expense" and "seems ridiculous" presents a personal opinion about costs associated with selected alternatives that is unsupported by facts or evidence. Please refer to Response to Comment SPAS-PC00143-2 regarding the need to plan for a north airfield to meet ADG VI standards and Response to Comment SPAS-PC00149-2 for a summary of the project objectives associated with the north airfield improvements. The commentor is incorrect in stating that the projected number of ADG VI aircraft in 2025 was based on "original buy orders." Please refer to Response to Comment SPAS-PC00159-12 regarding ADG VI fleet mix assumptions developed for the SPAS Draft EIR analyses.

The SPAS Draft EIR does not "blame the NLAs for extensive, expensive changes" as stated by the commentor. As discussed in Section 4.7.2.3 of the SPAS Draft EIR and in Response to Comment SPAS-PC00143-2, the current north airfield does not meet FAA design standards for ADG V or VI aircraft. The airfield improvements proposed under SPAS Alternative 2 would not remedy the fact that

certain ADG V and all ADG VI operations are non-standard on the north airfield. It is critical to plan for a north airfield that would meet FAA design standards of safety as the number of ADG V and VI operations increases over time. The A380 is not the only ADG VI aircraft expected to operate at LAX in the future; the Boeing 747-800 is also expected to operate at LAX.

Please see Response to Comment SPAS-PC00130-41 regarding phasing of project improvements. As noted in that response, construction phasing plans have not yet been developed for the SPAS alternatives; therefore, information regarding necessary runway closures has not been determined.

Please see Response to Comment SPAS-PC00130-1012 regarding the north airfield abandoned tunnel segment (referred to by the commentor as Manchester Tunnel). Please see Response to Comment SPAS-PC00130-348 and Topical Response TR-SPAS-LR-1 regarding sewers that lie beneath LAX and Response to Comment SPAS-PC00130-51 regarding sink holes.

Please see Response to Comment SPAS-PC00130-169 regarding ability of the Argo Drainage Channel to continue to convey stormwater following implementation of improvements proposed under Alternatives 1, 5, and 6 and Response to Comment SPAS-PC00130-201 regarding USACOE jurisdiction over the channel. Regarding the commentor's statement that covering the channel with a permeable substance is not practical, the SPAS Draft EIR does not make such a recommendation.

SPAS-PC00128-3

Comment:

What coordination with other agencies will be completed so that time lines and true cost estimates are accurate in the Final EIR for all Alternatives?
- Other agencies include: The Army Corps of Engineers (Argo Flood Control Channel), Caltrans (the CTA upper roadway, Lincoln Blvd, Sepulveda Blvd, and Sepulveda Tunnel), LA Public Works Dept. (sewers and storm drains), LA Water and Power (utility lines, water mains), FAA (tower and TRACON staffing, flight paths and Runway Protection, Safety, and Buffer Zones - and FAA enforcement of these zones).

Response:

Agencies that are expected to be involved with various aspects of SPAS implementation are identified in Section 2.4 (pages 2-74 through 2-77) of the SPAS Draft EIR. As indicated in the SPAS Draft EIR, these agencies may include the Federal Aviation Administration (FAA), Transportation Security Administration (TSA), U.S. Army Corps of Engineers (USACOE), California Air Resources Board (CARB), California Department of Transportation (Caltrans), California Coastal Commission (CCC), California State Historic Preservation Officer (SHPO), State Water Resources Control Board (SWRCB) South Coast Air Quality Management District (SCAQMD), the County of Los Angeles Airport Land Use Commission (ALUC), and various City of Los Angeles departments.

LAWA provided a detailed account of the financial requirements of each of the alternatives in Chapter 8 of the Preliminary LAX SPAS Report, with backup information included in Appendix G. Please see Response to Comment SPAS-PC00130-730 regarding the treatment of economic conditions in an EIR, including costs of proposed improvements.

SPAS-PC00128-4

Comment:

Why were the following items (which were listed in comments on the NOP) not addressed in the DEIR? These issues would do more for safety on the airfield than moving 24R would. Some of these items would require interfacing with the FAA. Was this done? Or at least attempted? If so, what was the outcome?
- Improve communications between tower and cockpit
- Fully staff tower and TRACON offices
- Install modern and efficient equipment in the tower
- Install and implement the GPS ground-tracking system

- Complete the installation and implementation of Runway Status Lights in the whole North Airfield

Response:

The contents of this comment are similar to the concerns expressed in comment SPAS-PC00096-5; please refer to Response to Comment SPAS-PC00096-5.

SPAS-PC00128-5

Comment:

The DEIR includes 7 alternatives that involve the runways and 2 alternatives that involve other issues such as the Consolidated Rental Auto Facility (CONRAC). Below is an analysis of these alternatives and the issues they raise (or solve).
Alt. 1 (Moves 24R 260 ft North and 600 ft West. Moves 24L 1250 ft East. Adds a Centerfield Taxiway).
- Displaces businesses and homes
- Risky construction factors; could be very costly in time and delays
- Fixes little traffic or Central Terminal Access (CTA)
- Impacts major underground utilities, sewer, and tunnel
- Very costly, not affordable

Alt.2 (Leaves Runways in current location. Reconfigures taxiways. Adds new terminal and extends Bradley and Mid-Course terminals North)
- Most affordable
- Most efficient
- Most environmentally sound
- Less impact to communities

Alt. 3 (City approved Alt. D. Extends 24R 1495 ft West. Moves 24L 340 ft South and adds Centerfield taxiway. Ground Transportation Center in Manchester Square with a baggage tunnel to the CTA. CTA closed to car traffic. Integrated Transportation Center in Continental City at Aviation/Imperial)
- Not affordable. Cost has risen from $12 billion in 2004 to over $100 billion in 8 years
- Baggage tunnel safety, viability, and efficiency is questionable

Alt. 4 (Alt. D Green Light projects +. 24R left as is. 24L moves 835 ft East. No Centerfield taxiway. Argo Flood Channel partially enclosed. CONRAC in Manchester Square. No terminal, taxiway, or taxilane changes)
- Does little for CTA traffic and access
- Questionable viability and stability in covering the Flood Channel

Alt. 5 (Moves 24R 350 ft North and 604 ft West, and widens it to 200 ft. Adds Centerfield taxiway. Lincoln Blvd moved sub terrain & new Sepulveda connect. Fully encloses all 9857 ft of the Argo Channel. Compatible with ground access in Alts. 1, 2, 8 & 9)
- Greatest impacts to businesses and residents
- Major move of flight path North (heavily impacting Westchester and Inglewood)
- Risky construction factors, could be very costly in time and delays
- Does little for traffic and CTA access
- Not affordable (have the airlines indicated agreement to paying the astronomical landing fees that would be imposed?)

Alt. 6 (Moves 24R 100 ft North. Moves 24L 1250 East. Adds Centerfield taxiway. Reconfigures taxiways & taxilanes. Lincoln Blvd moved sub terrain & new Sepulveda connect. - Does little for traffic and CTA access. Eliminates all remote gates. Compatible with ground access in Alts 1, 2, 8 & 9)
- Impacts businesses & residents
- Adds new terminal and extends Bradley and Mid-Course terminals North
- Moves flight path North
- Risky construction factors, could be very costly in time and delays

Alt. 7 (24R no extension or widening. 24L moves 1250 ft East. Adds Centerfield taxiway. Reconfigures taxiways & taxilanes. All remote gates eliminated. No business district impact. Adds new terminal and extends Bradley and Mid-Course terminals North. Compatible with ground access in Alts 1, 2, 8 & 9.)
- Avoids construction risks of tunnel, roadways, sewers
- May involve extensive or complete remodeling of Terminals 1, 2, and 3
- Costly, airlines could be charged much higher landing fees

Alt. 8 (Has CONRAC in Lot C with bus service into CTA. Parking moved to Manchester Square)
- Only partially addresses CTA traffic

- Does not include train service into CTA
Alt. 9 (Moves CONRAC to Manchester Square with a people mover that goes into CTA)
- Creation of people mover that could service amount of people traffic and length required to transport from Manchester Square into CTA is problematic
- Once people mover in place, CTA traffic would be reduced

The only acceptable alternative is Alt. 2. It has the least cost, yet is safe, efficient, and has the least impact on the communities surrounding LAX.

Other alternatives would involve massive cost. In addtion to the disruption on the North, the South Airfield would be significantly impacted by the extended North Airfield down time to accomplish the Alt. 1, 3, 4, 5, 6, and 7 projects.

Response:

The commentor's support for Alternative 2 is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Chapter 2 of this Final EIR regarding the LAWA Staff-Recommended Alternative, which couples the airfield and terminal improvements associated with Alternative 1 with the ground access components associated with Alternative 9, including a discussion of the rationale behind the selection of these alternatives over the other alternatives evaluated in the SPAS Draft EIR.

The content of this comment is similar to comment SPAS-PC00130-46, which made a number of the same assertions regarding each alternative; please refer to Response to Comment SPAS-PC00130-46. Portions of this comment raise issues that are not addressed in Response to Comment SPAS-PC00130-46; responses to these issues are provided herein.

The commentor's statements that Alternatives 1 and 5 are not affordable, that Alternative 7 is costly, and that alternatives other than Alternative 2 would involve massive costs, are personal opinions that are unsupported by facts or evidence. Please see Response to Comment SPAS-PC00130-730 regarding the treatment of economic impacts in an EIR. As noted in that response, CEQA does not require an analysis of cost or project funding. (State CEQA Guidelines Section 15131; Pub. Resources Code Section 21068.) However, Chapter 8 of the Preliminary LAX SPAS Report provides estimated costs and an approximation of funding sources for the SPAS alternatives and demonstrates how each alternative would be funded. As noted in Response to Comment SPAS-PC00130-46, Alternative 2 is not the most affordable alternative; Alternative 4 would have lower costs than Alternative 2.

Table 4.7.2-16 on pages 4-569 and 4-570 in Section 4.7.2 of the SPAS Draft EIR documents the efficiency of the airfield under each alternative. As indicated in that table, the degree to which safety and efficiency is enhanced varies between the alternatives. Please also see Response to Comment SPAS-PC00089-1 regarding efficiency associated with Alternative 2 compared to other airfield alternatives.

The commentor's assertion that Alternative 2 would have less impact on local communities is not accurate. As indicated in Tables 1-17 and 1-18 of the SPAS Draft EIR, Alternative 2 would have the second highest impacts of all the alternatives relative to both population newly exposed to 65 CNEL and to population that would experience a 1.5 dBA CNEL increase over 65 CNEL.
The commentor's statement that the baggage tunnel proposed as one option under Alternative 3 is questionable in terms of safety, viability, and efficiency is a personal opinion that is unsupported by facts or evidence.

The statement that Alternative 7 may involve extensive or complete remodeling of Terminals 1, 2, and 3 is incorrect. Terminal improvements associated with Alternative 7 are described in Section 2.3.1.7.1 of the SPAS Draft EIR and illustrated in Figure 2-7. As demonstrated in Table 2-2 of the SPAS Draft EIR, terminal improvements associated with Alternative 7 would involve partial demolition of the Terminal 1 concourse (to the same extent required under Alternatives 1, 2, 5, and 6); no demolition of Terminal 2; and reconfiguration of the entire Alternative 3 concourse (to the same extent proposed under Alternatives 1, 2, 5, and 6). Similar to Alternatives 1, 2, 5, and 6, Alternative 7 includes the addition of

Terminal 0 as well as an extension to the Bradley West concourse and the MSC, although to a lesser extent than under Alternatives 1, 2, 5, and 6.

The statement that creation of an APM under Alternative 9 is problematic is a personal opinion that is unsupported by facts or evidence.

Please see Response to Comment SPAS-PC00130-41 regarding phasing of project improvements. As noted in that response, construction phasing plans have not yet been developed for the SPAS alternatives; therefore, information regarding necessary runway closures has not been determined.

SPAS-PC00129 Tallarico, Lorraine M Avis Budget Car Rental, LLC 10/9/2012

SPAS-PC00129-1

Comment:

Mr. Alvarez, please see our attached letter. Please confirm your receipt of these comments within the stated time period.

Response:

It is noted that the comment letter from Avis Budget Car Rental, LLC was received on October 9, 2012, one day before the close of the public comment period on the SPAS Draft EIR (October 10, 2012). Please see Responses to Comments SPAS-PC00129-2 through SPAS-PC00129-7 below.

SPAS-PC00129-2

Comment:

The following comments represent the position of Avis Budget Car Rental, LLC, ("Avis") which has operated its rental car companies at Los Angeles International Airport ("LAX") for over 35 years. As such, we have a unique vantage point with respect to the planning at LAX, particularly with respect to ground transportation. We take no position on the various alternatives in SPAS with respect to runway changes. Many, if not all, aviation alternatives set forth in SPAS can be matched with one of the alternatives pertaining to the ground transportation. Therefore, any of the alternatives which expands the passenger capacity of the airport, improves overall efficiency, or increases the safety at LAX, receives our support.

Most importantly, Avis supports Alternatives I and 2, which do not include the construction of any Consolidated Rental Car Facility ("CRCF"). In addition, Avis supports Alternatives 8 and 9. Avis only supports Alternatives 8 and 9 in the event LAWA decides, notwithstanding all evidence in SPAS to the contrary, that a Consolidated Rental Car Facility is even necessary. The cost/benefit of a Consolidated Rental Car Facility in Los Angeles simply does not add up.

We are pleased that LAWA took the time to carefully review the Master Plan that has been in place for almost a decade. Many things have changed in the area of technology, and the general public's habits with respect to travel. These changes must be considered before LAWA moves forward with major construction such as a Consolidated Rental Car Facility, or Ground Transportation Centers, or even new public parking lots. We applaud the thorough job reviewing all of these changes, as well as challenging old perceptions that were driving early decisions. These perceptions and assumptions may no longer be accurate, if they ever were, regarding rental car activities.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the

adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00129-3

Comment:

The SPAS report findings, particularly in the traffic study data, that he conclusion that the construction of an estimated $750 million-$1billion dollar Consolidated Rental Car Facility will not significantly improve either traffic congestion or air quality, the two key drivers for the inclusion of a CRCF in the Master Plan for LAX. SPAS data indicates the minimal positive impact resulting from a CRCF is insufficient to justify the cost. We agree.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Please note that the Preliminary LAX SPAS Report and SPAS Draft EIR do not analyze the CONRAC individually, but rather as a component of some SPAS alternatives. Sections 4.12 and 4.2 of the SPAS Draft EIR, Transportation and Air Quality, respectively, analyze and discuss the impacts from the various alternatives, including those that include a CONRAC.

SPAS-PC00129-4

Comment:

All the rental car companies operating on-airport at LAX now utilize the newest in clean burning CNG fuel efficient buses. The CO2 and other NOX emissions are virtually zero now. As such, even a 40% reduction in the total buses that might result if a CRCF were constructed will have an insignificant impact of overall air quality in the area. In other words, technology alone has solved one of the first targeted problems the CRCF plan was intended to solve.

Response:

The comment implies that pollutant emissions from the CNG rental car shuttle buses are negligible; thus, a consolidated rental car facility (CONRAC) is no longer warranted. In fact, emissions of nitrogen oxides (NOx) and methane (CH4, a greenhouse gas) from CNG vehicles are measurable and still contribute to the pollutant burden in the South Coast Air Basin. Emissions of NOx contribute to the formation of ozone and PM2.5, both nonattainment pollutants in the South Coast Air Basin. Table 4.2-13 of the SPAS Draft EIR indicates that the addition of a CONRAC at Manchester Square with a dedicated busway (Alternative 8) provides an additional reduction of over 400 lbs/day of NOx from roadways and parking lots when compared to Alternatives 1 and 2. Note that Alternatives 1 and 2 also have a dedicated busway to Manchester Square, but no CONRAC. The addition of the CONRAC, and the reduction in vehicle miles traveled (VMT) that is associated with it would also reduce emissions of carbon monoxide, volatile organic compounds, and particulate matter.

The SPAS Draft EIR determined that operational impacts of NOx and particulate matter, among other pollutants, will be significant and unavoidable as shown in Table 4.2-17 (page 4-156).

SPAS-PC00129-5

Comment:

Secondly, SPAS also concluded that the overall traffic impacts in the LAX surrounding area resulting from rental car buses, or rental vehicle fleet movement, will not significantly change. In fact, the concentration of the rental car industry traffic at certain affected intersections will deteriorate if all

vehicles are moving in and out of a single location as compared to the existing locations that disperse the traffic among various routes.

Utilizing the millions of dollars paid by rental car customers for facility improvements for roadway changes, such as an elevated and dedicated roadway in and out of LAX will be far more effective in improving traffic than one, enormous building sitting at the corners of several key intersections.

Improvement to the vertical circulation at each terminal, and modifications to the Central Terminal Roadway system will have a much more significant impact improving traffic than a single destination CRCF. In fact, changes to the CTR that enable the companies to all utilize a single level for pick up and drop off will cut the rental car shuttle bus traffic by 50% immediately. The Industry has advocated for this change for many years. It will be much more effective and far less costly than a CRCF that few, if anyone, in the rental car industry wants to see build. Rental car customers have already contributed $150 million dollars that can be properly used to fund these roadway projects.

Response:

As described in Section 2.3 and depicted in Figures 2-3, 2-4, 2-8, and 2-9 of the SPAS Draft EIR, a CONRAC would be constructed at Parking Lot C under Alternatives 3 and 4, and at Manchester Square under Alternatives 8 and 9. The SPAS Draft EIR is intended to identify the program-level magnitude of the traffic impacts associated with each SPAS alternative and has included mitigation measures, where feasible, to address the significant traffic impacts associated with each alternative. Should LAWA approve one of the SPAS alternatives, separate project-level environmental studies would be initiated to identify the potential localized traffic impacts associated with major program elements, such as the CONRAC, and feasible mitigation measures would be identified to avoid or minimize the associated traffic impacts.

The commentor states that "SPAS also concluded that the overall traffic impacts in the LAX surrounding area resulting from rental car buses, or rental vehicle fleet movement, will not significantly change." Contrary to the language in the comment, the SPAS alternatives had different impacts in the off-airport surface transportation analysis. For a summary of these impacts please see Tables 4.12.2-13 and 4.12.2.19 of the SPAS Draft EIR.

The comment also states that "an elevated and dedicated roadway in and out of LAX will be far more effective in improving traffic than one, enormous building sitting at the corners of several key intersections." The comment does not specify the nature of the dedication contemplated in the comment; however, the SPAS Draft EIR analyzed Alternatives 1, 2, and 8 which include a dedicated busway and Alternatives 3 and 9 which include an elevated Automated People Mover (APM).

The commentor also recommends "changes to the CTR [Central Terminal Roadway system] that enable the companies to all utilize a single level for pick up and drop off…" SPAS Mitigation Measure MM-ST(OA) (SPAS)-2, presented on page 4-1178 of the SPAS Draft EIR, provides for the type of circulation system change suggested by the commentor.

As acknowledged by LAWA page 1-12 of the SPAS Draft EIR, curbside demand is unevenly distributed especially during peak periods. This is why LAWA has proposed numerous alternatives which change the internal airport circulation system, through the construction of a dedicated busway, an APM, an Intermodal Transportation Center, a Consolidated Rental Car Facility, and through the closure of the CTA to private vehicles. The SPAS Draft EIR has provided a reasonable range of alternatives which address on-airport surface transportation impacts. The results of this analysis are provided in Section 4.12.1 of the SPAS Draft EIR.

SPAS-PC00129-6

Comment:

Notwithstanding the above factors, we do understand it's possible that some may still advocate for a CRCF to be approved for construction. In that case, it would be an utter disaster for a CRCF to be built on, or about, Lot C. Alternatives 3 and 4 are 100% unacceptable. The only possible location for a CRCF of sufficient size and design is Manchester Square, or a portion thereof. Lot C has been studied by the

industry and a team of planners and architects. All agree Lot C is not a suitable site. The Lot C location is too small oddly configured, divided by a Westchester and other city streets, encumbered by aviation/runway easements that restrict design and utility.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Please note that the comment expresses an opinion that Lot C is not suitable for the CONRAC without any factual basis or substantial evidence to support this conclusion.

SPAS-PC00129-7

Comment:

We will not support any use of Lot C for a CRCF. It would be a tremendous error in judgment for LAWA to think a CRCF at Lot C is in the best interest of the traveling public, the community, the industry, or the City. The rental car industry looks forward to a clear direction from LAWA on these matters soon. Uncertainty has, in the past, prevented the industry from modernizing its existing facilities in a manner that reflects LAX as a world-class airport.

Accordingly, we urge LAWA to recognize the strong position of the rental car industry and either abandon all plans for a CRCF and modernize LAX in a manner that is in the best interests of the public, or, adopt Alternative 8 or 9 only, with respect to ground transportation.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00130 Schneider, Denny ARSAC 10/9/2012

SPAS-PC00130-1

Comment:

On behalf of the Alliance for a Regional Solution for Airport Congestion (ARSAC), we provide these comments on the Draft Subsequent Environmental Impact Report (DEIR) prepared for the Specific Plan Amendment Study ("SPAS" or "Project") at Los Angeles International Airport (LAX).

The SPAS Project DEIR assesses numerous potential alterations to LAX, including runway relocations and realignments, the relocation of Lincoln Boulevard, reconfiguration of central terminal area roadways, and relocation and construction of various terminals, security implements, and transportation facilities. The DEIR discusses 9 separate alternatives, the components of which can be configured into 25 separate possible projects. This "mix and match" approach renders the Project a moving target. As the SPAS DEIR fails to specify LAWA's preferred project it is unclear what LAWA's plans for the airport actually are, and which environmental impacts would be expected to result. ARSAC and the public are thus unable to focus their comments on LAWA's preferred project, and important concerns about potential impacts are likely to be lost in the mass of comments that will be generated by the many SPAS Alternative permutation projects. More importantly, the EIR's failure to designate a preferred project

precludes satisfaction of two of the goals sought by the California Environmental Quality Act (CEQA) - public involvement and informed decision making.

Response:

The comment is noted. Please see Responses to Comments SPAS-PC00130-2 through SPAS-PC00130-1051 below for a response to all comments on the SPAS Draft EIR submitted by the commentor.

Please see Responses to Comments SPAS-AL00007-6, SPAS-AL00008-3 and SPAS-AL00008-26 for an explanation of why the analysis of nine alternatives in the SPAS Draft EIR instead of a single proposed project was consistent with CEQA's requirements and facilitated public review of the alternative. As indicated in these responses, Section 2.3.1 of the SPAS Draft EIR provides a thorough description of each of the nine alternatives that is accurate, stable, and finite. Although a preferred alternative was not identified in the SPAS Draft EIR, the environmental impacts of each alternative are fully evaluated. Despite the commentor's claim that "important concerns about potential impacts are likely to be lost in the mass of comments that will be generated," in accordance with State CEQA Guidelines Section 15088, LAWA has prepared written responses to all comments received on the SPAS Draft EIR during the public review period. The written responses are thorough, detailed, and provide good faith, reasoned analyses. These responses are provided herein as part of this Final EIR. The responses to comments on the SPAS Draft EIR will be considered by the decision-makers during project deliberations. As seen throughout the SPAS Draft EIR, the SPAS alternatives were presented and evaluated in a manner that fosters informed decision-making and public participation. (State CEQA Guidelines Section 15126.6(f)). Please see Response to Comment SPAS-PC00048-5 regarding the extensive public participation program undertaken for SPAS. As reported to the Board of Airport Commissioners on December 3, 2012, over 370 unique individuals signed in to the three public meetings and 101 attendees provided oral comments (including attendees who commented at more than one public meeting). In total, 251 unique commentors provided oral testimony, comment letters, emailed comments, or comments via LAWA's project website or virtual meeting site; many of these commentors provided more than one set of comments (e.g., provided oral testimony as well as a written comment letter).

SPAS-PC00130-2

Comment:

I. Preliminary Statement About the Background of the SPAS Process.

ARSAC is a public interest community organization composed of area residents and business owners with many years of experience collaborating with LAWA on issues related to LAX expansion. In accordance with the February 2006 Stipulated Settlement with the City of Los Angeles calling for significant revisions to the 2005 LAX Master Plan, ARSAC has been a member of the SPAS Advisory Committee and has been extensively involved with the development of the SPAS Study. Even so, it appears that LAWA has disregarded ARSAC's carefully considered alternatives for runway alignment, terminal configurations, and ground transportation facilities. ARSAC is adamantly opposed to expanding LAX into the surrounding communities, and especially to any alternative that would relocate Runway 24 Right further north. As with all of its submissions during this process, ARSAC provides these comments with the hope that LAWA will revise the SPAS Project DEIR to remove northward runway movements to reach consistency with both the Settlement Agreement and community needs.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. It should be noted that the Stipulated Settlement does not call for significant revisions to the 2005 LAX Master Plan. Rather, the Stipulated Settlement requires LAWA to, among other things, study potential alternative designs, technologies, and configurations for the LAX Master Plan Program that would provide solutions to the problems that the Yellow Light Projects were designed to address, consistent with a practical capacity of LAX at 78.9 MAP. The Stipulated Settlement does not preclude study of configurations that include northward runway movements. LAWA has carefully considered a wide range of alternative designs

during the SPAS process, as documented in Chapter 5 of the Preliminary LAX SPAS Report. Nine alternatives, eight of which provide alternative designs, technologies, and configurations for the LAX Master Plan Program, were analyzed in detail in the SPAS Draft EIR, including alternatives that were raised by members of the SPAS Advisory Committee.

SPAS-PC00130-3

Comment:

The Settlement Agreement contemplated that LAWA would "focus the LAX Specific Plan Amendment Study on . . . . Potential alternative designs, technologies, and configurations for the LAX master Plan Program that would provide solutions to the problems that the Yellow Light Projects were designed to address consistent with a practical capacity of LAX at 78.9 million annual passengers. . . [and] Potential environmental impacts that could result from replacement of the Yellow Light projects with the Alternatives Projects, and potential mitigation measures that could provide a comparable level of mitigation to that described for the Yellow Light Projects in the LAX Master Plan Program EIR." (Settlement Agreement, p. 9, Section V.D.)

Instead of fulfilling this intent of the Settlement Agreement, the DEIR emphasizes north runway movement, while failing to adequately address traffic and other consequences, calling them generally unmitigable. We are therefore surprised that, despite its many flaws, the DEIR correctly acknowledges, "Compliance with FAA Airport Design Standards - the larger aircraft are more acceptably handled by Alternative 2, no additional runway spacing." (Table 4.7-2-8.) In view of the fact that Alternative 2 is also designated the "Environmentally Superior Alternative," the decision to choose this alternative as the preferred project should be clear. Once a preferred alternative is chosen, the DEIR must be recirculated to allow informed and meaningful public review and comment.

Response:

The commentor's support for Alternative 2 is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Chapter 2 of this Final EIR regarding the LAWA Staff-Recommended Alternative, which couples the airfield and terminal improvements associated with Alternative 1 with the ground access components associated with Alternative 9, including a discussion of the rationale behind the selection of these alternatives over the other alternatives evaluated in the SPAS Draft EIR. The SPAS Draft EIR identifies a comprehensive set of applicable LAX Master Plan Commitments and mitigation measures, as well as SPAS-specific mitigation measures, that would reduce or eliminate significant impacts associated with the SPAS alternatives.

Table 4.7.2-8 of the SPAS Draft EIR acknowledges that under Alternative 2 (as well as under Alternatives 1, 5, 6, and 7) the ability of large aircraft (ADG V and ADG VI) to taxi to/from runways would improve, although the SPAS Draft EIR does not state that "the larger aircraft are more acceptably handled by Alternative 2," as claimed by the commentor. However as indicated in Table 1-3 of the SPAS Draft EIR, without runway relocation and increased separation, under Alternative 2, the north airfield would continue to require non-standard operating procedures for ADG V and ADG VI aircraft (i.e., would not meet FAA design standards). Please also see Table 4.7.2-16 in Section 4.7.2 of the SPAS Draft EIR which provides a summary of safety and efficiency enhancements to the north airfield operations under each of the seven SPAS alternatives (Alternatives 1 through 7) that involve airfield improvements. Please also see Response to Comment SPAS-PC00089-1 regarding efficiency associated with Alternative 2 compared to other airfield alternatives.

The identification of a recommended alternative by LAWA does not require recirculation of the SPAS Draft EIR, as the impacts of all of the SPAS alternatives were fully analyzed and disclosed in the SPAS Draft EIR. Identification of a recommended alternative does not meet any of the criteria for recirculation outlined in Section 15088.5 of the State CEQA Guidelines, as further explained in Chapter 2 of this Final EIR.

SPAS-PC00130-4

Comment:

The DEIR improperly characterizes the bulk of the Project's impacts as resulting from the projected increase in aircraft operations and passenger growth instead of from the project components. Several of the SPAS Alternatives propose relocating airport runways north, nearer to homes and businesses in Westchester and Playa del Rey, which would have significant and unmitigable environmental impacts attributable to noise, vibration, air and water pollution, and aircraft safety hazards.

Response:

The commentor's statement that "the DEIR improperly characterizes the bulk of the Project's impacts as resulting from the projected increase in aircraft operations and passenger growth instead of from the project components" is incorrect and is not supported by substantial evidence. The SPAS Draft EIR does correctly acknowledge that some of the impacts of the project are attributable to the projected increase in aircraft operations and passenger growth. This is the case for some impacts that are associated with operations, such as aircraft noise, air quality, and traffic, but is not the case for impacts that would result from construction activities or from changes in airport facilities, such as construction traffic and equipment noise, biological resources, and hydrology and water quality. As indicated on page 1-13 of the SPAS Draft EIR, the increase in passenger activity over time would occur with or without the SPAS alternatives. That is to say, the project would not change the potential for growth at LAX; rather, future passenger activity is forecast to reach 78.9 MAP at LAX by the planning horizon year of 2025 with or without the SPAS alternatives.

As evidenced in Table 4.2-13 of the SPAS Draft EIR, which presents the incremental project operational emissions in 2025 compared to baseline (2009) emissions, the predominant source of air pollutant emissions is aircraft operations, which increase under all alternatives, including Alternative 4, which proposes no airfield improvements other than runway safety area compliance improvements that do not affect daily operations. Given that there are no material changes to the existing airfield under Alternative 4, the estimated increase in air pollutant emissions in 2025 compared to 2009 baseline conditions is attributable to projected growth in airport activity levels by 2025 that would occur irrespective of SPAS. As even more apparent in Table 4.2-14 of the SPAS Draft EIR, which compares the future (2025) emissions of the SPAS alternatives that propose airfield improvements (i.e., Alternatives 1, 2, 3, 5, 6, and 7) to Alternative 4, which proposes no airfield improvements that affect operations, implementation of the SPAS-related airfield improvements would actually decrease future air pollutant emissions from aircraft operations compared to aircraft emissions that would occur in leaving the north airfield in its existing configuration.

Regarding air quality, as indicated in Section 4.2 of the SPAS Draft EIR, even after mitigation, construction activities, which are not related to the projected increase in aircraft operations and passenger growth, would result in significant and unavoidable air quality impacts under all of the alternatives, including Alternatives 1, 5, and 6 which propose a northward relocation of Runway 6L/24R. Specifically, under all of the alternatives except for Alternative 4, construction emissions of carbon monoxide (CO), volatile organic compounds (VOC), oxides of nitrogen (NOx), particulate matter with an equivalent aerodynamic diameter of 10 micrometers (PM10), and particulate matter with an equivalent aerodynamic diameter of 2.5 micrometers (PM2.5) would be significant and unavoidable. Under Alternative 4, significant and unavoidable construction emissions would occur for NOx and PM10. Under all of the alternatives, even after mitigation, construction-related concentrations of nitrogen dioxide (NO2) and PM10 would be significant and unavoidable. Operation of the airport would also result in significant and unavoidable impacts to air quality. Even after mitigation, operational emissions of sulfur dioxide (SO2), PM10, and PM2.5 would be significant and unavoidable under all of the alternatives. Operational concentrations of NO2, PM10, and PM2.5 would also be significant and unavoidable under all of the alternatives.

Increases in aircraft noise are attributable to increases in passenger activity over time, as well as changes in the north airfield configuration, which affect the use of the north and south airfields and the location of the noise contour relative to off-airport land uses. As indicated in Table 4.10.1-55 on page 4-926 of the SPAS Draft EIR, all of the SPAS alternatives, including Alternative 4, would increase the

population and dwellings within to 65 CNEL or higher noise exposure contour when compared to baseline (2009) conditions as a result of increased operations. However, implementation of the SPAS-related airfield improvements associated with Alternatives 1, 2, 3, 5, 6, and 7 would result in the exposure of fewer dwellings and less population to 65 CNEL or higher noise levels than would Alternative 4, which is the result of the airfield configuration associated with each alternative. As indicated in Table 4.10.1-56 on page 4-927 of the SPAS Draft EIR, implementation of the SPAS-related airfield improvements would decrease the number of dwellings subject to an increase in 1.5 CNEL within the 65 CNEL and higher noise exposure contour under Alternatives 1, 3, 5, and 6 in comparison to Alternative 4, which proposes no airfield improvements that affect operations, but would increase the number of dwellings under Alternatives 2 and 7 in comparison to Alternative 4. Please also see Responses to Comments SPAS-PC00152-2 and SPAS-PC00149-2 regarding the SPAS Draft EIR analysis and conclusions relative to aircraft noise impacts on surrounding communities.

As shown in Table 4.7.2-16 on pages 4-569 and 4-570 of the SPAS Draft EIR, the alternatives that propose comprehensive airfield improvements (Alternatives 1, 2, 3, 5, 6, and 7) would increase safety and efficiency of the north airfield compared to Alternative 4, which proposes minimal airfield improvements. Please also see Response to Comment SPAS-PC00149-2 regarding safety related to the north airfield. As indicated on page 4-571 in Section 4.7.2 of the SPAS Draft EIR, none of the SPAS alternatives, including Alternatives 1, 5, and 6, which would relocate Runway 6L/24R north, would result in a significant impact with respect to safety.

Impacts associated with transit-related vibration, which are addressed in Section 4.10.4 of the SPAS Draft EIR, are not characterized as resulting from the projected increase in aircraft operations and passenger growth. These impacts are correctly attributed to the dedicated busway associated with Alternatives 1, 2, and 8, or the APM associated with Alternatives 3 and 9. Please see Response to Comment SPAS-PC00038-3 regarding vibration impacts associated with aircraft operations.

Similarly, impacts to hydrology and water quality, which are addressed in Section 4.8 of the SPAS Draft EIR, are not characterized as resulting from the projected increase in aircraft operations and passenger growth but, rather, are correctly attributed to changes in impervious surfaces and pollutant loads associated with SPAS-related facilities and activities. As indicated on page 4-639 of the SPAS Draft EIR, implementation of Mitigation Measure MM-HWQ (SPAS)-1, Conceptual Drainage Plan Revision and Update, would reduce the hydrology and water quality impacts associated with Alternatives 1, 2, and 4 through 9 to a level that is less than significant. Compliance with the Conceptual Drainage Plan, developed in accordance with LAX Master Plan Commitment HWQ-1, would ensure that impacts to hydrology and water quality associated with Alternative 3 would be less than significant. Therefore, no mitigation specific to SPAS is required for this alternative.

SPAS-PC00130-5

Comment:

Northward runway extension would also require northward expansion of the FAA-mandated runway protection zone to include additional homes and businesses, which would ultimately be vacated and demolished. As Westchester and Playa del Rey have already lost many homes and businesses to past airport expansion, the cumulative community impacts of additional losses would be great, and must be avoided.

Response:

Potential impacts associated with changes in the Runway Protection Zone (RPZ) for the SPAS alternatives are addressed in Section 4.7.2 of the SPAS Draft EIR. Please refer to Response to Comment PC00096-11 regarding the fact that several options would be considered for how to address substantial safety hazards, if any, associated with existing structures or uses within an RPZ, which may or may not include removal of such structures or uses. Regarding the commentor's indication that a northward move of the runway would result in additional homes being included in the RPZ, that statement is inaccurate. As described in Chapter 2 and Section 4.7.2 of the SPAS Draft EIR, Alternatives 1, 5, and 6 all move Runway 6L/24R northward, but also include a westerly shift in runway displaced threshold, in which case the RPZ would also move westward beyond where the homes are

located -- the existing homes located within the current RPZ would no longer be within the RPZ under those alternatives.

SPAS-PC00130-6

Comment:

Significant impacts would also be expected to affect communities located east of LAX, if proposed changes to the approach pattern are adopted.

Response:

A discussion of potentially significant impacts to cities and communities east of LAX, including the City of Inglewood and the communities of Lennox and Athens (in the County of Los Angeles) and South Los Angeles (in the City of Los Angeles) is provided, where applicable, in Chapter 4 of the SPAS Draft EIR. As summarized in Section 1.4 of the SPAS Draft EIR, and analyzed in detail in Chapter 4 of the SPAS Draft EIR, some or all of the SPAS alternatives would result in significant impacts after mitigation to portions of some of these communities for the environmental topics of air quality, greenhouse gases, aircraft noise exposure, construction equipment noise, and off-airport transportation.

SPAS-PC00130-7

Comment:

Runway movement would also require relocation and potential tunneling of busy Lincoln Boulevard (California State Highway 1), which would undoubtedly have significant traffic impacts on all of western Los Angeles County.

Response:

The comment is noted. Please see Response to Comment SPAS-PC00160-15 regarding the impacts to the off-airport transportation system associated with the realignment of Lincoln Boulevard.

SPAS-PC00130-8

Comment:

Such tunneling would also require re-routing of wastewater treatment lines, and identification and mitigation of possible water seepage issues.

Response:

Please see Topical Response TR-SPAS-LR-1 for a discussion of the Lincoln Boulevard realignment associated with Alternatives 1, 5, and 6.

SPAS-PC00130-9

Comment:

Sensitive biological resources, including the endangered El Segundo blue butterfly, could be impacted by relocation of navigational aids, needed to support relocated runways.

Response:

Impacts to sensitive biological resources associated with the relocation of navigational aids, including impacts to the El Segundo blue butterfly, are addressed in Section 4.3 of the SPAS Draft EIR. This section includes mitigation for significant impacts to habitat and sensitive species associated with the relocation of navigational aids under Alternatives 1 through 7, including mitigation for El Segundo blue butterfly. With implementation of these mitigation measures, impacts to all biological resources affected by relocation of navigational aids, including impacts to El Segundo blue butterfly, would be less than significant.

SPAS-PC00130-10

Comment:

Even unrelated to runway relocation, the SPAS Alternatives may have significant impacts on air pollution, traffic congestion, hazardous materials, and safety.

Response:

As indicated in Section 4.2 of the SPAS Draft EIR, even after mitigation, construction activities would result in significant and unavoidable air quality impacts under all of the alternatives. Specifically, under all of the alternatives except for Alternative 4, construction emissions of carbon monoxide (CO), volatile organic compounds (VOC), oxides of nitrogen (NOx), particulate matter with an equivalent aerodynamic diameter of 10 micrometers (PM10), and particulate matter with an equivalent aerodynamic diameter of 2.5 micrometers (PM2.5) would be significant and unavoidable. Under Alternative 4, significant and unavoidable construction emissions would occur for NOx and PM10. Under all of the alternatives, even after mitigation, construction-related concentrations of nitrogen dioxide (NO2) and PM10 would be significant and unavoidable.

Operation of the airport would also result in significant and unavoidable impacts to air quality. Even after mitigation, operational emissions of sulfur dioxide (SO2), PM10, and PM2.5 would be significant and unavoidable under all of the alternatives. Operational concentrations of NO2, PM10, and PM2.5 would also be significant and unavoidable under all of the alternatives.

As indicated in Section 4.12.1 of the SPAS Draft EIR, on-airport traffic impacts related to curbsides and to departures and arrivals level roadways would be less than significant for Alternatives 1, 2, 4, 8, and 9. All of these alternatives would, however, result in a significant and unavoidable impact related to the volume to capacity level at one intersection within the CTA. Alternatives 1, 2, 8, and 9 would also result in significant and unavoidable construction-related impacts to the on-airport transportation system. No on-airport traffic impacts would occur under Alternative 3 because, under that scenario, the CTA would be closed to private vehicles. Alternatives 5, 6, and 7 focus on airfield and terminal improvements that, in themselves, would not affect on-airport traffic, but would be coupled with the ground transportation improvements proposed under Alternatives 1, 2, 8, or 9, the impacts of which are summarized above.

Relative to off-airport traffic impacts, as addressed in Section 4.12.2 of the SPAS Draft EIR, the majority of the 200 intersections evaluated within the SPAS off-airport transportation study area would not be significantly impacted under Alternatives 1, 2, 3, 4, 8, and 9; however, significant impacts to some off-airport intersections and/or Congestion Management Plan (CMP) facilities would occur under each of these alternatives. The total number of significantly-impacted intersections and/or CMP facilities would vary slightly among those alternatives. Alternatives 5, 6, and 7 focus on airfield and terminal improvements that, in themselves, would not affect off-airport traffic, but would be coupled with the ground transportation improvements proposed under Alternatives 1, 2, 8, or 9, the impacts of which are summarized above.

Impacts related to hazardous materials are addressed in Section 4.7.3 of the SPAS Draft EIR. As indicated on page 4-597 of that section, implementation of LAX Master Plan Commitment HM-1, and compliance with the Procedure for the Management of Contaminated Materials Encountered During Construction, developed in accordance with LAX Master Plan Commitment HM-2, would ensure that impacts related to hazardous materials associated with Alternatives 1 through 9 would be less than significant.

Regarding safety, as indicated on pages 4-569 through 4-571 of the SPAS Draft EIR, implementation of Alternatives 1, 2, 3, 4, 5, 6, and 7 would enhance the safety and efficiency of aircraft operating in the north airfield, compared to baseline conditions (2010) and contrary to the statement by the commentor, none of the SPAS alternatives would result in a significant impact related to safety. Table 4.7.2 16 provides a summary of the safety and efficiency enhancements to the north airfield operations that would occur with implementation of airfield improvements under Alternatives 1, 2, 3, 4, 5, 6, and 7.

SPAS-PC00130-11

Comment:

As discussed further in the comments below and attached, the SPAS DEIR fails to adequately disclose and mitigate the Project's potential environmental impacts. Accordingly, the document must be revised and recirculated before approval by LAWA.

Response:

Please see Responses to Comments PC00130-1 through PC00130-10 and Responses to Comments PC00130-12 through PC00130-1051 for detailed responses to all of the comments that are provided in, and attached to, the commentor's letter.

The SPAS Draft EIR is complete, adequate, and meets the requirements of CEQA. LAWA has carefully reviewed all of the comments submitted on the SPAS Draft EIR and prepared written responses, supported by substantial evidence, for all of those comments. Because no "significant new information" as defined in State CEQA Guidelines Section 15088.5 has been added to the SPAS Draft EIR, recirculation of the Draft EIR is not required.

SPAS-PC00130-12

Comment:

II. LAWA's SPAS Review Process Has Been Procedurally Defective.

ARSAC believes the public's ability to fully participate in the environmental review process and the decision makers' ability to fully understand the project and its impacts has been hindered by the DEIR's failure to provide an adequate project description and its use of tiering without sufficiently summarizing or providing access to necessary documents.

Response:

The comment introduces concerns that are more fully described in the eight comments that follow; please refer to Responses to Comments SPAS-PC00130-13 through SPAS-PC00130-20.

SPAS-PC00130-13

Comment:

A. The DEIR's Project Description Fails to Identify the Proposed Project.

"The term 'project' refers to the activity which is being approved." CEQA Guidelines §15378(c). The DEIR fails to accurately identify this activity. The Project Description states the project is merely to conduct a study of alternative designs for the LAX Master Plan: "The project is to complete a Specific Plan Amendment Study (SPAS)." (DEIR 1:17-18.) However, the study is not the activity that would be approved. Rather, the proposed activity is the selection of a Specific Plan amendment that would implement changes to the LAX Master Plan.

The DEIR describes nine different alternatives, seven of which have interchangeable runway, terminal and ground access components, resulting in at least 25 different configurations. (DEIR 1:17-18.) While identifying alternatives is required under CEQA, the DEIR does not indicate a preferred alternative among these various options. Failing to identify a defined project by not selecting a preferred alternative violates CEQA's requirement for an adequate project description and fails to inform decision makers and the public of the activity under consideration.

CEQA mandates that the EIR identify a single proposed project. The EIR must include "[a]lternatives to the proposed project." (Pub. Res. Code §21100(b)(4).) Since statutes should be interpreted according to their plain and unambiguous wording (Sutton v. Industrial Acc. Com. (1956) 46 Cal.2d 791, 797), this

statute demonstrates that there must be "the proposed project," which is singular, and alternatives to the proposed project, which are plural. In contrast, the SPAS DEIR fails to provide one, defined proposed project, and provides instead numerous potential projects LAWA has labeled "alternatives."

The requirement to identify a single project is present throughout CEQA and the CEQA Guidelines. For example, pursuant to CEQA, an EIR must contain a detailed statement of "all significant effects on the environment of the proposed project." (Pub. Res. Code §21100(b)(1), emphasis added.) The CEQA Guidelines also provide that a project description shall include "[t]he precise location and boundaries of the proposed project . . . ." (CEQA Guidelines §15124(a), emphasis added.) Provisions of statutes should be interpreted consistently with the apparent purpose and intention of the legislature. (DeYoung v. City of San Diego (1983) 147 Cal.App.3d 11, 18; see also United Business Com. v. City of San Diego (1979) 91 Cal.App.3d 156, 170.) The legislature refers to "the proposed project" in the singular. The Legislature's intention that a single project be identified and evaluated in an EIR, compared to feasible alternatives, and modified in response to environmental information received was thwarted as this EIR obscures the true proposal under review.

The importance of a single, defined project description has been discussed repeatedly by the courts.

[A]n accurate, stable and finite project description is the sine qua non of an informative and legally sufficient EIR. The defined project and not some different project must be the EIR's bona fide subject. [Citation.]

(Mira Monte Homeowners Assn. v. County of Ventura (1985) 165 Cal.App.3d 357, 365, emphasis added.)

Courts have explained the consequences of failing to provide an adequate project description:

A curtailed or distorted project description may stultify the objectives of the reporting process. Only through an accurate view of the project may affected outsiders and public decision-makers balance the proposal's benefit against its environmental cost, consider mitigation measures, assess the advantage of terminating the proposal (i.e., the "no project" alternative) and weigh other alternatives in the balance.

(County of Inyo v. City of Los Angeles (1977) 71 Cal.App.3d 185, 192-93.) The Inyo court added that an "enigmatic, or unstable project description draws a red herring across the path of public input." Id. at 197-198.

Contrary to CEQA's requirement to identify a single project, the EIR purports to analyze nine different potential projects with a myriad of different combinations. By failing to describe a specific proposed project, the DEIR violates CEQA. Even if LAWA's description of numerous potential projects, in place of a project description, was not clearly prohibited, which ARSAC disputes, such a technique violates CEQA because the description of numerous alternatives frustrates the CEQA's twin goals of public participation and informing the public and decision makers of a project's environmental impacts. For example, the matrix prepared to show potential traffic impacts of the Project describes in detail the changes that would be made to each subarea for each alternative, as well as the pros and cons of each element. However, because the DEIR never reveals the preferred Project alternative, it fails to disclose the potential traffic impacts of the Project.

Response:

Please see Responses to Comments SPAS-AL00007-6, SPAS-AL00008-3, and SPAS-AL00008-26 for an explanation of why the analysis of nine alternatives in the SPAS Draft EIR instead of a single proposed project was consistent with CEQA's requirements and facilitated public review of the alternatives. In accordance with CEQA, for each of the nine alternatives evaluated, the SPAS Draft EIR identifies the precise location and boundaries of the alternatives, and identifies all of the alternatives' significant effects on the environment. As indicated in Response to Comment SPAS-AL00007-6, Section 2.3.1 of the SPAS Draft EIR provides a thorough description of each of the nine alternatives that is accurate, stable, and finite and is not curtailed or distorted. The SPAS alternatives were presented and evaluated in a manner that fosters informed decision-making and public participation.

Please see Response to Comment SPAS-PC00130-1, which demonstrates that the analysis of nine alternatives did not "frustrate" public participation.

SPAS-PC00130-14

Comment:

B. The DEIR Improperly Uses Incorporation by Reference Without Adequate Descriptions of the Incorporated Material.

The DEIR incorporates by reference the LAX Specific Plan. (See DEIR 1-105.) CEQA Guidelines require that certain requirements be met in order to use incorporation by reference:

Where an EIR or Negative Declaration uses incorporation by reference, the incorporated part of the referenced document shall be briefly summarized where possible or briefly described if the data or information cannot be summarized. The relationship between the incorporated part of the referenced document and the EIR shall be described.

(CEQA Guidelines § 15150(c).)

However, several sections of the DEIR fail to specifically identify the "incorporated part of the referenced document," in this case the specific sections of the LAX Specific Plan EIR it is incorporating. For example, the DEIR states:

...the analysis of indirect effects from light emissions, air pollutant emissions, and noise is based upon the evaluation contained within the LAX Master Plan EIR [citation to entire Master Plan EIR], which is incorporated by reference into this EIR. Baseline conditions relative to light emissions, air pollutant emissions, and noise are not markedly different from those that existed at the time of the LAX Master Plan EIR. Therefore, conclusions regarding potential impacts associated with baseline conditions at that time are considered to apply to current baseline conditions.

(DEIR 4-99.) By not providing citations to the portions of the document being incorporated, the general public and decision makers are unable to determine what portions of the LAX Specific Plan EIR are being incorporated or how to locate them.

Even when the DEIR references a particular document within the LAX Master Plan EIR, it fails to provide the page numbers where the portion of the document being incorporated is located. When discussing hydrology, the DEIR states:

The rationale for the selection of pollutants of concern is presented in Technical Report 6, Hydrology and Water Quality Technical Report, and Technical Report S-5, Supplemental Hydrology and Water Quality Technical Report, of the LAX Master Plan Final EIR, which is incorporated by reference...

(DEIR 4-603.) These two technical reports consist of 137 pages in total. To expect members of the public and decision makers to read these entire reports to locate the relevant portions of these documents places an extreme and undue burden on them.

Courts have explained that the presentation of the information in the EIR is extremely important:

The data in an EIR ... must be presented in a manner calculated to adequately inform the public and decision makers, who may not be previously familiar with the details of the project. "[I]nformation 'scattered here and there in EIR appendices' or a report 'buried in an appendix,' is not a substitute for 'a good faith reasoned analysis.'" [Citation.]

(Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova (2007) 40 Cal.4th 412, 442.) The information that was incorporated by reference in the DEIR fails to adequately inform the public and decision makers.

Also, the DEIR should not use incorporation by reference for its substantive analysis of environmental impacts. The CEQA Guidelines state, "Incorporation by reference is most appropriate for including long, descriptive, or technical materials that provide general background but do not contribute directly to the analysis of the problem at hand." (Guidelines § 15150(f), emphasis added.) Nonetheless, the "analysis of the problem at hand" from the LAX Master Plan EIR is incorporated into the DEIR. An example of this is the DEIR's analysis of effects from light, air pollution, and noise. "[T]he analysis of indirect effects from light emissions, air pollutant emissions, and noise is based upon the evaluation contained within the LAX Master Plan EIR..." (DEIR 4¬99.) The DEIR did not use incorporation by reference to properly provide general background information, but rather to improperly support its analysis of these substantive issues.

Response:

The commentor selectively quotes language from page 4-199 of the SPAS Draft EIR (not page 4-99, as referenced in the comment) and suggests that the SPAS Draft EIR does not describe "[t]he relationship between the incorporated part of the referenced document and the EIR…" The missing language from the commentor's quote (underlined below) provides additional cross references and page citations: "*As indicated in Section 4.3.2.3*, the analysis of indirect effects from light emissions, air pollutant emissions, and noise is based upon the evaluation contained within the LAX Master Plan EIR, which is incorporated by referenced into this EIR… *The LAX Master Plan EIR concluded that, based on the success of vegetation restoration efforts within the Los Angeles/El Segundo Dunes, which have been accompanied by substantial increases in populations of the El Segundo blue butterfly, flora and fauna at LAX are not adversely affected by existing air quality*." This SPAS Draft EIR text cites two footnotes: Footnote 205 (City of Los Angeles, Final Environmental Impact Report for Los Angeles International Airport (LAX) Proposed Master Plan Improvements, April 2004) and Footnote 206 (City of Los Angeles, Final Environmental Impact Report for Los Angeles International Airport (LAX) Proposed Master Plan Improvements, April 2004, pp 4-882 and 4-883). Additional page references to the LAX Master Plan Final EIR are also provided in the footnotes on page 4-200 of the SPAS Draft EIR. Section 4.3.2.3 of the SPAS Draft EIR also references Section 4.10.2 of the LAX Master Plan EIR.

The relationship between the LAX Master Plan Final EIR and the SPAS Draft EIR is explained in Sections 1.1.1 and 1.7 of the SPAS Draft EIR. The more specific relationship of this incorporated document was used to show consistency between the two documents in regards to biological resource methodology. As discussed in Section 4.3.2.3 of the SPAS Draft EIR (a subsection of the Biological Resources "Methodology" discussion), "[t]he analysis follows the approach used in the LAX Master Plan EIR, which was substantiated with the findings of published literature." Additional discussion of the methodology is provided in Sections 4.3.2.3 and 4.3.3.3 of the SPAS Draft EIR.

The commentor quotes further language from page 4-199 of the SPAS Draft EIR (not page 4-99, as referenced in the comment) and suggests that the language is used to replace "substantive analysis of environmental impacts." The commentor takes the language out of context. The quoted language is contained more broadly in the discussion of existing conditions in Section 4.3.3 of the SPAS Draft EIR and was used to provide discussion of the environmental setting related to biological resources and their sensitivities to light, noise, and air pollutants (i.e., "existing Effects from Light, Air Quality, and Noise"). Analyses of impacts to biological resources, including indirect impacts, from the SPAS alternatives is provided in the impacts analysis section, Section 4.3.6, of the SPAS Draft EIR. For example the analysis for Alternative 1 (provided in Section 4.3.6.1 of the SPAS Draft EIR) discusses biological resources impacts associated with noise, air quality (deposition), and light emissions (see pages 4-223 through 4-224 of the SPAS Draft EIR). As also discussed in the SPAS Draft EIR, indirect impacts to El Segundo blue butterfly associated with light emissions and noise are not expected to occur. The minimal increases in light emissions would occur at night, but this species is diurnal and does not exhibit flight to light behavior (see page 4-223 of the SPAS Draft EIR). The species does not have an auditory organ and therefore no sense of hearing (see page 4-173 of the SPAS Draft EIR). Nevertheless, the quoted language has been revised to clarify the language. Please see Chapter 5, Corrections and Additions Related to the SPAS Draft EIR.

The commentor also suggests that the SPAS Draft EIR does not comply with CEQA because it does not provide page numbers for LAX Master Plan Final EIR Technical Report 6, Hydrology and Water Quality Technical Report and Technical Report S-5, Supplemental Hydrology and Water Quality

Technical Report. The commentor also suggests that the current presentation in the SPAS Draft EIR does not "adequately inform the public and decision makers…" There is no requirement in Section 15150(c) of the State CEQA Guidelines to identify specific pages of a document incorporated by reference. In fact, Section 15150(c) requires discussion of "[t]he relationship between the incorporated part of the referenced document and the EIR." As indicated on page 4-603 of the SPAS Draft EIR, the relationship between these two documents was to provide "[t]he rationale for selection of pollutants of concern." Additional details regarding the relationship of these two documents is provided in Sections 1.1.1 and 1.7 of the SPAS Draft EIR. Unlike the information "buried" in an appendix in the referenced Vineyard case, the SPAS Draft EIR discussed this information in detail, starting on page 4-602, explaining, "[t]he pollutants of concern evaluated in the analysis were based upon studies of the Santa Monica Bay, the primary receiving water body for runoff from LAX…19 pollutants of concern have been identified for the Santa Monica Bay…[t]en of these pollutants were selected for analysis based on the reasonable likelihood that they would be present in storm water runoff from LAX. These pollutants include total suspended solids, phosphorus, total Kjedahl nitrogen, copper, lead, zinc, biochemical oxygen demand, chemical oxygen demand, oil and grease, and pathogenic bacteria…the specific types of pathogenic bacteria chosen for analysis were fecal coliform, fecal enterococcus, and total coliform bacteria. In addition, ammonia, a component of total Kjedahl nitrogen, was analyzed." The information requested by the commentor can be found in Section 3.2.2.2 (pages 21-23) of LAX Master Plan Final EIR, Technical Report 6, Hydrology and Water Quality Technical Report.1 This information can also be found in Section 3.3 (pages 3-4) of LAX Master Plan Final EIR Technical Report S-5, Supplemental Hydrology and Water Quality Technical Report.2

For the reasons described above, the SPAS Draft EIR properly incorporated by reference portions of other documents, including portions of the LAX Master Plan Final EIR, which is a publically-available document. As noted on page 1-105 of the SPAS Draft EIR, the documents incorporated by reference were available for public review at Los Angeles World Airports, Capital Programming and Planning Division (formerly Facilities Planning Division), One World Way, Los Angeles, CA 90045, and are also accessible via the internet at laxspas.org.

1. City of Los Angeles, Los Angeles World Airports, LAX Master Plan EIS/EIR, Hydrology and Water Quality Technical Report, January 2001, Available: http://www.ourlax.org/docs/draft_eir_NE/T06_LR .pdf, accessed December 19, 2012.
2. City of Los Angeles, Los Angeles World Airports, LAX Master Plan Supplement to the Draft EIS/EIR, Supplemental Hydrology and Water Quality Technical Report, June 2003, Available: http://www. ourlax.org/publications/supplemental/SEIS_TR_S-05.pdf, accessed December 19, 2012.

SPAS-PC00130-15

Comment:

C. Components of the Airport Revitalization Project are Improperly Segmented into Separate Review Processes.

LAWA has undertaken study of maintenance facility separate from the SPAS EIR. This facility should have been included in the DEIR and its impacts, both project specific and cumulative, analyzed. A scoping meeting about this project is scheduled for October 4, with comments due on October 15.

As reported in the Daily Breeze newspaper "Los Angeles World Airports, which operates LAX, says the maintenance complex is needed so that existing facilities in the center of the airport can make way for new terminals and airport access projects." (http://www.dailybreeze.com/news/ci_21621901/lax-begin-enviromnental-studies-proposed-aircraft-maintenance-compound?source=rss)

One of the features of this project at the west end of LAX (southeast corner of Pershing and World Way West) is a Ground Run-up Enclosure (GRE). The GRE is where aircraft are parked and the engines are turned on for testing. The proposed run-up enclosure will have three sides and no roof. This GRE could cause noise problems for El Segundo and Playa del Rey residents. There are GRE's that are fully enclosed like an aircraft hangar. This GRE should be fully enclosed GRE and have restrictions on

operating times. There will also be Group VI size aircraft hangars at this location. Who will be the tenant? Will it be Qantas Airways?

Another feature that could adversely affect Playa del Rey, Westchester and Inglewood with fugitive dust is the contractor staging yard. Quote from the ourlax.org website: "In addition, as part of the proposed Project, existing contractor staging yards and associated infrastructure equipment on the Project site would be relocated to existing LAX staging areas located to the south of Westchester Parkway and west of Lincoln Boulevard. Stockpiled materials (consisting of uncharacterized soil and construction rubble) currently existing within and immediately adjacent to the Project site, would be re-used on-site as backfill material and/or exported off-site to permitted landfills." Therefore, the cumulative dust pollution impact of this project and others contemplated must be identified and analyzed in the EIR.

Response:

LAWA published a Notice of Preparation and Initial Study for the West Aircraft Maintenance Area Project in September 2012. The West Aircraft Maintenance Area Project is identified as a cumulative airfield-related project on page 5-17 in Section 5.3.1 of the SPAS Draft EIR, and the cumulative impacts of this project, in conjunction with SPAS and other cumulative projects, are analyzed in Chapter 5 at a level of detail appropriate for a cumulative impact analysis. When the cumulative projects list for the SPAS Draft EIR was prepared, the West Aircraft Maintenance Area Project was anticipated to encompass approximately 60 acres. However, during the project planning phase, the project was expanded to include the westerly extension of Taxiway B to the western limits of the project site in order to provide primary egress from the project area. Inclusion of the Taxiway B extension in the West Aircraft Maintenance Area Project would not alter the cumulative impacts analysis provided in the SPAS Draft EIR. The West Aircraft Maintenance Area Project was addressed in the analysis of cumulative impacts to aesthetics, archaeological resources, and hydrology and water quality. Regarding aesthetics, as the taxiway extension would involve the addition of pavement adjacent to other portions of paved area associated with the West Aircraft Maintenance Area Project, and would not add any features that could affect views, no changes in cumulative aesthetic impacts would occur. Similarly, the potential for cumulative impacts to archaeological resources would be the same with the added taxiway extension as the added acreage would not result in any new cumulative impacts. The cumulative analysis of hydrology and water quality is not a quantified analysis based on acreage; therefore, the additional area associated with the West Aircraft Maintenance Area Project would not change the cumulative impact analysis. As indicated in Section 5.5.8 of the SPAS Draft EIR, implementation of the SPAS alternatives would require the Conceptual Drainage Plan (CDP) to be updated to account for changes in conditions at LAX, including changes associated with the selected SPAS alternative as well as other existing or proposed improvement projects at LAX. The CDP update would address the totality of the Western Aircraft Maintenance Area Project, including the added acreage associated with the extension of Taxiway B.

As stated in the Initial Study, the intent of the proposed West Aircraft Maintenance Area Project is to consolidate, relocate, and modernize existing aircraft maintenance facilities at LAX, particularly those that need to be replaced in conjunction with LAX Master Plan improvements. The consolidation, relocation, and modernization of these facilities would allow for more efficient and effective maintenance of existing aircraft at the airport, including Aircraft Design Group (ADG) VI aircraft (Airbus A380s and Boeing 747-8s). The comments concerning specific features and environmental effects of the West Aircraft Maintenance Area Project, including comments regarding the proposed ground run-up enclosure and questions about future tenants are beyond this scope of the SPAS EIR but may be raised during the public comment period for the West Aircraft Maintenance Area Project Draft EIR.

The area located south of Westchester Parkway and west of Lincoln Boulevard is an existing LAX construction staging area. Use of this area for construction staging associated with the SPAS alternatives is proposed in the SPAS Draft EIR. As indicated in Section 2.3.1.12 of the SPAS Draft EIR, this area is SPAS Construction Staging Area A. Environmental impacts associated with use of Construction Staging Area A are evaluated throughout the SPAS Draft EIR.

SPAS-PC00130-16

Comment:

Another project not included in the SPAS EIR is the "LAX Runway 7L/25R Runway Safety Area (RSA) Project & Associated Improvements." LAWA has issued a Notice of Availability on September 28, 2012 for the Draft Environmental Assessment with comments due by November 13, 2012. The 7L/25R runway project is listed under NEPA. Why is this project also not considered under CEQA? If Runway 7L/25R is closed for construction, then this will alter the normal air traffic pattern of aircraft landing on the outboard runways 24 Right and 25 Left and takeoffs occurring on Runways 24 Left and 25 Right. Where are the impacts of a Runway 7L/25R closure, even if for limited time periods, covered in the SPAS DEIR?

Response:

The Runway 7L/25R Runway Safety Areas project and Runway 7L/25R East End Reconstruction project are both identified as cumulative airfield-related projects on page 5-17 in Section 5.3.1 of the SPAS Draft EIR. These projects were subsequently combined and named the Proposed Runway 7L/25R Runway Safety Area Project and Associated Improvements. An Environmental Assessment for the project, prepared pursuant to NEPA, was published jointly by FAA and LAWA in September 2012. A Notice of Preparation announcing the preparation of an EIR pursuant to CEQA was published by LAWA in October 2012.

As indicated on page 3-25 of the Initial Study prepared for the Proposed Runway 7L/25R Runway Safety Area Project and Associated Improvements, which was published in conjunction with the NOP, the proposed construction sequencing for the Runway 25R reconstruction would require an approximate three-month closure of the runway. As the runway is the primary departure runway on the south airfield, the proposed closure would require shifting aircraft traffic from this runway to other runways at LAX for the duration of construction. The shift in aircraft flight patterns during the three-month period has the potential to result in significant airport noise exposure changes, causing noise levels to exceed airport noise standards in some noise-sensitive areas. The Initial Study indicates that resulting aircraft noise exposure effects will be evaluated further in the Runway 7L/25R Runway Safety Area Project and Associated Improvements Project EIR.

As stated in Section 2.8 of the Proposed Runway 7L/25R Runway Safety Area Project and Associated Improvements Initial Study, construction of the proposed project is expected to be completed within two years. As indicated on page 2-8 of the SPAS Draft EIR, construction of the SPAS improvements is not anticipated to begin until 2015. Therefore, the temporary, construction-related runway closure would not overlap with construction of any SPAS improvements, and no cumulative noise impacts would occur.

Concerns and questions regarding specific features and environmental effects of the Proposed Runway 7L/25R Runway Safety Area Project and Associated Improvements are beyond the scope of the SPAS EIR and may be raised during the public review process for that proposed project.

SPAS-PC00130-17

Comment:

D. LAWA Should Have Consulted with Public Agencies Potentially Affected By Anticipated Changes.

As lead agency, LAWA is required to consult with responsible and trustee agency with jurisdiction over resources that might be affected by LAWA's proposal. (Public Resources Code 21153(a) [lead shall consult with responsible agency]; Public Resources Code 21080.4(a) [shall send NOP to responsible agency].)

We have learned that LAWA failed to consult with, or even to notify, the Bureau of Sanitation that its sewer lines might be affected by the movement of a runway north and tunneling of Lincoln Boulevard. Denise Chow, an Environmental Engineering Associate in the Wastewater Engineering Services

Division of the Bureau of Sanitation of the City of Los Angeles confirmed on September 5, 2012 that her division had not yet received a request to review the SPAS project. Subsequent to an ARSAC request for clarification, LA Sanitation contacted LAWA Planning and confirmed that LAWA understands that the outfall sewers cannot be moved. How that knowledge impacts the rerouting of Lincoln or Sepulveda Boulevards is an unanswered question. In the Specific Plan Amendment Report Appendix G, program level cost estimates are provided, but appear to be severely underestimated given the magnitude of the work that would be involved in relocating wastewater lines.

Response:

LAWA provided a copy of the SPAS Draft EIR to the City of Los Angeles Department of Public Works, Bureau of Sanitation, for their review and received a response letter in return (SPAS-AL00002). The Bureau of Sanitation, Wastewater Engineering Services Division, had no comments regarding wastewater facilities, including sewers. Also note that the Bureau of Sanitation, Wastewater Engineering Services Division is not a Responsible Agency for the SPAS EIR.

Please see Response to Comment SPAS-PC00130-348 and Topical Response TR-SPAS-LR-1 regarding the relationship between sewer lines and the north airfield improvements and Lincoln Boulevard realignment, respectively. As indicated in those responses, none of the outfall sewers that lie beneath LAX would be affected by the SPAS alternatives. Please also see Topical Response TR-SPAS-LR-1 concerning allowances in the Lincoln Boulevard rough-order-of-magnitude (ROM) cost estimates for utility relocations.

SPAS-PC00130-18

Comment:

Additionally, there is an FAA radar site on Lincoln and McConnell. McConnell is a short street that connects Lincoln to Westchester Parkway. In Alternatives 1, 5 and 6 (DEIR pages 4-693, 4-739 and 4-749, respectively), this radar site would need to be moved to allow for Lincoln to be pushed closer to Westchester Parkway. Therefore, FAA should have to be consulted about this possible relocation.

Response:

Following approval of a SPAS alternative by the Los Angeles City Council, FAA will review the SPAS project pursuant to the National Environmental Policy Act (NEPA). Such review would include all aspects of the SPAS project, including the need to relocate navigational aids such as the radar facility referred to by the commentor. The requirement for FAA to approve this relocation is noted on page 2-74 in Section 2.4.1 of the SPAS Draft EIR. In the event that an alternative is selected that would require relocation of the FAA radar facility, FAA would have responsibility for relocation of the radar. However, the FAA is not a responsible agency for the purposes of State CEQA. (See State CEQA Guidelines Sections 15381 and 15379.)

SPAS-PC00130-19

Comment:

Was the California Department of Transportation (Caltrans) given the opportunity to review and comment on the potential need to realign by more than a mile and tunnelize California State Route 1? This would not be a minor modification or improvement to the state highway system but rather a major change.

Response:

Caltrans received a copy of the SPAS Draft EIR for review during the comment period for the Draft EIR. No comments from Caltrans were received. The need for Caltrans review and approval of the potential realignment of Lincoln Boulevard is noted on page 2-75 in Section 2.4.2 of the SPAS Draft EIR.

SPAS-PC00130-20

Comment:

E. LAWA Has Not Fully Complied with the Terms of the 2006

Settlement

In a series of communications with LAWA including Public Records Act requests, the most recent being dated July 16, 2012, we expressed concern about, and detailed how, LAWA was not complying with the terms of the 2006 Settlement agreement.

(Enclosure.) LAWA failed to consult with Petitioners even during SPAS update meetings prior to the release of the DEIR. Instead, LAWA chose to unilaterally present some, but not all, information about its plans without responding to feedback from ARSAC and others about such issues as the choice and assignments of security consultants, possible tunnelization of Lincoln Boulevard, and air quality impacts to the surrounding communities. We had hoped some of the questions and issues raised in prior correspondence would be addressed in the SPAS DEIR but find that they have not. Therefore, we renew our requests for the information below.

1. We Requested All Correspondence and Documents Related to Tunnel Projects Contemplated by LAWA.

It is our understanding that LAWA has been studying at least two tunnel locations: the Manchester Tunnel, a north-south tunnel behind the Bradley Terminal and discontiguous to under Runway 24 Right to the Argo Ditch, and a proposed tunnel on a re-aligned Lincoln Boulevard. We requested all writings regarding these tunnels within the past five years. Specifically, but not exclusively, we requested any inspection reports, test reports, memos, correspondence, drawings, plans, maps, photos and videos. As noted by ARSAC, if tunnelization of Lincoln Boulevard is proposed, those plans must be fully disclosed as part of the EIR so that they are reviewable by the public and public agencies. What inspection reports, test reports, memos, correspondence, drawings, plans, maps, photos and videos have been prepared for potential tunnelization of Lincoln Boulevard?

2. We Requested All Correspondence Between LAWA and FAA in the Past Year.

We requested all writings that LAWA received from, or sent to, FAA in the past year. We anticipated that the response to this request should include but not be limited to correspondence related to draft Advisory Circular No. 150/5300-13A. A copy of this document is posted at http://www.faa.gov/documentLibrary/media/Advisory_Circular/draft 150_5300_13a.pdf. It is our understanding the FAA is redesigning the airspace over LAX. That airspace redesign should have been fully explained in the EIR. How has FAA been proposing to redesign the airspace over LAX, and how does that affect LAWA's various proposals?

Response:

Comments regarding LAWA's compliance with the Stipulated Settlement and the Public Records Act require legal conclusions that are beyond the scope of what is required by CEQA. With respect to the Public Records Act request, LAWA has provided numerous documents in response to the referenced request, the scope of which has been modified through ongoing discussions and correspondence with ARSAC counsel.

Notwithstanding the above, please see Response to Comment SPAS-PC00130-1012 regarding what the commentor refers to as "the Manchester Tunnel."

Although Section 2.3 of the SPAS Draft EIR indicates that a portion of Lincoln Boulevard, as realigned under Alternatives 1, 5, and 6, would need to be below grade in order to meet FAA runway safety requirements for the northward realignment of Runway 6L/24R, there are no design plans for this concept as suggested by the commentor. The potential realignment of Lincoln Boulevard under these particular alternatives is currently at a conceptual level of planning and consideration. Should one of

those alternatives be selected through the SPAS process, further planning, design, and engineering would occur and more specific information would be available when project-specific CEQA documents are prepared. Please see Topical Response TR-SPAS-LR-1 for further discussion regarding the realignment of Lincoln Boulevard.

Regarding the commentor's reference to potential "airspace redesign," please see Response to Comment SPAS-PC00130-301.

SPAS-PC00130-21

Comment:

III. Attached Comments Prepared by ARSAC Members Identify Numerous Areas in Which Vital Information is Incorrect, Omitted, or Requires Further Clarification.

We are submitting herewith comments on the DEIR prepared by ARSAC and we request a response to each point raised in them. The comments and questions identify significant areas where vital information is missing. These areas include but are not limited to questions and comments about the following areas: project description; intended uses of the EIR; aesthetics, public health, air quality, traffic circulation and parking, hydrology and water quality, biological resources, hazardous materials, land use planning, wastewater, solid waste, public safety, and cultural resources impacts; and the alternatives analysis.

Response:

The comment is noted. Please see Responses to Comments SPAS-PC00130-22 through SPAS-PC00130-1051 below. In accordance with CEQA Guidelines Section 15088, LAWA has prepared written responses to all comments on environmental issues received on the SPAS Draft EIR during the public review period, including all comments submitted by ARSAC and other local community members. The written responses are thorough, detailed, and provide good faith, reasoned analyses. These responses are provided herein as part of this Final EIR. The responses to comments on the SPAS Draft EIR will be considered by the decision-makers during project deliberations.

SPAS-PC00130-22

Comment:

Significant impacts such as air quality impacts and significant traffic impacts to nine or more intersections are not unavoidable. They could be reduced or eliminated by an emphasis on regionalization including greater service at Ontario Airport to meet anticipated future demand instead of building up LAX with expanded facilities to try to provide all services.

Response:

Please refer to Topical Response TR-SPAS-REG-1 regarding the fact that LAWA, through the LAX Master Plan, the SPAS process, and other efforts, supports the regionalization of air travel demand in Southern California. As indicated therein, the LAX Specific Plan amendment proposed as part of SPAS further supports such regionalization. The subject Topical Response also discusses LA/Ontario International Airport, which is assumed within the regionalism of air travel demand.

Also, please note that the comment presents no facts or evidence showing that great service at Ontario would mitigate significant air quality and traffic impacts of the SPAS alternatives. As described in Section 6.2 of the SPAS Draft EIR, shifting LAX aviation activity to other airports could cause significant air quality and traffic impacts at those airports.

SPAS-PC00130-23

Comment:

"There must be good faith, reasoned analysis in response [to comments received]. Conclusory statements unsupported by factual information will not suffice." (CEQA Guidelines § 15088(c).) This requirement for good faith, reasoned analysis "ensures that stubborn problems or serious criticism are not swept under the rug." (Santa Clarita Organization for Planning the Environment v. County of Los Angeles (2003) 106 Cal. App. 4th 715, 732.) Inadequate responses to comments alone can be grounds for voiding a project approval. (Env. Protection Information Center. v. Johnson (1985) 170 Cal. App. 3d 604, 627.) The level of detail of responses to comments must be commensurate with the detail of the comments. (Friends of the Eel River v. Sonoma County Water Agency (2003) 108 Cal.App.4th 859, 878 ["the determination of the sufficiency of the agency's responses to comments on the draft EIR turns upon the detail required in the responses."])

Though these comments may appear detailed and comprehensive, in view of the length of the EIR, the limited time that has been allowed to reviofew it, and the difficulties accessing the documents, they represent ARSAC's best effort to provide timely comments before the October 10 deadline. Public Resources Code section 21092(b)(1) requires the City to provide "the address where copies of . . . all documents referenced in the draft environmental impact report . . . are available for review." CEQA Guidelines section 15087(c)(5) contains a similar requirement. LAWA did not make copies of the DEIR available at libraries immediately upon its release, and the electronic disc copy of the DEIR was not searchable. Additionally, documents referenced in the DEIR were not available. There are many references in general to the Alternative D EIR which is not readily available. Many of the footnoted documents were not made available. Documents that were available were not only unsearchable, but not susceptible to bookmarking, annotation or extracting pages which are all important in doing an effective review.

ARSAC may submit further comments as more information is made available or clarified. We request that these comments and questions be reviewed by LAWA and addressed. Once the information is supplied or corrected in the EIR, and a preferred alternative is chosen as the proposed project, the DEIR must be recirculated for at least 90 days to provide sufficient time for public review.

Response:

The comment is noted. In accordance with CEQA Guidelines Section 15088, LAWA has prepared written responses to all comments received on the SPAS Draft EIR, including all comments submitted by ARSAC. The written responses are thorough, detailed, and provide good faith, reasoned analyses. These responses are provided herein as part of this Final EIR. The responses to comments on the SPAS Draft EIR will be considered by the decision-makers during project deliberations.

Please see Response to Comment SPAS-AL00007-59 regarding the length of the public review period for the SPAS Draft EIR.

LAWA compiled copies of the references used in the preparation of the SPAS Draft EIR pursuant to Public Resources Code Section 21092(b)(1) and Section 15087(c)(5) of the State CEQA Guidelines, including references that were cited in footnotes to the SPAS Draft EIR. These documents were available for review at LAWA's Administrative offices during the public comment period and continue to be available for review upon request. As part of this compilation, the LAX Master Plan Final EIS/EIR, which includes an analysis of Alternative D, is available at LAWA's Administrative offices. It should be noted that electronic and hard copies of the LAX Master Plan EIS/EIR were widely distributed when the document was published; the commentor received copies of this document as part of this distribution. In addition, the document is available at www.ourlax.org and at www.laxspas.org.

The SPAS Draft EIR was available at www.laxspas.org on July 27, 2012, the first day of its release. Although not required by CEQA, copies of the SPAS Draft EIR were distributed to six area libraries. All of the libraries received discs with electronic files of the SPAS Draft EIR on or before Monday, July 30, with the exception of Hawthorne Library, which is closed on Mondays and received the electronic file on Tuesday, July 31. All of the libraries received hard copies of the SPAS Draft EIR on or before Tuesday, July 31.

The electronic version of the SPAS Draft EIR provided via disk and on www.laxspas.org is a searchable file. CEQA does not require a lead agency to provide electronic files that can be bookmarked, annotated, or otherwise manipulated.

In preparing the SPAS Final EIR, LAWA has reviewed all of the comments received, and has carefully considered the responses to these comments and other information provided in the SPAS Final EIR. None of the information provided in the SPAS Final EIR meets the criteria for recirculation of an EIR as outlined in Section 15088.5 of the State CEQA Guidelines. The identification of a preferred alternative by LAWA does not require recirculation, as the impacts of all of the SPAS alternatives were fully analyzed and disclosed in the SPAS Draft EIR. Selection of a preferred alternative does not meet any of the criteria for recirculation outlined in Section 15088.5 of the State CEQA Guidelines.

SPAS-PC00130-24

Comment:

CONCLUSION

For all of the reasons set forth above and delineated in the attached comments, the current SPAS DEIR is inadequate. The document must be revised and recirculated. Additionally, the Project cannot be approved as proposed because feasible mitigation measures and alternatives exist. As mentioned above, the Settlement Agreement is based on a good faith effort, and ARSAC is disappointed with the results of that agreement thus far. Even so, ARSAC remains committed to working with LAWA to improve and modernize LAX. Thank you for your time and consideration in this matter.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Responses to Comments SPAS-PC00130-1 through SPAS-PC00130-23 above and SPAS-PC00130-25 through SPAS-PC00130-1051 below which include responses that address additional mitigation measures and alternatives suggested by the commentor. In particular, please see Responses to Comments SPAS-PC00130-736, 800, 814, 815, 816, 843, 848, 849, and 969 which address alternatives suggested by the commentor. Please see Response to Comment SPAS-PC00130-23 regarding recirculation.

SPAS-PC00130-25

Comment:

Re: Second Request for Documents and Information to Be Provided in Compliance with February 16, 2006 Settlement Agreement in County of Riverside Case No. RIC 426822, City of El Segundo v. City of Los Angeles, and Pursuant to the Public Records Act

Dear Ms. Tracy and Mr. Haig:

Thank you for sending your letter of June 7, 2012 and providing certain documents. For clarity's sake we list out the documents we received from LAWA in response to our letter:

1. Letter dated June 7, 2012 from Los Angeles City Attorney to Chatten-Brown & Carstens
2. Req for St Lighting May 20 2009 (rec'd on 6-7-12, email from Brian Haig)
3. SPAS Advisory Committee Meeting Presentation 03-12-2012 (rec'd on 6-7-12 in email from Brian Haig)
4. Airport Regional Strategic Plan 2009 (rec'd on 6-7-12 in email from Brian Haig)
5. Airport Regional Strategic Plan 2007 (rec'd on 6-7-12 in email from Brian Haig)
6. 1st Mtg Agenda 10-12 SCRAA (rec'd on 6-7-12) in email from Brian Haig)
7. SCRAA Mailing List (rec'd on 6-7-12 in email from Brian Haig)
8. SCRAA Minutes 10 12 06 (rec'd on 6-7-12 in email from Brian Haig)
9. SCRAA PUBLIC MEETING NOTICE 101206 (rec'd on 6-7-12 in email from Brian Haig)
10. REGIONALIZATION UPDATE 12-15-11 BOAC (rec'd on 6-7-12 in email from Brian Haig)

11. 2008 REGIONALIZATION UPDATE NON-BOAC (rec'd on 6-7-12 in email from Brian Haig)
12. 2007 BOAC regionalization update (rec'd on 6-7-12 in email from Brian Haig)
13. FAA Response Letter Dated 10 2 09 Street Lights (rec'd on 6-7-12)
14. Board Report for amendmentl (rec'd on 5-29-12)
15. Board report (rec'd on 5-29-12)
16. CONTRACT CAMP DRESSER AND MCKEE INC (rec'd on 5-29-12)
17. First amendment camp dresser and mckee inc (rec'd on 5-29-12)
18. 2008_LAX_Metro_Green_Line_Task_Force_Record_Proceedings_Part5 (rec'd on 5-29-12)
19. 2008_LAX_Metro_Green_Line_Task_Force_Record_Proceedings_Part4
20. 2008_LAX_Metro_Green_Line_Task_Force_Record_Proceedings_Part3
21. 2008_LAX_Metro_Green_Line_Task_Force_Record_Proceedings_Part2
22. 2008_LAX_Metro_Green_Line_Task_Force_Record_Proceedings_Part1 (rec'd on 5-29-12)
23. Response to Chatten-Brown & Carstens-May 24, 2012 (rec'd on 5-24-12)

Please advise us if you believe LAWA sent other documents that we have not listed.

We do not believe these documents show that LAWA has complied with the Settlement Agreement. Therefore, we are both requesting further writings, and look forward to discussing with you what can be done to meet the terms of the agreement. While we appreciate LAWA's attempts to achieve compliance with the agreement, we do not intend for our comments and further requests about certain items to imply that we are satisfied that LAWA has complied with the Settlement Agreement with regard to all of its provisions. Instead, at this time we are still conducting our review of documents and considering how to obtain more complete compliance with the Agreement. Part of our hope is that the Draft Environmental Impact Report and Specific Plan Amendment Study Report whose existence was first referenced in the June 28 SPAS meeting and promised to be released simultaneously and include costing information, when they are released later in July as has been anticipated, will supply necessary information though much of it should have been made available earlier.

A. We Requested the Air Quality Apportionment Study Supporting Data, an Update on Its Status, and All Annual Contractor Progress Reports.

We note that the links to the Air Quality Apportionment Study that you provided were not provided to ARSAC until Brian Haig's email in response to our letter in June 2012. This obviously was not conducted in consultation with all Petitioners.

The links that were provided with the study do not have any data or set of conclusions from the first two and a half phases of the three phase study. We request all writings that are related to the Air Source Apportionment Study, including but not limited to the Phase I and II data and "preliminary emissions inventory" as noted on the website.

B. We Requested Documents Regarding Traffic Analysis.

Regarding traffic analysis, thank you for the lists of intersections that were added. We were not aware of other intersections that had been identified until you sent the lists contained in emails from other Petitioners. We note that lists of intersections were provided to LAWA in 2008, but these lists were not provided to all ARSAC until Brian Haig's email in response to our letter. We look forward to reviewing the SPAS DEIR's analysis of traffic issues including time phased estimated traffic counts entering the CTA from each of the three directions which were promised in several SPAS meetings from 2008 on.

C. Security Consultation Requirements Were Not Adequately Met.

We continue to disagree that security consultation with Petitioners has been adequately undertaken. LAWA has not answered the questions posed about the content, selection process, and other issues raised in ARSAC's prior letters. Slides 15-17 at the March 12 SPAS meeting do not address the scope of the security study. Slide 16 states "TranSecure may provide programmatic recommendations" but there is no more detailed information (and none provided verbally in the meeting).

D. We Requested Documents or Information Identified in Various Other Provisions of the Settlement Agreement.

You noted the provision of the "Airport Layout Plan" is pending. We look forward to reviewing that when it is made available.

With regard to our request for documents about the Regional Airport Working Group (Section VII of the Settlement Agreement), LAWA noted that SCRAA disbanded. However, SCRAA is not the only activity LAWA could or should undertake to promote regionalization. As noted, and requested, below, LAWA must also develop a regional strategic planning initiative each year to analyze potential opportunities to utilize under-utilized airports. LAWA appears to have extended one invitation and then nothing more when that did not work out.

With regard to Regional Strategic Planning (Settlement Agreement Section VIII), LAWA responded with a link and statement that the most recent report was Dec. 15, 2011 sent by Brian Haig.

It is our understanding that the initial regional strategic plan was "withdrawn" by LAWA and cancelled. LAWA has not held a regionalization meeting with petitioners for several years despite requests to do so. The BOAC presentations (2007 and 2008 BOAC regionalization updates) were status reports of LAWA efforts; they did not provide documentary back up and they did not provide specifics. We request all writings related to Regional Strategic Planning.

We requested documentation showing compliance with the requirement to operate at least eight FlyAway sites before 2015 and implement a public outreach program. LAWA responded that compliance is not required until 2015. While full compliance is not due until 2015, has there been any progress on this settlement term to date? We request all writings related to FlyAway sites.

We requested information about the conversion of LAWA and tenant GSE to low emission technology by 2015. LAWA responded that compliance is not required until 2015. While full compliance is not due until 2015, has there been any progress on this settlement term to date? We request all writings related to conversion of LAWA and tenant GSE to low emission technology.

Regarding electrification of passenger gates, LAWA responded with a list of gates in the attachment to the letter. The total number of gates listed was 133, not 158. It was our impression that there is a cap of 158 gates and that there are 158 gates at LAX. Please confirm that there are only 133 gates, or provide writings related to electrification of the other 25.

Regarding LAWA's attempt to establish a fund of $1 million to participate in street lighting projects affecting residential neighborhoods adjacent to the northern boundary of LAX, LAWA sent a copy of FAA's letter rejecting LAWA's request. After we asked, LAWA sent a copy of the letter requesting the funding. The letter did not make it clear which streets were the subject of the lighting request.

E. We Requested Information Regarding Projects LAWA Considers Not Covered By the Settlement Agreement.

LAWA did not provide any list of projects it considers to be outside the scope of the settlement agreement in response to our request. Please provide us a copy of all notices pursuant to Public Resources section 21092.2 and the Public Records Act for all projects conducted or planned by LAWA since 2006. We request such documents whether they are related to the Settlement Agreement or not.

F. We Request All Correspondence and Documents Related to Tunnel Projects Contemplated by LAWA.

It is our understanding that LAWA has been studying at least three tunnel locations: on Manchester Boulevard, a north-south tunnel behind the Bradley Terminal, and on Lincoln. We request all writings regarding these tunnels within the past five years. Specifically, but not exclusively, we request any inspection reports, test reports, memos, correspondence, drawings, plans, maps, photos and videos.

G, We Request All Correspondence Between LAWA and FAA in the Past Year.

We request all writings that LAWA received from or sent to FAA in the past year. We anticipate that the response to this request should include but not be limited to correspondence related to draft Advisory Circular No. 150/5300-13A. A copy of this document is posted at

http://wwvv.faa. gov/documentLibrary/media/Advisory_Circular/draft_150_5300_13a.pdf.

CONCLUSION

Please let us know if you would like to discuss our requests, and the schedule for supplying the requested information if it will not be possible to provide all documents within 10 days as required by the Public Records Act.

If documents are provided after July 30, we ask that you transmit them by email, or provide them to us at our new office location at 2200 Pacific Coast Highway, Suite 218, Hermosa Beach, CA 90254.

Response:

Comments regarding LAWA's compliance with the Stipulated Settlement and the Public Records Act require legal conclusions that are beyond the scope of what is required by CEQA. LAWA has provided numerous documents in response to the referenced Public Records Act request, the scope of which has been modified through ongoing discussions and correspondence with ARSAC counsel. Production has extended well beyond those documents listed in the July 2012 correspondence attached to the comment, including several boxes of documents made available for review on-site at LAX.

SPAS-PC00130-26

Comment:

We continue to want to work with you in creating the world class LAX airport that the City of Los Angeles and the region deserves.

The close of the DEIR comment period should have been a momentum building milestone in the SPAS process. Instead we are left with almost as many questions after the documents are released as before.

Many of the issues raised over the past six years remain unaddressed including those in our 2008 and 2010 Notice of Preparation comments. The response period for this DEIR has been so short that we have concentrated our efforts on the DEIR to preserve all of our legal options. The 6,000 page SPAS Report included with the DEIR release and, the Stipulated Settlement activities conduct in general, will be addressed much more comprehensively after the DEIR comment period has expired.

Response:

The comment is noted. It is acknowledged that copies of ARSAC's comment letters on the 2008 and 2010 NOPs for the SPAS Draft EIR are included as part of the comment package on the SPAS Draft EIR submitted by ARSAC. Copies of ARSAC's comment letters on the 2008 and 2010 SPAS Draft EIR NOPs are provided in the first part of Appendix A (pages 79 through 214) and the second part of Appendix A of the SPAS Draft EIR (pages 151 through 230), respectively. The comments in both NOP comment letters were considered and addressed in the SPAS Draft EIR. In addition, please see Responses to Comments SPAS-PC00130-729 through SPAS-PC00130-970 below which address each separate comment, and the issues raised, in ARSAC's comment letters on the 2008 and 2010 NOPs for the SPAS Draft EIR.

Regarding the length of the public review period, LAWA provided a 75-day review period for the SPAS Draft EIR. Public Resources Code Section 20191(a) requires that the review period for a Draft EIR that is submitted to the State Clearinghouse for review shall be at least 45 days. The review period for the SPAS Draft EIR provided an additional 30 days for public comment.

SPAS-PC00130-27

Comment:

ARSAC has difficulties with the much delayed SPAS implementation process and presented assessment but we want to facilitate the modernization of LAX as quickly as possible. To this end, we support implementation of SPAS DEIR Alternative 2 with the incorporation of Alternative 9 to reaffirm the consolidated rental car facility in Manchester Square along with a rail type connection into LAX.

We encourage LAWA to designate this combination the preferred alternative. In our opinion, this action is a "no brainer" because it meets the stated goals introduced in the DEIR and is a benefit to all stakeholders. Alternative 2 is referred to as "the Environmentally Superior Alternative," is assessed to have the most efficient times from runway to gate, lowest cost, least construction cost and schedule risks, least impact on surrounding communities, and includes the taxiway changes that provide safe operations.

Although LAWA has not yet committed to phasing or scheduling of project elements, we encourage you to start with the landside and taxiway projects which impact visitor and tourist experience while creating the greater number of much needed, permanent jobs. We ask that these projects be done first to ensure that LAWA will not run out of money or credit before the critical landside projects are completed.

Response:

The commentor's support for Alternatives 2 and 9 is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Chapter 2 of this Final EIR regarding the LAWA Staff-Recommended Alternative, which couples the airfield and terminal improvements associated with Alternative 1 with the ground access components associated with Alternative 9, including a discussion of the rationale behind the selection of these alternatives over the other alternatives evaluated in the SPAS Draft EIR. Please see Topical Response TR-SPAS-T-1 regarding transit options into LAX.

Regarding delays in the completion of SPAS, please see Response to Comment SPAS-PC00130-1018. Regarding the extent to which Alternatives 2 and 9 meet the SPAS project objectives, Table 1-2 in Chapter 1 of the SPAS Draft EIR provides a preliminary evaluation of how each alternative responds to the objectives of the SPAS. Regarding enhancements to the safety and efficiency of the airfield under each alternative, please see Table 4.7.2-16 on page 4-570 in Section 4.7.2 of the SPAS Draft EIR. As indicated in that table, the SPAS alternatives achieve substantial enhancements to safety and efficiency; the degree to which safety and efficiency is enhanced varies between the alternatives. Please also see Response to Comment SPAS-PC00089-1 regarding efficiency associated with Alternative 2 compared to other airfield alternatives. Please see Response to Comment SPAS-PC00115-1 regarding the commentor's assertion that Alternatives 2 and 9 would present the least intrusive impact on local communities and provide the lowest construction cost and construction risk.

Please see Response to Comment SPAS-PC00130-730 regarding the treatment of economic conditions in an EIR. As noted in that response, CEQA does not require an analysis of cost or project funding. (State CEQA Guidelines Section 15131; Pub. Resources Code Section 21068.) Nevertheless, the combination of Alternatives 2 and 9 is not the lowest cost design option (see Table 8-2 in Chapter 8 of the Preliminary LAX SPAS Report).

Please see Response to Comment SPAS-PC00130-41 regarding phasing, Response to Comment SPAS-PC00130-725 regarding the economic benefits of landside improvements versus runway improvements, and Response to Comment SPAS-PC00096-2 regarding funding sources for SPAS improvements.

SPAS-PC00130-28

Comment:

Less than seventy-five days ago LAWA released the DEIR and a SPAS Report consisting of over 12,000 pages causing struggle to complete a comprehensive review. LAWA chose not to facilitate our review by withholding detailed information prior to the formal release. LAWA also hindered the process

by releasing restricted use PDF document files that precluded cutting, pasting, bookmarking and extracting pages.

Response:

Please see Response to Comment SPAS-AL00007-59 regarding the length of the public review period for the SPAS Draft EIR. It should be noted that the text of the SPAS Draft EIR is approximately 1,800 pages in length. Printed appendices total approximately 3,000 pages, much of which consists of model output data sheets. Appendix K2-6, which includes intersection level of service worksheets, is provided in electronic format only and is approximately 3,000 pages in length. The text of the Preliminary LAX SPAS Report is 259 pages. Appendices to the Preliminary LAX SPAS Report are approximately 2,900 pages in length.

LAWA met with the Advisory Committee on June 28, 2012 prior to release of the SPAS Draft EIR. At this meeting, LAWA outlined the methodologies and key assumptions used in the SPAS Draft EIR, presented the preliminary analytical results, and reviewed the plans for public outreach related to the release of the SPAS Draft EIR. A Power Point presentation from this Advisory Committee meeting is provided in Appendix D-2 of the Preliminary LAX SPAS Report.

The electronic version of the SPAS Draft EIR provided via disk and on www.laxspas.org is a searchable file. CEQA does not require a lead agency to provide electronic files that can be bookmarked or from which text can be extracted. It should be noted that Councilman Bill Rosendahl requested a searchable file of the SPAS Draft EIR, which was provided to him.

SPAS-PC00130-29

Comment:

There are several major issues which we want to highlight to you and by including this letter in our DEIR Comments request responses for the final EIR.

Response:

The comment is noted. Please see Responses to Comments SPAS-PC00130-30 through SPAS-PC00130-44 below.

SPAS-PC00130-30

Comment:

The Master Plan Vision is Incomplete.
Many of our community leaders predate the current round of program planning and the establishment of LAX Specific Plan whereas the present LAWA management team is "relatively new." We fear that LAWA corporate knowledge continuity of promises made to the community has been lost. Perhaps LAWA is unaware that the overriding purpose of the 2006 Stipulated Settlement is to develop a total Master Plan for LAX which revises Alternative D with elements that are of no greater impact on the surrounding communities. That intent is thwarted within the current DEIR and preliminary report that is neither comprehensive nor fully accurate.
- Nowhere in any of the SPAS DEIR is a Master Plan that provides the total vision for the future of LAX. In fact, several new elements are referred to in the documents as being out of the scope of the DEIR such as terminals 1.5 and terminals 2.5, and passenger support areas in the CTA such as tearing down parking structures P3 and P4 to build a Tom Bradley International passenger processing area. Further, elements such as the recently released NOP for the West Aircraft Maintenance Area are not even included in the overall program level plan discussions. Master Plan Alternative D contains two taxiways to connect the north and south runway complexes, R and S, but only S has been constructed. We understand that taxiway R will be built sometime in the future using some unrevealed trigger condition but that the evaluations assume both are in place. Your staff likely has more examples since we are not privy to LAWA future construction planning such as Belford Square which LAWA now owns but whose purpose has not been revealed.

Response:

As stated in Section V.D of the Stipulated Settlement, and restated on page 1-9 of the SPAS Draft EIR, LAWA is required to focus the LAX Specific Plan Amendment Study on the following:

1. Potential alternative designs, technologies, and configurations for the LAX Master Plan Program that would provide solutions to the problems that the Yellow Light Projects were designed to address, consistent with a practical capacity of LAX at 78.9 MAP (the Alternative Projects).
2. Security, traffic, and aviation activity of such alternative designs, technologies, and configurations for the Alternative Projects.
3. Potential environmental impacts that could result from replacement of the Yellow Light Projects with the Alternative Projects, and potential mitigation measures that could provide a comparable level of mitigation to that described for the Yellow Light Projects in the LAX Master Plan Program EIR.

Consistent with the provisions of the Stipulated Settlement, the purpose of SPAS is to focus on the Yellow Light Projects, not to develop a "total Master Plan for LAX." If one of the SPAS alternatives, other than Alternative 3, is approved by BOAC and the City Council, then the LAX Specific Plan would be amended to reflect the projects associated with that alternative. Other applicable, adopted plans would be amended, as necessary, to ensure precise consistency among applicable plans. Amendments to ensure plan consistency are summarized on page 1-82 in Chapter 1 of the SPAS Draft EIR. The Stipulated Settlement does not state that Alternative D is to be revised with "elements that are of no greater impact on the surrounding communities." Rather, as noted above, Section V.D.3 requires LAWA to study "potential mitigation measures that could provide a comparable level of mitigation to that described for the Yellow Light Projects in the LAX Master Plan Program EIR." Section V.C requires LAWA to identify Specific Plan amendments in a manner that includes minimizing environmental impacts on the surrounding communities. Consistent with this provision of the Stipulated Settlement, the SPAS Draft EIR addresses the environmental impacts associated with the alternatives and identifies mitigation that minimizes adverse environmental effects.

Although non-Yellow Light Master Plan projects and non-Master Plan projects are not the subject of the SPAS Draft EIR, the EIR does consider all past, present, and reasonably foreseeable projects as cumulative projects subject to analysis in the SPAS Draft EIR in Chapter 5. Please see Response to Comment SPAS-AL00007-44 concerning airfield- and terminal-related cumulative projects. Specifically, page 5-18 of the SPAS Draft EIR identifies both the North Terminals Improvements, also referred to as Terminals 1.5 and 2.5, and the Midfield Satellite Concourse Program, including the new passenger processor within the CTA, as cumulative projects. As noted in Response to Comment SPAS-AL00007-44, these cumulative projects, as well as other airfield- and terminal-related projects, were assumed in the simulation analysis of future conditions with implementation of the SPAS alternatives. Therefore, the simulation analysis represents future conditions with the airfield and terminal changes associated with each of the SPAS alternatives as well as changes associated with these cumulative projects. The West Aircraft Maintenance Project is also included in the cumulative projects list (see page 5-17 of the SPAS Draft EIR), as are the north-south taxiways Taxiways S and T (also on page 5-17 of the SPAS Draft EIR), which are located immediately west of the Bradley West Project and will replace the former Taxiways Q and S, which previously existed immediately west of TBIT. (It should be noted that Taxiway R, formerly referred to as the Crossfield Taxiway Project, was completed in 2010.) Please see Response to Comment SPAS-PC00130-15 regarding the cumulative analysis pertaining to the West Aircraft Maintenance Area Project. No future land uses are assumed for the Belford area in the SPAS Draft EIR as LAWA has no development plans at this time for this property; any assumptions regarding future land uses would be purely speculative. A comprehensive list of all past, present, and reasonably-foreseeable future LAWA projects is provided in Section 5.3 of the SPAS Draft EIR.

By considering all past, present, and reasonably foreseeable airport and non-airport projects in the analysis of cumulative impacts, the SPAS Draft EIR is complete and accurate with regards to cumulative impacts.

SPAS-PC00130-31

Comment:

- For us to have provided more effective solution suggestions, it would have been helpful for us to have LAWA planned major maintenance ideas of the magnitude of the Central Utilities Plant or identified, but not fully scoped upper roadway repairs.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. As noted in Response to Comment SPAS-PC00130-30, Section 5.3 of the SPAS Draft EIR includes a comprehensive list of past, present, and reasonably foreseeable cumulative development projects at LAX, including the Central Utility Plant, the CTA Second Level Roadway Expansion Joint and Deck Repairs, and many other LAX airfield, terminal, infrastructure, security, land development, and miscellaneous projects.

SPAS-PC00130-32

Comment:

- The Settlement presents a list of the Yellow Light projects. It was expected (and requested by ARSAC numerous times over the past six years) that LAWA identify and quantify the specific parameters that the Yellow Light Projects had resolved so that we could ensure that the updated Master Plan properly addressed them. This was not intended to be a carte blanche for LAWA to create a new set of goals for Master Planning and to ignore the requirement not to be more intrusive on local communities.

Response:

The problems the Yellow Light Projects were designed to address were identified in the 2008 SPAS NOP and the 2010 SPAS NOP. The SPAS Draft EIR discusses, in detail, the specific problems that the Yellow Light Projects were designed to address. (Section 2.3 of the SPAS Draft EIR.) However, identification of the problems the Yellow Light Projects were designed to address does not absolve LAWA from developing objectives for the SPAS alternatives and, LAWA is obligated under CEQA to provide a statement of objectives sought by the SPAS alternatives. (See Section 15124(b) of the State CEQA Guidelines.) Comments regarding LAWA's compliance with the Stipulated Settlement require legal conclusions that are beyond the scope of what is required by CEQA. However, LAWA has not ignored the requirement in Section V.C of the Stipulated Settlement to plan for modernization and improvement of LAX while minimizing environmental impacts on the surrounding communities. For instance, as provided in Section 2.2 of the SPAS Draft EIR, a SPAS project objective is to minimize environmental impacts on surrounding communities. The SPAS Draft EIR identifies a comprehensive set of applicable LAX Master Plan commitments and mitigation measures, as well as SPAS-specific mitigation measures, that would reduce or eliminate significant impacts, many of which are directed at managing environmental impacts on surrounding communities. The extent to which each SPAS alternative would provide solutions to the problems the Yellow Light Projects were designed to address is addressed in Chapter 6 of the Preliminary LAX SPAS Report.

SPAS-PC00130-33

Comment:

The SPAS Matrix of Projects fails to provide a unique project for comments and questions.
The mix and match approach doesn't focus on only one vision. As such, we are unable to determine the interrelationship of the elements within the environmental assessments made by LAWA. In order to present specific questions we are forced to make several assumptions about what LAWA has included in its detailed analyses. The assumptions made at the sub element level are not directly specified in the detail appendices.

Response:

Please see Responses to Comments SPAS-AL00007-6, SPAS-AL00008-3, and SPAS-AL00008-26 for an explanation of why the analysis of nine alternatives in the SPAS Draft EIR instead of a single

proposed project was consistent with CEQA's requirements and facilitated public review of the alternatives. The commentor does not identify any specific assumptions that the commentor had to make regarding the analysis presented in the SPAS Draft EIR. Methodologies and assumptions used in the various analyses are identified in Chapter 4 of the SPAS Draft EIR, with details provided in the appendices.

SPAS-PC00130-34

Comment:

Inadequate Solutions are Evaluated and it appears SPAS generated suggestions were ignored.
Throughout the document LAWA has indicated that there are significant and unavoidable impacts which are driven by the projected increase in LAX passenger use or aircraft operation assumptions. LAWA in many cases didn't even address cargo increase impacts. LAWA appears to have used the increased use of LAX and its attendant overwhelming impacts as a reason to not change basic approaches. In the traffic section and appendices, for instance, LAWA created matrices of scenarios for various sub elements and then analyzed the pros and cons of each approach. Which elements were assumed in the evaluation calculations, however was never highlighted.
- Never is there any mention of the extensive traffic discussions held in the SPAS meetings which provided innovative impact solutions. One example is the diversion of traffic from the 96th Street bridge into the Park One area and creating paths for allowing Terminal One passenger vehicles to leave the area directly onto Sepulveda without going through the CTA loop. This is known as the "Front Door Terminal Concept." Another is the traffic flow changes recommended by the Petitioners in the drawings made by HNTB for us and given to LAWA. Yet another was the rerouting of traffic from the 405 to the underutilized LaCienega Boulevard which runs parallel to the 405 beyond Manchester Avenue to Century.

Response:

Vehicle trips associated with cargo operations at LAX were included in the SPAS Draft EIR traffic analysis. As indicated in Table 4.12.2-9 of the SPAS Draft EIR, a growth factor of approximately 146 percent was assumed for cargo operations for future (2025) conditions, compared to baseline (2009) conditions. As correctly noted by the commentor, this growth in cargo activity is anticipated to occur irrespective of the SPAS alternatives.

The traffic analyses in Sections 4.12.1 and 4.12.2 of the SPAS Draft EIR include a number of tables comparing the traffic impacts of the SPAS alternatives; presumably, these are the "matrices" the commentor references. The traffic analyses presented therein address the impacts associated with the ground transportation system improvements specific to each SPAS alternative, as explained in the methodology discussion subsection of each section. The specific elements of the ground transportation system improvements proposed under each alternative are delineated in the project description (Section 2.3 of the SPAS Draft EIR), and are carried forth throughout the entire impact analysis.

As explained in Chapters 4 and 5 of the Preliminary LAX SPAS Report, LAWA did review and consider the input received from the public and the SPAS Advisory Committee during formulation of the SPAS concept alternatives. Regarding what the commentor refers to as the "Front Door Terminal Concept" please see Response to Comment SPAS-PC00130-93 for the reasons why such a concept would not provide a feasible and effective means of improving traffic conditions within the CTA, and, if anything, could adversely affect traffic on Sepulveda Boulevard. Regarding potential traffic flow changes, such as suggested to occur under the ARSAC alternative concept calling for an elevated roadway system serving LAX, please see Response to Comment SPAS-PC00130-814.

Access from Interstate 405 (I-405) onto La Cienega Boulevard is already available through several existing interchanges in the vicinity of LAX including from southbound lanes of the I-405 just north of Florence Avenue, as well as near 97th Place, and between Century Boulevard and 104th Street. Northbound traffic on the I-405 near LAX can access La Cienega Boulevard by traveling west from the exits at El Segundo Boulevard, Imperial Highway, and Century Boulevard. With regard to the commentor's specific recommendation to reroute traffic from the I-405 to La Cienega Boulevard at the interchange north of Manchester Boulevard, there is currently an informational guide sign on the southbound I-405 indicating "LAX Airport Next 2 Exits." The first of those two subject exits is the

Florence Avenue/Manchester Boulevard exit that links directly to La Cienega Boulevard, and there are way-finding signs along the route to guide drivers to LAX. The subject informational sign is located on the west side of the freeway approximately 100 feet north of the overhead sign that indicates "Inglewood NEXT EXIT." It should be noted that the subject sign was installed by Caltrans in 2006 to replace the previous freeway informational guide sign that was located farther north and indicated "LAX Airport Next 5 Exits." The replacement/relocation of the freeway informational guide sign for LAX was initiated in response to concerns expressed by several residents in Westchester, including the commentor, that felt the then existing guide sign caused airport-bound traffic to travel south on Sepulveda Boulevard through Westchester in lieu of traveling on Century Boulevard.1 The current freeway informational guide sign informs drivers of alternative routes to LAX and directs airport-bound traffic from the I-405 and on to La Cienega Boulevard, especially if/when there is congestion on the southbound I-405 near LAX (i.e., airport-bound drivers are more likely to exit the freeway and take the subject alternate route).

1. E-mail correspondence on March 16, 2006 from Yunus Ghausi, Senior Transportation Engineer, Caltrans Office of Traffic Investigations to Patrick Tomcheck and Michael Doucette of LAWA.

SPAS-PC00130-35

Comment:

Northern Runway Movement impacts not fully evaluated or disclosed.
The DEIR states in general terms that movements of Lincoln Boulevard, changes to the ARGO Flood Control Channel, and removal of a decommissioned 740' Manchester Tunnel that extended Lincoln Boulevard to approximately where Runway 24L exists would be required if a runway is moved north. The DEIR assumed that the Runway Protection Zone areas would not be fully enforced. It never addressed the upcoming changes in the FAA Advisory Circular 150/5300-13A Airports Design to be released at the end of September 2012 or the FAA airspace redesign efforts in process.

Response:

Section 4.7.2 of the SPAS Draft EIR addresses impacts associated with changes in the RPZ boundaries under the SPAS alternatives. The comment is unclear as to how or why it is felt that "The DEIR assumed that the Runway Protection Zone areas would not be fully enforced" as there is no such statement or implication within the SPAS Draft EIR. The SPAS Draft EIR delineates the nature and location of existing uses within the RPZs for each alternative, notes the potential safety implications of such uses within the RPZ, and describes potential options for addressing substantial safety hazards, if any, of incompatible structures or uses within the RPZ. While the SPAS planning and analysis is only at the program level at this time, the SPAS Draft EIR discussion of FAA design standards is based on the current standards. The detailed design of airport improvements, which would occur in the future, would be based on the FAA standards in effect at that that time. Although FAA is currently considering certain amendments to FAA Advisory Circular 150/5300, many of those amendments are still in the preliminary stages and have not been adopted. Relative to land uses within an RPZ, the FAA is currently developing a new guidance document for the Regional Office (RO) and Airport District Office (ADO) staff that is anticipated to clarify FAA's policy for existing and proposed uses within an RPZ and is slated for publication in 2013.1 In the meantime, FAA RO and ADO staff are to continue working with airport sponsors (i.e., airport operators such as LAWA) to remove or mitigate the risk of any existing incompatible land uses in the RPZ as practical.

1. Federal Aviation Administration, Interim Guidance on Land Uses Within a Runway Protection Zone, September 27, 2012, Available: http://www.faa.gov/airports/planning_capacity/media/interimLandUseRPZGuidance.pdf, accessed November 3, 2012.

SPAS-PC00130-36

Comment:

Air Quality studies in process for the past five years were ignored.

The overdue Air Quality and Apportionment Study that is currently three years in arrears is not even mentioned in the air quality evaluation sections of the DEIR. Since LAWA is now saying that the last phase of the comprehensive study would be complete in the first quarter of 2013 there should have been some useful data available.

Response:

LAWA has committed to conduct a study to determine and quantify LAX's contribution to air pollutant impacts on neighborhoods surrounding the airport by conducting the LAX Air Quality and Source Apportionment Study (AQSAS), pursuant to the Community Benefits Agreement, Section VII. The study is not tied to any specific LAX project, since the timing of the study could be affected by events outside of LAWA's control (such as the events of 9/11 which delayed the original study implementation). In addition, the LAX AQSAS uses methodologies and techniques that are research oriented, state-of-the-art, and, sometimes different than USEPA-approved methods for analyzing pollutant concentrations for comparison to ambient air quality standards.

The LAX AQSAS is overseen by the study's Technical Working Group. The Technical Working Group provides oversight of the technical quality of the AQSAS and is comprised of air quality scientists, researchers, and engineers from the U.S. Environmental Protection Agency (U.S. EPA), California Air Resources Board (CARB), South Coast Air Quality Management District (SCAQMD), State of California Office of Environmental Health Hazard Assessment (OEHHA), Federal Aviation Administration (FAA), and community organizations.

The LAX AQSAS is currently in its third and final phase, including monitoring at numerous locations in the communities around the airport, conducting laboratory analyses, applying receptor modeling techniques to the monitored data, interpreting the results, and preparing the final report. LAWA has committed to publish the study final report in the spring of 2013. The project status can be viewed at: http://www.lawa.org/welcome_LAX.aspx?id=1066.

SPAS-PC00130-37

Comment:

Cost Estimates for various protects are questionable.
Although not normally a part of the DEIR, this important issue was included in the SPAS Report and therefore relevant to this discussion.
- In 2008 LAWA started to provide cost estimates. That effort was suspended and not restarted when we pointed out to LAWA that the estimates demonstrated that it was more expensive to "not move a runway at all" than to pour concrete, move utilities, and to implement all of the other necessary changes.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. As noted by the commentor, cost estimates are not normally part of a Draft EIR. Please see Response to Comment SPAS-PC00130-730 regarding the treatment of economic conditions in an EIR, including costs of proposed improvements. As noted in that response, CEQA does not require an analysis of cost or project funding. (CEQA Guidelines Section 15131; Pub. Resources Code Section 21068.) Nevertheless, cost estimates were prepared during SPAS and are provided in Chapter 8 of the Preliminary LAX SPAS Report, with details included in Appendix G.

SPAS-PC00130-38

Comment:

- The current report has a cost chart that is used extensively in all of the presentations made by LAWA. In the June 28, 2012 SPAS meeting with the Petitioners LAWA presented this chart and, after questions, admitted that several major cost factors were not included that should have been to provide a comprehensive picture. Despite knowing the inadequacies LAWA continues to present this same

chart without noting limitations at presentations to BOAC, formal SPAS DEIR comment hearings and the recent Neighborhood Council Westchester-Playa Town hall.

Response:

An EIR shall inform decision-makers and the public about the potential significant environmental effects of the proposed project and identify means to reduce, avoid, or mitigate environmental damage. (State CEQA Guidelines Section 15002(a).) The comment does not raise any environmental issue or address the adequacy of the environmental analysis included in the SPAS Draft EIR. It raises funding and economic questions, which need not be discussed because economic effects of a project shall not be treated as significant effects on the environment. (State CEQA Guidelines Section 15131(a).) Because a lead agency need only respond to comments that raise significant environmental issues, no further response is required. (State CEQA Guidelines Section 15204.) However, rough-order-of-magnitude cost estimates were prepared during the SPAS process and are provided in Chapter 8 of the Preliminary LAX SPAS Report, with detailed information provided in Appendix G. Preliminary costs associated with all of the SPAS alternatives were presented to the Board of Airport Commissioners on June 18, 2012 and to the SPAS Advisory Committee at a meeting on June 28, 2012. At the Advisory Committee meeting, LAWA noted that the costs that had been presented to BOAC were still being refined at the time of the presentation as part of completion of the SPAS process, and that the costs associated with Alternative 9 (which included SPAS-related land acquisition) had been revised slightly upward since the BOAC presentation. These refinements were completed prior to the Advisory Committee meeting, at which time the updated cost estimates for Alternative 9 were presented. The costs for Alternative 9 presented to BOAC were slightly less than $2,000,000,000, whereas the costs presented to the Advisory Committee for this alternative were slightly higher than $2,000,000,000. The costs presented to the Advisory Committee are consistent with the costs presented in the Preliminary LAX SPAS Report. As indicated in Table 8-2 of the Preliminary LAX SPAS Report, estimated costs associated with the ground access improvements and land acquisition under Alternative 9 (rows c through f) total $2,315,434 in escalated dollars. The cost estimates have not been revised since the version presented to the Advisory Committee on June 28th. Moreover, the cost estimates presented to BOAC on June 18 have not been used in subsequent presentations by LAWA.

SPAS-PC00130-39

Comment:

- We are including lots of cost comment questions to the DEIR questions to clarify assumptions made and to get a better picture of the cost impact differences of the various runway movement amounts. This includes the impacts of underground utilities including sewers (both movable and those too expensive to move), gas lines, power lines, water channels, tunnels, etc.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. The comment discusses funding and economic issues, which are not significant environmental impacts under CEQA. CEQA does not require an analysis of cost or project funding. (State CEQA Guidelines Section 15131; Pub. Resources Code Section 21068.) Nevertheless, LAWA has provided responses to comments concerning cost estimates and funding for informational purposes. Other comments pertaining to cost included in this comment letter include, but are not necessarily limited to, SPAS-PC00130-37, SPAS-PC00130-38, SPAS-PC00130-77, SPAS-PC00130-500, SPAS-PC00130-507, SPAS-PC00130-517, SPAS-PC00130-572, SPAS-PC00130-582, SPAS-PC00130-751, and SPAS-PC00130-1012.

SPAS-PC00130-40

Comment:

- We know that the costs needed to bring LAX up to "World Class" will be substantial.

Although it is not a CEQA requirement, it is important for decision makers to have this information. Will there be enough money to complete all of the tasks? We are concerned that even with FAA grants the cost to implement the needed changes are tremendous and work could be limited by available credit.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. The comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR. (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)). As noted by the commentor, considerations of cost and financing are not normally part of a Draft EIR. (State CEQA Guidelines Section 15131; Pub. Resources Code Section 21068.) The EIR provides a sufficient degree of analysis to provide decision-makers with information which enables them to make a decision which intelligently takes account of environmental consequences of the project. (State CEQA Guidelines Section 15151.) Please see Response to Comment SPAS-PC00130-730 regarding the treatment of economic conditions in an EIR, including costs of proposed improvements. Nevertheless, LAWA provided a detailed account of the financial requirements of each of the alternatives in Chapter 8 of the Preliminary LAX SPAS Report, with backup information included in Appendix G. If assumed funding sources are not available in the future, certain projects would be deferred until funds become available. (Section 8.6 of the Preliminary LAX SPAS Report.) A more detailed discussion of the funding assumptions for the project is provided in Section 8 of the Preliminary LAX SPAS Report. Please also see Response to Comment SPAS-PC00096-2 regarding funding sources for SPAS improvements.

SPAS-PC00130-41

Comment:

We understand that time phasing is not normally a requirement of a DEIR, but again this is critical to decision makers. Even if not part of the DEIR, please present as part of SPAS a time phasing of how LAWA would complete its projects. As you heard often at the hearings and town hall we encourage LAWA to start with landside and critical taxiway improvements before going to any risky construction projects associated with moving runways.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. The comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR; therefore, no further response is required. (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)). Nevertheless, the discussion below is provided for informational purposes.

As stated on page 2-8 of the SPAS Draft EIR, the nine SPAS alternatives addressed within the SPAS Draft EIR were formulated at a programmatic level of conceptual planning. At this level of planning, detailed information about the SPAS alternatives, including construction phasing plans, sequencing of projects, and construction scheduling, has not yet been determined, nor are such details required in order to analyze the environmental impacts of the SPAS alternatives. In general, however, it is anticipated that all of the improvements proposed under each alternative would be completed by 2025, with construction beginning in 2015. LAWA will determine the phasing of SPAS projects based on a number of factors, including operational needs, facility requirements, construction sequencing, financing, and other factors. Please see Responses to Comments SPAS-PC00130-142 and SPAS-PC00130-235 for a discussion of the programmatic review conducted for the SPAS project. As indicated in that response, generally speaking, program EIRs analyze broad environmental effects of the program. (State CEQA Guidelines Section 15168.) An EIR is not required to speculate about the environmental consequences of future development that is unspecified or uncertain, and such an analysis should be done when future actions are sufficiently well-defined that it is feasible to evaluate their potential impacts. (Environmental Protection Info. Ctr. v. Department of Forestry & Fire Protection (2008) 44 Cal.4th 459, 502.) LAWA's preparation of a programmatic analysis of the SPAS project was appropriate and consistent with the level of detail currently known about the various SPAS alternatives.

The commentor provides no substantiation of the statement that relocation of runways would constitute a "risky construction project." Please see Response to Comment SPAS-PC00130-725 regarding the benefits of terminal improvements versus runway improvements.

SPAS-PC00130-42

Comment:

General impacts not fully disclosed.
What assumptions has LAWA made about runway protection zones implementation? How much residential and business areas will be impacted with removal? How much residential and business area will be in the RPZ but remain with aircraft landing and taking off over or just adjacent to them?

Response:

Section 4.7.2 of the SPAS Draft EIR addresses the direct impacts from changes in the RPZ under each SPAS alternative, as well as the potential secondary or indirect impacts associated with measures to address potential airspace obstructions or incompatible structures/uses within RPZ areas. Figures 4.7.2-3 and 4.7.2-4 delineate the RPZ boundaries for baseline (2010) conditions and the nature and location of land uses therein, and Figures 4.7.2-6 through 4.7.2-19 provide such information for each alternative (i.e., Alternatives 1 through 7). Included in those figures is a clear delineation of the runway relocations and improvements proposed under each alternative, which provides the reader with an understanding of the physical relationship between the runway and the land uses nearby (i.e., so that the reader can approximate the location of aircraft landing or taking off relative to uses in the general vicinity).

SPAS-PC00130-43

Comment:

If Lincoln is moved and lowered to some level in avoidance of the outfall sewers that can't be moved how will that impact the Sepulveda Business District?

Response:

Please see Topical Response TR-SPAS-LR-1 for a discussion of the Lincoln Boulevard realignment associated with Alternatives 1, 5, and 6.

SPAS-PC00130-44

Comment:

The Regionalization Component of the LAX Master Plan has been ignored.
A tenant of the entire process to update the LAX Master Plan is to incorporate LAX into a regional network of airports to improve capacity, and drive down the impacts of air commerce. The idea is to create alternatives to having just one vulnerable airport handle the majority of the air commerce (as is the case with LAX currently) and to expedite an effective back up plan. To date the best candidates to foster regionalization, LA/Ontario and LA/Palmdale have been far less than genuine. The alternatives considered as part of this DEIR did not include a regionalization component. For that reason we have pushed for the local control of these airports.

While it is bad enough to ignore regionalization, it is a flagrant violation to work in direct opposition to a term of the Settlement Agreement. LAWA listed "SPAS Project Goal 3" as enhancing LAX capacity.

Response:

Please refer to Topical Response TR-SPAS-REG-1 regarding the fact that LAWA, through the LAX Master Plan, the SPAS process, and multiple other efforts, supports the regionalization of air travel demand in Southern California. The topical response also explains why regionalization was not considered as a SPAS objective, but was considered as part of the SPAS alternatives themselves, as

well as in the context of potential revisions to Section 7H of the LAX Specific Plan. Also provided therein are discussions related to LA/Ontario International Airport, Palmdale Regional Airport, and LAWA's direct involvement in efforts regarding regionalization. Also, please note that this comment does not raise any new significant environmental issues or address the adequacy of the analysis included in the SPAS Draft EIR. (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15205(a)).

It is unclear as to what the commentor is referring to in indicating that "LAWA listed 'SPAS Project Goal 3' as enhancing LAX capacity" as no such statement or inference is contained in Project Objective 3 or in any other project objective presented in Section 2.2 of the SPAS Draft EIR.

SPAS-PC00130-45

Comment:

The questions in this letter are requested to be addressed as part of the DEIR process. Additional questions are also attached in the ARSAC submittal with this letter for LAWA to address before moving forward into the approval process.

Response:

The comment is noted. Please see Responses to Comments SPAS-PC00130-1 through SPAS-PC00130-44 above and SPAS-PC00130-46 through SPAS-PC00130-1051 below. In accordance with State CEQA Guidelines Section 15088, LAWA has prepared written responses to all comments received on the SPAS Draft EIR during the public review period, including all comments submitted by ARSAC. The written responses are thorough, detailed, and provide good faith, reasoned analyses. These responses are provided herein as part of this Final EIR. The responses to comments on the SPAS Draft EIR will be considered by the decision-makers during project deliberations.

SPAS-PC00130-46

Comment:

Summary of the LAX Specific Plan Amendment Alternatives in the 8-2012 DEIR (ARSAC Generated www.RegionalSolution.org)

Alt #	Alternative Name/Comments	Characteristics
1	**LAWA Mgmt Preferred "Fully Integrated" Alternative** - *Displaces businesses and homes - Risky construction factors; could be very costly in time and delays - Fixes little traffic or CTA access -Major underground utilities, sewer, and tunnel impacts*	**Moves Runway 24R (outboard)-260' N and 600' W (width to 200'), Moves Runway 24L (inboard)-1250' E,** **Adds Centerfield Taxiway** **Reconfigures taxiways and taxilanes to accommodate bigger aircraft** **Moves Terminal 3 40' W, Adds Terminal 0 and extends TB IT and Mid Concourse Terminals N** **Argo Flood Channel enclosed** **Eliminated ConRAC** **Lincoln Blvd repositioned to sub terrain or tunnel and new Sepulveda interface** **Impacts business district and homes** **Redesigned 96th St. Entrance into Park One**
2	**No Runway Movement "Fully Integrated" Alternative** *-Most affordable* *-Does little for traffic and CTA access*	**Leaves Runways in current location** **Reconfigures taxiways and taxilanes to accommodate bigger aircraft Adds Terminal 0 and extends TB IT and Mid Concourse Terminals N No ConRAC** **Redesigned 96th St. Entrance into Park One** **Lincoln Blvd/Sepulveda Blvd interface intact**

3	**City Approved Alt D** **"Fully Integrated" Alternative** *-NOT AFFORDABLE. Cost has risen from $12B 2004 approval time estimate at to over $100* ***B*** *in eight years*	**Extends Runway 24R (outboard) 1,495 feet west** **Moves Runway 24L (inboard) 340' S and adds Centerfield taxiway** **Reconfigures taxiways and taxilanes to accommodate bigger aircraft** **ConRAC in Lot C** **Ground Transportation Center in Manchester Square with baggage tunnel to Central Terminal Area** **Central Terminal Area Closed to traffic** **Integrated Transportation Center in Continental City** **Lincoln Blvd/Sepulveda Blvd interface intact**
4	**Alt D Green light projects w misc. projects; No yellow** **"Fully Integrated" Alternative** *-Limited runway movement* *-No runway movement North* *-Least impacts or cost* *-Does little for traffic and CTA access*	**Leaves Runway 24R in current location** **Move Runway 24L (inboard)- 835 ' E** **No Centerfield taxiway** **Argo Flood Channel partially enclosed** **Linclon Blvd/Sepulveda Blvd interface left intact** **ConRAC in Manchester Square** **No Taxiways or taxilanes reconfigured** **No Terminal Changes** **Lincoln Blvd/Sepulveda Blvd interface intact**
5	**Airfield Mod 350' N** **"Airfield Change Alternative"** *-Greatest impacts north businesses and residents/major move of flight path north* *-Risky construction factors; could be very costly in time and delays* *-Does little for traffic and CTA access*	**Move Runway 24R (outboard)-350' N and 604' W (increase to 200' wide)** **Move Runway 24L (inboard)- 1250 ' E** **Adds Centerfield Taxiway** **Moves Terminal 3 40' W, Adds Terminal 0 and extends TB IT and Mid Concourse Terminals N** **Argo Flood Channel enclosed (9857')** **Lincoln Blvd sub terrain and moved/new Sepulveda connect** **Impacts business district and homes**

		All west remote gates eliminated **Compatible with ground access in Alts 1,2,8, & 9**
6	**Airfield Mod 100' N** **"Airfield Change Alternative"** - *Impacts north businesses and residents/major move of flight path north* *-Risky construction factors; could be very costly in time and delays* *-Does little for traffic and CTA access*	**Move Runway 24R (outboard)-100' N (no extension or widening) Move Runway 24L (inboard)- 1250 ' E** **Adds Centerfield Taxiway** **Reconfigures taxiways and taxilanes to accommodate bigger aircraft Argo Flood Channel partially enclosed (1400')** **Lincoln Blvd sub terrain and moved/new Sepulveda connect Impacts business district and homes** **Adds Terminal 0 and extends TB IT and Mid Concourse Terminals N All west remote gates eliminated** **Compatible with ground access in Alts 1,2,8, & 9**
7	**Airfield Mod 100' S** **"Airfield Change Alternative"** - *Avoids construction risks of tunnel, roadway moves, sewers*	**Runway 24R (outboard)- no extension or widening** **Move Runway 24L (inboard)- 100' S and extend 1250 ' E (widen to 200')** **Adds Centerfield Taxiway** **Reconfigures taxiways and taxilanes to accommodate bigger aircraft** **All west remote gates eliminated** **No Business district or home impact** **Adds Terminal 0 and extends TB IT and Mid Concourse Terminals N** **Compatible with ground access in Alts 1,2,8, & 9**
8	**Consolidated Rental Car - bus** **"Ground Alternative"** *-fails to reduce CTA traffic - collected $ reimbursement req'd*	**Removes ConRAC** **Places Parking in Manchester Square** **(must be combined with others to establish full Master Plan)**

9	**Consolidated Rental Car - peo mov "Ground Alternative"** - *reduces CTA traffic*	**Moves ConRAC to Manchester Square from Lot C (as approved in Alt D) (must be combined with others to establish full Master Plan)**

Response:

This comment provides a summary of the SPAS alternatives prepared by the commentor. This response addresses inaccuracies in this summary.

Regarding the comments pertaining to Alternative 1, this alternative was not designated as the preferred alternative of LAWA Management in the SPAS Draft EIR. In fact, the SPAS Draft EIR did not designate a preferred alternative. However, after publication of the SPAS Draft EIR, a staff-recommended alternative was identified. Please see Chapter 2 of this Final EIR regarding the LAWA Staff-Recommended Alternative, which couples the airfield and terminal improvements associated with Alternative 1 with the ground access components associated with Alternative 9, including a discussion of the rationale behind the selection of these alternatives over the other alternatives evaluated in the SPAS Draft EIR. Property acquisition associated with Alternative 1 is identified in Tables 2-4 and 2-5 and Figures 2-11 and 2-12 of the SPAS Draft EIR. While Alternative 1 would require the acquisition of several businesses located east of the CTA, no homes would be displaced. Alternative 1 would not require any more business acquisition than any other alternative. Please see Response to Comment SPAS-PC00130-636 regarding property acquisition in Westchester. No property acquisition is anticipated as a result of the relocation of Runway 6L/24R to the north. The commentor does not provide substantial evidence to support the claims that Alternative 1 would involve risky construction factors, and would be costly in time and delays. Traffic impacts associated with Alternative 1 are addressed in Sections 4.12.1 and 4.12.2 of the SPAS Draft EIR. As indicated in Section 4.12.1 of the SPAS Draft EIR, under Alternative 1, on-airport traffic impacts related to curbsides and to departures and arrivals level roadways would be less than significant. However, a significant and unavoidable impact would occur related to the volume to capacity level at one intersection within the CTA. Alternative 1 would also result in significant and unavoidable construction-related impacts to the on-airport transportation system. Relative to off-airport traffic impacts, as addressed in Section 4.12.2 of the SPAS Draft EIR, the majority of the 200 intersections evaluated within the SPAS off-airport transportation study area would not be significantly impacted under Alternative 1; however, significant impacts to some off-airport intersections and/or Congestion Management Plan (CMP) facilities would occur. Alternative 1 would improve access to the CTA by adding the ITF and providing a dedicated busway from the ITF and from parking facilities in Manchester Square to the CTA. In addition, Alternative 1 would provide connectivity to regional transit, which would further improve access to the CTA. Please see Topical Response TR-SPAS-LR-1 regarding impacts to subsurface utilities. As indicated in the topical response, Alternative 1 would not result in major impacts to underground utilities, sewers, or tunnels.

Regarding the commentor's characterization of Alternative 1, please see Section 2.3.1.1 of the SPAS Draft EIR for a discussion of the improvements and characteristics of Alternative 1. As noted in that discussion, Runway 6L/24R would be extended 604 feet to the west (not 600 feet as stated in the comment). This alternative does not include a new Lincoln Boulevard/Sepulveda Boulevard interface. The intersection would remain in its current configuration, although there may need to be a minor modification of the right turn move from southbound Sepulveda Boulevard to westbound Lincoln Boulevard. As noted above, there would be no acquisition within, or impacts to, the Westchester Business District and no homes would be acquired.

Regarding the comments pertaining to Alternative 2, and the comment that Alternative 2 is the most affordable, Alternative 4 would have lower costs than Alternative 2. Please see Tables 8-1 and 8-2 of the Preliminary LAX SPAS Report regarding the estimated costs associated with each of the SPAS alternatives. Please see Response to Comment SPAS-PC00096-2 regarding funding sources for SPAS improvements. Traffic impacts associated with Alternative 2 are addressed in Sections 4.12.1 and 4.12.2 of the SPAS Draft EIR. As indicated in Section 4.12.1 of the SPAS Draft EIR, under Alternative 2, on-airport traffic impacts related to curbsides and to departures and arrivals level roadways would be less than significant. However, a significant and unavoidable impact would occur related to the volume to capacity level at one intersection within the CTA. Alternative 2 would also result in significant and unavoidable construction-related impacts to the on-airport transportation system. Relative to off-airport traffic impacts, as addressed in Section 4.12.2 of the SPAS Draft EIR, the majority of the 200 intersections evaluated within the SPAS off-airport transportation study area would not be significantly impacted under Alternative 2; however, significant impacts to some off-airport intersections and/or Congestion Management Plan (CMP) facilities would occur. Alternative 2 would improve access to the CTA by adding the ITF and providing a dedicated busway from the ITF and from parking facilities in

Manchester Square to the CTA. In addition, Alternative 2 would provide connectivity to regional transit, which would further improve access to the CTA.

The commentor provides no substantiation for the claim that costs associated with the approved LAX Master Plan (i.e., Alternative 3) have grown to over $100 billion. The estimated costs of Alternative 3 are provided in Table 8-1 of the Preliminary LAX SPAS Report. It should be noted that, as described on page 3-77 in Chapter 3 of the LAX Master Plan Final EIR, a baggage tunnel connecting the GTC to the CTA is one option for the secure transport of baggage to and from the GTC.

Regarding the characterization of Alternative 4, as indicated on page 2-25 of the SPAS Draft EIR, Taxiway E would be extended 535 feet east to support the easterly extension of Runway 6R/24L and to provide additional hold area for departing aircraft. The commentor does not provided any facts or evidence that support the comments pertaining to traffic and CTA access. Please see the SPAS Draft EIR for analysis of the impacts of Alternative 4, and specifically the discussion of traffic impacts in Section 4.12 of the SPAS Draft EIR.

Regarding the comments pertaining to Alternative 5, no property acquisition is directly associated with this alternative. Acquisition of some businesses located east of the CTA would occur in conjunction with the ground access alternative with which Alternative 5 is paired. Please see Response to Comment SPAS-PC00130-636 regarding property acquisition in Westchester. No property acquisition is anticipated as a result of the relocation of Runway 6L/24R 350 feet to the north. Moreover, any impacts associated with the movement of the runway north, including aircraft noise and safety impacts, are evaluated in Section 4.10.1.6.6, Aircraft Noise, and 4.7.2.6.6, Safety, of the SPAS Draft EIR. The commentor does not identify what constitutes a risky construction factor and does not provide substantial evidence to support the claims that Alternative 5 would involve risky construction factors, and would be costly in time and delays. Alternative 5 focuses on airfield improvements. Impacts to traffic and CTA access would depend upon the ground access alternative with which Alternative 5 is paired. It should be noted that all of the alternatives with which Alternative 5 could be paired (i.e., Alternatives 1, 2, 8, or 9) would improve access to the CTA. Please see the analysis of the transportation impacts of Alternatives 1, 2, 8, and 9 in Section 4.12 of the SPAS Draft EIR.

Regarding the commentor's characterization of Alternative 5, this alternative does not include a new Lincoln Boulevard/Sepulveda Boulevard interface. Please see Section 2.3.1.5 of the SPAS Draft EIR for a discussion of the improvements and characteristics associated with Alternative 5. The intersection would remain in its current configuration, although there may need to be a minor modification of the right turn move from southbound Sepulveda Boulevard to westbound Lincoln Boulevard. As noted above, there would be no acquisition within, or impacts to, the Westchester Business District and no homes would be acquired.

Regarding the comments pertaining to Alternative 6, no property acquisition is directly associated with this alternative. Acquisition of some businesses located east of the CTA would occur in conjunction with the ground access alternative with which Alternative 6 is paired. Please see Response to Comment SPAS-PC00130-636 regarding property acquisition in Westchester. No property acquisition is anticipated as a result of the relocation of Runway 6L/24R 100 feet to the north. Any possible impacts associated with the movement of the runway north, as proposed in Alternative 6, including noise and safety impacts, are discussed in Section 4.10.1.6.7, Aircraft Noise, and Section 4.7.2.6.7, Safety, of the SPAS Draft EIR. The commentor does not provide substantial evidence to support the claims that Alternative 6 would involve risky construction factors, and would be costly in time and delays. Traffic impacts associated with Alternative 6 are addressed in Sections 4.12.1 and 4.12.2 of the SPAS Draft EIR. As indicated in Section 4.12.1 of the SPAS Draft EIR, under Alternative 6, on-airport traffic impacts related to curbsides and to departures and arrivals level roadways would be less than significant. However, a significant and unavoidable impact would occur related to the volume to capacity level at one intersection within the CTA. Alternative 6 would also result in significant and unavoidable construction-related impacts to the on-airport transportation system. Relative to off-airport traffic impacts, as addressed in Section 4.12.2 of the SPAS Draft EIR, the majority of the 200 intersections evaluated within the SPAS off-airport transportation study area would not be significantly impacted under Alternative 6; however, significant impacts to some off-airport intersections and/or Congestion Management Plan (CMP) facilities would occur. Alternative 6 would improve access to the CTA by adding the ITF and providing a dedicated busway from the ITF and from parking facilities in

Manchester Square to the CTA. In addition, Alternative 6 would provide connectivity to regional transit, which would further improve access to the CTA.

Regarding the characterization of Alternative 6, contrary to the comments provided, Alternative 6 includes a 604-foot westerly extension of Runway 6L/24R; in addition, the runway would be widened to 200 feet. This alternative does not include a new Lincoln Boulevard/Sepulveda Boulevard interface. The intersection would remain in its current configuration, although there may need to be a minor modification of the right turn move from southbound Sepulveda Boulevard to westbound Lincoln Boulevard. As noted above, there would be no acquisition within, or impacts to, the Westchester Business District and no homes would be acquired.

Regarding the comments and characterization pertaining to Alternative 8, this alternative includes a CONRAC in Manchester Square. Addition of a CONRAC and an ITF, and a dedicated busway from these facilities to the CTA, would reduce access within the CTA by reducing the number of shuttles. In addition, Alternative 8 would provide connectivity to regional transit, which has the potential to further improve traffic in the CTA. As this alternative does include a CONRAC, no reimbursement of CFCs would be required.

SPAS-PC00130-47

Comment:

Attachment of Detail Comments and Questions for LAWA to address as part of the final release of the SPAS DEIR due 10/10/2012

Los Angeles International Airport -- LAX Specific Plan Amendment Study Draft EIR July 2012

General comment: These comments are by no means comprehensive as we have been given inadequate time to fully evaluate the statements and studies presented in the 12,000 pages (6000 DEIR, supporting 6000 SPAS Report).

These comments were prepared by many readers. Many, but not all, have specified a specific section in the DEIR. Comments are in regular text and Questions are in italics. These are supplemental to the general issues and questions raised in the basic letter, ARSAC position letter with questions, and other attachments where questions are asked.

Response:

The comment is noted. Please see Responses to Comments SPAS-PC00130-48 through SPAS-PC00130-386 below. LAWA provided a 75-day review period for the SPAS Draft EIR. Public Resources Code Section 20191(a) requires that the review period for a Draft EIR that is submitted to the State Clearinghouse for review shall be at least 45 days. The review period for the SPAS Draft EIR provided an additional 30 days for public comment.

The comment inaccurately describes the length of the SPAS Draft EIR and the Preliminary LAX SPAS Report. The text of the SPAS Draft EIR is approximately 1,800 pages in length. Printed appendices total approximately 3,000 pages, much of which consists of model output data sheets. Appendix K2-6, which includes intersection level of service worksheets, is provided in electronic format only and is approximately 3,000 pages in length. As authorized by State CEQA Guidelines Section 15147, Draft EIR appendices present highly technical and specialized analyses, and the text of the SPAS Draft EIR contains sufficient information to permit full assessment of significant environmental impacts by reviewing agencies and the public. The text of the Preliminary LAX SPAS Report is 259 pages. Appendices to the Preliminary LAX SPAS Report are approximately 2,900 pages in length.

SPAS-PC00130-48

Comment:

The newly referenced check in for a midfield terminal, for instance, is noted as non-spas and is not in the existing Master Plan. Question: What is the basis for LAWA interpretation of SPAS project relevancy for inclusions in this DEIR? Doesn't inclusion of this have a ripple impact on CTA parking?

Response:

As described in Chapter 1 of the SPAS Draft EIR, the primary focus of the SPAS is on potential alternatives to the LAX Master Plan improvements defined in the Stipulated Settlement as the Yellow Light Projects. The Yellow Light Projects are listed in Section 2.3.1 of the SPAS Draft EIR. While the focus of SPAS is on alternatives to the Yellow Light Projects, such as the GTC and its associated roadways and one of the two APM systems proposed under the LAX Master Plan, the SPAS alternatives also take into consideration key non-Yellow Light projects and include proposed modifications to, or proposed deletion of, these non-Yellow Light projects.

Chapter 5 of the SPAS Draft EIR analyzes the cumulative impacts of the alternatives and related projects. The cumulative impacts analysis presented in the SPAS Draft EIR considers, among other things, specific projects at and near LAX, including those that would be carried out or approved by LAWA, as well as those outside LAWA's control. The Midfield Satellite Concourse (MSC) fits this criterion for inclusion in the SPAS Draft EIR as a cumulative project. The MSC was a component of Alternative D and was addressed in the program-level LAX Master Plan EIR. The MSC, including the concourse and gates, associated taxiways, and passenger processing facilities, will be subject to a project-level EIR when the project is proposed for implementation. As explained in Section 3 of Appendix F-2 of the Preliminary LAX SPAS Report, several cumulative projects, including the MSC, were assumed in the simulation analysis of future conditions with implementation of the SPAS alternatives. Therefore, the simulation analysis represents future conditions with the airfield and terminal changes associated with each of the SPAS alternatives as well as changes associated with cumulative airfield-related projects. Please see Response to Comment SPAS-AL00007-44 for a listing of the other cumulative projects included in the simulation analysis of future conditions.

SPAS-PC00130-49

Comment:

The way that the alternatives are presented makes it nearly impossible to ensure we understand what was evaluated in any particular circumstance. Question: How can we determine what is assumed in each evaluation? How does LAWA justify the tearing and reference to Alt D EIR without specificity?

Response:

Please see Responses to Comments SPAS-AL00007-6, SPAS-AL00008-3, and SPAS-AL00008-26 for an explanation of why the analysis of nine alternatives in the SPAS Draft EIR instead of a single proposed project was consistent with CEQA's requirements and facilitated public review of the alternatives. Methodologies and assumptions used in the various analyses are identified in Chapter 4 of the SPAS Draft EIR, with details provided in the appendices. The commentor does not provide any specific examples of instances where the commentor was unable to understand what was evaluated in the Draft EIR; therefore, no specific response can be provided. Similarly, the comment regarding tiering (which was not used for preparation of the SPAS Draft EIR) and the reference to Alternative D are not specific enough to provide a response. Please see Response to Comment SPAS-PC00130-14 regarding the incorporation of portions of the LAX Master Plan Final EIR by reference.

SPAS-PC00130-50

Comment:

The 2006 Stipulated Settlement calls for reworking the Master Plan to include potential alternative designs, technologies, and configurations that would provide solutions to the problems that the Yellow Light Projects were designed to address consistent with a practical capacity of LAX at 78.9 million annual passengers (the "Alternative Projects"). Question: How has LAWA determined which projects are part of SPAS and how is it finishing the task to incorporate the entire package of projects into a coherent, comprehensive group of projects into a Master Plan?

Response:

The five LAX Master Plan components required to be addressed in SPAS--the GTC, APM2 from the GTC to the CTA, demolition of CTA Terminals 1 through 3, north runway reconfiguration, and onsite road improvements associated with the GTC and APM2--are identified in Section 7.H.1 of the LAX Specific Plan, as amended, which requires LAWA to initiate a complete LAX Specific Plan Amendment Study prior to seeking an LAX Plan Compliance determination for any one of these Yellow Light Projects. These projects are also defined in the Stipulated Settlement. Although these projects have independent utility from other LAX Master Plan projects, the SPAS improvements, together with the non-Yellow Light Master Plan projects that have already been implemented or are planned for future implementation, would provide a comprehensive set of improvements to LAX.

SPAS-PC00130-51

Comment:

Hydrology can impact long term viability of the north airfield from impacts of an unknown water source that can flood areas, distribute pollution, and has caused sink holes. We note that LAWA is making changes to the Argo Ditch Flood Channel as noted in Hydrology tech reports 6 and S-5. Question: On what basis has LAWA confirmed that projects won't change underground water pathways causing problems? How has LAWA analyzed past sink hole occurrences? By what authority have they redesigned the Argo ditch without coordinating with the design authority?

Response:

Sink holes are not a common occurrence at LAX although very isolated sink holes have occurred. During construction of the North Outfall Replacement Sewer, which was completed in 1993, a sink hole occurred in an area of sandy soils to the south of Taxiway E. Another sink hole occurred between Runways 6L/24R and 6R/24L in 2002. More recently, two sink holes occurred in the vicinity of Taxiway R as a result of construction activity associated with the water deluge system. The sink holes were not caused by an unknown water source. The recent sink holes and the sink hole in 1993 were isolated incidents related to construction activities or failed equipment. The cause of the sink hole in 2002 was unrelated to construction activity but there is no evidence to suggest that it was caused by an unknown water source. In all of these cases, the sink holes were filled immediately. No damage to people or equipment, including aircraft, occurred and no active runways or taxiways were compromised. The isolated sink holes at LAX have not resulted in impacts to aviation safety. If sink holes were to occur in the future, similar remedial actions would be implemented to fill the sink hole and prevent further damage. As a result, no environmental impacts would result from unexpected sink holes. The commentor provides no substantiation of the claim that there is an unknown water source at the airport that could result in flooding, distribute pollution, or cause sink holes. As noted on page A-8 of the 2008 SPAS NOP, the depth to groundwater at LAX is generally greater than 90 feet and perched groundwater conditions have been noted in the upper 20 to 60 feet at some locations at the airport. Perched groundwater is a small, isolated area of groundwater that is perched above and separated from the main water table by an aquiclude, which is a saturated geologic unit that is incapable of transmitting significant quantities of water under ordinary hydraulic gradients. Due to its isolated nature, perched groundwater does not distribute pollution or contribute to flooding. There is no evidence to suggest that perched groundwater is responsible for any sink holes at LAX. As noted above, three of the four sink holes that have occurred at LAX over the past 20 years have resulted from improper construction practices. As discussed in Section 2.3.1 of the SPAS Draft EIR, the SPAS Draft EIR is a programmatic document, thus no design or engineering plans are currently available. An EIR is not

required to speculate about the environmental consequences of future development that is unspecified or uncertain. (Environmental Protection Info. Ctr. v. Department of Forestry & Fire Protection (2008) 44 Cal.4th 459, 502.) However, if an alternative is selected, detailed analysis associated with individual project components would be conducted during engineering design to verify that there would be no impacts to groundwater prior to construction. Also, as discussed in Section 4.8.7 of the SPAS Draft EIR, Mitigation Measure MM-HWQ (SPAS)-1 would ensure that impacts to hydrology and water quality would be less than significant.

Regarding the commentor's reference to the "design authority," it is assumed that the commentor is referring to the U.S. Army Corps of Engineers (USACOE). The Argo Drainage Channel is not under control of USACOE, although USACOE has regulatory authority over jurisdictional areas associated with the Argo Drainage Channel and mitigation for impacts. Please see Response to Comment SPAS-PC00130-201 regarding USACOE jurisdiction.

SPAS-PC00130-52

Comment:

Question: IF NOP was released in 2010 shouldn't data used in analyses be from then forward? Is there a table of data periods used for the various analyses and the period covered by the data? Why must LAWA choose, in some cases year old data instead of from NOP inception for twelve months since monthly values are frequently available?

Response:

As explained on pages 4-4 and 4-5 of the SPAS Draft EIR, where possible, October 2010 was used as the baseline date for characterizing existing conditions in the environmental analysis. Where existing conditions data specific to October 2010 were not available or where October 2010, by itself, was not an appropriate representation of baseline conditions, the various sections of the SPAS Draft EIR identify this fact, explain what data were used to determine existing conditions, and provide evidence of why this information is representative of baseline conditions. For example, in some cases, available reports and other documentation were only available for timeframes preceding 2010. For those topics which relied upon site surveys, such information was collected during preparation of the Draft EIR, typically in 2011. Due to the highly developed nature of LAX and the surrounding communities, and the lack of economic growth in recent years, site conditions at and around LAX have not materially changed. Therefore, the available information in 2009 or 2011 that was used to characterize baseline conditions is considered to be generally representative of 2010 conditions.

For certain analyses, a full year's worth of data was considered necessary and appropriate to characterize existing baseline conditions. Such is the case relative to existing aircraft noise, existing aircraft-related criteria and toxic air pollutant emissions (the latter of which was used as the basis for the human health risk assessment), and existing airport traffic generation, whereby the variability in airport operations throughout the year, especially seasonal variations, results in "existing" conditions for those topics being very different depending on time of year. Similar to the approach used in the LAX Master Plan Final EIR, airport operations data for the prior calendar year, which in the case of the SPAS EIR NOP is 2009, were used to define existing baseline conditions for those topics. It was necessary to assess a full year of data, in order to first identify a peak month in the year and, second, identify an average day in the peak month, to derive peak month average day (PMAD) activity characteristics, which are required for modeling purposes. The peak month within the 2009 calendar year was August 2009, from which a PMAD was identified and used in the design day flight schedule (DDFS) analysis for the SPAS Draft EIR.

It is customary for operational analyses to be based upon a calendar year (i.e., January to December), although a PMAD can be calculated based on a rolling sum of 12 months of data. Had a rolling 12 months been used for the SPAS DDFS, the time period that would have been evaluated would have been June 2009 through May 2010, as May 2010 was the most recent monthly data set available at the time the operational analysis was initiated. In that time period, the peak month was March 2010. However, it is known that, historically, the busiest months at LAX in terms of both operations and passenger volumes are the summer months (June, July, or August). In order to provide an analysis that is reflective of conditions at LAX, it was important to select a PMAD in the summer months to reflect the

schedule practices of the airlines during the summer time period. Schedule practices vary by season, and affect such characteristics as city pairs, time of operations, fleet mix, frequencies, and other factors. As noted above, the peak month with the highest number of monthly operations in the period of June 2009 through May 2010 was March 2010, with 48,899 operations, representing 8.8 percent of the total 12-month operations. The PMAD number of operations would have been 1,577 in an average day in March 2010 (48,899 divided by 31 days). However, if one were to select a peak summer month within that time period, that month would have been August 2009, the same month that was used in the SPAS DDFS analysis. With 48,448 operations, August 2009 represented 8.7 percent of the total 12-month operations, and yielded a PMAD number of operations at 1,563. The difference between the PMADs in March 2010 and August 2009 is only 14 operations (1,577 vs. 1,563), i.e., seven aircraft. Considering this minimal difference, selecting the month of August 2009 instead of March 2010 as a peak month would be preferable in order to ensure that the baseline DDFS reflected typical peak passenger and operation volumes as well as summer air carrier scheduling practices. Therefore, an average day in August 2009 would have been selected as the PMAD even if a rolling time period had been used instead of the 2009 calendar year time period.

SPAS-PC00130-53

Comment:

Reference to the Alt D EIR is generally used as justification for not studying something yet specifics are not included in this DEIR document (ie archeology, hydrology issues). Question: Please create a list of each element that is not being freshly studied.

Response:

As described on page 7-6 in Section 7.7 of the SPAS Draft EIR, the Initial Study included in the October 2010 LAX SPAS EIR Notice of Preparation, provided as Appendix A of the SPAS Draft EIR, determined, for the reasons explained therein, that effects on the following resource areas would result in no impact, or less than significant impacts, and were therefore not addressed in the SPAS Draft EIR: agricultural resources, geology and soils, mineral resources, population/housing, and recreation.

In addition, as explained on page 4-2 of the SPAS Draft EIR, the text under the heading of "Introduction" for each of the 13 sections in the environmental impacts analysis chapter (Chapter 4) briefly describes the issues addressed in the analysis and identifies related topics. The Introduction also identifies any specific issue area of the topic that is not being addressed as part of the SPAS Draft EIR and provides a discussion explaining the reasons why. In many cases, the 2010 LAX SPAS EIR Notice of Preparation/Initial Study determined impacts to specific issue areas would to be less than significant. In accordance with Sections 15063(c)(3)(A) and 15128 of the State CEQA Guidelines, further analysis of specific issue areas where impacts were determined to be less than significant in the Initial Study is not required and was not provided. The specific issue areas where it was determined, in accordance with the State CEQA Guidelines, that further analysis was not required in the SPAS Draft EIR, and the specific pages of the SPAS Draft EIR which explain the reasons for such determinations, are as follows:

- paleontological resources (see page 4-337 in Section 4.5.1);
- risk of upset related to facilities that handle large volumes of toxic or flammable materials which include the Central Utility Plant (CUP), Liquefied Natural Gas (LNG)/Compressed Natural Gas (CNG) facilities, and LAXFUEL Fuel Farm (see page 4-483 in Section 4.7.2.1);
- risks associated with exposing people or structures to wildland fires (see page 4-573 in Section 4.7.3.1);
- potential for accidental releases of a hazardous material or substance to occur from the routine use, transport, and disposal of potentially hazardous materials or substances (see page 4-573 in Section 4.7.3.1);
- groundwater supply and recharge (see page 4-599 in Section 4.8.1);
- impacts related to inundation by seiche, tsunami, and mudflow (see page 4-599 in Section 4.8.1);
- potential for impacts related to dividing an established community (see page 4-641 in Section 4.9.1);
- employment and visitor-related demand for parkland, libraries, and schools (see page 4-993 in Section 4.11);
- inert solid waste disposal (see page 4-1353 in Section 4.13.2.1); and

- reclaimed water use (see page 4-1379 in Section 4.13.4.1).

Please note that potential impacts to archaeological resources and hydrology/water quality from implementation of the SPAS alternatives are addressed in Sections 4.5 and 4.8 of the SPAS Draft EIR, respectively.

Lastly, as discussed on page 1-105 in Section 1.7 of the SPAS Draft EIR, portions of the SPAS Draft EIR incorporate by reference information from other documents that are available to the public. In such cases, the document being incorporated by reference is identified by name and the information from that document is summarized in the relevant SPAS Draft EIR discussion. In particular, portions of the following documents were incorporated by reference in the SPAS Draft EIR:

- LAX Master Plan Final EIR (December 2004); and
- LAX Master Plan Alternative D Mitigation Monitoring and Reporting Program (MMRP) (September 2004).

The documents listed above are available for public review at Los Angeles World Airports, Capital Programming and Planning Division, One World Way, Los Angeles, CA 90045, and are also accessible via the internet at www.ourlax.org.

SPAS-PC00130-54

Comment:

Alternative 7 includes moving runway 24R 100' south. It seems to be a hybrid of ARSAC submittal and the LAWA fatal flaw versions. Question: How was the included version of 100'S determined? Where is this documented? Could this version be tweaked to improve taxiway changes or improve the gate availability of a new Terminal 0?

Response:

Chapter 5 of the Preliminary LAX SPAS Report describes the SPAS concept development process, including how each of the nine alternatives addressed in the SPAS Draft EIR were formulated, refined, and advanced into the Draft EIR analysis. This discussion includes Alternative 7, which would relocate Runway 6R/24L 100 feet southward.

The commentor provides no information describing what are identified as the "ARSAC submittal" and the "LAWA fatal flaw versions" nor is there any indication as to how or why the taxiway changes and Terminal 0 gating associated with Alternative 7 are in need of improvement. As such, it is not possible or necessary to provide a well-reasoned response to the comment.

SPAS-PC00130-55

Comment:

Safety is the political reason given for runway expansion. The Academic Panel/NASA study (NASS) is referenced in the DEIR as equivalent to several less rigorous studies. LAWA also included an FAA response letter to the NASS and called it "a study." Question: When establishing safety needs and status why didn't LAWA include the Academic response to the FAA letter? Why were none of the NTSB concerns with FAA design criteria not included in the discussions of runway safety? What other studies of runway safety have been conducted that are relevant to the design issues at LAX? How has LAWA reviewed actual data? Has LAWA kept incursion and excursion data for LAX since it stopped posting it on it's website? When the FAA fails to post incident data for extended periods of time after an event does LAWA keep track status or ask why it has not been presented?

Response:

Section 2.2 of the SPAS Draft EIR describes the many problems associated with the current outdated design of the north airfield and presents the project objectives that are intended to address those problems. Enhanced safety is one of several reasons for the airfield improvements, along with other

reasons such as improving the efficiency of airfield operations, accommodating a greater percentage of departing aircraft, and minimizing or eliminating the extent to which Runway Protection Zones overlay residential areas.

The academic panel's responses to the FAA letter regarding the draft North Airfield Safety Study (NASS) is included in Appendix H-6 of the Preliminary LAX SPAS Report. (See pages 195 through 215 of the 276-page PDF of Appendix H-6.)

The commentor provides no description or citation of what "NTSB concerns with FAA design criteria" are of concern.

In addition to a summary of the NASS, Section 4.7.2 of the SPAS Draft EIR summarizes six other safety studies pertaining to the north airfield.

Table 4.7.2-7 of the SPAS Draft EIR presents runway incursion/incident data for LAX from 2001 through 2011, based on information both from the FAA and from LAWA records as indicated in the sources description in the table.

SPAS-PC00130-56

Comment:

The comments below are for the Main Document of the DEIR.

Page 1-1 1. INTRODUCTION AND EXECUTIVE SUMMARY
General Question: Overview includes reference to Palmdale airport. Has LAWA officially given up LA/Palmdale operational certificate and therefore all responsibility?
Page 1-1 to 1-2 1.1.1 LAX Master Plan and EIR

Response:

As described in Topical Response TR-SPAS-REG-1, LAWA expended substantial effort to help develop air service at Palmdale Regional Airport (PMD). Efforts began with LAWA working cooperatively with the "Wheels-Up Palmdale Coalition" to apply for federal grants that would support the establishment of air service at PMD. Those efforts culminated in the award of a FAA grant in August of 2006 that would provide operating subsidies to an air carrier that offered service from PMD, and subsequently to the launch of a new flight operated by United Airlines between PMD and SFO in June of 2007. After 18 months in which LAWA, the U.S. Department of Transportation, and the City of Palmdale spent more than $238 per passenger to subsidize air service at PMD, United Airlines discontinued flights and LAWA transferred the airport operating certificate to the City of Palmdale.

SPAS-PC00130-57

Comment:

In December 2004, the Los Angeles City Council approved the LAX Master Plan2 and related entitlements for the future development of LAX. The LAX Master Plan provides the first major new facilities for, and improvements to, the airport since 1984, and plans to accommodate projected growth in passengers and cargo at LAX through the year 2015. The LAX Master Plan serves as a broad policy statement regarding the conceptual strategic planning framework for future improvements at LAX and working guidelines to be consulted by LAWA as it formulates and processes site-specific projects under the LAX Master Plan program.

Environmental Review and Approval (Phase III): Phase III of the LAX Master Plan Study included a thorough evaluation of the potential environmental effects associated with the four build alternatives,..

Questions:
1. Since they reference the phases, does LAWA have to review the assumptions to see if their assumptions still justify disregarding ideas?
2. Must this also only go to 2015 or could it be required to go to 2020 or beyond?

Response:

The subject text from pages 1-1 and 1-2 of the SPAS Draft EIR summarizes the history and background of the LAX Master Plan, particularly with regard to the formulation and evaluation of the five alternatives addressed in the LAX Master Plan EIR, leading to Alternative D being ultimately selected for approval. The discussion's reference to the three study phases associated with the LAX Master Plan simply provides a breakdown of the major steps over the 10-year planning and approval process for the LAX Master Plan, and does not suggest or require that the assumptions associated with the LAX Master Plan process need to be re-evaluated.

While the planning horizon year for the LAX Master Plan was 2015, the SPAS planning horizon year is 2025; however, both planning frameworks are based on the same future passenger activity level of 78.9 MAP. As provided in footnote 13 on page 1-47 of the SPAS Draft EIR, 78.9 MAP is consistent with the regional growth projections adopted in the 2012 SCAG Regional Transportation Plan. Alternative D, the LAX Master Plan alternative that was approved in 2004, was designed with a maximum of 153 gates to provide a practical capacity of 78.9 MAP at LAX in 2015 and all of the SPAS alternatives also reflect that 153-gate limitation and future activity level of 78.9 MAP. While the future passenger activity level of 78.9 MAP was held constant between the LAX Master Plan and SPAS, all other aspects of the SPAS analysis account for the planning horizon year being 10 years later than assumed for the LAX Master Plan, including future regional surface traffic projected for 2025 and air quality emission factors projected for 2025.

SPAS-PC00130-58

Comment:

Figure 1-2 shows the existing airport and the Argo drainage channel just north and east of 24R to west of 24R. Will there be a chart that shows the utilities underground such as the major sewer lines and tunnels in the area so that construction impacts are assessable? If included, where is it? if not included, why not?

Response:

Please see Topical Response TR-SPAS-LR-1 for a discussion as to why detailed utility plans are not required to be provided in a program-level EIR.

SPAS-PC00130-59

Comment:

Page 1-9 1.1.2 The Stipulated Settlement
In January 2005, the City of El Segundo, the City of Inglewood, the City of Culver City, the County of Los Angeles, and the Alliance for a Regional Solution to Airport Congestion (Petitioners) filed petitions challenging the approval of the LAX Master Plan Program. In early 2006, the City of Los Angeles and Petitioners agreed to, and the court approved, a Stipulated Settlement of the subject lawsuits (Stipulated Settlement) "... is designed for a practical capacity of 78.9 MAP while enhancing safety and security, minimizing environmental impacts on the surrounding communities, and creating conditions that encourage airlines to go to other airports in the region,..."

Question: How does LAWA interpret this statement of minimizing environmental impacts? Is the best performing environmentally preferred since it minimizes impacts? What specific conditions are used by LAWA to create conditions that encourage airlines to go to other airports?

Response:

Comments regarding LAWA's compliance with the Stipulated Settlement require legal conclusions that are beyond the scope of what is required by CEQA. As presented throughout Chapter 4 of the SPAS Draft EIR and summarized in Table 1-6, numerous LAX Master Plan commitments and mitigation measures are delineated for each of the SPAS alternatives to minimize environmental impacts. Please

refer to Topical Response TR-SPAS-REG-1 regarding the fact that LAWA, through the LAX Master Plan, the SPAS process, and other efforts, supports the regionalization of air travel demand in Southern California.

SPAS-PC00130-60

Comment:

Page 1-10 1.2 Summary of Proposed Project
The proposed project is the LAX SPAS. As noted above, the SPAS process involves the identification and evaluation of potential alternative designs, technologies, and configurations for the LAX Master Plan Program that would provide solutions to the problems that the Yellow Light Projects were designed to address.

Question: Where is the table of problems that the Yellow Light Projects were designed to address and what quantifiable numbers are assigned to these problems so that we can assess if the solutions are adequate or in the case of multiple solutions which more closely matches the solution of the Yellow Light Project?

Response:

The problems that the Yellow Light Projects were designed to address, and to which the SPAS alternatives would provide solutions, are identified in Section 2.3.1 of the SPAS Draft EIR and in Chapter 3 of the Preliminary LAX SPAS Report. The subject discussions of those problems are presented in the context of describing the various options for addressing the problems by way of the different alternatives being considered by LAWA. Given that SPAS Alternative 3 reflects the improvements proposed in the LAX Master Plan Yellow Light Projects, the analysis of each of the SPAS alternatives presented throughout the SPAS Draft EIR provides a reasonable and meaningful basis of comparison between alternatives. This is particularly evident in the detailed tables within Chapter 4 and the summary tables in Chapter 1, which provide side-by-side comparisons of the SPAS alternatives, including Alternative 3, which represents the Yellow Light Projects.

SPAS-PC00130-61

Comment:

Page 1-10 1.2.1 Project Objectives
1. Provide North Airfield Improvements that Support the Safe and Efficient Movement of Aircraft at LAX...
Existing problems associated with the outdated airfield design include, but are not limited to, the following:
- LAX does not have an airfield, in either the north complex or the south complex, that is fully designed for the largest aircraft types currently in service (i.e., Aircraft Design Group (ADG) V aircraft, such as the Boeing 747-400, and ADG VI aircraft, such as the Airbus A380).
- The north airfield configuration requires non-standard operating procedures, which are not optimal for safety and increase aircraft delay.

Question: 1.2.1 bullet 1
LAWA states that neither of the airfield complexes meet Grp V or Grp VI but the basis for the SAIP was that it would. Are the designs contemplated supposed to meet the requirements in place at the time Alt D was passed, requirements current at NOP release, or current/future requirements in the draft AC 150/5300-13A approved last month?

Is it the LAWA position that all standards MUST be met without waiver or is there some standards of practicality and cost involved? What are those factors?

Question: 1.2.1 bullet 2
If the north airfield configuration is not "...optimal for safety and increase aircraft delay." What condition is acceptable for safety and aircraft times and how was it determined? What assumptions in airfield conditions are made? What would be the time phasing of implementation of the design changes? Is the

answer that LAWA is to provide safety based on total project implementation? What technical improvements and signage marking improvements are assumed? What about staffing and work load? What other factors has LAWA included in its assumptions?

Response:

The runway-taxiway separation standards in FAA Advisory Circular (AC) 150/5300-13 Airport Design used by LAWA for the preparation of the SPAS Draft EIR do not differ from the runway-taxiway separation standards provided in FAA AC 150/5300-13A Airport Design

The SPAS Draft EIR does not require that all standards be met without waiver. As discussed in Section 1.2.1 of the SPAS Draft EIR, Project Objectives, SPAS is designed to provide north airfield improvements that, among other things, minimize modifications of standards, waivers, or operational restrictions, all of which reduce airfield efficiency and level of service. The SPAS process sought to identify potential amendments that plan for the modernization and improvement of LAX, specifically while enhancing safety and security, minimizing environmental impacts on surrounding communities, and creating conditions that encourage airlines to go to other airports in the region. (See Section 1.1.2 of the SPAS Draft EIR.) The SPAS alternatives represent a reasonable range of alternatives that would attain most of the basic objectives of the project, including the objective discussed above, sufficient to allow informed decision-making and public participation. (State CEQA Guidelines Section 15126.6(a).)

As described in Section 4.7.2 of the SPAS Draft EIR, the specific airfield design associated with each of the seven airfield improvement alternatives responds differently to the objective of meeting FAA design standards without waivers and to other safety considerations evaluated in that section. Those differences are summarized in Table 4.7.2-16 of that section. Similarly, Appendix F-2 of the Preliminary LAX SPAS Report provides a detailed discussion of aircraft taxi times and other efficiency-related considerations. The analysis included in that appendix discusses the relevant assumptions. The LAWA Board of Airport Commissioners (BOAC) will take those differences into account along with many other considerations related to the alternatives, such as costs, environmental impacts, responsiveness to project objectives, public input, and other factors in deciding which, if any, alternative to approve.

The SPAS Draft EIR is a programmatic document. Therefore, the certainty, timing, nature, and extent of, and the approach to the modifications discussed therein, have not been determined at this programmatic level of conceptual planning. More specific project details would be developed, and project-level environmental review would occur, prior to implementation of any specific component of a SPAS alternative.

SPAS-PC00130-62

Comment:

Page 1-11
- The primary north airfield departure runway (6R/24L) is too short for certain larger aircraft (e.g., fully loaded Boeing 747-400) on long-haul flights, requiring those aircraft to taxi to the south airfield, resulting in less efficient operations and disproportionate environmental impacts.

Question: Although ARSAC has acknowledged support for extending 24L east, how many flights per year are not acceptable for assignment to the current north runway? Is this based on a decision made by a carrier or is it related to the aircraft and weather conditions? How is this decision made? Please quantify the number of aircraft involved and where they originated for the past years and show how this can be extrapolated to the future. What is the time taxiing penalty for aircraft moving from one complex to the other?

Response:

A Takeoff Length Analysis for heavy aircraft, those with a maximum certificated takeoff weight (MTOW) of 255,000 pounds or more, was prepared for Runway 6R/24L. The analysis used the airplane manufacturers' airport planning manuals to identify the MTOW of each aircraft included in the 2020 No Yellow Light Project flight schedule. This analysis can be found in Appendix E1-5 of the Preliminary LAX SPAS Report. As presented on the histogram of Table 1A (vertical blue dashed line), the analysis

states that when using the 2020 No Yellow Light Project flight schedule, approximately 54.1 percent of departures can be accommodated, leaving 45.9 percent of heavy aircraft departures at MTOW that cannot be accommodated on Runway 6R/24L when the temperature is 59°F. As presented on the histogram of Table 1B (vertical blue dashed line), at 86°F, 36.6 percent of departures can be accommodated, leaving 63.4 percent of heavy aircraft departures at MTOW that cannot be accommodated on Runway 6R/24L.

There are many factors that influence actual required runway length for individual aircraft. These factors include aircraft and engine type, actual aircraft takeoff weight, aircraft flap settings, airport elevation, temperature, wind speed and direction, runway surface conditions, and runway grade. The decision of whether a specific runway is acceptable to an aircraft is ultimately made by the air carrier and aircraft pilots.

The time taxiing from one airport complex (airfield) to the other is variable and depends on a number of factors including taxi route distance, aircraft taxi speed, other taxiing traffic, and Air Traffic Control instructions.

SPAS-PC00130-63

Comment:

- The outdated airfield design creates a situation where aircraft are at increased risk of hazards. Those hazards include potential collisions with other aircraft, such as when a landing aircraft might move in the path of a departing aircraft (incursion). 7 Other potential hazards include, but are not limited to, insufficient side-by-side passing clearances between certain types of aircraft arriving/departing on runways and aircraft on nearby taxiways. Such hazards contribute to the potential for conflicts between taxiing aircraft and ground vehicles on runways, taxiways, and nearby service roads

Question: The reference to incursions says that it is based on inadequate spacing between runways and taxiways. Every one of the designs submitted by LAWA to move north which includes a center line taxiway leaves a condition where an aircraft on the taxiway is closer to an adjoining runway than is currently the condition between the two runways. What is the basis for which LAWA has determined that this is acceptable?

Response:

There are various FAA separation guidelines for aircraft operations on runway and taxiway surfaces. These separation guidelines vary depending whether a runway is next to a runway or a runway is next to taxiway or a taxiway is next to a taxiway. Tables 3-6 and 3-7 of FAA Advisory Circular (AC) 150/5300-13A Airport Design identifies all the required separation standards for runway to taxiway for all types of aircraft. Section 316 of AC 150/5300-13A discusses the parallel runway separation requirements (i.e., the distance required between parallel runways). According to Section 321(a)(2) of AC 150/5300-13A, the standards for separation of runway to taxiway are determined by landing and takeoff flight path profiles and physical characteristics of aircraft. Because there is no centerfield taxiway on the north airfield, runway-to-runway separations apply to current conditions. Runway-to-taxiway separation guidelines would apply with the addition of a centerfield taxiway.

SPAS-PC00130-64

Comment:

- With one exception, the north airfield configuration does not comply with FAA Runway Safety Area (RSA) requirements.

Question: If the RSA requirements are not met, how does LAWA justify or explain that these RSA would not have changed in previous approved Master Plans or the FAA Record of Decision? Will LAWA explain and list all of the requirements which will NOW be required to be met, but were acceptable to be grandfathered as is before?

Response:

Section 4.7.2 of the SPAS Draft EIR outlines existing Runway Safety Area (RSA) dimensions and proposed RSA dimensions for the north airfield alternatives. U.S. statutory requirements for compliance with all current RSA requirements by December 31, 2015, are also addressed in this section.

SPAS-PC00130-65

Comment:

- The north airfield high-speed taxiways are not in compliance with FAA Engineering Brief No. 75.

Question: "The north airfield high-speed taxiways are not in compliance..." LAWA is not required to meet every Engineering Brief as these are advisory. Has LAWA performed studies or reviewed any FAA studies to show that these must be required? Past history on the south complex was that high speed turnoffs (hst) were ADDED for safety and then it was recently changed for the SAIP which removed hst's. How do we know that the requirement will not change back to hst's before the north is reconfigured?

Response:

As noted in FAA Engineering Brief (EB) No. 75, published in 2007, "Key elements of this Engineering Brief will be incorporated into the new comprehensive revisions to Advisory Circular 150/5300-13..." The current version of FAA Advisory Circular (AC) 150/5300-13A Airport Design includes the design strategies which were recommended in EB No. 75. Page 11 of EB No. 75, for example, provides that high-speed exit taxiways that provide a direct route across a parallel runway are problematic. Likewise, Section 411(b) of AC 150/5300-13A states "Do not provide direct access from a high speed exit to another runway."

Due to the acceptance of Airport Improvement Program (AIP) funding and Passenger Facility Charge (PFC) funds, LAWA is required to adhere to current FAA guidance for airport design standards incorporated in the FAA Advisory Circulars. LAWA cannot predict what changes to future ACs may be and is only able to design based on current ACs until new revisions are released. The north airfield does not meet current AC 150/5300-13A standards for high-speed exit taxiways.

The South Airfield Improvement Project (SAIP) removed high-speed exit taxiways that provided direct access to another runway. However, with the addition of the midfield parallel taxiway, high-speed exit taxiways were included that terminate at the taxiway and do not cross other runways.

SPAS-PC00130-66

Comment:

- The north airfield does not provide sufficient areas at the end of the runways for holding arriving flights and sequencing departing aircraft.

Question: What requirement is not met to specify that the "north airfield does not provide sufficient areas... for holding ...flights..." Since this study is to address items fixed by yellow light projects, what specifically changed in Alt D to justify this?

Response:

Under Section V.D of the Stipulated Settlement, LAWA is to focus the SPAS on, among other things, potential alternative designs, technologies, and configurations for the LAX Master Plan Program that would provide solutions to the problems that the Yellow Light Projects were designed to address. Section 2.2 of the Preliminary LAX SPAS Report and Section 2.2 of the SPAS Draft EIR set forth the SPAS project objectives and the problems that the Yellow Light Projects were designed to address. As stated therein, one of the SPAS objectives is to provide north airfield improvements that support the safe and efficient movement of aircraft at LAX, and one of the problems associated with the outdated airfield design that prevents achievement of this goal under existing conditions is that the north airfield does not provide sufficient areas at the end of the runways for holding arriving flights and sequencing

departing aircraft. This condition is existing and is not triggered by any change in the previously approved LAX Master Plan (Alternative D).

As identified on page 2-18 of the SPAS Draft EIR, the LAX Master Plan Alternative D (which is SPAS Alternative 3), included a 1,280-foot easterly extension to the Runway 24L end as well as a 980-foot extension of Taxiway E to support this runway extension. The taxiway extension would provide additional taxiway length for departure aircraft queuing. Similarly, each of the remaining north airfield alternatives in the SPAS Draft EIR proposes an extension to the Runway 24L end. In addition to providing additional runway length for departing aircraft, the associated taxiway extension to reach the proposed Runway 24L threshold would provide an additional portion of taxiway for departure aircraft queuing. Under Alternatives 1, 2, and 5 through 7, Taxiway E would be extended 950 feet to the east; under Alternative 4, Taxiway E would be extended 535 feet east. Table 1-12 in Chapter 1 of the SPAS Draft EIR provides a summary of safety and efficiency enhancements of each alternative, including which alternatives provide increased separation between runways and taxiways, which better enables taxiing and holding aircraft to stay clear of arriving and departing aircraft, as well as improvements that provide more holding areas near the end of runways thereby improving the ability to sequence departures.

The extension of both the runway and taxiway would allow air traffic control more flexibility in queuing departing aircraft. It would have the added benefit of moving the departure queue east, away from the taxiways immediately in front of the terminal areas where at peak departure times, queued departure aircraft currently hinder the ability for air traffic control to efficiently move aircraft in and out of those terminal areas. Additionally, this extra taxiway area would enhance air traffic control's flexibility in holding arriving aircraft while awaiting their gate assignments.

SPAS-PC00130-67

Comment:

- The existing Runway Protection Zone (RPZ) associated with Runway 6L/24R includes residential uses.

Question: If "existing Runway Protection Zone (RPZ) ...includes residential uses" what changes are in the yellow light project that fixed this or caused it to be worse? The RPZ was approved by the FAA in its Record of Decision.

Response:

The LAX Master Plan (Alternative D) Yellow Light Project at issue is the north airfield reconfiguration. Both existing conditions and the LAX Master Plan north runway reconfiguration include residential parcels within the north airfield RPZ. As shown in Table 4.7.2-3 in the SPAS Draft EIR, there are a total of 9 residential parcels within the north airfield RPZ under baseline conditions. As shown in Table 4.7.2-11 in the SPAS Draft EIR, there would also be a total of 9 residential parcels within the north airfield RPZ under Alternative 3 (i.e., LAX Master Plan Alternative D). As stated on page 4-534 of the SPAS Draft EIR, under Alternative 3, "[t]here would be no notable change in the runway safety areas at the eastern end of Runway 6L/24R, including the RPZ which currently encompasses numerous businesses and residences in Westchester." The same is true under Alternatives 2, 4, and 7. Alternatives 1, 5, and 6 would reduce the number of residential parcels within the RPZ from 9 to 0 (see Tables 4.7.2-9, 4.7.2-13, and 4.7.2-14, respectively of the SPAS Draft EIR).

SPAS-PC00130-68

Comment:

Page 1-11
In identifying and evaluating alternatives to the north airfield improvements called for in the LAX Master Plan, LAWA is seeking to provide north airfield improvements that support the safe and efficient movement of aircraft at LAX; specifically, such improvements:
- Are consistent with FAA design standards for the largest aircraft types currently in service and anticipated for the future (ADG V and VI aircraft) for all weather conditions;

- Minimize modifications of standards, waivers, or operational restrictions, all of which reduce airfield efficiency and level of service;
- Reduce the potential for airfield hazards, including incursions, and enhance the overall safety of airfield operations through runway and taxiway design;
- Accommodate a greater percentage of departing aircraft, thereby increasing airfield efficiency;
- Provide sufficient areas at the ends of the runways for holding arriving flights and sequencing departing aircraft; and
- Minimize or eliminate the extent to which Runway Protection Zones overlay residential areas.

Question: the six bullets state LAWA north airfield improvement technical goals, but LAWA will never have unlimited funds. Please identify associated costs to relate these goals.

Response:

Costs for objectives or goals cannot be estimated, as different physical improvements may achieve the same goals. However, costs can be estimated for specific improvements. Rough-order-of magnitude cost estimates were developed for the improvements associated with the SPAS alternatives, and are included in Appendix G of the Preliminary LAX SPAS Report. Please see Response to Comment SPAS-PC00096-2 regarding funding sources for SPAS improvements.

SPAS-PC00130-69

Comment:

Going back to the purpose of this study, however,--to identify the issues Alt D addressed which of these were directly accomplished in Alt D? What numerical improvements did (do) they achieve?

Response:

The purpose of the SPAS is not, as the commentor suggests, to identify the issues addressed by the approved LAX Master Plan (Alternative D). To clarify, under Section V.D of the Stipulated Settlement, LAWA is to focus the SPAS on, among other things, potential alternative designs, technologies, and configurations for the LAX Master Plan Program that would provide solutions to the problems that the Yellow Light Projects were designed to address. Section 2.2 of the Preliminary LAX SPAS Report and Section 2.2 of the SPAS Draft EIR set forth the SPAS project objectives and the problems that the Yellow Light Projects were designed to address. The bullet points referenced in the comment are not intended to represent problems that the Yellow Light Projects were designed to achieve but instead represent the north airfield improvements LAWA is seeking to provide that support the safe and efficient movement of aircraft at LAX, as explained in both the SPAS Draft EIR and the Preliminary LAX SPAS Report. This is consistent with the purpose of the Stipulated Settlement and with CEQA. Under Section V.E of the Stipulated Settlement, LAWA has discretion to determine an appropriate methodology to conduct the LAX SPAS, which includes the identification of project objectives.

It is not clear what types of "numerical improvements" the commentor is seeking to identify. The SPAS Draft EIR and Preliminary LAX SPAS Report identify how and to what extent Alternative 3, and all of the SPAS alternatives, provide solutions to the problems that the Yellow Light Projects were designed to achieve. For more information, please see Section 2.3.1 of the SPAS Draft EIR and Section 6.3 of the Preliminary LAX SPAS Report.

SPAS-PC00130-70

Comment:

2. improve the Ground Access System at LAX to Better Accommodate Airport-Related Traffic, Especially as Related to the Central Terminal Area
Page 1-11 Travelers, visitors, employees, vendors, and others utilizing the commercial passenger terminal at LAX, defined by the CTA, have various ground access options including private vehicles, transportation service providers (i.e., taxis, shuttles, limousines, etc.), and public transit. Ground access within the CTA, where departing and arriving passengers are dropped off and picked up at curbside or can park their vehicles, is provided by an upper-level roadway and a lower-level roadway that loop

around the center of the CTA and connect with surface streets on the east side of the CTA. The subject roadway system poses a number of concerns relative to traffic flows including, but not limited to, the following:
- CTA roadway system design currently creates queuing, weaving, and conflict points at various locations that impede traffic flow;
- During peak travel times, inbound airport traffic currently extends out of the CTA roadways onto public streets and may worsen as airport activity returns and grows;

Question: 1.2.1 Topic 2 - Improve Ground Access
What were the Alt D ground access improvements? Numerically, how many more people could get to their gates? Again, all of the bullets describe more of the "problems" with the current rather than what improvements were accomplished that need to be addressed. Since virtually no significant changes are imposed on CTA traffic by the LAWA alternatives what does LAWA believe should be done to improve traffic? Is this objective considered lower priority? How can these improvements be combined with the serious capital improvement and refurbishment projects that LAWA must entertain just to keep LAX open?

Response:

SPAS Alternative 3 proposes the ground access improvements associated with Alternative D of the LAX Master Plan. Those improvements are described in Section 2.3.1.3.3 of the SPAS Draft EIR. Relative to "Numerically, how many more people could get to their gates?" it is unclear as to how exactly the question pertains to the traffic flow discussion on page 1-11 of the SPAS Draft EIR, as cited in the comment; however, in general terms, traffic flow characteristics do not determine the number of people that reach their intended gates, but do have an influence on whether they reach their gates on-time or not.

Section 2.2 of the SPAS Draft EIR presents the SPAS project objectives, including those related to ground access within the CTA. As described therein, LAWA is seeking to improve the ground access system at LAX to better accommodate airport-related traffic, especially within the CTA. In particular, LAWA is seeking to:
- Design CTA roadway segments and curbside areas that reduce traffic "bottlenecks" and congestion;
- Reduce the volume of private vehicles accessing the CTA by reconfiguring and developing airport facilities that allow for alternative drop off and pick up of passengers outside the CTA;
- Reduce roadway congestion and improve performance and reliability of the airport ground transportation system by providing a grade-separated/dedicated transportation system that connects airport and transit facilities to the CTA; and
- Integrate LAWA's ground access system improvements with regional transit facilities nearby, including the recently approved Metro Crenshaw/LAX Transit Corridor and Station.

The objective of reducing traffic at LAX, specifically the CTA, was not a "lesser" objective. In fact, as described in Section 2.3 of the SPAS Draft EIR, the SPAS alternatives provide numerous options for ground access improvements, including, among other things, constructing an automated people mover to link to the CTA (Alternatives 3 and 9), adding new curbside space with the addition of Terminal 0 (Alternatives 1, 2, 5, 6, and 7), and development of an elevated/dedicated busway (Alternative 8). As indicated in Section 2.2 of the SPAS Draft EIR, these improvements are designed to improve the ground access system at LAX and better accommodate airport related traffic, especially related to the CTA.

Should the LAWA Board of Airport Commissioners (BOAC) select and approve a SPAS alternative, implementation of the ground access improvements proposed under that alternative would be integrated as appropriate with other ongoing capital improvement projects at LAX. Such integration would be further assessed and coordinated in conjunction with more detailed design and construction level planning of the approved SPAS improvements.

SPAS-PC00130-71

Comment:

Page 1-12 3. Maintain LAX's Position as the Premier International Gateway in Supporting and Advancing the Economic Growth and Vitality of the Los Angeles Region
LAX serves a key role in the region's economy, particularly as related to LAX's position as the international gateway for the western United States. According to a study completed in 2007 by the Los Angeles Economic Development Corporation (LAEDC), over the course of 2006 an average transoceanic flight traveling round-trip from LAX everyday added $623 million in economic output and sustained 3,120 direct and indirect jobs in Southern California with $156 million in wages. 8 Given the continued growth in, and reliance on, new large aircraft such as the Airbus A380 by major airlines operating on those long distance international routes, it is important that LAX be able to effectively accommodate those aircraft. LAX is a major employer on both a local level and a regional level. According to the LAX Master Plan Final EIS/EIR, on-airport employment at LAX provided almost 59,000 jobs and, on a larger-scale, LAX related regional employment provided over 400,000 jobs and $60 billion in economic output.

Question: Although air commerce is tied strongly to our regional economy, where does LAWA prove that the amount of economic benefits couldn't be provided by having the same amount of economic activity disbursed around the region. How is this objective consistent with fixing the problems which Alt D fixed? Are the numbers quoted based on LAWA'S dominant position with 75% of all activity? A prior 1968 LAX Master Plan EIR recognized the importance of regionalization. Is this objective lost by the current LAWA administration?

Response:

The discussion cited from page 1-12 of the SPAS Draft EIR provides economic and employment data specific to LAX, as taken into consideration in formulating the SPAS project objectives. Note that economic/social impacts, such as employment and distribution of economic activity, are not required to be evaluated under CEQA. (State CEQA Guidelines Section 15064(e).) The SPAS project objectives appropriately pertain to improvements and activities at LAX. Objective 3, to which commentor refers, is a general comment which the improvements and modifications contained in Alternative D sought to promote. Relative to the relationship between SPAS improvements proposed at LAX and the regionalization of air travel demand in Southern California, please refer to Topical Response TR-SPAS-REG-1 regarding the fact that LAWA, through the LAX Master Plan, the SPAS process, and other efforts, supports the regionalization of air travel demand in Southern California.

SPAS-PC00130-72

Comment:

It also talks about job growth. Since there's not unlimited funds, has LAWA done an evaluation of job/economic impacts of the various types of jobs? We understand that landside projects provide twice the job creation of airside ones and 8X more economic benefits. What has LAWA's studies shown?

Response:

The content of this comment is similar to comment SPAS-PC00130-725; please refer to Response to Comment SPAS-PC00130-725.

SPAS-PC00130-73

Comment:

Page 1-12 10Los Angeles Economic Development Corporation, Economic Impact Analysis - LAX Airfield and Terminal Construction Projects, 2011.

Question: LAWA appears to be relying on this LAEDC analysis. Where in the document pile is this analysis? If not included, please make it available.

Response:

LAWA compiled copies of the references used in the preparation of the SPAS Draft EIR pursuant to Public Resources Code Section 21092(b)(1) and Section 15087(c)(5) of the State CEQA Guidelines, including the report by the Los Angeles Economic Development Corporation identified in this comment. These documents were available for review at LAWA's Administrative offices during the public comment period and continue to be available for review upon request.

SPAS-PC00130-74

Comment:

Page1-13 4.Plan Improvements That Do Not Result in More Than 153 Passenger Gates at 78.9 MAP In identifying and evaluating alternatives to the demolition of Terminals 1, 2, and 3, LAWA is seeking to maintain consistency with the LAX Master Plan design for a total of 153 passenger gates, which was based on a future passenger activity level of 78.9 MAP at LAX in 2015

Question: No more than 153 gates? What schedule for phase out of gates has LAWA created or assumed when evaluating their alternatives? Is there a plan to remove the remote gates? Separate projects like the AA gates in the southeast portion of LAX are apparently not part of this study since a separate NOP and negdec was used. What other gate related projects are contemplated?

Response:

Please see Response to Comment SPAS-PC00130-170 with respect to the phasing out of the west remote gates, and Response to Comment SPAS-PC00130-173 regarding the fact that the American Airlines commuter facility was included in the 153 gates. The only other gate-related projects currently being contemplated for LAX are the Bradley West Project, currently under construction, the future Midfield Satellite Concourse, and the Passenger Boarding Bridge Replacements/Improvements. All of these projects are identified in Section 5.3 of the SPAS Draft EIR and accounted for in the cumulative impacts analysis in Chapter 5 of the SPAS Draft EIR.

SPAS-PC00130-75

Comment:

Page 1-13 5. Enhance Safety and Security at LAX
In identifying and evaluating alternatives to the Yellow Light Projects, which are key elements of the LAX Master Plan, LAWA is seeking to maintain the ability of the LAX Master Plan, if and as modified by the outcome of the SPAS process, to enhance safety and security at LAX.

Question: There were dozens of recommendations in the 2004 RAND Study of LAX Security. Which of these have been introduced in the new alternatives? If not in the alternatives, how many have been addressed by separate projects?

Response:

The SPAS Draft EIR is a programmatic document, prepared pursuant to Section 15168 of the State CEQA Guidelines. A program EIR is prepared at a more general level of planning than a project level EIR, and allows a lead agency to "consider broad policy alternatives and program-wide mitigation measures at an early time when the agency has greater flexibility to deal with basic problems or cumulative impacts." (State CEQA Guidelines Section 15168(b)(4).) At this level of planning, the SPAS alternatives do not include the final design of any of the individual project components, including the security measures to be incorporated into the proposed facilities. Security measures would be determined and addressed during project-level planning and design, at which time any impacts of these measures would be analyzed, and, if required, feasible mitigation measures imposed. Additionally, security is not an environmental impact and is, therefore, not required to be discussed in the SPAS Draft EIR under CEQA or any other law. However, a security assessment of the SPAS alternatives is included in Appendix I of the Preliminary LAX SPAS Report to comply with the Stipulated Settlement and Section 7.G(2) of the LAX Specific Plan. Please also see Response to Comment SPAS-PC00130-424 regarding the implementation of security issues recommended by the RAND Corporation.

SPAS-PC00130-76

Comment:

Page 1-13 6. Minimize Environmental Impacts on Surrounding Communities
LAX is a major international airport located within a very urbanized area, with established communities situated directly to the north, east, and south. These communities are affected to varying degrees by existing operations at the airport. Recognizing that these existing effects to the surrounding communities may change based on the alternatives being considered in SPAS, LAWA seeks to identify and apply ways to avoid, reduce, or minimize environmental impacts on surrounding communities

Question: 1.2.2 Airfield Improvements
Where is taxiway placement to facilitate movement listed? How much improvement can be accomplished by moving and changing taxiways as opposed to runways? How do the analyses used in this study differ from those in the Northside Safety Analysis for which LAWA paid a couple million dollars?
Where are the assumptions listed used in the estimates? ie location of gates, taxiways, types of aircraft, frequency of aircraft, tower staffing, etc.

Response:

Taxiway construction and placement is discussed throughout Chapter 1, Introduction and Summary, and Chapter 2, Project Description, of the SPAS Draft EIR. The safety section, Section 4.7.2, also discusses the safety benefits of including a taxiway, such as movement of aircraft and minimizing aircraft incursions. As discussed and illustrated in Chapter 2 of the SPAS Draft EIR, the placement of each taxiway or taxilane is based on a separation standard per FAA guidelines. The facilities impacted by the placement of the taxiways/taxilanes are discussed in Sections 2.3.1 and 2.3.1.10 of the SPAS Draft EIR.

The EIR analyzed an alternative that did not propose runway relocation and did include taxiway modifications. Specifically, Alternative 2 does not include the relocation of Runway 6L/24R or Runway 6R/24L, but does include the modification and addition of high-speed runway exits (taxiways) to enhance safe and efficient movement of arriving aircraft. (See page 2-17 and Table 2-2 of the SPAS Draft EIR.)

The SPAS Draft EIR effort and the Los Angeles International Airport North Airfield Safety Study (NASS) are not easily comparable because they were conducted for different reasons and/or objectives. As stated in the Executive Summary of the NASS, the primary aim of the study was to "estimate as specifically as possible the level of future safety of several alternate configurations of the LAX North Airfield." An auxiliary goal was "to provide useful information about the capacity implications of the various configurations," in light of projections about LAX traffic levels in 2020.

The project objectives for the SPAS Report were more numerous, including (1) to improve the ground access system at LAX, (2) to maintain LAX's position as the premier international gateway in the Los Angeles region, and (3) to enhance safety at LAX, among others. The various project objectives for the SPAS effort are identified in Section 2.2 of the SPAS Draft EIR.

The NASS is referenced and summarized on page 4-505 in Section 4.7.2 of the SPAS Draft EIR and provided in its entirety as Appendix H-6 of the Preliminary LAX SPAS Report. Please refer to Response to Comment PC00130-168 regarding the NASS and the opinion of the academic panel involved in that study.

The elements and assumptions used in both studies are identified throughout the documents. The assumptions considered for the development of the SPAS alternatives can be found in the Preliminary LAX SPAS Report.

SPAS-PC00130-77

Comment:

Page 1-13 7. Produce an Improvement Program that is Efficient, Sustainable, Feasible, and Fiscally Responsible
The nature and scope of improvements associated with the Yellow Light Projects are substantial. Each of those projects represents a major undertaking, requiring substantial funding; considerable planning, engineering, and design; and major construction activities. The costs for each of these major improvement projects would be financed primarily by Airport Improvement Program grants, Passenger Facility Charges (PFCs), and bond sales, all of which are subject to federal requirements regarding expenditure of airport funds, and which will also be utilized to finance other airport improvements outside of the scope of SPAS. The ability to successfully fund such improvements is, to a large extent, dependent on whether certain airport activity levels are reached. Additionally, the types of improvements associated with the Yellow Light Projects and the alternatives thereto represent major long-term investments in the airport's infrastructure that must be efficient and sustainable for many years. The construction of these major improvements poses the potential for major disruptions to existing airport operations. In identifying and evaluating alternatives to those Yellow Light Projects, LAWA is seeking to produce an improvement program that is efficient, sustainable, feasible, and fiscally responsible. (underline is emphasis)

Question: Since LAWA is concerned about cost, what has LAWA identified as a prioritization for projects? Are any time phasing issues addressed? Has LAWA identified the potential disruptions? What are they? What assumptions have been made in the establishment of the costs? Who prepared the cost estimates and how reliable are they? ie Alt D was estimated at $6B prior to the approval cycle and increased to $12 at approval. Current estimates for Alt D we've heard exceed $100B. What is the actual current estimate? Cost estimates were done for LAWA in 2008 for SPAS. How have they changed in scope and confidence?

Response:

Please see Response to Comment SPAS-PC00130-41 regarding phasing plans for SPAS. As discussed in that response, the SPAS Draft EIR is a programmatic document. Therefore, because there are no specific improvement or modification designs, potential disruptions associated with project implementation are unknown. A project-level environmental review will be conducted for individual projects prior to construction.

An EIR shall inform decision-makers and the public about the potential significant environmental effects of the proposed project and identify means to reduce, avoid, or mitigate environmental damage. (State CEQA Guidelines Section 15002(a).) The comment does not raise an significant environmental issue or address the adequacy of the environmental analysis included in the SPAS Draft EIR. It raises funding and economic questions, which need not be discussed because economic effects of a project shall not be treated as significant effects on the environment. (State CEQA Guidelines Section 15131(a).) Therefore, because a lead agency need only respond to comments that raise significant environmental issues, no further response is required. (State CEQA Guidelines Section 15204.) However, rough-order-of-magnitude cost estimates were prepared for all of the components of all of the SPAS alternatives evaluated in the SPAS Draft EIR (see Chapter 8 and Appendix G of the Preliminary LAX SPAS Report). These cost estimates did not rely on any previous cost estimates that may have been prepared. In addition to providing an equal basis of cost comparison between the SPAS alternatives, as presented in Chapter 8 of the Preliminary LAX SPAS Report, these cost estimates were used as the basis for the program-level air quality construction analysis. In order to complete the ROM cost estimates, assumptions were made as to the characteristics of the various improvements. The SPAS ROM cost estimates, prepared by professionals experienced in the development of construction cost estimates and familiar with the construction programs at LAX, were detailed and thorough estimates for this level of planning and, as the name states, provide a rough-order-of-magnitude of the costs associated with constructing the improvements associated with the various SPAS alternatives. The cost estimates consider a wide range of factors, and provide assumptions and allowances for those factors that are not known at this time. Assumptions used in the calculations are identified in Appendix G of the Preliminary LAX SPAS Report. The commentor provides no substantiation for the claim that costs associated with the approved LAX Master Plan have grown to over $100 billion. The estimated

costs to complete the remaining projects associated with the approved LAX Master Plan (i.e., Alternative 3) are presented in Chapter 8 of the Preliminary LAX SPAS Report, with details provided in Appendix G.

SPAS-PC00130-78

Comment:

Page 1-13 1.2.2 Overview of SPAS Alternatives
Nine alternatives offering various options to the Yellow Light Projects, including one alternative that provides for implementation of the Yellow Light Projects (i.e., implement the Yellow Light Projects as generally reflected in the LAX Master Plan instead of options to those improvements), are addressed within this Draft EIR for SPAS. Figure 1-4 identifies the location of the Yellow Light Project areas. The types of improvements used to define the key characteristics of each SPAS alternative can be grouped into the following three categories:
- Airfield improvements - Airfield improvements include changes to the runways, taxiways, navigational aids, and service and maintenance roads associated with the north airfield. The primary differences in airfield improvements associated with the various SPAS alternatives pertain to:
- Separation distances between runways and taxiways. Separation distances largely determine the maximum size aircraft that can freely operate on that system under various visibility conditions, and, in certain visibility conditions, would either require Federal Aviation Administration (FAA) approval of special operating procedures (i.e., Modifications of Standards or other forms of operational waivers) or would be prohibited;

Question: Where is taxiway placement to facilitate movement listed? How much improvement can be accomplished by moving and changing taxiways as opposed to runways? How do the analyses used in this study differ from those in the Northside Safety Analysis for which LAWA paid a couple million dollars?
Where are the assumptions listed used in the estimates? ie location of gates, taxiways, types of aircraft, frequency of aircraft, tower staffing, etc.

Response:

The content of this comment is essentially the same as comment SPAS-PC00130-76; please refer to Response to Comment SPAS-PC00130-76.

SPAS-PC00130-79

Comment:

Page 1-14
- Whether an increase in the separation distance between Runway 6L/24R and Runway 6R/24L would allow for the construction of a centerfield parallel taxiway between the runways, to enable aircraft arriving on the outboard (6L/24R) runway to exit onto the center taxiway and hold while aircraft are departing on the inboard (6R/24L) runway, thereby allowing the departing aircraft to safely pass before the arriving aircraft proceeds to the terminal gates;
- The extent to which the Lincoln Boulevard and the Argo Drainage Channel would have to be modified in order to accommodate a northerly shift in the alignment of Runway 6L/24R;
- Whether Runway 6R/24L would be extended 1,250 feet eastward to provide greater departure length in west flow condition that would better accommodate departures of large aircraft on longhaul flights and improve the balance between the north airfield and the south airfield relative to such departures;
Whether Runway 6L/24R would be reconfigured or extended to relocate its associated RPZ with respect to residential uses, and/or to improve the north airfield and the south airfield relative to the operation of aircraft;
- How RSA requirements would be met, in terms of runway extensions, declared distances,11 displaced thresholds, 12 or a combination thereof; and
- Separation distances between Runway 6R/24L, Taxiway E, Taxilane D, the adjacent vehicle service road, and the aircraft gates/parking positions at the north end of the CTA, which largely determine the maximum size aircraft that can either freely operate on that system or would be subject to certain

limitations, particularly as related to the interface between aircraft going to or from the gates at Terminals 1 through 3 and aircraft taxiing to the east end of Runway 6R/24L for departure.

Question: Which flight mix was assumed as several were developed during the past four years? How was it determined? How does this flight mix assumption compare with the Part 161 study that LAWA is about to complete?

Response:

Please refer to Appendix F-1 of the Preliminary LAX SPAS Report. A future Design Day Flight Schedule (DDFS) was developed to represent forecasted activity levels for a Peak Month Average Day (PMAD) in 2025 (the forecast year). Specifically, aircraft fleet mix assumptions for the 2025 DDFS for scheduled passenger and cargo activity were based on the 2009 DDFS. Please see Appendix F-1, page 22 for a detailed discussion of the methodology for developing the 2025 DDFS. Information about the 2009 DDFS is also available in Appendix F-1.

In Appendix F-1, the LAX 2025 fleet mix is presented in Table 12 entitled "LAX 2025 DDFS Aircraft Fleet Mix by Airplane Design Group." Section 4.2 in Appendix F-1 of the Preliminary LAX SPAS Report presents the methodology used to develop the 2025 fleet.

The commentor is inquiring about how the 2025 DDFS compares to the LAX Part 161 Study currently under way. The LAX Part 161 Study and the SPAS Draft EIR analyzed two different forecast years, 2017 and 2025, respectively. Therefore, no valid comparison could be drawn because 8 years separate the two forecast years.

SPAS-PC00130-80

Comment:

- Terminal Improvements - Terminal improvements consist primarily of additions/demolitions to existing terminals/concourses, and, for most SPAS alternatives, the construction of a new terminal - Terminal 0 ("zero"). The primary differences in terminal improvements for the various SPAS alternatives are directly related to the movement of runways and taxiways under each alternative. Specifically, the alternatives differ in the location of their building limit lines (i.e., the "object free" safety area along runways and taxiways where no part of a structure can be present) and their aircraft parking limit lines (APLL) (i.e., the safety clearance setback area along runways and taxiways into which no part of an aircraft parked at a gate can extend). The northernmost limit of concourse building area and/or aircraft gate parking positions is defined by the southernmost safety clearance distance for the runways and taxiways in the north airfield. Depending on the location and design of the runways and taxiways associated with each alternative, the locations of the building limit line and APLL may differ between alternatives.

Question: How has LAWA reconciled and quantified Alt D improvements for comparison to current program proposed? ie More or less terminal area? curb space? seating area near gates? concessions? TSA and baggage handling areas?

What assumptions has LAWA made about the need and schedule for fixing current infrastructure? ie upper roadway, bridges, terminals, etc .

Response:

As described in Section 2.3.1.3 of the SPAS Draft EIR, the LAX Master Plan (Alternative D) is part of the SPAS alternatives as a fully integrated alternative which encompasses airfield, terminal and ground access components. Alternative 3 is the CEQA "No Project" Alternative and represents what would reasonably be expected to occur if the LAX Master Plan, and all associated improvements envisioned in the LAX Master Plan document, were to be implemented.

Throughout the SPAS Draft EIR, comparisons between Alternative 3 and the remaining SPAS alternatives can be drawn, in that all of the alternatives are addressed in each topical section and the tables within those sections provided side-by-side data for the alternatives. Specifically, Table 1-2 in Chapter 1 of the SPAS Draft EIR presents a preliminary evaluation of the relationship between SPAS

project objectives and alternatives. Table 1-3 of the SPAS Draft EIR also describes each of the SPAS alternatives' characteristics as related to the SPAS Draft EIR objectives. Please see Table 2-2 in Chapter 2 of the SPAS Draft EIR for a summary of elements studied in the SPAS Draft EIR analyses such as terminal and ground access key elements.

Regarding "seating area near gates, concessions, TSA and baggage handling areas," as a program-level document, the SPAS Draft EIR did not specify these elements. LAWA would analyze these project-specific elements as part of any subsequent project-level CEQA documentation.

Regarding "the need and schedule for fixing current infrastructure," ongoing maintenance and miscellaneous improvements were considered in the cumulative impacts analyses provided in Chapter 5 of the SPAS Draft EIR. Please see pages 5-17 through 5-22 for a description of the ongoing and planned airfield-, terminal-, and infrastructure/security-related improvements at LAX. Additionally, LAWA provides information on ongoing projects on their website under "Projects and Reports": http://www.lawa.org/welcomeLAX.aspx.

SPAS-PC00130-81

Comment:

Page 1-17 1.2.2 Terminals....
In general, the building lines and APLLs associated with most of the alternatives extend southward, overlapping, to varying degrees, portions of the concourse areas for Terminals 1 through 3, which would require removal (demolition) of those building areas that encroach past the building limit line and/or the elimination or reduction in aircraft size capability of gate parking positions that encroach past the parking limit line. Conversely, the building and parking limit lines associated with several alternatives do not extend as far south as the limit lines defined in the LAX Master Plan, which assumed the movement of Runway 6R/24L 340 feet south and defined the northerly building limits for the Tom Bradley International Terminal (TBIT) West Gates, currently under construction as part of the Bradley West Project, and the future Midfield Satellite Concourse (MSC). In those cases, establishing building and parking limit lines farther north than the current LAX Master Plan limit lines would allow the opportunity for a future northward extension (i.e., an addition to) the north concourses for Bradley West and the MSC.
While the amount of concourse area and the layout of aircraft gates vary between alternatives, none of the SPAS alternatives includes more than 153 passenger gates.

Question: The locations and purposes of the terminal 0 appear to have been located to create new gate types which are different than existing ones. Where is the chart which shows the number and types of gates that must be present? Include this information since although there is to be no more than 153 gates it appears that "remote gates" are not taken out of service.

Response:

Please see Figure B entitled "SPAS Alternatives 1 and 2 Gate Positions" in Attachment A to Appendix F-1 of the Preliminary LAX SPAS Report. Table 13 in Appendix F-1 illustrates the number of terminals and number of gates at each terminal under Alternatives 1 through 4. Alternatives 5 through 7 also include Terminal 0. However, as indicated in Section 2.3 of the SPAS Draft, the configuration of the terminal facilities in these alternatives are similar to Alternative 1. The minor differences are discussed in the section for each alternative in Section 2.3 of the SPAS Draft EIR.

As described in Sections 2.3.1.1.2, 2.3.1.2.2, 2.3.1.5.2, 2.3.1.6.2, and 2.3.1.7.2 of the SPAS Draft EIR, and as depicted in Figure B, Terminal 0 would include seven gates, under SPAS Alternatives 1, 2, 5, 6, and 7. Six out of seven gates would be Aircraft Design Group (ADG) III capable (depicted with representative Boeing 737-800s with winglets), with the seventh gate being ADG IV capable (depicted with a representative Boeing 757-200 with winglets).

The comment reads: "Include this information since although there is to be no more than 153 gates it appears that "remote gates" are not taken out of service." It is unclear which "remote gates" the commentor is referring to. As described in Section 2.3.1.1.2 of the SPAS Draft EIR, the west remote gates (currently located between Taxiways E17 and AA) would be eliminated upon completion of the

airfield and terminal improvements. That is reflected in Figure B, referenced above, whereby the west remote gates are no longer in service. Also, under Alternative 1, construction of Terminal 0 will replace gates lost or downsized at Terminals 1 through 3.

SPAS-PC00130-82

Comment:

Page 1-17 1.2.2 Terminals....
Certain alternatives propose a westerly realignment of the Terminal 3 concourse to provide a wider alleyway between the concourses at Terminals 2 and 3 for aircraft taxiing.
For those alternatives that include development of the new Terminal 0, the existing alignment of Sky Way (the primary access road connecting CTA to southbound Sepulveda and 96th Street Bridge) would be shifted east, into the area now occupied by the Park One parking lot, providing an improved entrance roadway into the CTA.

Question: 1.2.2 Terminals
The shift of the 96th street bridge appears to be the only major change to CTA traffic flow despite numerous suggestions during SPAS meetings. is there a listing of all of the traffic flow improvements in one location or table? Please list them as it appears that most have not been considered.

Response:

The SPAS Draft EIR considered numerous ground access improvements, including those related to the CTA. Please see Section 2.3.1 of the SPAS Draft EIR for a discussion of the types of ground access improvements proposed for each alternative. Additionally, as provided on page 1-17 of the SPAS Draft EIR, the proposed ground access improvements consist of changes to on-airport roads, the addition of specific transportation facilities, and development of dedicated access (i.e., busway or APM) into the CTA. The EIR also took into account non-Yellow Light ground access improvements, including an Intermodal Transportation Center (ITC) and an APM connecting the ITC and Consolidated Rental Car Facility (CONRAC) to the CTA.

All ground access suggestions during the SPAS meetings were considered. Please see Appendix D-1, Community Meetings, and Appendix D-2, Advisory Meetings, of the Preliminary LAX SPAS Report, for a list of advisory committee and community meeting dates, meeting materials, and public comments from community meetings. Section 5.1.2.1 provides a detailed discussion of the initial ground access concepts. Please see Chapter 5 and Appendix E2 of the Preliminary LAX SPAS Report which identifies the entire SPAS Concept Development Process and includes the ground access concepts that were provided at the SPAS meetings. The ground access concepts in SPAS Draft EIR are the final concepts that were included for the EIR analysis.

SPAS-PC00130-83

Comment:

Page 1-25 1.2.2 Alternatives interchangeability and functionally defined

Alternative 4 represents what would reasonably be expected to occur if all ongoing and reasonably foreseeable non-Yellow Light improvements identified in the LAX Master Plan (i.e., "Alternative D") were implemented, and none of the Yellow Light Projects or any of the identified alternatives to the LAX Master Plan Program were constructed or implemented. Analysis of Alternative 4 will allow decision-makers and the public to evaluate the impacts of simply eliminating the Yellow Light Projects from the LAX Master Plan Program. Alternative 4 is a fullyintegrated alternative, consisting of airfield, terminal, and ground access components. Ongoing and reasonably-foreseeable non-Yellow Light projects that would be developed include the Bradley West Project, an extension to Runway 6R/24L for RSA improvements, the MSC and related new passenger processor and connector within the CTA, and various terminal improvements. In addition, a CONRAC at Parking Lot C would be constructed and a new parking structure would be developed at the ITC site to accommodate the public parking displaced by the CONRAC. A portion of the Argo Drainage Channel would be covered to comply with existing RSA requirements by converting a portion of the existing open unlined channel to an enclosed concrete

box culvert. There would be no modifications to Lincoln Boulevard under this alternative. This alternative is illustrated in Figure 1-8.

Question:. How do Alternatives 3 and 4, the two LAWA identifies as unique and not "interchangeable" consider major capital improvements which will need to be made just to keep airport ground access functional? CTA upper roadway bridge repairs to take care of creeping rust issues. parking lots and passenger bridges to terminals etc.

Response:

Both Alternatives 3 and 4 include improvements designed to facilitate ground access. Alternative 4, for instance, includes the construction of a CONRAC at Parking Lot C, as well as a new parking structure to accommodate parking displaced by the CONRAC. (Section 1.2.2 of the SPAS Draft EIR.) Please see Section 1.2.2 of the SPAS Draft EIR for a discussion of the ground access improvements associated with Alternative 3.

Implementation of any of the SPAS alternatives, if approved, would be coordinated with other improvement projects, as well as with ongoing maintenance programs, at LAX as appropriate. The nature, characteristics, and timing of such coordination would be determined at the more detailed planning, design, and construction stages of each SPAS improvement project when implemented.

SPAS-PC00130-84

Comment:

Page 1-25 1.2.2 Alternatives interchangeability and functionally defined
Alternative 5 provides, as noted above, a focus on airfield improvements and associated terminal improvements, as may be compared to such improvements proposed under Alternatives 1 through 4. This alternative is compatible with the ground access improvements associated with Alternatives 1 and 2, as well as the ground access improvements associated with Alternatives 8 and 9, described below. The distinguishing feature of this alternative is the movement of Runway 6L/24R 350 feet north. Similar to Alternative 1, a new centerfield taxiway would be constructed, Runway 6R/24L would be extended, Taxilane D and Taxiway E would be modified/improved, and the service road would be relocated. Under this alternative, the taxilane/taxiway improvements would meet FAA design requirements to fully accommodate ADG VI aircraft. (Under Alternatives 1, 2, and 6, the taxiway configuration would either not meet or only partially meet ADG VI design standards, which would impose certain limitations and special requirements during the operation of those aircraft.) The increased runway-taxiway separation requirements under this alternative would cause the aircraft taxiway operations area to extend farther south than under Alternatives 1, 2, and 6, which, in turn, would result in comparatively less concourse and/or gate area for the potential TBIT extension and MSC extension. Under this alternative, a greater portion of Lincoln Boulevard would be below grade and/or tunneled than under Alternative 1. This alternative is illustrated in Figure 1-9.

Question: 1.2.2 Alternative 5 description notes that alts 1,2, and 6 taxiway/taxilanes would not fully accommodate ADG VI aircraft. What chart lists the taxiway/taxilane aircraft accommodations? Since the SPAS is supposed to address the same "problems" fixed by Alt D what specific changes in alt D changed taxiway/taxilane limits and how is this different from each of the alternatives?

Response:

A summary of north airfield runways and parallel taxiways compliance with FAA Airport Design Standards is provided in Table 4.7.2-8 of Section 4.7.2 of the SPAS Draft EIR. This table lists the differences between all of the alternatives in a tabular format. Additionally, Table 4.7.2-16 in Section 4.7.2 provides a summary of how each alternative relates to safety and efficiency enhancements to the north airfield, and Table 1-2 in Section 1 provides a preliminary evaluation of how each alternative responds to the objectives of the SPAS. In Section 2.3 of the SPAS Draft EIR provides a detailed discussion of each alternative, specifically the changes to north airfield runways and parallel taxilane/taxiway improvements. Chapter 6 of the Preliminary LAX SPAS Report describes how each of the SPAS alternatives addresses the criteria identified in Section V.D of the Stipulated Settlement, and Sections 6.3.1.5, 6.3.2.5, 6.3.4.5, 6.3.5.5, 6.3.6.5, 6.3.7.5, 6.3.8.5, and 6.3.9.5 specifically address how

and to what extent each of the SPAS alternatives provide solutions to the problems the Yellow Light Projects were designed to address.

SPAS-PC00130-85

Comment:

Page 1-25 1.2.2 Alternatives interchangeability and functionally defined
Alternative 6, similar to Alternative 5, also focuses on airfield improvements and associated terminal improvements, as may be compared to such improvements proposed under Alternatives 1 through 4. This alternative is compatible with the ground access improvements associated with Alternatives 1 and 2, as well as the improvements associated with Alternatives 8 and 9. The distinguishing feature of this alternative is the movement of Runway 6L/24R 100 feet north. Similar to Alternative 1, a new centerfield taxiway would be constructed. All other physical aspects of the airfield and terminal improvements associated with this alternative would be essentially the same as those of Alternative 1, described above, with a lesser portion of the Argo Drainage Channel requiring covering (i.e., conversion to a concrete box culvert) and a lesser portion of Lincoln Boulevard requiring tunneling. This alternative is illustrated in Figure 1-10.

Question: 1.2.2 Alternative 6 notes conversion of the argo ditch to a concrete box culvert. Since this is created to accommodate runoff and flow of water from an unknown water source what calculations has LAWA performed to ensure adequacy of flow capacity? Does it (or any other changes to the argo ditch) accommodate a 100 year storm (worst case flow condition)?

Response:

The Argo Drainage Channel does not convey runoff from an unknown water source; rather, the channel conveys stormwater from the Argo sub-basin, which is illustrated in Figure 4.8-1 of the SPAS Draft EIR. The modifications to the Argo Drainage Channel, proposed as a part of Alternatives 1, 5, and 6, have been developed at a program level of planning for SPAS. These alternatives do not define the final culvert design, including size of the culvert or the design storm that would be accommodated. These details will be determined and addressed at the project level, should one of those alternatives be approved. Please see Response to Comment SPAS-PC00130-169 for additional details regarding the design capacity of the Argo Drainage Channel improvements. As indicated in this response, and as stated in Mitigation Measure MM-HWQ (SPAS)-1, the design storm frequency used would be a minimum of a 10-year storm event in accordance with the City of Los Angeles Manual Part G, Storm Drain Design, Section G200 Hydrologic Design for areas without sumps (G 222, Design Frequencies),1 which is applicable to the airport. A depression or sump is an area from which there is no surface flow outlet and must meet one or more of the following conditions during a flood event: (1) Ponded depth of 3 feet or greater, and (2) Ponded water surface elevations within one foot below the base of adjacent dwellings resulting from construction of facilities with less than the design capacity. This condition does not apply if ponded water can escape as surface flow before reaching the base of adjacent dwellings during the design storm. There are no areas on the airport that meet these conditions. Therefore, LAX is subject to the criteria for areas without sumps (i.e., the 10-year storm event), noted above. This is considered an acceptable level of protection. Substantially larger storm events, such as the 100-year storm event, may result in short-term, localized flooding within portions of the airport. However, such a condition would occur so infrequently (i.e., there is a 1% probability that that such an event would occur in any given year) and would remain for a very limited period of time before flows would recess to the storm drain that investment in much larger infrastructure is not warranted unless there are special conditions such as sumps, for which a 50-year event is used as the design storm. Please also see Response to Comment SPAS-PC00130-273 for a discussion of the applicable flood standards.

1. City of Los Angeles, Department of Public Works, Bureau of Engineering, City of Los Angeles Manual Part G, Storm Drain Design, Hydrologic Design (G 200), June 1973.

SPAS-PC00130-86

Comment:

Page 1-26 1.2.3 Preliminary Evaluation of Relationship Between Project Objectives and SPAS Alternatives
Based on the project objectives presented above in Section 1.2.1 and the characteristics of the nine SPAS alternatives summarized in Section 1.2.2, Table 1-2 presents a preliminary evaluation of the relationship between each project objective and each SPAS alternative. A more detailed evaluation of that relationship will be completed in conjunction with further evaluation of the alternatives through preparation of the Final EIR and during the public hearings process. Table 1-3 provides additional information summarizing key characteristics associated with the SPAS alternatives that pertain to each objective. (underline for emphasis)

Question: The underlined sentence above states that further evaluations will be conducted. Is LAWA planning to recirculate their documents when this is done? How will LAWA ensure that each of the detailed assessments are changed to match the Alternative changes?

Response:

The subject statement was provided in anticipation of receiving comments during the public review period for the SPAS Draft EIR regarding the characteristics of each alternative and its environmental impacts. LAWA also received during the public review period comments and suggestions as to other potential alternatives that should be considered for SPAS. LAWA has carefully reviewed and considered all of those comments, prepared written responses to the comments, and, staff has recommended an alternative to the LAWA Board of Airport Commissioners (BOAC) for its consideration. As described in Chapter 2 of this SPAS Final EIR, the staff-recommended alternative is a combination of Alternative 1, for airfield and terminal improvements, and Alternative 9, for ground access improvements. The selection of Alternatives 1 and 9 combined as the staff-recommended alternative includes consideration of how these alternatives responded to the project objectives, in comparison to the other alternatives, based on existing information presented in Section 1.2.3 of the SPAS Draft EIR. Staff's evaluation of how the combination of Alternatives 1 and 9 respond to the project objectives is further described in detail in Chapter 2 of the Final EIR. Given that both Alternatives 1 and 9 were included in the SPAS Draft EIR analyses, and because no "significant new information" as defined in CEQA Guidelines Section 15088.5 has been added to the SPAS Draft EIR, there is no need to revise and/or recirculate the detailed assessment completed for the SPAS Draft EIR and circulated to agencies and the public.

SPAS-PC00130-87

Comment:

Page 1-45
Chapter1 -- Introduction and Executive Summary
This chapter introduces the project background and project description, an overview of the report organization, a discussion of areas of known controversy and issues to be resolved, and a delineation of documents that are incorporated by reference into this EIR. Also included is a summary of the environmental analysis and identification of the environmentally superior alternative. (underlined for emphasis)

Question: Since the analysis is summarized and environmentally superior alternative identified, why hasn't LAWA selected this as a preferred to go forward?

Response:

Please see Chapter 2 of this Final EIR regarding the rationale for the selection of the LAWA Staff-Recommended Alternative, which couples the airfield and terminal improvements associated with Alternative 1 with the ground access components associated with Alternative 9, which includes an APM.

SPAS-PC00130-88

Comment:

Page 1-46 1.3 Organization of this EIR
Chapter 6 -- Evaluation of Amendments to the LAX Specific Plan
This chapter evaluates the environmental impacts associated with amendments to the LAX Specific Plan, including a revision to Section 7.H that would require completion of passenger and airline surveys and studies, the results of which would help inform LAWA as to potential actions that could be taken to encourage airlines to provide increased domestic passenger service at other airports in the region, particularly those owned or operated by LAWA, as well as administrative amendments to the LAX Specific Plan that might be needed depending on the SPAS alternative. (Underline for emphasis)

Question: If the underlined action to require passenger and airline surveys is performed, how will LAWA make these public and how will they correlate this information to result in actions?
What other Amendments to the LAX Specific Plan are contemplated? When will final versions of the changes become available and how will they be distributed?

Response:

It is anticipated that the summaries of the results of the surveys required by the potential amendment to Section 7.H of the LAX Specific Plan will be presented to the LAWA Board of Airport Commissioners (BOAC) and will also be accessible for public review. The specific details of this presentation are unknown at this time, but do not impact the analysis of environmental impacts that would result from this potential amendment. The manner in which the survey information would be correlated with actions for encouraging activity at other airports will depend on the content of, and responses to, the surveys, which are not known at this time.

Preliminary LAX Specific Plan amendments were described in Section 6.1 of the SPAS Draft EIR; an updated discussion of potential LAX Specific Plan amendments, as well as a discussion of potential amendments to the LAX Plan, is provided in Chapter 3 of this Final EIR. If the Board of Airport Commissioners chooses to adopt one of the SPAS alternatives, all amendments to the LAX Specific Plan necessary to effectuate this approval will receive consideration by other local agencies, including the Los Angeles City Planning Commission and the Los Angeles City Council. Notice of consideration of the amendments by these agencies will be provided pursuant to the Brown Act.

SPAS-PC00130-89

Comment:

Page 1-46 1.4 Executive Summary of Environmental Impacts Related to SPAS
Table 1-4 summarizes the environmental impacts after mitigation of the SPAS alternatives as identified in Chapter 4, Environmental Impacts Analysis, of this EIR. Impacts associated with implementation of the alternatives include those directly associated with proposed physical improvements (e.g., impacts to biological resources that would occur from grading activities, impacts to aesthetics, views, light, and glare that would occur from development of new structures or modification of existing structures). Impacts associated with implementation of the alternatives also include those associated with proposed or anticipated changes in airport operations (e.g., noise impacts, air pollutant emissions from aircraft operations, traffic impacts from vehicles traveling to and from the airport). The majority of the operations related impacts summarized in this section, and more fully addressed in Chapters 4 and 5, are primarily attributable to future growth in aircraft and passenger activity levels at LAX that are projected to occur independent of the SPAS alternatives. The Draft EIR analyzes and identifies mitigation for such impacts even though they are attributable to future growth not related to the proposed project.

Question: None of the past EIRs have mentioned sink holes, but we are aware that they are occurring all over the airport. What is the frequency and magnitude of the occurrences over the past 10 years? ie before and after the drought period? Since LAWA is now aware of the Manchester Tunnel and it had water before the drought, have they measured the water since the drought ended? Where are the results of the water tests from the Manchester Tunnel? What did they reveal?.

Response:

Please see Response to Comment SPAS-PC00130-51 regarding sink holes at LAX and Response to Comment SPAS-PC00130-1012 regarding the north airfield abandoned tunnel segment.

SPAS-PC00130-90

Comment:

Page 1-47 1.4 Executive Summary of Environmental Impacts Related to SPAS
Specifically, the impacts analyses completed for the SPAS project include an evaluation of conditions projected to occur upon completion (buildout) of each alternative compared to conditions that existed at the time the Notice of Preparation (NOP) for the Draft EIR was published (i.e., existing baseline conditions). The analyses of operations-related impacts, such as those pertaining to air quality, noise, and traffic, account for the growth in activity projected to occur between 2009 (56.5 MAP and 1,493 average daily aircraft operations [landings and takeoffs combined]) and 2025 (78.9 MAP and 1,937 average daily aircraft operations). 13 This 30 to 40 percent increase in aircraft and passenger activity at LAX is projected to occur regardless of SPAS (i.e., would occur even if none of the SPAS alternatives were implemented). The SPAS Draft EIR analysis evaluates how the improvements specific to each alternative would interact with that projected growth and delineates the differences, or the similarities, in impacts between alternatives.

Question: How does the estimate of activity on page 1-46 2009 (56.5 MAP) to 2025 (78.9 MAP) correlate to what was used in the North Airfield Safety Study? Were the same flight mixes used? How do they differ?

Response:

The North Airfield Safety Study used a future Design Day Flight Schedule (DDFS) commensurate to 78.9 million annual passengers (MAP), the same MAP level as assumed under the SPAS Draft EIR analyses (as discussed on page 63 in Appendix A of Appendix E2-1 of the Preliminary LAX SPAS Report).

At the time the North Airfield Safety Study was initiated, the SPAS 2025 DDFS was not finalized and therefore not available to the North Airfield Safety Study team. However, a previous DDFS commensurate to 78.9 MAP had been developed for LAWA and was submitted to the North Airfield Safety Study team. This DDFS was previously developed by the LAWA technical consultant team using assumptions and methodology similar to those used in the SPAS Draft EIR analyses. Refer to Sections 4.1 and 4.2 of Appendix F-1 of the Preliminary LAX SPAS Report for details.

Regarding fleet mix differences, as shown in the table below, the fleet mixes assumed in the DDFS provided to the North Airfield Safety Study team and in the SPAS Draft EIR DDFS are similar in terms of percentages of total operations by Aircraft Design Group (ADG).

Percentages of Total Daily Operations

ADG	North Airfield Safety Study DDFS	SPAS Draft EIR 2025 DDFS
I	1.6%	0.6%
II	21.4%	21.0%
III	43.6%	46.5%
IV	20.4%	19.5%
V	11.2%	10.5%
V	1.8%	1.9%
Total	100.0%	100.0%

SPAS-PC00130-91

Comment:

Page 1-47 1.4 Executive Summary of Environmental Impacts Related to SPAS
As indicated in Table 1-4, impacts are anticipated to be less than significant after mitigation for all nine alternatives relative to most environmental topics. Unavoidable significant impacts are expected to occur for all alternatives relative to air quality, greenhouse gas emissions, human health risk, aircraft noise, construction equipment noise, on-airport surface transportation, and off-airport surface transportation.14 With the exception of construction equipment noise impacts, the vast majority of the unavoidable significant impacts that occur under all alternatives are primarily attributable to the projected growth in airport activity... (underlined for emphasis)

Question: Even though many impacts are significant and unavoidable, why hasn't LAWA presented the quantified each significant impacts in a way that each alternative performance can be compared and rank ordered? Will this be normalized to separate unavoidable impacts resulting from the assumed airport growth?

Response:

Table 1-5 of the SPAS Draft EIR provides a side-by-side summary comparison of the unavoidable significant impacts between alternatives which, in conjunction with summary of significant impacts and mitigation measures included in Chapter 1 of the SPAS Draft EIR, goes beyond the requirements of what must be included in the summary section of an EIR under State CEQA Guidelines Section 15123(b)(1). Depending on the relative value and importance that a reader may give to each type of environmental impact, the alternatives could be ranked based on those personal preferences. Table 1-5 includes a delineation of those unavoidable significant impacts that are caused primarily by the future growth in airport activity that would occur regardless of the SPAS alternatives.

SPAS-PC00130-92

Comment:

Pages 1-49 to 1-60 Table 1-5 Summary Comparison of Unavoidable Significant Impacts

Question: Table 1-5 What assumptions are made to show the differences in human health risk for each of the alternatives? Why is no runway separation best? and no airfield improvements worst by a significant amount. In Alt 4 are there no taxiway changes as well?

Response:

Please refer to the text in Section 4.7.1 and Appendix G1 of the SPAS Draft EIR for details regarding the human health risk analysis, which provides evaluation of possible impacts to human health for all alternatives. The calculations for the human health risk assessment were based on incremental TAC emissions associated with the SPAS alternatives activities relative to the 2009 environmental baseline. Please refer to Section 4.2.2 in the SPAS Draft EIR for detailed assumptions used in the modeling of the TAC emissions. In general, differences among alternatives are due to differences in aircraft operations associated with current conditions and various airside improvements.

The no runway separation scenario is represented by Alternative 2. As noted in the comparison of Alternative 2 to Alternative 4 in Section 4.2.6.3.2, Alternative 2 has fewer airside-related emissions than Alternative 4 due to reduced aircraft taxi/idle operations anticipated from proposed airfield improvements. In fact, Table 4.2-13 shows that incremental project operational emissions from aircraft are lowest for Alternative 2 when compared to all of the other alternatives. Since acrolein in aircraft emissions is the hazard risk driver for acute hazards, lower aircraft emissions for Alternative 2 translate into lower acute hazards than Alternatives 1, 3, 4, 5, 6, and 7.

The no airfield improvements scenario is represented by Alternative 4. As noted on page 4-120 in Section 4.2 of the SPAS Draft EIR, Alternative 4 is the future scenario that represents the least amount

of airfield improvements (the only airfield improvements would be the addition of pavement for safety purposes, which would not alter airfield operations), thereby resulting in longer taxiing time (i.e., longer periods of aircraft engine emissions). Greater aircraft emissions for Alternative 4 translate into greater acute hazards than those associated with Alternatives 1, 2, 5, 6, and 7. Alternative 3 has greater aircraft emissions and construction emissions than any of the other alternatives; however, improvements made in other areas result in Alternative 3 having lower acute risks than Alternative 4.

It should be noted that Alternative 4 does include taxiway changes, consisting of the easterly extension of Taxiway E; however, as with the extension of Runway 6R/24L, the taxiway improvement consists of additional pavement needed to meet Runway Safety Area requirements and would not alter existing airfield operations.

SPAS-PC00130-93

Comment:

Question: In table 1-5 what would the number of on-airport intersections w/o feasible fix be for the ARSAC suggested fix which we can't find in the DEIR where the 96th st bridge is moved east with a new drop off structure and moving sidewalk to support Terminal 1 allowing cars to enter the drop off and then exit directly to Sepulveda without having to clog up the CTA?

Response:

Development of a passenger drop-off center adjacent to Sepulveda Boulevard, allowing vehicles to enter from and exit onto Sepulveda Boulevard without entering the CTA, with passengers traveling between the drop-off center and Terminal 1, is not anticipated to substantially improve traffic conditions within the CTA and, if anything, would adversely affect traffic on Sepulveda Boulevard. The development of such a passenger drop-off center serving Terminal 1 is unlikely to attract a substantial amount of passengers, given that they would be dropped-off at the center, would need to board a moving sidewalk with all of their luggage and travel on a moving sidewalk approximately 1,000 feet to reach the Terminal 1 entrance. It is more likely that drivers dropping-off passengers at Terminal 1 would simply drive to the curbside directly in front of Terminal 1, where passengers could check their bags at the curb directly with the airlines and drivers would only need to continue west for approximately 250 feet, where they would turn south on East Way (see Figures 4.12.1-6 and 4.12.1-7 of the SPAS Draft EIR for the relationship of East Way to Terminal 1), which typically has little traffic (see Table 4.12.1-12 for traffic volumes, volume to capacity ratios, and level of service along East Way - specifically, Roadway Links UB, UC, UD, UP, CW, CX, CY, CZ, and CAA), and then turn east on World Way South where they can soon exit the CTA onto Sepulveda Boulevard or Century Boulevard. Even if some notable number of passengers were to utilize the remote drop-off center to access Terminal 1, that would do little to reduce total traffic volumes within the CTA associated with the other seven terminals plus Tom Bradley International Terminal and the future Midfield Satellite Concourse. SPAS Alternatives 1, 2, 8, and 9 include the Intermodal Transportation Facility and a dedicated access route (busway or APM) with a connection to transit as a means to reduce the overall traffic volumes within the CTA.

It should also be noted that while development of the remote passenger drop-off facility would not likely improve on-airport traffic conditions to any notable degree, operation of the subject facility would adversely affect traffic flows on Sepulveda Boulevard. Access to and from the facility for both northbound traffic and southbound traffic on Sepulveda Boulevard would occur through a new signalized intersection. Traffic flows on Sepulveda Boulevard would be interrupted by signal-operated access of facility traffic onto the roadway.

Based on the above, LAWA does not consider the Terminal 1 passenger drop-off facility suggested by ARSAC to be a feasible and effective means of improving traffic conditions within the CTA. Therefore, this suggestion was not evaluated in detail in the SPAS Draft EIR.

SPAS-PC00130-94

Comment:

Question: Page 1-54 to 1-56 Table 1-6 LAX Master Plan Commitments, LAX Master Plan Mitigation Measures, and SPAS-Specific Mitigation Measures as Related to the SPAS Alternatives

Question: Page 1-54 Table 1-6 What is the characteristic of the alt 1 (260' N), alt 5 (350' N), and Alt 6 (100' N) related to MM-SAF (SPAS)-1 Runway Protection Zone Reviews that impacts safety? What does note 4 to the table mean?

Response:

Mitigation Measure MM-SAF(SPAS)-1 cited in Table 1-6 is presented in its entirety in Section 5.5.7.2.10 of the SPAS Draft EIR (see pages 5-85 and 5-86). This measure is proposed as part of SPAS to mitigate aviation safety hazards that may result on a cumulative basis, as a combination of moving Runway 6L/24R northward under Alternatives 1, 5, and 6, and developing new uses within the LAX Northside area (i.e., FAR Part 77 imaginary surface impacts). Footnote 4 in Table 1-6 indicates that this mitigation measure pertains to cumulative impacts, as opposed to a project-specific mitigation measure.

SPAS-PC00130-95

Comment:

Question: Table 1-6 On-airport Shows no mitigations for Alts 5,6,7 in any intersection or on-airport condition. How is this possible when Alt 1 has mitigations?

Response:

As stated in Note 2 of Table 1-6 on page 1-60 of the SPAS Draft EIR, Alternatives 5, 6, and 7 focus on airfield improvements, and would not have any impacts related to ground transportation; however, assuming the airfield improvements under those alternatives would be paired with ground access improvements proposed under Alternative 1, 2, 8, or 9, there would be impacts to ground transportation that would subject to this mitigation measure.

SPAS-PC00130-96

Comment:

Question: Table 1-6 Wastewater Generation How is it possible that there are no wastewater generation mitigations for any SPAS or LAX Master Plan elements? If the runways are moved north and Lincoln/Sepulveda interface is necessarily below current levels it could impact the major sewer lines going to Hyperion. If the argo ditch is covered and/or enclosed and LAWA's capacity guess is too low can't there may be quite a wastewater issue causing spillage on to the runways and towards the terminals and or business district? What special precautions does LAWA plan to design?

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Responses to Comments SPAS-PC00130-730 through SPAS-PC00130-969, which address each separate comment provided in ARSAC's comment letters on the 2008 and 2010 NOPs for the SPAS Draft EIR. The comments in both NOP comment letters were fully considered during preparation of the SPAS Draft EIR. Responses to all of the comments raised by ARSAC in its comment package on the SPAS Draft EIR are provided in Responses to Comments SPAS-PC00130-1 through SPAS-PC00130-1051.

SPAS-PC00130-97

Comment:

Page 1-61 Aesthetics
Alternative 3 would include the greatest extent of development throughout the airport environment, including improvements within the Los Angeles/Bl Segundo Dunes, north airfield, CTA, Lot C, Manchester Square, and Continental City. These improvements would affect aesthetics and views from sensitive receptors within the CTA, Century Corridor/eastern boundary, and southern, western, and northern boundary areas. Within the CTA, improvements related to the APM and terminal improvements under Alternative 3 would result in significant impacts to focal views of the Theme Building. Implementation of Mitigation Measure MM-HA (SPAS)-1, Preservation of Historic Resources: Theme Building and Setting (Alternative 3), described in Section 4.1, Aesthetics, would reduce impacts to views associated with Alternative 3 within the CIA to a level that is less than significant.
Compared to Alternative 3, improvements that would affect aesthetics and views under Alternatives 1 and 2 would not be as extensive, particularly within the CTA, Manchester Square, and Continental City. Impacts to views of the Theme Building under Alternatives 1 and 2 would be less than significant. Ground access facilities associated with Alternative 3, including the CONRAC, APM, and GTC, would not be developed under these alternatives. Alternative 4 has limited improvements with the potential to affect visual resources, including a CONRAC in the Lot C area and a parking structure in Continental City. (underline for emphasis)

Question: Aesthetics - what is the second paragraph of page 1-61 saying? Is there an explanation of the assumptions used to draw conclusions of this nature with more detail than section 4.1 of the document?

Response:

The text to which the commentor refers is a summary of comparative impacts between the SPAS alternatives that is provided in Section 1.4 of the SPAS Draft EIR. The second paragraph on page 1-61 notes that the aesthetic impacts of Alternatives 1 and 2 would not be as great as the aesthetic impacts of Alternative 3, particularly within the CTA, Manchester Square, and Continental City. In part, the reason that the aesthetic impacts would be less under Alternatives 1 and 2 than they would be under Alternative 3 is that Alternative 3 includes a CONRAC, APM, and GTC, all of which would result in aesthetic impacts. Alternatives 1 and 2 do not include these facilities.

The summary on page 1-61 is based on the full analysis of potential aesthetics impacts provided in Section 4.1 of the SPAS Draft EIR, which provides a detailed evaluation of aesthetics, including the assumptions used to draw conclusions of the type stated on page 1-61 of the SPAS Draft EIR. More specifically, regarding the assumptions used to support the analysis and related conclusions, please see the discussion in the Methodology section in Section 4.1 of the SPAS Draft EIR.

As discussed in Section 2.3.1 of the SPAS Draft EIR, the SPAS Draft EIR is a programmatic document; thus, no design or engineering plans are currently available. Project-level impacts related to aesthetics associated with implementation of individual SPAS components would be assessed in future CEQA documents. Please see Responses to Comments SPAS-PC00130-235 and SPAS-PC00130-142 for a discussion of the appropriateness of the programmatic review conducted for the SPAS project.

SPAS-PC00130-98

Comment:

Page 1-62 Air Quality
Table 1-7 and the text below summarize the conclusions regarding significant air quality impacts, all of which are based on the comparisons to baseline (2009) conditions or, in the case of construction impacts, the SCAQMD construction emission thresholds.

Question: Page 1-62 Air Quality references comparisons to a 2009 baseline condition. Why was this year chosen when the NOP was created in 2011 as a baseline and what year is assumed as the final year for comparisons?

Response:

Please see Response to Comment SPAS-PC00130-52 regarding the use of 2009 as the baseline year for aviation activity levels. As explained on page 4-91 of the SPAS Draft EIR, use of a full year's worth of aircraft activity data is required to ascertain the peak month average day activity characteristics, which are required for air quality modeling purposes. As further explained on page 4-91, baseline facilities in the air quality analysis are generally representative of 2010. In accordance with CEQA, air quality conditions with implementation of the project in 2025 were compared to 2009 baseline conditions to determine the significance of air quality impacts.

However, for many of the topics in the SPAS Draft EIR, including air quality, in addition to evaluating conditions at buildout of each SPAS alternative compared to existing baseline conditions, the analysis also provides, where possible, a comparison of conditions at buildout of each SPAS alternative in 2025 to conditions anticipated to occur in 2025 without the improvements proposed under the various SPAS alternatives. That latter form of comparison is intended to provide the public, agencies, and decision-makers with additional information regarding impacts attributable directly or indirectly to the improvements proposed under each SPAS alternative, which is not discernible through comparison against baseline conditions. For the air quality analysis, this was done by comparing the impacts of the SPAS alternatives to conditions under Alternative 4. Of the nine alternatives, Alternative 4 has the least amount of improvements and most closely represents a future (2025) "no Yellow Light Projects" scenario, from which to measure the differences in emissions that would occur with implementation of the improvements associated with each other alternative. It should be noted that Alternative 4 does not represent a future scenario with no airport improvements related to air quality impacts, as inclusion of a CONRAC (and associated consolidation/reduction of rental car company shuttle travel) in Alternative 4 provides some air quality benefits not achieved in the other alternatives. The modeling assumptions associated with Alternative 4 do, however, account for the continued implementation of more stringent motor vehicle emissions standards and cleaner vehicle fleets in the future that would also occur with all the other alternatives. In so doing, the differences between vehicular source emissions when compared to Alternative 4 are more illustrative of the differences in ground access improvements between the alternatives. Using Alternative 4 as a basis of comparison between alternatives also better represents the differences in aircraft emissions that are directly attributable to the different airfield configurations under the SPAS alternatives. Under Alternative 4, the only airfield improvement would be the eastward extension of Runway 6R/24L, which would be solely to provide for additional runway safety area in accordance with FAA requirements and would not alter existing airfield operations. When comparing impacts of the SPAS alternatives with 2009 baseline conditions, the incremental aircraft emissions associated with each alternative in 2025 (i.e., buildout year) are measured against the existing aircraft emissions in the baseline (2009) condition. As such, the incremental aircraft emissions of each alternative include both the growth in aircraft activity anticipated to occur between 2009 and 2025, which is common to all alternatives, and the changes in aircraft operations that are attributable to the proposed airfield configuration specific to each alternative. When comparing 2025 conditions to 2009 baseline conditions, the vast majority of the aircraft emissions increases are due to the anticipated growth in aircraft activity. When using Alternative 4 as a basis of comparison, the incremental aircraft emissions associated with each alternative in 2025 are measured against the 2025 emissions of Alternative 4. The same aircraft activity level and fleet mix are assumed for all alternatives in 2025. As such, the incremental aircraft emissions under this scenario are only influenced by the differences in the airfield configuration specific to each alternative. Although comparisons to 2009 baseline conditions and to 2025 Alternative 4 conditions are both disclosed in the SPAS Draft EIR, it should be noted that conclusions regarding whether the incremental emissions would result in a significant impact are based solely on the comparisons to 2009 baseline conditions. The comparisons to Alternative 4 conditions in 2025 are provided for informational purposes only.

SPAS-PC00130-99

Comment:

In order to assess intermediate air quality conditions there has to be some sort of construction order and schedule assumed. Where is this documented and the assumptions listed?

Response:

Please see Response to Comment SPAS-AR00002-43 regarding interim year air quality analysis and Response to Comment SPAS-PC00130-228 regarding the methodology used to evaluate construction-related air quality impacts.

SPAS-PC00130-100

Comment:

Why is the air quality apportionment study data which is currently 3 years beyond completion schedule not included in any of the discussion? As LAWA has not released any data from the first phase, second phase, or second (plus) phases which LAWA indicates are complete, how is this data reconciled with whatever IS used?

Response:

This content of this comment is similar to comment SPAS-PC00130-36; please refer to Response to Comment SPAS-PC00130-36.

SPAS-PC00130-101

Comment:

Question: Table 1-7 Air Quality impacts after Mitigation: Many of the elements and especially particulate matter of each size (ultra fines not addressed) show significant, unavoidable impact. Are some of the alternatives "better" than others? How are they ranked and what is the basis for the ranking? Is there a ranking that combines levels with concentrations?

Response:

Table 1-7 of the SPAS Draft EIR summarizes the comparison of the air quality impacts from each alternative to the significance threshold for that impact. Numerical results of air pollutant emissions are presented for each alternative in Table 4.2-13 (pages 4-122 through 4-125) and Table 4.2-14 (4-126 through 4-129) of the SPAS Draft EIR. Numerical results of air pollutant concentrations are presented in Table 4.2-15 (pages 4-139 through 4-141) and Table 4.2-16 (page 4-142) of the SPAS Draft EIR.

Table 4.2-13 provides the incremental emissions for each alternative relative to the 2009 baseline emissions, which allows one to see whether future (2025) emissions would go up or down, and by how much, when compared to existing emissions. Table 4.2-14 provides incremental emissions for each alternative in 2025 relative to Alternative 4 emissions in 2025, which allows one to compare the differences between alternatives for each pollutant.1 Table 4.2-15 provides pollutant concentrations for each alternative which can be compared between alternatives.

The South Coast Air Quality Management District has established separate significance thresholds for air pollutant emissions and air pollutant concentrations. Therefore, the comparisons of alternative impacts to emissions and concentrations are made separately. The lead agency can use the results to determine a ranking for each alternative, although such a ranking could potentially be different for emissions and concentrations. In addition, any ranking for air quality could be different than a ranking for traffic congestion, water quality, and noise, for example. It will be up to the lead agency to determine how to rank alternatives both environmentally and with regard to project objectives.

Please also see Responses to Comments SPAS-PC00130-225 and SPAS-PC00130-36 regarding ultrafine particulate matter (UFP) and the measurement of UFP as part of the LAX Air Quality and Source Apportionment Study, respectively.

1. Alternative 4 has the least amount of proposed physical changes to the airport; thus, is the most representative of a future no project alternative. A negative emission rate for a given alternative in Table 4.2-14 indicates that the proposed changes for that alternative would result in lower operational emissions than the proposed changes for Alternative 4.

SPAS-PC00130-102

Comment:

Page 1-70 Table 1-9
Summary of Impacts to Listed/Eligible Historical Resources After Mitigation
Question: Where is the Union Savings and other historic buildings located on a map in this document? Are these the only historical resources?

Response:

As described on pages 4-357 and 4-358 and shown in Figure 4.5-1 in Section 4.5 of the SPAS Draft EIR, the Union Savings building is located at 9800 S. Sepulveda Boulevard. The other historical resources identified within the SPAS cultural resources study area are also shown in Figure 4.5-1 of the SPAS Draft EIR. Section 4.5 of the SPAS Draft EIR is based in part on more comprehensive information contained in Appendix E of the SPAS Draft EIR.

The potential impacts of the SPAS alternatives were considered as they relate to known historical resources identified in previous surveys undertaken in association with the LAX Master Plan EIR, discussed on pages 4-350 through 4-354 and listed in Table 4.5-1 in Section 4.5 of the SPAS Draft EIR. The Section 106 Report and Supplemental Section 106 Report for the LAX Master Plan are provided in Appendix I and Appendix S-G of the LAX Master Plan Final EIR, respectively. In addition, previously unevaluated buildings/structures within the SPAS cultural resources study area, which were not old enough to be considered for evaluation as part of the previous LAX Master Plan EIR historical resources surveys but are now over 45 years in age, have been evaluated for purposes of the SPAS Draft EIR and are discussed in Section 4.5 of the SPAS Draft EIR on pages 4-354 to 4-358, and documented on DPR survey forms in Appendix E of the SPAS Draft EIR.

Of these properties, two eligible historical resources would potentially be affected by one or more of the SPAS alternatives: 1) the Theme Building and Setting, and 2) the Union Savings and Loan Building. The other historical resources would not be affected by the SPAS alternatives because of their distance from the proposed improvements. Mitigation measures to preserve and protect historical resources are identified on pages 4-380 through 4-383 of the SPAS Draft EIR and include Mitigation Measures MM-HA (SPAS)-1 Preservation of Historic Resources: Theme Building and Setting (Alternative 3); MM-HA (SPAS)-2 Preservation of Historic Resources: Theme Building and Setting (Alternative 9); and MM-HA (SPAS)-3 Preservation Of Historic Resources: Union Savings and Loan Building (Alternative 3).

SPAS-PC00130-103

Comment:

Page 1-70 Cultural Resources
No direct impacts to any historical resources would result from Alternatives 1, 2, 4, 5, 6, 7, or 8. Indirect impacts to historical resources associated with proposed concourse and terminal improvements under Alternatives 1, 2, 5, 6, and 7 would be less than significant due to their height limitations, design, and distance from the Theme Building and Setting and the intervening development. Similarly, indirect impacts to the Union Savings and Loan Building under Alternatives 1, 2, 8, and 9 would be less than significant due to the distance of the improvements to this resource. Impacts to historical resources under Alternatives 1, 2, and 5 through 9 would be further reduced with implementation of LAX Master Plan Commitment HR-1, Preservation of Historic Resources.

Question: Page 1-70 discusses historical resource impacts. What potential impacts were considered if the hydrology efforts are found to be inadequate? Can't some of the movements of land and underground structures cause redirection of unknown water sources? What about leeching of airfield contaminants and those contaminants from the old Garret Research site (Park One) by new water flow patterns and deposit into new locations? Can't this also make some historic resources require significant clean up since they would no longer be buried under the Park One lot? What about "normally expected" fuel contaminants that occurred from pipeline leaks as well as normal aircraft operations?

Response:

The commentor provides no information or evidence explaining how stormwater flows or contaminated groundwater could adversely affect historic or cultural resources. Nor does the commentor provide any evidence in support of the notion that that the SPAS alternatives could alter groundwater flows or result in contamination of historic or cultural resources. No impacts to groundwater flows are anticipated as a result of implementing the SPAS alternatives. As discussed in Section 4.7.3 of the SPAS Draft EIR, sites with known groundwater contamination are undergoing remediation. These remediation efforts ensure that contamination does not migrate. Please see Response to Comment SPAS-PC00130-265 for a discussion of LAX Master Plan Commitment HM-2 which was designed to ensure that any potential effects from contaminated materials encountered during construction would be less than significant.

SPAS-PC00130-104

Comment:

Page 1-72 Table1-10 Summary of Impacts to Recorded Archaeological Resources
Note from table: Alternatives 1 through 4 consist of airfield, terminal, and ground access improvements. Alternatives 5 through 7 focus on airfield and terminal improvements only. Alternatives 8 and 9 focus on ground access improvements only. The airfield/terminal improvements associated with Alternatives 1, 2, 5, 6, and 7 could be paired with the ground access improvements associated with Alternatives 1, 2, 8, or 9. Similarly, the ground access improvements associated with Alternatives 1, 2, 8, and 9 could be paired with the airfield improvements associated with Alternatives 1, 2, 5, 6, or 7. The full impacts of any alternative must consider airfield, terminal, and ground access contributions. The airfield, terminal, and ground access improvements associated with Alternatives 3 and 4 are specific to each of those alternatives and cannot be paired with other alternatives.

Question: The note at the bottom of Table 1-10 (above) talks about the mix and match concept but doesn't properly spell out a concept for evaluation.

Response:

Please see Responses to Comments SPAS-AL00007-6, SPAS-AL00008-3, and SPAS-AL00008-26 for an explanation of why the analysis of nine alternatives in the SPAS Draft EIR instead of a single proposed project was consistent with CEQA's requirements and facilitated public review of the alternatives.

SPAS-PC00130-105

Comment:

Has LAWA identified the native american indian sites which used to be located in the areas in and around LAX? How are they watching for artifacts and other indications of encampments and burial grounds?

Response:

As stated on pages 4-360 through 4-363 in Section 4.5.3.3 of the SPAS Draft EIR, a cultural resources records search through the South Central Coastal Information Center was completed that identified eight recorded archaeological resources, seven of which are Native American cultural resources, on LAX property and within the cultural resources study area for SPAS. These resources would not be impacted by any of the SPAS alternatives. In addition, a pedestrian survey of the undeveloped portions of the LAX property potentially affected by the SPAS alternatives was conducted to identify previously unknown archaeological or Native American resources. As stated on page 4-363 in Section 4.5.3.3 of the SPAS Draft EIR, no resources were identified during the pedestrian survey.

As stated on page 4-383 in Section 4.5.7.2 of the SPAS Draft EIR, Mitigation Measure MM-HA (SPAS)-4, Conformance with LAX Master Plan Archaeological Treatment Plan (ATP), is proposed to address significant impacts to previously unidentified archaeological resources by requiring construction activities to be undertaken in conformance with the ATP. Requirements outlined in the ATP include

specific procedures for archaeological monitoring, identifying and assessing the significance of resources, and the recovery and curation of resources when warranted. For example, an archaeological excavation program to remove the resources may be implemented, if deemed necessary. In such instances, the ATP provides for evaluation and treatment of archaeological resources consistent with the Secretary of the Interior's Standards and Guidelines for Archaeological Documentation and other applicable guidance. In addition, the ATP includes guidance on retaining a Native American monitor if Native American cultural resources are encountered. If human remains are found, LAWA will comply with the State Health and Safety Code regarding the appropriate treatment of those remains as outlined in the ATP. Finally, the ATP details the reporting requirements to document the archaeological monitoring effort and provides guidance as to the proper curation and archiving of artifacts in accordance with industry and federal standards.

SPAS-PC00130-106

Comment:

Page 1-74 Table 1-11 Summary of Human Health Risk Impacts After Mitigation

Question: What is the basis for these categorizations of significance of health risks?

Question: Table 1-11 Summary of Human Health Risk Impacts states that all alternatives have acute non-cancer health hazards as significant and unavoidable. Where have these been assessed in enough detail to rank order the impacts? What assumptions have been made to get to these conclusions?

Response:

Section 4.7.1 of the SPAS Draft EIR includes a detailed assessment of human health risks associated with the SPAS alternatives and provides the basis upon which determinations of significance for human health were made. In particular, Section 4.7.1.4 of the SPAS Draft EIR provides a discussion of the thresholds of significance that were used to reach the significance determinations that are summarized in Table 1-11 of the SPAS Draft EIR. The increased cancer risk of ≥ 10 in a million and the hazard index ≥ one thresholds are based on Southern California Air Quality Management District (SCAQMD) guidance.

The calculations in the HHRA were based on incremental toxic air contaminants (TAC) emissions associated with the SPAS alternatives relative to 2009 baseline conditions. Section 4.2.2 of the SPAS Draft EIR identifies the assumptions that were used in modeling the TAC emissions. Section 4.7.1 and Appendix G1 of the SPAS Draft EIR provide details regarding the analysis of acute non-cancer health hazards, including all assumptions and inputs to the calculations. Specifically, Section 4.7.1.6.3 provides a discussion of the results of the acute non-cancer health hazards analysis. Tables 4.7.1-7 and 4.7.1-8 present comparative results for each of the alternatives that could be used to rank the alternatives in order of impact for each receptor type.

SPAS-PC00130-107

Comment:

Again, as in several other commented areas, why has LAWA used a 2009 baseline?

Response:

As discussed in Section 4.7.1.3 of the SPAS Draft EIR, "Baseline conditions discussed herein refer to calendar year 2009, the last full calendar year for which air quality data were available from the SCAQMD prior to the release of the SPAS NOP. As operational activity in 2009 was lower than (2012) current conditions, use of this baseline year is considered to provide a conservative (i.e., protective) analysis." As explained in Section 4.7.1.2 of the SPAS Draft EIR, possible health impacts in the SPAS Draft EIR were assessed as an increment above baseline conditions. When baseline conditions reflect lower TAC releases than current conditions, as in 2009, the increment between baseline emissions and emissions for any given alternative is greater. Thus, protective in the text above means "likely to overestimate impacts to human health." Also note that the baseline year does not affect estimates of

health impact associated with construction emissions as baseline construction emissions are assumed to be zero.

As noted in Section 4.7.1.2.1 of the SPAS Draft EIR, the HHRA was conducted based on diesel particulate matter (DPM) emissions associated with SPAS construction and on total TAC emissions associated with operational activities. A detailed discussion regarding why 2009 emissions were selected to represent the baseline year is provided in Response to Comment SPAS-PC00130-52.

SPAS-PC00130-108

Comment:

Although this table on page 1-74 talks about "buildout in 2025" are there other impacts which are compared at other times?

LAWA has talked about time-phased and condition-phased implementation of various projects. What if significant elements have not been constructed by 2025?

Response:

As indicated on page 2-8 of the SPAS Draft EIR, the nine SPAS alternatives addressed within this Draft EIR were formulated at a programmatic level of conceptual planning, and no design or engineering plans, or construction phasing plans or schedules, are available for any of the alternatives. In general, however, it is anticipated that, if approved, all of the improvements proposed under each alternative would be completed by 2025, with construction beginning in 2015.

The SPAS Draft EIR identifies and compares between alternatives the impacts anticipated to occur at buildout in 2025 for all environmental topic areas. This provides a reasonable and appropriate basis for the decision-makers to compare the overall impacts of the all the alternatives in determining which, if any, of the alternatives to approve. Following selection and approval of a particular alternative, if any, the development of more detailed plans for the proposed improvements will provide the basis to formulate an implementation phasing program and schedule, which, in turn, will provide the basis for evaluating impacts at specific points in time within the implementation schedule.

As noted above, the SPAS planning and analysis framework is based on an anticipated buildout year of 2025. There is currently nothing at this conceptual level of planning to indicate that specific elements of the SPAS improvements would not be completed by 2025.

SPAS-PC00130-109

Comment:

Question: Table 1-11 health risks

Under what category are TAC (toxic air contaminants) which are generated during construction from toxic fugitive dust piles inadequately controlled during construction? One example are the piles in the staging area behind the Sepulveda Ralphs Market off Westchester Parkway which has been uncovered and unaddressed for in excess of 6 months despite several community requests.

Response:

Toxic air contaminants (TACs) that would be emitted during construction, in addition to those that would be emitted during operation of the alternatives, were calculated and analyzed for health risk impacts in Section 4.7.1 of the SPAS Draft EIR. In general, the construction dust-related TACs would be particulate phase metals and inorganic compounds, which are listed in Table 4.7.1-1 of the SPAS Draft EIR as PM-Metal or PM-Inorganics.

Section 4.2.5 of the SPAS Draft EIR identifies the LAX Master Plan commitments and mitigation measures relative to air quality, including measures pertaining to construction activities; these measures would extend to construction staging areas where appropriate. In addition, LAWA maintains a

construction hotline (310.649.5292) and an online construction inquiry and complaint form system (http://www.lawa.org/laxdev/CommunityInfo.aspx?id=3689). LAWA tracks its compliance with the requirements of the LAX Master Plan commitments and mitigation measures in annual progress reports.

Regarding the dirt mounds noted in the comment, this is not a comment on the SPAS Draft EIR and does not address potential impacts that would result from the SPAS project. The following response is provided for informational purposes only. Clean soils excavated from the CTA in conjunction with the installation of a segment of new underground pipelines and utility lines related to the Central Utility Plant Replacement Project were temporarily stored at the subject staging area site until that segment of pipeline/utility line installation could be completed. Although several more weeks of pipeline/utility line installation remained, LAWA removed the stockpiled soil based on concerns expressed by nearby residents and transferred the soils to Continental City, where they will remain until reused as backfill in the CTA. Please also see Response to Comment SPAS-PC00130-265 regarding the management of contaminated soils encountered during construction at LAX.

SPAS-PC00130-110

Comment:

Page 1-75 Health Risks section
...The increased acrolein emissions are attributable mostly to the increase in passenger activity levels and associated aircraft operations anticipated to occur between 2009 and 2025 for all alternatives....

Question: Page 1-75 highlight phrase notes that acrolein emissions are attributed to passenger activity levels. Is taxi time to gate a significant item in allowing for comparing the bad impacts from each alternative? What assumptions in flight mix, gate location, times of day (relative amounts of air traffic ie peak hours or not), and other factors were made? What were all of the factors?

Response:

The air quality impact analysis presented in Section 4.2 of the SPAS Draft EIR used the Federal Aviation Administration's Emissions and Dispersion Modeling System (EDMS), version 5.1.3, for developing emissions from aircraft. Aircraft taxi-in and taxi-out emissions are included in the emission estimates for aircraft.

The detailed aircraft fleet mixes used in the technical analyses are presented in Appendix J1-1 of the SPAS Draft EIR. Table 3 presents the fleet mix used for the baseline (2009) conditions, while Table 8 presents the fleet mix used for all alternatives in 2025. The relative number of operations, by aircraft type, for daytime, evening, and nighttime periods of the day are also included in Tables 3 and 8. The aircraft fleet mix is also summarized in Appendix F-1 of the Preliminary LAX SPAS Report: Table 8 for 2009 and Table 12 for 2025. Also, please refer to Response to Comment SPAS-PC00130-770 for a table of aircraft/engine fleet mix combinations used in the analysis.

In completing the analysis conducted with EDMS v.5.1.3, aircraft were assigned to specific terminals. For example, aircraft arriving at any gate associated with Terminal 3 under a given alternative are simply identified as arriving at Terminal 3.

Month-of-year, day-of-week, and hour-of-day activity levels for aircraft and vehicular traffic are also included in the analysis. Airport activity is generally highest in July and August, and on weekdays compared to weekends. The aircraft activity peaks during the hour between noon and 1:00 pm. Vehicular traffic follows a morning and afternoon peak overlaid on the airport peak.

Complete EDMS v.5.1.3 model input and output files were submitted to the South Coast Air Quality Management District on November 29, 2012. These file are available, upon request, in electronic format and are also available for public review in hard-copy form at LAWA's Capital Programming and Planning Division, Room 208, One World Way, Los Angeles, California. Please also see Response to Comment SPAS-AR00002-46 regarding these files.

SPAS-PC00130-111

Comment:

Page 1-75 Health Risks section
LAX Master Plan mitigation measures would reduce TAC emissions associated with all of the SPAS alternatives. However, even with implementation of these measures, acute non-cancer health hazards at some fence-line receptors would exceed the threshold of significance under all of the alternatives, compared to 2009 baseline conditions. As such, acute non-cancer health hazard impacts under all of the SPAS alternatives are considered to be significant and unavoidable.

Question: Why is 2009 used as the baseline condition when the NOP was released in 2010?

Response:

Please see Responses to Comments SPAS-PC00130-52 and SPAS-PC00130-107 regarding the use of 2009 as the baseline year for analyses that are based on aviation activity levels, such as human health risk.

SPAS-PC00130-112

Comment:

Page 1-76 Safety
Currently, no active solid waste landfills are located within a five-mile radius of LAX. Therefore, none of the alternatives would relocate a runway to within 10,000 feet of a solid waste landfill. Under all of the alternatives, no new facilities would be constructed or operational conditions implemented that would serve as attractants to birds. In accordance with FAA requirements, the airfield would continue to be maintained to avoid the ponding of water, the growth of vegetation, and the development of other conditions that may serve as attractants to nuisance wildlife, including birds. Therefore, impacts under all of the alternatives with respect to birdstrikes would be less than significant.

Question: Were is an analysis of the impacts of tunnels, utilities such as major sewer lines, hot oil lines and high voltage power on safety? Where is unknown water source causing sink holes evaluated in this document? What is the frequency and magnitude of sink holes? When a tunnel is removed, what controls for sink holes are in place if unknown water sources are in the area?

Response:

The commentor does not provide any factual basis or substantial evidence of a significant environmental issue not analyzed in the EIR. Please see Response to Comment SPAS-PC00130-51 regarding sink holes at LAX. The SPAS Draft EIR is a programmatic document. Issues associated with implementation of individual components, such as specific impacts to utility pipelines and other infrastructure, will be assessed during project-level planning and engineering design. Please see Responses to Comments SPAS-PC00130-235 and SPAS-PC00130-142 for a discussion of the appropriateness of the programmatic review conducted for the SPAS project.

SPAS-PC00130-113

Comment:

Question: page 1-76 discusses safety and states that there are no impacts because there are no solid waste landfills within a five-mile radius. However there are known contaminants within the airport airside and landside plus areas in the Northside Development area that contain toxic items used or leaked into the ground as well as having had many oil wells and gas wells naturally occurring and operated in the past at these locations. When can disturbing the ground that may have covered contamination become a safety hazard? What about during construction and movement of the contaminated soil?

Response:

As indicated on page 1-76 in Section 1.4 of the SPAS Draft EIR, no active solid waste landfills are located within a five-mile radius of LAX. Therefore, none of the alternatives would relocate a runway to within 10,000 feet of a solid waste landfill. Under all of the alternatives, no new facilities would be constructed or operational conditions implemented that would serve as attractants to birds; therefore, impacts with respect to birdstrikes would be less than significant.

Please see Topical Response TR-SPAS-LR-1 regarding the identification of contaminated sites within the airport property and SPAS alternatives acquisition areas. As indicated on page 4-573 in Section 4.7.3 of the SPAS Draft EIR and in the topical response, the analysis of hazardous materials was based on a records search performed by Environmental Data Resources, Inc. (EDR) of all sites with known contamination (including both soil and groundwater contamination) within the airport property and SPAS alternatives acquisition areas. The EDR Report, which is provided in Appendix G3 of the SPAS Draft EIR, identifies the sites with known contamination throughout the airport property, as well as known contamination in some areas adjacent to the airport. The EDR records search found no known contamination sites in the LAX Northside area. The results of the EDR Report were supplemented by LAWA's existing records and knowledge of known contamination, which do not identify any known contamination within the LAX Northside area.

Although there is no known contamination within the LAX Northside area, Section 4.7.3 of the SPAS Draft EIR acknowledges that previously unknown contamination may be encountered during construction of any of the project components. With compliance with existing laws and regulations, including LAWA's Procedure for the Management of Contaminated Materials Encountered During Construction, which was prepared in accordance with LAX Master Plan Commitment HM-2 (Handling of Contaminated Materials Encountered During Construction), and adopted subsequent to approval of the LAX Master Plan, this impact was found to be less than significant.

There are no active oil wells at LAX although there are seven plugged or abandoned wells located within the airport property (see Figure F4.17.2-1 in Section 4.17.2 of the LAX Master Plan Final EIR). If any construction occurs in proximity to an abandoned well, it may be necessary to plug or re-plug the well to current specifications established by the California Department of Conservation, Division of Oil, Gas, and Geothermal Resources. In addition, the State Oil and Gas Supervisor is authorized to order the reabandonment of previously plugged and abandoned wells when construction over or in the proximity of wells could result in a hazard (Section 3208.1 of the Public Resource Code). If construction over an abandoned well is unavoidable, an adequate gas venting system is required to be placed over the well. Compliance with these requirements would ensure that no impacts would occur with respect to plugged or abandoned oil wells.

SPAS-PC00130-114

Comment:

Page 1-76 and 1-77 Table 1-12 Summary of Safety and Efficiency Enhancements to the North Airfield Operations

Question: Table 1-12 summarizes safety and efficiency enhancements but there are some questionable items which give credit for improvements to certain alternatives over others. Where are the details and assumptions listed which justify classifications for each of the line items? Footnote 1 of this table indicates "greater amount of FAA Airport Design Standards for ADG V and VI are met as noted, but since there is a new version of AC150/5300-13A in draft review at this time is this still true? Under current design standards if a center line taxiway has an aircraft between two runways the actual separation distance from the taxiway to the adjacent runway is smaller than the current separation without the center line taxiway. How is this justified by LAWA and how is it considered in the current FAA design standard? The new draft mentions this condition and notes this issue on separation distances. Where did LAWA address this? Also, when a centerline taxiway exists how are the new failure modes such as landing or taking off from a taxiway addressed?

Question: Related to table item on "Realigns/straightens Taxilane D... Table 1-12 Safety and Efficiency Enhancements Why is the first item only referring to Taxilane D as full ADG VI when the version of Alt 6

given to Diego Alvarez twice and the one sent in a letter to GML in Jan 2011 each had full ADG VI? This again raises the question of what version of Alt 6 is used by LAWA in its evaluation, either of the two with poison pills in them drawn by LAWA or the corrected one provided by ARSAC?

Response:

Table 1-12 in the SPAS Draft EIR provides a summary of the safety and efficiency enhancements to the north airfield operations that would occur under each of the SPAS airfield improvement alternatives. The more detailed analysis supporting the conclusions in that summary table is contained in Section 4.7.2 of the SPAS Draft EIR. Please see Response to Comment SPAS-PC00130-431 for a discussion of FAA Advisory Circular 150/5300-13A and the standards for runway-to-runway and runway-to-taxiway separation standards. Regarding the commenter's suggestion that the north airfield has to comply with new AC 150/5300-13A, as discussed in Response to Comment SPAS-PC00130-345, the separation standards did not change from the previous advisory circular. The SPAS Draft EIR uses the appropriate separation standards for analysis of the impacts to safety and operations, and the safety and efficiency enhancements associated with each alternative are accurately provided in Table 1-12 of the SPAS Draft EIR.

LAWA is in receipt of a letter from ARSAC dated January 3, 2011 regarding ARSAC's recommendations for Taxilane D improvements. That letter addresses Alternative 7 (i.e., Relocation of Runway 6R/24L 100 feet south) and suggests that Taxilane D be straightened and extended as an ADG V taxilane, which is exactly what SPAS Alternative 7 proposes. In ARSAC's current comment, inquiring why Alternative 6 does not propose Taxilane D as an ADG VI taxilane, there is no need to incorporate such a change into Alternative 6 given that the range of SPAS alternatives already includes two alternatives - Alternatives 3 and 5 - with such a taxilane configuration. CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. (State CEQA Guidelines Section 15204.) The SPAS alternatives represent a reasonable range of alternatives that would attain most of the basic objectives of the project, sufficient to allow informed decision-making and public participation. (State CEQA Guidelines Section 15126.6(a).)

SPAS-PC00130-115

Comment:

Page 1-77 Safety enhancement evaluations...
Regarding cumulative impacts, none of the ongoing and reasonably foreseeable on-airport improvements identified in Chapter 5, Cumulative Impacts, would increase the potential for aviation incidents or accidents. Future development within LAX Northside would place new structures north of the north airfield complex. The relocation of Runway 6L/24R to the north under Alternatives 1, 5, and 6 and the westerly shift of the displaced landing threshold for Runway 24L would shift the associated FAR Part 77 Airspace Surfaces accordingly, drawing them closer to LAX Northside. Depending on the location, design, height, and timing of future development in LAX Northside, there would be a potential cumulative impact on aviation safety due to structures penetrating the Part 77 Airspace Surfaces (i.e., the potential for future development to penetrate existing Part 77 surfaces and, in combination with the shifting of the surfaces, increase the amount of penetration). FAR Part 77 imaginary surfaces are primarily intended to serve as a means of identifying objects that require more detailed analyses specific to the types of airspace operations and related safety requirements that occur within those surfaces. A determination of whether such penetrations of a Part 77 surface pose an aviation safety hazard, and the identification of the appropriate measure(s) to address any such hazard, occur through the more detailed analysis, which is completed by, or in coordination with, the FAA. Options to address potential aviation safety hazards can range from doing nothing (i.e., for low-risk objects), to placing high-visibility markings and lighting on structures to make them highly visible to pilots and indicating such objects on avigation maps, to...

Question: Re: Cumulative impact on safety of on-airport improvements; Didn't Congress mandate that all RPZ be resolved by 2015 and that new runways be constructed with full RPZ implemented?

Response:

In response to the commentor's question, Congress did not mandate that all Runway Protection Zones (RPZs) be resolved by 2015 and that new runways be constructed with full RPZ requirements being implemented. The comment does not include any evidence or facts to support its implication to the contrary. Congress did, however, set forth a mandate relative to meeting Runway Safety Area (RSA), which is different than an RPZ (see page 4-491 of the SPAS Draft EIR for additional explanation), by December 31, 2015. That Congressional mandate is discussed on page 4-492 of the Draft EIR. As part of the LAX Northside Update, which is a separate and independent project subject to its own environmental review process, building heights will be limited to 45 and 60 feet and will not penetrate the existing Part 77 surfaces and potential Part 77 surfaces related to any SPAS alternatives.

SPAS-PC00130-116

Comment:

Page 1-78 Hazardous Materials
Proposed improvements associated with all of the SPAS alternatives would require excavation in areas of known contamination. Alternative 3 would have the potential to affect ongoing remediation at the greatest number of sites, whereas Alternative 4 would affect the fewest. However, implementation of LAX Master Plan Commitment HM-1, Ensure Continued Implementation of Existing Remediation Efforts, impacts associated with interference with remediation efforts under all of the SPAS alternatives would be less than significant.

Question: LAWA has made low to no impact, but have they actually tested soil at each of the areas where digging is to be done? When was this testing done and were are the reports?

Response:

The SPAS Draft EIR is a program-level environmental document and therefore, the SPAS alternatives have been analyzed at a program level of planning and design. Analysis and testing of soil at areas to be excavated would occur as part of a project-level environmental review for each individual SPAS project. As discussed in Section 4.7.3 of the SPAS Draft EIR, to prevent SPAS-related construction, including excavation, from interfering with planned or ongoing remediation such that environmental contamination is exacerbated or permanent clean up of sites prevented, LAWA would implement LAX Master Plan Commitment HM-1, Ensure Continued Implementation of Existing Remediation Efforts. Implementation of this commitment would ensure that remediation projects would be completed to the extent possible and necessary before constructing SPAS improvements, or that alternate clean up methods would be implemented during construction to prevent contaminant migration, if necessary. As part of this commitment, remediation systems would be reinstated following the completion of construction, if required.

Exposure of construction workers would be minimized by implementing OSHA and CalOSHA standards, which establish exposure limits for workers; require protective equipment, and require employers to provide a written health and safety program, worker training, emergency response training, and medical surveillance. Furthermore, LAWA would comply with the Procedure for the Management of Contaminated Materials Encountered During Construction ("Procedure"), which identifies procedures associated with identification and handling of excavated contaminated materials. Please see Response to Comment SPAS-PC00130-265 for a more detailed discussion of the Procedure. Compliance with the Procedure would ensure that contaminated materials encountered during construction, including soil, are properly identified, stored, remediated, and disposed of in accordance with all applicable regulations. As a result, impacts associated with interference with remediation activities, as well as impacts to construction workers associated with the excavation of contaminated materials, would be less than significant.

SPAS-PC00130-117

Comment:

When the Manchester Tunnel was finally acknowledged and LAWA examined its contents were reports created? Where are those reports? When were those reports written? What levels of water and

contamination were found? Were samples taken one time or have they been taken since the drought ended two years ago?

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. The comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR. (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commentors. (State CEQA Guidelines Section 15204.) The SPAS Draft EIR provides a sufficient degree of analysis to provide decision-makers with information which enables them to make a decision which intelligently takes account of the project's environmental consequences. (State CEQA Guidelines Section 15151.) Because the SPAS Draft EIR is a programmatic document, further project-level environmental review will be conducted if an alternative is selected. Therefore, if an alternative that moves the runway north is selected, any impacts associated with the north airfield abandoned tunnel segment will be evaluated at that time. Please see Section 4.7.3.5 of the SPAS Draft EIR for a discussion of applicable mitigation measures and LAX Master Plan commitments. Please see Response to Comment SPAS-PC00130-1012 regarding the north airfield abandoned tunnel segment (referred to by the commentor as Manchester Tunnel), including a discussion of the results of the tunnel inspection conducted in 2010.

SPAS-PC00130-118

Comment:

Page 1-78 Hazardous Materials
...A lack of adequate access could impair the effective implementation of emergency response activities by impeding the movement of emergency vehicles....

Question: Page 1-78 has a notation (above) noting potential for lack of adequate access...emergency response..." This was a defect noted by ARSAC and others when reviewing Alternative D and was one of many other safety and security issues noted in a RAND study provided to LAWA. Has LAWA reviewed the alternatives studied against the recommendations? If not, why not. If so, which of the recommendations were implemented in the alternatives?

Response:

Please see Response to Comment SPAS-PC00130-75 regarding the incorporation of security measures into the design of the SPAS alternatives.

SPAS-PC00130-119

Comment:

Question: p 1-78 Safety The statement says that Alternatives 5-7 do not propose ground access improvements, but if the tunnel under the north runways is opened and thereby destabilized, there may need for special access to the runway areas. Is this not considered? If it was, where will the access come from and what impact will it have on air operations? How long could this condition linger?

Response:

As described on page 2-52 of the SPAS Draft EIR, under Alternatives 1, 5, and 6, the north airfield abandoned tunnel segment would be filled and compacted to enable the relocation of Runway 6L/24R and/or taxiways. Certified clean fill would be used to fill the tunnel segment and stability would be ensured through engineering design. As a result, the relocated runway would not require special access following completion of construction.

SPAS-PC00130-120

Comment:

Page 1-79 Table 1-13 Summary of Hydrology and Water Quality Impacts After Mitigation

Question: What studies have been made on the north complex for sink holes? Does the CDM report contain this information to be included as part of the DEIR? Has the covering of the ergo ditch been assessed to ensure that mitigation is adequate under all conditions? What about movement of Lincoln Blvd to a new site and lowering it. Has all underground water flow been measured and monitored to ensure that it is not going to be driven onto the LAWA property and runways or terminal areas? Just because the baseline condition may or may not have been adequately determined doesn't relieve LAWA of responsibility to ensure that new construction doesn't cause more problems. This relates also to the Argo Flood Channel as well as underground utilities and tunnels.

Response:

CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended by commentors. (State CEQA Guidelines Section 15204.) Additionally, as discussed in Section 2.3.1 of the SPAS Draft EIR, the SPAS Draft EIR is a programmatic document, and no specific design or engineering plans exist for any of the alternatives. An EIR is not required to speculate about the environmental consequences of future development that is unspecified or uncertain. (See Environmental Protection Info. Ctr. v. Department of Forestry & Fire Protection (2008) 44 Cal.4th 459, 502.) Thus, if and when an alternative is selected and project details become more defined, project-level environmental review will be conducted.

Please see Response to Comment SPAS-PC00130-51 regarding sink holes at LAX and Response to Comment SPAS-PC00130-169 regarding the covering of the Argo Drainage Channel. Please see Topical Response TR-SPAS-LR-1 regarding the Lincoln Boulevard realignment.

It is unclear what the commentor means by "just because the baseline condition may or may not have been adequately determined." As discussed in Section 4.8.3 of the SPAS Draft EIR, the analysis used existing conditions as a baseline for hydrology and water quality. The alternatives were then analyzed and compared to existing conditions. (See Section 4.8.6 of the SPAS Draft EIR.)

SPAS-PC00130-121

Comment:

Page 1-79 Hydrology
Since much of the area surrounding the airport in both the Santa Monica Bay and Dominguez Channel watersheds is developed (i.e., impervious) under baseline conditions, changes associated with the alternatives would represent a marginal increase in regional impervious area. However, the increases in impervious area and the associated increase in storm water peak flow rates could potentially exceed the capacity of the storm water facilities in area sub-basins, which would result in flooding in any location where capacity was exceeded...

Question: P 1-79 Hydrology
The storm water capacity and runoff is identified as an issue and the DEIR notes "under Alternatives 1,2,and 4 through 9, ...improvements may not fully mitigate flooding impacts..." Therefore what other measures have been evaluated to make sure that LAX operations are not impacted nor operations on lands outside of LAX?

Response:

Please see Response to Comment SPAS-PC00130-463 regarding the new mitigation measure, MM-HWQ (SPAS)-1 that is proposed to address hydrology and water quality impacts associated with Alternatives 1, 2, and 4 through 9. Under this mitigation measure, the existing LAX CDP would be tailored to the specific characteristics of the selected alternative and would provide the basis and

specifications by which detailed drainage improvement plans would be designed in conjunction with site engineering specific to each improvement associated with any selected SPAS alternative. With implementation of this measure, impacts associated with drainage and water quality would be less than significant, including impacts to LAX operations or operations on lands outside of LAX.

SPAS-PC00130-122

Comment:

Several paragraphs of this section are highlighted to identify questions of how a new mitigation was established to be adequate when construction and movement of Lincoln or other areas could drive more underground water into the area. If the argo ditch is enclosed what impacts could an earthquake have including loss of proper water flow? What quake level must occur to present unacceptable impacts? Please list all potential impacts.

Response:

The commentor does not specifically identify which paragraphs on page 1-79 of the SPAS Draft EIR he is referring to as highlighted text; the comment letter did not include highlighted text nor was an attachment provided with highlighted text. Mitigation Measure MM-HWQ (SPAS)-1, set forth in Section 4.8.7 of the SPAS Draft EIR, would mitigate hydrology and water quality impacts associated with the SPAS alternatives to a less than significant level. The commentor provides no evidence in support of the assertion that the realignment of Lincoln Boulevard or other activities could result in more underground water in the area. Please note, however, that the Caltrans Highway Design Manual Chapters 800-890, and in particular Chapter 840, address the design of roadways to safely collect and convey both surface and subsurface drainage from the completed road surface and not result in adverse impacts on the roadway or surrounding area. The City of Los Angeles Bureau of Engineering design of streets and roadways is covered in the Street Design Manual (Part E) and the Storm Drain Design Manual (Part G), which also address appropriate handling of surface and subsurface drainage. Improvements to Argo Drainage Channel would be designed in accordance with the BOE Storm Drain Design Manual (Part G) and all required standards, including seismic standards. Please see Response to Comment SPAS-PC00130-169 for additional detail regarding the design capacity of the Argo Drainage Channel with implementation of Alternatives 1, 5, and 6. It would be speculative to predict the impacts to the Argo Drainage Channel improvements in the event of an earthquake.

SPAS-PC00130-123

Comment:

Page 1-79 Hydrology
...flooding would be less than significant. However, under Alternatives 1, 2, and 4 through 9, the LAX Conceptual Drainage Plan improvements may not fully mitigate flooding impacts, as these improvements were not specifically designed for these alternatives. This would be a significant impact....

Question: If this is a significant impact what mitigations are necessary?

Response:

Please see Responses to Comments SPAS-PC00130-121 and SPAS-PC00130-463 regarding mitigation of hydrology impacts associated with Alternatives 1, 2, and 4 through 9.

SPAS-PC00130-124

Comment:

Page 1-80 Hydrology
Also, under Alternatives 1 and 5, the entire channel would be structurally covered to support aircraft and, therefore, not subject to erosion or siltation. Under Alternatives 2, 4, and 7, only the easterly end of the channel (750 linear feet) would be lined; however, there would be no increase in the peak flow rates

through the Argo Drainage Channel under these alternatives and, therefore, no increase in the potential for erosion or sedimentation. Under Alternatives 3 and 6 portions of the Argo Drainage Channel would remain unlined and there would be an increase in peak flows to the channel, resulting in the potential for erosion and sedimentation. As described in Section 4.8, Hydrology/Water Quality, a new mitigation measure, MM-HWQ (SPAS)-1, Conceptual Drainage Plan Revision and Update, is proposed to tailor the LAX Conceptual Drainage Plan recommendations to the specific characteristics of the selected SPAS alternative. This measure would reduce erosion and sedimentation impacts associated with Alternatives 3 and 6 to a level that is less than significant. Therefore, the impact of erosion or siltation due to runoff from the airport would be less than significant for all drainage facilities under all alternatives.

Question: If siltation and erosion are considered not to be a problem, why are sink holes occurring all over the airfield necessitating repairs? If silt clogs a flow what issues could occur to impact operations or even safety?

Response:

Please see Response to Comment SPAS-PC00130-51 regarding sink holes at LAX. As noted in that comment, sink holes are not occurring all over the airfield, as stated by the commentor. Sink holes are not caused by siltation and erosion. Drainage channels and stormwater pipelines at LAX are maintained to prevent blockages that could lead to flooding. Please see Section 4.8 of the SPAS Draft EIR for a discussion of the impacts to hydrology and water quality from each alternative. As detailed in that section, specifically Section 4.8.7, impacts to hydrology and water quality would be less than significant with the implementation of Mitigation Measure HWQ (SPAS)-1, Conceptual Drainage Plan Revisions and Update. That mitigation measure provides the basis and specifications by which detailed drainage improvement plans shall be designed in conjunction with site engineering specific to each improvement associated with the alternatives to ensure that the effect of airport operations on hydrology would be less than significant.

SPAS-PC00130-125

Comment:

Page 1-82 Land Use Planning - Plan Consistency
No significant impacts due to a plan inconsistency or plan conflict with the applicable plans analyzed were identified for any of the SPAS alternatives. However, each of the alternatives would include plan amendments to either an off-airport or on-airport plan to ensure precise consistency with the applicable plan. Alternatives 1 and 4 would include amendments to the greatest number of plans, and Alternative 3 would include amendments to the fewest. All of the alternatives, with the exception of Alternative 3, would include amendments to the LAX Plan and LAX Specific Plan. All of the alternatives with ground access components (i.e., Alternatives 1 through 4, 8, and 9) would include amendments to the City of Los Angeles Transportation Element. Alternatives 1, 3, 4, 5, and 6 would also include amendments to the City of Los Angeles 2010 Bicycle Plan. Finally, all of the alternatives with airfield components, with the exception of Alternative 3, (i.e., Alternatives 1, 2, 4, 5, 6, and 7) would include amendments to the Los Angeles County Airport Land Use Plan (ALUP). With an amendment to the LAX Plan, LAX Specific Plan, City of Los Angeles Transportation Element, and City of Los Angeles 2010 Bicycle Plan to ensure precise consistency, impacts related to conflicts with plans and regulations would be less than significant.

Question: Page 1-82 talks about Chapter 5 Cumulative Impacts and Plan Consistency. Has any table been prepared to highlight these necessary changes? This section states that "Because acquisition and removal of businesses would not require changes..." however LAWA has told businesses in informal meetings that they would help relocate them into local areas which COULD require changes.

Response:

A description of changes required to the referenced plans to achieve precise consistency is provided in Section 4.9.6 of the SPAS Draft EIR. As stated on page 2-76 in Section 2.4.3 of the SPAS Draft EIR, implementation of the selected SPAS alternative would be subject to a series of actions by various City of Los Angeles departments as part of the review and approval process, including amendments and/or

updates to the LAX Plan and LAX Specific Plan, City of Los Angeles Transportation Element of the General Plan, City of Los Angeles Noise Element of the General Plan, City of Los Angeles Bicycle Plan, Los Angeles Coastal Transportation Corridor Specific Plan, and LAWA Aircraft Noise Mitigation Program. In addition, the County of Los Angeles Airport Land Use Commission will review the recommended SPAS alternative and make a determination as to whether the alternative is consistent with the County's Airport Land Use Plan. These subsequent actions, following the selection of a SPAS alternative, would include proposed changes to the applicable text and figures of these plans.

The referenced text on page 1-82 accurately states that "acquisition and removal of businesses would not require changes to existing General Plan or zoning designations" because these areas are already located within the boundaries of the LAX Plan and LAX Specific Plan (which provide the General Plan and zoning designations for LAX), as analyzed in Section 4.9.6 of the SPAS Draft EIR. The focus of the paragraph is on the potential for general plan and zoning inconsistencies within the boundaries of the LAX Plan and LAX Specific Plan.

The businesses proposed for acquisition under the various alternatives are identified in the LAX Master Plan Draft Relocation Plan. (See Section 4.9.6 of the SPAS Draft EIR.) The businesses identified are eligible for relocation assistance as described in LAX Master Plan Commitment RBR-1, Residential and Business Relocation Program. Acquired areas would be subject to LAX Master Plan Commitment LU-2, Establishment of a Landscape Maintenance Program for Parcels Acquired Due to Airport Expansion. Businesses that are located on LAWA property are not subject to the relocation provisions, and relocation of these uses would be a business decision.

It is acknowledged that relocated businesses could be faced with the need to request general plan and zoning changes, if they choose to relocate to areas that would require such changes. To the extent that new construction occurs in association with a displaced business as a result of acquisition and relocation, potential impacts, including changes to land use or zoning designations, would be addressed through applicable regulations and ordinances by jurisdiction, and through project-level environmental review for discretionary projects. Such potential effects were not evaluated in the SPAS Draft EIR as the circumstances surrounding environmental effects at relocation sites cannot be accurately predicted and such analysis would be highly speculative.

SPAS-PC00130-126

Comment:

Page 1-83 Aircraft Noise Exposure
...in Table 1-16, Alternative 4 would result in the greatest number of residential units, population, and non-residential noise-sensitive facilities that would be newly exposed to 65 CNEL or higher noise levels. This alternative would also result in the greatest number of residential units and acres that would be newly exposed to the 75 CNEL....

Question: Table 1-16 and the highlighted note on page 1-83 states that Alternative 4 (Alt D) would result in the greatest number of residential units....newly exposed..." This is counter intuitive as it leaves the outboard runways 24R in place and moves the inboard south 340'. Assuming that these newly impacted residences and other facilities are to the east, one would expect an equal number or greater number would be found moving north. What is the basis of these statements? What noise model and assumptions were used? What Integrated Noise Model was chosen and how was this validated? Was CNEL the only criteria used? Was any combination of factors such as single event also addressed? Which factors were they? If newer, more dense residential units were built in areas already impacted would they not be considered impacted because structures after a certain date require sound mitigation to preclude being included?

Response:

As shown in Table 1-16 and summarized on page 1-83 of the SPAS Draft EIR, Alternative 4 would result in the greatest number of residential units, population, and non-residential noise-sensitive facilities that would be newly exposed to 65 CNEL or higher noise levels. While it is true that those alternatives involving the relocation of Runway 6L/24R northward (i.e., Alternatives 1, 5, and 6) would result in increased aircraft noise impacts to areas immediately north and northeast of the airport, there

would be an accompanying decrease in aircraft noise impacts to areas east, southeast, and south of the airport. As summarized on the top of page 1-84 of the SPAS Draft EIR "[t]he density of the population is not constant across the area exposed to noise above 65 CNEL or higher; consequently, while the area of exposure may be similar among alternatives, the numbers of persons, dwellings or non-residential noise-sensitive facilities varies among the alternatives." Similar discussion was also provided in Section 4.10.1.6.8 of the SPAS Draft EIR.

As indicated in Sections 4.9 and 4.10.1, and summarized in Tables 1-16 and 1-17 of the SPAS Draft EIR, there would, in general, be fewer residential units exposed to 65 CNEL by moving Runway 6L/24R northward (Alternatives 1, 5, and 6) than would occur in moving 6R/24L southward (Alternatives 3 and 7) or not moving either runway (Alternatives 2 and 4), and the total residential population newly exposed to 65 CNEL would be lowest under Alternative 5 (i.e., relocate Runway 6L/24R 350 feet northward) than under any other alternative. Relative to a 1.5 CNEL increase above 65 CNEL, which includes areas currently exposed to greater than 65 CNEL, the total residential units and residential population exposed to such an increase is consistently higher for alternatives that move Runway 6R/24L southward (Alternatives 3 and 7) or do not move the runways (Alternatives 2 and 4). These differences in the numbers of homes and people being exposed to aircraft noise impacts--specifically, that total overall aircraft noise impacts would be lower with alternatives that move Runway 6L/24R northward--are due to the fact that the land use/development intensities in areas to the east, southeast, and south are higher than in the areas north of the airport. That is, although more homes to the north of the airport would be impacted by noise with a northward move of Runway 6L/24R, an even greater number of homes to the east, southeast, and south of the airport would no longer be impacted by noise, resulting in an overall decrease in the numbers of homes and people exposed to aircraft noise impacts.

Please see Response to Comment SPAS-PC00130-209 regarding the noise model and assumptions that were used and Response to Comment SPAS-AL00006-8 regarding the calculation of population and dwelling units. Regarding validation of the noise model, the model outputs were validated by comparing the 2009 baseline modeled contours with LAWA's RealContours, which is based on the information from the FAA's Automated Radar Terminal System data, FAA Tower Traffic Records, and Noise Monitoring Stations data.

Regarding other criteria used to determine noise impacts, as shown in Tables 1-19 and 1-20 and analyzed in Section 4.10.1.6 of the SPAS Draft EIR, other noise metrics were used to analyze single event aircraft noise exposure that result in nighttime awakening or classroom disruption including awakening probability contours, grid point analysis, interior noise levels of 55 dBA Lmax, 65 dBA Lmax, and 35 Leq(h).

The commentor also asks whether CNEL was the only criteria used and whether "single event" was addressed. Additional noise metrics and criteria were used in the aircraft noise analysis, including discussion of single event aircraft noise. See Section 4.10.1.2 of the SPAS Draft EIR for discussion of the methodology and noise metrics in the aircraft noise analysis and Section 4.10.1.4 of the SPAS Draft EIR for discussion of the thresholds of significance (i.e., the "criteria") applied in the aircraft noise analysis.

The commentor also asks questions about impacts to new unconstructed residential units. CEQA requires analysis of impacts to existing conditions, not future unconstructed facilities. (See State CEQA Guidelines Sections 15125(a) and 15126.2(a).) Existing regulations require inclusion of noise insulation into new residential units which insure interior noise level are 45 dBA Ldn or less. (Title 24, California Code of Regulations (California Building Code or "CBC"), Part 2, Volume 1, Section 1207.11.2.)

SPAS-PC00130-127

Comment:

Page 1-86 Table 1-20 Awakening Probability Impacts of All Alternatives

Question: Table 1-20 indicates that all of the runway movement alternatives reduce the exposed population for likelihood of being awakened. This is far from intuitive since more people are impacted as shown by previous tables. How is this justified?

Response:

As summarized on the top of page 1-84 of the SPAS Draft EIR "[t]he density of the population is not constant across the area exposed to noise above 65 CNEL or higher; consequently, while the area of exposure may be similar among alternatives, the numbers of persons, dwellings or non-residential noise-sensitive facilities varies among the alternatives." Similar discussion was also provided in Section 4.10.1.6.8 of the SPAS Draft EIR.

As indicated in Table 1-20 on page 1-86 of the SPAS Draft EIR, there would be a decrease in the probability of nighttime awakening under Alternatives 1, 5, 6, and 7 compared to Alternative 4. As indicated in Table 1-17 and summarized on page 1-84 of the SPAS Draft EIR, there would be a decrease in the population and dwelling units exposed to 65 CNEL or higher noise levels under Alternatives 1, 2, 3, 5, 6, and 7 compared to Alternative 4. This decrease in population and dwelling units and corresponding decrease in nighttime awakening is due to the shift in the noise contours which would result in the removal of some densely populated areas to the east, southeast, and south from high noise levels as described in Response to Comment SPAS-PC00130-126.

SPAS-PC00130-128

Comment:

Under Mitigation Evaluation on same page, 1-86, numerous noise abatement program items are listed. One noise abatement used at LAX is take off on inboard and landing on outboard. This is not always followed, however, due to the fact that at certain times of the day more aircraft are landing than taking off and vice versa. This leads to both runways used for take offs at some periods which results in increased noise over the "modeled" amounts. What assumptions are identified which impact the conclusion as the one noted above, and where in the DEIR are they listed?

Response:

The comment (1) states that the Preferential Runway Use Policy (first bullet point on page 1-86 of the SPAS Draft EIR) is not always followed by aircraft pilots and (2) suggests this results in "increased noise over the 'modeled' amounts." As discussed in greater detail on page 4-930 in Section 4.10.1.7 of SPAS Draft EIR, LAWA currently implements the Preferential Runway Use Policy to reduce aircraft noise impacts to noise-sensitive uses by using inboard runways for departures and outboard runways for arrivals when possible. As acknowledged on page 4-930, '[t]he control of aircraft in flight is the responsibility of the FAA." Therefore, LAWA does not have the authority to make this a mandatory policy, and, in some instances, pilots deviate from this policy.

Contrary to the suggestion in the comment, the aircraft noise analysis did not assume the Preferential Runway Use Policy is always followed, therefore impacts would not be "increased over the 'modeled' amounts," as suggested in the comment. As described in Section 3.1.1.1 of Appendix J1-1 of the SPAS Draft EIR, the percentage use of the existing runways for the baseline (2009) conditions was based on information provided by LAWA's flight data through analysis of records of flight operations from the Federal Aviation Administration (FAA) Airport Traffic Control Tower (ATCT) radar data at LAX. Based on the data, the majority of the flights departed off the inboard runways and about 5 percent of the flights used the outboard runways for departures in 2009. Table 1 in Appendix J1-1 of the SPAS Draft EIR provides the 2009 conditions runway utilization percentages. Future runway assignments were developed based on the airfield and airspace simulations for the SPAS Draft EIR. The future runway use percentages for the SPAS alternative scenarios are presented under each of the alternative sections in Appendix J1-1 of the SPAS Draft EIR.

SPAS-PC00130-129

Comment:

Page 1-86 Mitigation Evaluation
The airport has a long history of addressing concerns related to aircraft noise. The operational elements of the current LAX noise abatement program are:

- Use preferred inboard runways for departures and arrivals and interior parallel Taxiways C and E during the hours between 10:00 p.m. and 7:00 a.m. This measure is intended to move nighttime noise to the interior of the airfield and away from noise-sensitive areas adjacent to the airport to the north and south.

Question: Even though this is an objective to keep takeoffs on the inboard runway, what percentage of aircraft take off from the outboard? Doesn't this occur especially when a majority of aircraft are waiting for takeoff rather than a mix of landings and takeoff?

Response:

Table 1 in Section 3.1.1.1 on page 8 of Appendix J1-1 of the SPAS Draft EIR provides the percentages of 2009 operations assumed in the aircraft noise analyses for the 2009 baseline conditions, by runway and landings and takeoffs. By adding the percentages presented in Table 1 for total takeoffs, the percentage of takeoffs recorded in 2009 from the outboard runways was 4.85 percent, i.e., Runways 7R (0.05 percent), 25L (3.31 percent), 6L (0.02 percent) and 24R (1.47 percent).

LAWA's Preferential Runway Use policy establishes a preference for arrivals on the outboard runways and departures on the inboard runways during the day and, at night (10:00 p.m. - 7:00 a.m.), the use of only inboard runways for arrivals and departures whether during Over Ocean or Westerly Operations. However, the FAA LAX Air Traffic Control Tower (ATCT) staff has the ability and authorization to utilize any runway when they deem necessary. The use of an outboard runway for a departure is not a violation of any kind.

Please refer to page 5 in Section 1.4.5 of Appendix F-2 of the Preliminary LAX SPAS Report regarding information on runway operating configurations. In addition, refer to Section 1.4.7 and Figure 4 regarding information on departure corridors.

The reasons for assigning takeoffs to the LAX outboard runways are numerous. It is the responsibility of the LAX ATCT staff to assign aircraft to runways. As suggested by the commentor, allowing takeoffs on the outboard runways can be a means to expedite takeoffs at peak departure times. In addition, and when considering a full year of data, reasons for assigning takeoffs to the outboard runways can vary widely and may include, but not be limited to, the following considerations: weather conditions (ceiling height, visibility, wind direction and speed); proximity of the departing aircraft to an outboard runway; departure length required by an aircraft; granted pilot-specific request by the ATCT to use a specific runway; and the need for a large aircraft to exit the local airspace by making an immediate left turn when departing from Runway 25L.

SPAS-PC00130-130

Comment:

Page 1-86 Mitigation Evaluation (third bullet)
- Conduct departures to the west along the runway heading until reaching the coastline. The measure has been the subject of continuing concern to assure better compliance to achieve the desired effect.

Question: Since a significant number of early turns have occurred and still occur how is this modeled into the sleep awakenings modeling? With a substantial number (even though reduced in recent times) of outboard over-ocean takeoffs on the south side how is this included in the model to establish sleep awakening impacts?

Response:

Please see Response to Comment SPAS-PC00112-1 regarding early turns. The INM modeling in Appendix J1-1 was also used as the basis for the sleep disturbance analysis. As discussed on page 4-811 of the SPAS Draft EIR "the INM and post-processor were utilized to calculate awakening probabilities at regularly-spaced intervals across a large grid area." Additional details regarding flight tracks (including early turns) is included in Appendix J1-1 as explained in Response to Comment SPAS-PC00130-354.

SPAS-PC00130-131

Comment:

Page 1-88 Airport Operating Regulations
Local regulations would be needed to implement mandatory reductions in airport operations, shifts in flight schedules, or changes in aircraft permitted to operate at the airport. With the adoption of the Airport Noise and Capacity Act of 1990, Congress required that airport operators could adopt such regulations only upon completion of a detailed study of the potential impacts of and alternatives to the proposed regulations. In most cases, the regulations can be adopted only after explicit FAA approval of the proposed restrictions.17 Before the FAA will consider a proposal to adopt a noise or access restriction, the airport sponsor must complete an analysis in compliance with 14 CFR Part 161. The analysis must demonstrate that the proposed restriction would meet the following six statutory conditions:

Question: What is the status of the Part 161 request LAWA has been preparing for the past four to five years? How is it accounted for in the conclusions made in this document? Is it assumed that it is granted? if not, what impacts are exacerbated and by how much?

Response:

As indicated on page 1-88 of the SPAS Draft EIR, LAWA is currently preparing the Part 161 Study.

As described in greater detail in Section 4.10.1.5 of the SPAS Draft EIR, these measures are directly related to aircraft noise abatement through operation or source noise control. One of the mitigation measures pertaining to aircraft noise adopted by LAWA as part of the LAX Master Plan and included in the Alternative D Mitigation Monitoring and Reporting Program (MMRP) is Mitigation Measure MM-N-5, Conduct Part 161 Study to Make Over-Ocean Procedures Mandatory. The Part 161 Study seeks federal approval of locally-imposed Noise and Access Restriction on departures to the east during Over-Ocean operations, or when the airfield is operating on the Westerly runway configuration during the Over-Ocean operations time period. Additional details regarding the Part 161 Study are provided on pages 4-929 and 4-930 in Section 4.10.1.7 of the SPAS Draft EIR. The Part 161 study was released in October 2012, with notice sent to the stakeholders and representatives of communities registered with the LAWA Noise Management Office including ARSAC. Additionally, information regarding the LAX Part 161 Study is available on LAWA's website for the subject study at http://www.laxpart161.com/en/index.cfm.

For the purposes of noise modeling for the SPAS Draft EIR, the future year noise exposure levels assumes the same percentage of flights complying with the existing Over-Ocean program that were identified for the baseline (2009), which provided a conservative approach related to noise modeling. It was speculative at the time of the release of the EIR to make assumptions regarding the outcome of the Part 161 process.

SPAS-PC00130-132

Comment:

Page 1-89 Airport Facilities
The construction and alteration of airport facilities can either directly or indirectly affect noise levels off the airport. Noise barriers, for example, can reduce the noise from aircraft ground operations that are heard off airport property. LAWA has already constructed noise barriers along the northern edge of the airport to reduce runway noise impacts to noise-sensitive uses to the north. Additionally, the LAX Master Plan and the LAX Noise Variance from the state include provisions for the future installation of two ground runup enclosures at LAX. Changes in runway length can alter noise patterns, as can the construction of new runways. The construction of taxiways can alter runway use by making the use of a given runway more convenient and safer for aircraft operators. Alternatives 1, 2, 3, 5, 6, and 7 include high-speed exists for arriving aircraft to exit from the runway and transition onto a taxiway that directs aircraft away from noisesensitive uses located to the north. Other airport facility improvements that serve to reduce aircraft noise impacts include the electrification of all passenger gates at LAX, along

with the installation of preconditioned (i.e., cooled) air systems, to reduce the need for parked aircraft to operate the on-board auxiliary power unit (i.e., turbine engine that provides power and cooling to the aircraft).

Question: page 1-89 Aircraft Noise abatement. There is a requirement for several hush hangers to be placed west of TBIT which is included in the CA DOT noise variance. Where are they to be located? If they are not present how has this been considered in the noise exposure predictions?

Response:

The comment is incorrect; there is no requirement for "several hush hangers to be placed west of TBIT." The LAX Master Plan indicates the future development of two ground run-up enclosures (i.e., "hush hangers"), one in the eastern portion of the airport and one in the western portion of the airport. The California DOT noise variance requires that design of the two ground run-up enclosures be done in the next several years, but does not specify any particular locations.

Section 5.3.1 of the SPAS Draft EIR describes development of the West Aircraft Maintenance Area, which includes development of a new maintenance hangar, along with aircraft Remain Overnight (RON) apron area, and a ground run-up enclosure (GRE), also known as "hush hanger" as referred to by the commentor. As stated in Section 5.3, the specific schedule of the development of the GRE is yet to be determined. The use of GRE was not modeled in the SPAS Draft EIR aircraft noise modeling analyses. Furthermore, noise associated with aircraft maintenance activities, such as engine ground run-ups, is relatively isolated and does not materially contribute to the airport's overall daily noise levels or the CNEL noise contours.

SPAS-PC00130-133

Comment:

Page 1-91 Table 1-22 Additional Schools Exposed to Significant Noise Impacts for Each Alternative 2025 Noise Exposure

Question: Table 1-22 Schools exposed to additional noise. The note indicates Alts 1,5,6,7 are comparable. Is the capacity of the runways assumed to be the same for each of these alternatives? If so, were the same aircraft mixes and numbers of aircraft creating the noise assumed to be the same? Since most of the schools are affected but not impacted per the legal definition, was there a predicted higher number of interruptions (single event) for one alternative over another?

Response:

As indicated in Appendix J1-1 of the SPAS Draft EIR, the fleet and aircraft operations assumptions remain constant for all of the alternatives. Aircraft noise impacts on schools, including number of disruptions, are presented in Section 4.10.1.6 of the SPAS Draft EIR for all of the alternatives. Aircraft noise impacts associated with classroom disruption are summarized in Table 4.10.1-60 of the SPAS Draft EIR.

SPAS-PC00130-134

Comment:

Page 1-92 Road Traffic Noise
The ground access improvements proposed under Alternatives 1, 2, 3, 4, 8, and 9 would result in changes in road traffic noise levels at off-site noise-sensitive receptors. The predicted changes in road traffic noise levels under each of these alternatives would be less than a 3 A-weighted decibel (dBA) increase in CNEL; therefore, the road traffic noise impacts associated with Alternatives 1, 2, 3, 4, 8, and 9 would be less than significant. Alternatives 5, 6, and 7 do not include ground access improvements and would therefore not affect road traffic noise levels at off-site noise-sensitive uses.

Question: Even though the underlined section above alternatives do not include ground access improvements will there be unacceptable levels of noise from construction equipment moving facilities north? How much impact?

Response:

Section 4.10.3 of the SPAS Draft EIR addresses construction noise impacts for each and every alternative, including as related to airfield improvements, terminal improvements, and ground access improvements. As summarized in Table 4.10.3-4, all of the SPAS alternatives are currently, at this program level of analysis, anticipated to result in significant unavoidable impacts related to construction noise. Please see Section 4.10.3.8 of the SPAS Draft EIR for a summary of these conclusions.

SPAS-PC00130-135

Comment:

Page 1-92 Road Traffic Noise
Regarding cumulative impacts, as discussed in Section 5.5.10.2 in Chapter 5, Cumulative Impacts, the increases in road traffic noise anticipated to occur between baseline (2010) conditions and future (2025) conditions, including the projected growth in regional traffic combined with the effects of each SPAS alternative, would not result in a 3+ dBA CNEL increase at any of the noise-sensitive receptor locations evaluated. As such, cumulative road traffic noise impacts would be less than significant.

Question: Is the rationale for no cumulative impact from noise along the northside due to an assumption that the previous 1982 Land Use Plan called for more traffic than that scaled back in Alternative D and neither has been enacted?

Response:

The traffic assumptions for future (2025) cumulative traffic include traffic from the buildout of LAX Northside as assumed in Alternative D of the LAX Master Plan. Although development within LAX Northside has not yet been commenced, it is assumed, for cumulative traffic modeling purposes, that the subject development would be completed by 2025, the planning horizon year for SPAS (i.e., development of LAX Northside is included in the Travel Demand Forecasting Model described in Section 4.12.2.2.1 of the SPAS Draft EIR).

SPAS-PC00130-136

Comment:

Page 1-96 Fire Protection
Airfield improvements under Alternatives 1, 2, 3, 4, 5, 6, and 7 would enhance the safety and efficiency of the airfield compared to baseline conditions, thereby decreasing the potential need for emergency fire response associated with airfield accidents.

Question: Where is the analysis that supports the above statement? What safety and efficiency factors are improved?

Response:

Section 4.11.1 of the SPAS Draft EIR provides a detailed analysis of impacts to fire protection services associated with the SPAS alternatives and identifies the factors that are evaluated in this analysis. As stated in Section 2.2 of the SPAS Draft EIR, one of the main objectives of the project is to provide north airfield improvements that support the safe and efficient movement of aircraft at LAX. The existing outdated airfield design places aircraft at an increased risk of hazards. Those hazards include, but are not limited to, potential collisions with other aircraft and insufficient side-by-side passing clearances between certain types of aircraft arriving/departing on runways and aircraft on nearby taxiways.

Enhancements in the safety and efficiency of the airfield under Alternatives 1 through 7 would have a beneficial effect on emergency fire response as the enhancements would address a current

circumstance where an outdated airfield design creates a situation where aircraft are at an increased risk of hazards, as described above. Regarding enhancements to the safety and efficiency of the airfield under each alternative, please see Table 4.7.2-16 on page 4-570 in Section 4.7.2 of the SPAS Draft EIR.

SPAS-PC00130-137

Comment:

Page 1-97 Law Enforcement
It is anticipated that these facilities would be relocated to the future LAX Public Safety Building and Supporting Facilities that is being planned independent of SPAS.

Question: Page 1-97 A new public safety building is planned to be "independent of SPAS." Where is the list of all projects independent of SPAS listed and their contributions to traffic?

Response:

Section 5.3 of the SPAS Draft EIR includes a comprehensive list of past, present, and reasonably foreseeable cumulative development projects at LAX; related, non-LAWA projects on or adjacent to the airport; and regional projections and development projects. The locations of all of the cumulative projects that are currently known are identified in Figures 5-1 and 5-2 of the SPAS Draft EIR. As indicated on page 4-1023 of the SPAS Draft EIR, LAWA is currently in the design and site selection phase of a new public safety building. As noted on page 5-128 in Section 5.5.12.2 of the SPAS Draft EIR, cumulative impacts to off-airport transportation are incorporated into the analysis provided in Section 4.12.2. As stated on page 4-1208 of Section 4.12.2, "future (2025) scenarios were developed based on SCAG's land use projections for future interim year 2023 and future 2035 conditions plus planned development projects." Additional discussion of the planned development projects that were accounted for in the off-airport transportation analysis is provided on page 4-1208 and in Appendix K2-2 of the SPAS Draft EIR. (It should be noted that the table provided in Appendix K2-2 is the same as Table 5-2 provided in Chapter 5 of the SPAS Draft EIR. This table corresponds to the graphic depiction of project locations provided in Figure 5-1.)

SPAS-PC00130-138

Comment:

Page 1-98 On-Airport Transportation Curbside Operations
No significant impacts to curbside operations would occur under any of the alternatives addressed (Alternatives 1, 2, 4, 8, and 9) relative to Baseline (2009) versus Baseline (2009) With Alternative analyses. For Future (2025) versus Future (2025) With Alternative conditions, all of the alternatives would have a significant cumulative impact at the inner curbside at TBIT on the arrivals level.

Question: Does this mean that no matter what LAWA has in any of its alternatives traffic around TBIT will be terrible? Aren't there other improvements that could address this that should have been considered? Why not?

Response:

Section 4.12.1.11.2 on page 4-1178 of the SPAS Draft EIR addresses the mitigation measures to alleviate the curbside impacts. As Indicated in Table 4.12.1-44 on page 4-1179, implementation of Mitigation Measure MM-ST(OA) (SPAS)-1, Relocate Existing Taxi Loading Zone at TBIT, would reduce impacts associated with Alternatives 1, 2, 4, 8, and 9 to a level that is less than cumulatively considerable. The results of this analysis are presented in Appendix K1 of the SPAS Draft EIR.

SPAS-PC00130-139

Comment:

Page 1-98 On-Airport Transportation Roadway Links

No significant impacts to on-airport roadway links would occur under any of the alternatives addressed (Alternatives 1, 2, 4, 8, and 9) relative to the Baseline (2009) versus Baseline (2009) With Alternative analyses. For Future (2025) versus Future (2025) With Alternative conditions, Alternatives 1 and 2 would have significant cumulative impacts at three roadway links, all on the arrivals level; Alternative 4 would have significant cumulative impacts at five roadway links, all on the arrivals level; Alternative 8 would...

Question: 1-98 Roadway Links indicates No significant impacts, but LAWA has been pushing a BRT (articulated bus that shares CTA levels). How is it possible to add giant buses into a congested curbside area and not cause even more congestion?

Response:

The commentor inquired about the executive summary discussion on roadway links presented in Chapter 1 on page 1-98 of the SPAS Draft EIR.

The buses proposed by LAWA to operate on the evaluated busway are non-articulated buses similar to the existing LAX shuttles. While the total number of LAX shuttles accessing the CTA would increase under Alternatives 1, 2 and 8, the total number of commercial vehicles accessing the CTA would effectively decrease. This is because buses serving new off-airport facilities like the Intermodal Transpiration Facility (ITF) under Alternatives 1, 2, and 8 and the Consolidated Rental Car Facility (CONRAC) under Alternative 8, as well as some other commercial modes and about 5 percent of the private vehicles currently accessing the CTA would no longer access the CTA when the elevated busway is in place. Instead, passengers would be dropped off or picked up at the off-airport facilities, such as the ITF and the CONRAC, where passengers would be consolidated into groups and boarded onto high capacity LAWA-operated buses that would be used to transport passengers into the CTA. These buses would operate with higher average passenger loads than would the commercial vehicles that would otherwise access the CTA. LAWA buses taking access to and from the CTA via the elevated busway would be carrying a mix of riders including CONRAC customers, arriving passengers for the FlyAway buses, and charter long-distance transit buses, which, in turn, would result in a fewer number of bus operations within the CTA than would otherwise occur if the rental car companies, FlyAway program, and transit bus companies were operating their own individual buses within the CTA, each with comparatively fewer riders. Please see Table 4.12.1-15 of the SPAS Draft EIR for a discussion of the Future (2025) Passengers Mode Splits in the LAX CTA.

Notwithstanding the above, please see Chapter 2 of this Final EIR regarding the LAWA Staff-Recommended Alternative, which couples the airfield and terminal improvements associated with Alternative 1 with the ground access components associated with Alternative 9, including the development of an APM system into the CTA instead of an elevated busway.

SPAS-PC00130-140

Comment:

Page 1-99 On-Airport Transportation Public Parking Impacts
The airport's public parking supply in each of the Future (2025) alternative scenarios is sufficient to accommodate the airport's estimated future (2025) public parking demand for all the alternatives; supplies which are assumed to be 15 percent greater than the space demand to account for fluctuations in vehicles arrivals in the facilities. Therefore, impacts associated with parking are considered less than significant....

Question: Page 1-99 Public Parking impacts. Has LAWA assumed that the parking structures will continue operation as is through 2025? Will there be major repairs or renovation to these facilities? What percentage of people are expected to park on-airport vs. off-airport? Was an assumption of off-site check in made? If not, why not?

Response:

Please see Table 2-2 on pages 2-47 and 2-48 in the SPAS Draft EIR for a summary of assumed parking structures under each SPAS alternative. All parking structures within the Central Terminal Area

(CTA) are assumed to remain in place throughout the SPAS development program, with the exception of parking structures P-2B and P-5 which would be demolished to allow for the construction of the Midfield Satellite Concourse (MSC) passenger processor, as noted in Footnote 2 of Table 2-2 on page 2-48. Additional details regarding parking assumptions for each alternative are provided in the On-Airport Transportation in Section 4.12.1.6.1 of the SPAS Draft EIR.

Any repairs or renovation of the CTA parking structures will be conducted on an as-needed basis as part of the normal LAX maintenance and operations.

Data from the 2006 LAX Air Passenger Survey shows that during the departures and arrivals level peak hours, 45.6 percent of parkers parked within the CTA, while 53.1 percent park outside of the CTA. Of those who chose to park outside of the CTA, 31.2 percent park in the remote airport lots, while 68.8 percent park in off-airport private parking lots not operated by LAWA. The 2006 LAX Passenger Survey is available to be downloaded at the following LAWA website address: http://www.lawa.org/uploaded files/lax/pdf/2006LAXPassengerSurveyFinal.pdf

The SPAS Draft EIR assumed that passenger and baggage check-in would not be provided at the off-site passenger processing facilities to provide a conservative basis for estimating traffic related impacts. The use of off-site check-in facilities would translate into a decrease in the number of vehicles entering the CTA as assumed for the SPAS Draft EIR and, therefore, further reduce the level of traffic activity and potential impacts as compared to that currently estimated. If off-site check-in facilities were incorporated, traffic operations within the CTA and local roadway system would likely be better than depicted in the SPAS Draft EIR. Additional details regarding parking assumptions are provided on pages 4-1054 and 4-1073 of the SPAS Draft EIR.

SPAS-PC00130-141

Comment:

Page 1-100 Note from Table 1-24 Summary of Off-Airport Transportation Impacts After Mitigation
The nine alternatives currently being considered for the SPAS project are only at a conceptual level of planning. No construction plans, programs, or schedules have been formulated for any of the alternatives. It would be speculative to estimate construction-related vehicle trip generation and distribution onto the local roadway network in order to evaluate traffic impacts on specific streets and intersections during peak and non-peak traffic periods. As such, the total number of intersections that may be temporarily significantly impacted during construction cannot be determined at this time.

Question: The note in table 1-24 states that "no construction plans, programs, or schedules .... It would be speculative to estimate..." Was any consideration of construction traffic made? If not, why not?

Response:

Construction-related traffic impacts are addressed, at a program level of analysis, in Section 4.12.1.9.4 relative to on-airport transportation and in Section 4.12.2.6.3 relative to off-airport transportation. Please see Responses to Comments SPAS-PC00130-142 and SPAS-PC00130-235 for a discussion of the appropriateness of the programmatic review conducted for the SPAS project.

SPAS-PC00130-142

Comment:

Page 1-100
The nine alternatives currently being considered for the SPAS project are only at a conceptual level of planning. No construction plans, programs, or schedules have been formulated for any of the alternatives. As such, it would be speculative to estimate construction-related vehicle trip generation and distribution onto the local roadway network in order to evaluate traffic impacts on specific streets and intersections during peak and non-peak traffic periods. Nevertheless, based on a qualitative evaluation,...

Question: Even at a program level some basic amounts of construction related traffic should be quantifiable if the general types of construction are identified. On the runway related movements it can be more difficult, but the amount of construction and a survey of potential complications should enable LAWA to make an estimate. Why hasn't these elements been properly considered. The cost estimates use boiler plate $xx/sq yard of runway, why can't construction related efforts be estimated at least as well as that?

Response:

As discussed on page 4-3 of the SPAS Draft EIR, the SPAS Draft EIR is a program-level document prepared pursuant to the State CEQA Guidelines. State CEQA Guidelines Section 15168(a) states that a program EIR "may be prepared on a series of actions that can be characterized as one large project" and applies to projects that are related either geographically or as logical parts in the chain of contemplated actions. A program EIR is prepared at a more general level of planning than a project-level EIR and allows a lead agency to "consider broad policy alternatives and program-wide mitigation measures at an early time when the agency has greater flexibility to deal with basic problems or cumulative impacts" (State CEQA Guidelines Section 15168(b)(4)).

Section 15146(b) of the State CEQA Guidelines states that "An EIR on a project such as the… amendment of… a local general plan should focus on the secondary effects that can be expected to follow from the… amendment, but the EIR need not be as detailed as an EIR on the specific construction projects that might follow."

Program EIRs are commonly used in conjunction with the tiering process, which is "the coverage of general matters in broader EIRs (such as general plans or policy statements) with subsequent narrower EIRs or ultimately site-specific EIRs…concentrating solely on the issues specific to the EIR subsequently prepare." (State CEQA Guidelines Section 15385.) Under CEQA's tiering principles, it is proper for a lead agency to focus a first-tier EIR on only the program's general impacts, "leaving project-level details to subsequent EIRs when specific projects are being considered." (State CEQA Guidelines Section 15152(c); In re Bay-Delta (2008) 43 Cal.4th 1143, 1174-1175.)

The State CEQA Guidelines establish several additional principles related to the level of detail appropriate for a first-tier program EIR. For example, an EIR project description should be "general" and "not supply extensive detail beyond that needed for an evaluation and review of the environmental impacts." (State CEQA Guidelines Section 15124.) Also, the degree of specificity in an EIR corresponds to the degree of specificity of the underlying activity being evaluated. (State CEQA Guidelines Section 15146(b)). An EIR's sufficiency is reviewed in the light of what is "reasonably feasible." (State CEQA Guidelines Section 15151.)

The requirements and principles for first-tier program EIRs reviewed above apply directly to the SPAS Draft EIR. As stated on page 1-10 in Section 1.2.1 of the SPAS Draft EIR, "The project is to complete a Specific Plan Amendment Study (SPAS) that fulfills Section 7.H of the LAX Specific Plan consistent with the definition of the SPAS set forth in the LAX Master Plan Stipulated Settlement." The outcome of SPAS is the possible amendment of the LAX Specific Plan, which is an element of the City's General Plan. Therefore, the SPAS Draft EIR is appropriately a program EIR that focuses on program-wide impacts, and is not a project-level EIR. Because it is a program EIR, the SPAS Draft EIR is not required to analyze the impacts of specific construction projects included in the program at a project-specific level of detail. An EIR is not required to speculate about the environmental consequences of future development that is unspecified or uncertain. (Environmental Protection Info. Ctr. v. Department of Forestry & Fire Protection (2008) 44 Cal.4th 459, 502.)

As indicated on page 2-74 in Section 2.4 of the SPAS Draft EIR, "Certification of the SPAS EIR would complete the program-level CEQA compliance review for the SPAS process. Depending on the outcome of the SPAS process, additional project-level CEQA review may be required for implementation of the improvements associated with the selected SPAS alternative." LAWA's approach to preparing second-tier project-level CEQA documents is exemplified by project-specific EIRs prepared for major elements of the LAX Master Plan implemented to date, such as the South Airfield Improvement Project EIR, the Bradley West Project EIR, and the LAX Crossfield Taxiway Project EIR.

SPAS-PC00130-143

Comment:

Page 1-101 Transportation-Related Fuel

... As discussed above, the SPAS alternatives with ground access components (i.e., Alternatives 1, 2, 3, 4, 8, and 9) include a variety of design features to shift individuals away from personal vehicle use to other more efficient modes of transportation, which would reduce transportation related fuel consumption. With these design features, Alternatives 1, 2, 3, 4, 8, and 9 would not result in a wasteful, inefficient, or unnecessary consumption of Jet A fuel, gasoline, or diesel....

Question: p 1-101 Transportation-Related Fuel
This section states that there will be no "wasteful, inefficient, or unnecessary consumption..." Since we would continue to expect the CTA to be gridlocked during peak hours, what does that statement mean? How many cars are assumed to be able to use the CTA during peak hours? What number of people changing access modes is necessary to reduce vehicle access enough to remove this limiting constraint on passenger growth?

Response:

Please note that the comment presents a personal opinion about expecting the "CTA to be gridlocked during peak hours" that is unsupported by facts or evidence. Based on the on-airport transportation analysis presented in Section 4.12.1 of the SPAS Draft EIR, future traffic conditions within the CTA are anticipated to be generally good during peak hours and would not be "gridlocked" as suggested in the comment. As indicated in Tables 4.12.1-17, 4.12.1-19, and 4.12.1-21 on pages 4-1108 through 4-1117 of the SPAS Draft EIR, future (2025) traffic conditions during peak hours within the CTA would operate at Level of Service A ("Excellent") or B ("Very Good") for the vast majority of curbsides, roadway links, and intersections within the CTA.

Please refer to Response to Comment SPAS- PC00130-140 regarding the number of vehicles that would be removed from the CTA roadways under the various SPAS alternatives.

It is not necessary to induce additional mode changes beyond those assumed in SPAS to accommodate the vehicle activity generated by the anticipated passenger growth. In addition, mitigation measures discussed in Section 4.12.1.10.2 of the SPAS Draft EIR have been identified to mitigate potential on-airport traffic impacts associated with the SPAS alternatives.

SPAS-PC00130-144

Comment:

Page 1-101 Solid Waste
Improvements associated with the proposed alternatives would not, in themselves, alter passengerrelated municipal solid waste generation. Passenger activity at LAX would increase by 2025 due to projected growth with or without implementation of the SPAS alternatives, and those future passenger activity levels would be the same under each of the alternatives. As a result of increased passenger activity levels, passenger-related solid waste generation at LAX would increase by 22 percent compared to baseline (2010) conditions. The increase in solid waste generation would be the same under all alternatives. The Sunshine Canyon Landfill has sufficient physical and permitted capacity to accommodate this increase in solid waste generation. LAWA would continue to implement and enhance existing programs aimed at reducing waste generation, which are designed to fulfill LAX Master Plan Commitment SW-1, Implement an Enhanced Recycling Program, and increase the diversion rate to meet the state's 70 percent requirement by 2020. Therefore, under all alternatives, impacts to solid waste disposal capacity and to diversion-related policies and objectives associated with the solid waste generated from the increased number of passengers would be less than significant. With respect to cumulative impacts, passenger activity levels at LAX are forecasted to be 78.9 MAP by 2025 as a result of natural growth. The increase in passenger activity is expected to occur with or

without implementation of any of the SPAS alternatives. Projected increased passenger demand at LAX, in...

Question: Since solid waste is expected to be significant regardless of alternative can LAWA utilize conversion techniques for its waste similar to that identified in RENEW LA which could reduce waste by 90% and thereby reduce the need for Sunshine Canyon or any other dump?

Response:

Contrary to the statement in this comment, as indicated in Section 4.13.2 of the SPAS Draft EIR, under all of the SPAS alternatives, impacts to solid waste disposal capacity and to diversion-related policies and objectives associated with the solid waste generated from the increased number of passengers would be less than significant. As stated on page 4-1362 of the SPAS Draft EIR, Sunshine Canyon Landfill has sufficient physical and permitted capacity to accommodate this increase in solid waste generation. However, as indicated in Section 5.5.13.2 of the SPAS Draft EIR, as future regional solid waste disposal capacity to meet projected demand in Los Angeles County is not assured, impacts associated with projected increased passenger demand at LAX, in conjunction with other regional projects and population growth, would be significant, and LAX's contribution to these impacts would be cumulatively considerable. Cumulative impacts could be mitigated through implementation of LAX Master Plan Mitigation Measure MM-SW-1 (Provide Landfill Capacity) Implementation of this mitigation measure is the responsibility of another agency (or agencies). If this mitigation measure is not fully, implemented, cumulative impacts would remain significant, and LAX's contribution would remain cumulatively considerable.

The City's RENEW LA Plan, is a 20-year blueprint that will guide the City in reducing the use of landfills by maximizing recycling and reuse, and converting solid waste that currently goes to landfills into clean energy and/or raw materials. As part of this plan, the City continues to evaluate conversion technologies and has initiated efforts to identify material recovery facility and transfer stations in Southern California that could potentially host a conversion technology facility. LAWA will continue to enhance its recycling programs at LAX, which may include conversion technologies in the future.

As indicated in Section 4.13.2 of the SPAS Draft EIR, LAWA would continue to implement and enhance existing programs aimed at reducing waste generation, which are designed to fulfill LAX Master Plan Commitment SW-1 (Implement an Enhanced Recycling Program) and increase the diversion rate to meet the state's 70 percent requirement by 2020 or sooner.

SPAS-PC00130-145

Comment:

Page 1-103 1.5 Environmentally Superior Alternative
Section 15126.6(e)(2) of the State CEQA Guidelines requires an EIR to identify an environmentally superior alternative. If the environmentally superior alternative is the "no project" alternative, the EIR must identify an environmentally superior alternative among the other alternatives. Based on the analyses in Chapter 4, Environmental Impact Analysis, and Chapter 5, Cumulative Impacts, of this EIR, Alternative 2 is considered to be the Environmentally Superior Alternative of the nine alternatives evaluated in detail throughout this document.21

Question: Section 1.5 Environmentally Superior Alternative. Since Alternative 2 is the environmentally superior noted alternative and the Settlement Agreement calls for the least impact, how are any of the other alternatives justified?

Response:

The Stipulated Settlement does not "call for the least impact" as indicated in the comment. Instead, Section V of the Stipulated Settlement, which identifies the SPAS process, calls for study of a range of alternatives. For example, Section V(D) of the Stipulated Settlement calls for the study of potential alternatives that would provide solutions to the problems the Yellow Light projects were designed to address.

The SPAS Draft EIR provides a broad range of alternatives that each respond to the project objectives differently (refer to Tables 1-2 and 1-3) and each have different environmental effects (refer to Tables 1-4 and 1-5); however, each and every alternative are subject to an extensive set of LAX Master Plan commitments and feasible mitigation measures to minimize environmental impacts (refer to Table 1-6).

SPAS-PC00130-146

Comment:

Page 1-105 Incorporation by Reference
Question: Was the 2004 LAX Master Plan Final EIR and addendums recently delivered and available at the libraries? Which ones?

Response:

The LAX Master Plan Final EIR, including addenda, was not distributed to local libraries in conjunction with the distribution of the SPAS Draft EIR, nor were these documents required to be distributed to local libraries under CEQA. However, as noted on page 1-105 of the SPAS Draft EIR, it was available for public review at Los Angeles World Airports, Capital Programming and Planning Division (formerly Facilities Planning Division), One World Way, Los Angeles, CA 90045, and also accessible via the internet at www.ourlax.org.

SPAS-PC00130-147

Comment:

Page 2-2 Project Objectives (third bullet)
- The primary north airfield departure runway (6R/24L) is too short for certain larger aircraft (e.g., fullyloaded Boeing 747-400) on long-haul flights, requiring those aircraft to taxi to the south airfield, resulting in less efficient operations and disproportionate environmental impacts.

Question: p 2-2 Project objectives states that runway 24L length can't handle "fully loaded 747-400" but isn't it true that many of these aircraft do take off from the north complex? What number and percent of the 747-400 must taxi to from the north to the south? What percentage is this number of the total aircraft operations? If the runway is "too short" what should it be and how did Alternative D account for this problem?

Response:

As discussed on page 5-80 in Chapter 5 of the Preliminary LAX SPAS Report, some long-haul departures occurring at the maximum certificated takeoff weight (MTOW) cannot use the north airfield and must use the longer runway available on the south airfield. A Takeoff Length Analysis for heavy aircraft, those with an MTOW of 255,000 pounds or more, was prepared for Runway 6R/24L at LAX. This analysis can be found in Appendix E1-5 of the Preliminary LAX SPAS Report. The analysis states that B747-400 and B747-400F aircraft require 10,500 ft. and 10,700 ft. of runway, respectively, for takeoff at MTOW and a temperature of 59°F. B747-400 and B747-400F aircraft require 11,300 ft. and 11,500 ft. of runway, respectively, at MTOW and with temperatures in excess of 90°F. B747-400 and B747-400F aircraft departing at weights less than MTOW may be able to use north airfield runways for departure.

The Takeoff Length Analysis also states that by using the 2020 No Yellow Light Project flight schedule, there are approximately 49 B747-400 and B747-400F daily departures, making up 12.99 percent of heavy aircraft departure operations. Combined, B747-400 and B747-400F aircraft make up approximately 4.12 percent of total airport operations.

Please see Response to Comment SPAS-PC00130-62 for a more detailed discussion of the findings of the Takeoff Length Analysis, including the percentage of heavy aircraft departures that cannot be accommodated at the existing north airfield. Alternative D extends Runway 6R 135 ft. to the west and Runway 24L 1,280 ft. to the east for a total runway length of 11,700 ft. According to the Takeoff Length Analysis, this runway length is sufficient to accommodate 100 percent of heavy aircraft departures at

MTOW and a temperature of 59°F, while accommodating approximately 90 percent of heavy aircraft departures at MTOW and a temperature of 86°F. (See Tables 1A and 1B of Appendix E1-5 of the Preliminary LAX SPAS Report.)

SPAS-PC00130-148

Comment:

Page 2-2 Project objectives (eighth bullet)
- The existing Runway Protection Zone (RPZ) associated with Runway 6L/24R includes residential uses.

Question: p2-2 Project objectives states "The existing Runway Protection Zone...includes residential uses." The Alt D yellow light project moved the inboard runway south with no change in the location of 24R therefore the RPZ remained the same. Since the key component of the Stipulated Settlement objective is to address the issues resolved by the yellow light project how is this an issue that is appropriate for consideration? If anything, since the RPZ was fixed by Alt D then no action which changes that for the worse should be unacceptable.

Response:

Under Section V.D of the Stipulated Settlement, LAWA is to focus the SPAS on, among other things, potential alternative designs, technologies, and configurations for the LAX Master Plan Program that would provide solutions to the problems that the Yellow Light Projects were designed to address. Section 2.2 of the Preliminary LAX SPAS Report and Section 2.2 of the SPAS Draft EIR set forth the SPAS project objectives and the problems that the Yellow Light Projects were designed to address. As stated therein, one of the SPAS objectives is to provide north airfield improvements that support the safe and efficient movement of aircraft at LAX. One of the problems associated with the outdated airfield design is that the existing Runway Protection Zone (RPZ) associated with Runway 6L/24R includes residential uses.

One of the objectives of the SPAS, as presented later in the last bullet on page 2-2, is for LAWA to seek airfield improvements that minimize or eliminate the extent to which RPZs overlay residential areas. The commentor is correct that LAX Master Plan Alternative D does not propose to relocate Runway 6L/24R; hence, the homes that are currently within the existing RPZ for that runway would continue to remain in the RPZ under the approved LAX Master Plan. It is LAWA's objective to identify and evaluate airfield improvement options that would remove the RPZ boundary from encompassing these homes, and the SPAS alternatives includes three options that do so - Alternatives 1, 5, and 6 (see Table 4.7.2-16 on page 4-569 of the SPAS Draft EIR).

SPAS-PC00130-149

Comment:

Page 2-2 2. Improve the Ground Access System at LAX to Better Accommodate Airport -
Related Traffic, Especially as Related to the Central Terminal Area
Travelers, visitors, employees, vendors, and others utilizing the commercial passenger terminal at LAX, defined by the Central Terminal Area (CTA), have various ground access options including private vehicles, transportation service providers (i.e., taxis, shuttles, limousines, etc.), and public transit. Ground...

Question: P2-2 Improve Ground Access System...Especially.. Central Terminal Area" What quantifiable values are need to conveniently access the CTA curbside at each terminal? What specific queing, weaving, and conflict points are being addressed to reduce the impedance of traffic? What causes each of these limits? Since no quantifiable numbers are provided it's hard to judge actual effectiveness.

Response:

The quantifiable values assumed to access the Central Terminal Area (CTA) curbsides are included in numerous sections of the SPAS Draft EIR. Refer to Section 4.12.1.3.13 on pages 4-1074 through 4-

1087 which discusses the procedures used to analyze the CTA curbsides. In addition, Tables 4.12.1-6 and 4.12.1-7 on page 4-1075 of the SPAS Draft EIR define the level of service thresholds using volume/capacity ratios within specified ranges, providing a way to quantify curbside operations analysis. The results of this analysis for the Baseline with Alternatives traffic conditions are provided in Table 4.12.1-16 on pages 4-1107 and 4-1108 of the SPAS Draft EIR. The results of future (2025) with Alternatives are provided in Table 4.12.1-17 on page 4-1108 through 4-1110 of the SPAS Draft EIR. Additional analysis is presented in Appendix K1 of the SPAS Draft EIR.

The effects of queuing, weaving and conflict points are addressed within the calculation of CTA roadway capacity. The curbside utilization is a measure of queuing on the curbsides. For example, on single loading curbsides, utilization of more than 100 percent would mean that the vehicles are queuing or actively loading/unloading on the second lane of the curbside roadway. The impedance of this condition on the overall flow of traffic within the CTA is considered in the roadway link analysis. Figure 4.12.1-8 on page 4-1081 of the SPAS Draft EIR shows the relationship between the curbside utilization and the reduction on throughput capacity of the adjacent roadway. The results of the CTA roadway link analysis under Baseline conditions are presented in Table 4.12.1-18 on pages 4-1110 through 4-1112 and the results of the CTA roadway link analysis under future (2025) conditions are presented in Table 4.12.1-19 on pages 4-1113 through 4-1115 of the SPAS Draft EIR. Additional analysis is presented in Appendix K1 of the SPAS Draft EIR.

SPAS-PC00130-150

Comment:

Page 2-3 Improve Ground Access
- Curbside demand is unevenly distributed, especially during peak periods, creating concentrations of passengers that are not accommodated by the existing curbside system;

Question: Page 2-3 Project objectives states that ground access is critical. I agree, but what is LAWA doing to reduce peak time access? Since it is stated that curbside demand is unevenly distributed what amounts of changes (quantitative measure) is needed? Would a third level for buses and emergency vehicles help the situation as has been suggested at SPAS meetings but has never made it into any LAWA plan?

Response:

As discussed on pages 1-11 and 1-12 in Section 1.2.1 of the SPAS Draft EIR, all alternatives considered and evaluated under the SPAS Draft EIR analyses are intended to reduce traffic accessing the Central Terminal Area (CTA) in both peak and non-peak hours.

For example, facilities such as the Intermodal Transportation Facility (ITF) under Alternatives 1, 2, and 8 and Consolidated Rental Car Facility (CONRAC) under Alternative 8 are anticipated to reduce the number of vehicles accessing the CTA by diverting trips to these off-site locations where passengers would be consolidated into groups and transported to the CTA using efficient high-occupancy shuttle buses on an elevated busway connecting airport facilities at Manchester Square, the new Green Line Aviation/LAX light rail station, the ITF and the CTA. CTA operational improvements such as the elimination of "double-looping" of certain shuttle bus operations for a more efficient single-level busing operation would further reduce traffic activity and related congestion in the CTA. Mitigation Measures MM-ST(OA) (SPAS)-2 on page 4-1178 of the SPAS Draft EIR describes the measures that address CTA curbside operations. Other alternatives, namely Alternative 3, eliminate private vehicle access to the CTA thereby reducing curbside traffic congestion.

Regarding the potential addition of a third level for buses and emergency vehicles discussed in the comment, construction of a third-level curbside would require significant reconfiguration of the terminals and CTA roadway system. Construction of a third level roadway and new pedestrian connections to the terminal buildings within the CTA would be infeasible. Accommodating these new facilities would require significant reconfiguration of the CTA's access and egress roadways, along with the simultaneous closures and reconstruction of portions of both the existing arrivals and departures level roadways to facilitate construction of the third level roadway support structure and deck. Additionally, development of a third level roadway and new pedestrian connections would substantially constrain

potential alignment and design options for a future Automated People Mover (APM) within the CTA, which is proposed under Alternative 9 (Note: Although Alternative 3 also proposes an APM system within the CTA, the CTA roadway system under that alternative would be closed to private vehicles, therefore there would be no need/purpose for a third level roadway). LAWA's priority for landside development is to implement improvements which encourages passengers to access the CTA using high-occupancy modes via an elevated busway (SPAS Alternatives 1, 2, and 8) or an APM system (SPAS Alternatives 3 and 9) in favor of constructing additional roadway capacity for private vehicles within the CTA. Furthermore, existing physical constraints, the expectation of limited availability of capital funding, and disruptions to CTA operations are additional factors for why construction of a third-level roadway was not considered as part of the SPAS Draft EIR.

Further, a third level would be just an alternative to one project component. Under CEQA, for multi-component projects like the SPAS alternatives, an EIR need not evaluate alternatives for each project component. (California Oak Foundation v. Regents of University of California (2010) 190 Cal.App.4th 227, 276-277; Big Rock Mesas Prop. Owners Ass'n v. Board of Supervisors (1977) 73 Cal.App.3d 218, 277; see also No Oil, Inc. v. City of Los Angeles (1987) 196 Cal.App.3d 223, 235.)

SPAS-PC00130-151

Comment:

Page 2-3 Improve Ground Access
- The roadway system is not designed to efficiently accommodate security screening of vehicles entering the CTA.

Question: P2-3 Project objectives states that LAX must remain the premier point for all activity to keep the vitality of the region. The SetOntarioFree.com has a study that shows an extra 1.6 million cars are being directed to the LAX area that could be handled in Ontario. Since the area is already gridlocked how much business expenses are wasted by employees and transportation of goods in an unnecessarily gridlocked area where regionalization has not been fostered?

Response:

Please refer to Topical Response TR-SPAS-REG-1 regarding the fact that LAWA, through the LAX Master Plan, the SPAS process, and other efforts, supports the regionalization of air travel demand in Southern California. As indicated therein, the potential LAX Specific Plan amendment to Section 7.H further supports such regionalization. The subject Topical Response also discusses LA/Ontario International Airport, which is assumed within the regionalism of air travel demand.

LAWA could find no reference on the "SetOntarioFree.com" website to "a study that shows an extra 1.6 million cars are being directed to the LAX area that could be handled in Ontario" (website accessed on December 15, 2012). Although the subject website includes claims to the effect that 1.3 million cars annually are traveling to LAX for flights that should be offered at Ontario International Airport, no study or other evidence supporting such claims could be found on or through the subject website.

SPAS-PC00130-152

Comment:

Page 2-3 3. Maintain LAX's Position as the Premier International Gateway in Supporting and Advancing the Economic Growth and Vitality of the Los Angeles Region
LAX serves a key role in the region's economy. This is particularly true relative to LAX's position as the international gateway for the western United States. According to a study completed in 2007 by the Los Angeles Economic Development Corporation (LAEDC), over the course of 2006 an average transoceanic flight traveling round-trip from LAX everyday added $623 million in economic output and sustained 3,120 direct and indirect jobs in Southern California with $156 million in wages.25 Given the continued growth in, and reliance on new large aircraft such as the Airbus A380 by major airlines operating on those long distance international routes, it is important that LAX be able to effectively accommodate those aircraft.

LAX is a major employer on both a local level and a regional level. According to the LAX Master Plan Final EIS/EIR, on-airport employment at LAX provided almost 59,000 jobs and, on a larger-scale, LAX related regional employment provided over 400,000 jobs and $60 billion in economic output.26 (underlined for emphasis)

Question: Page 2-3 Project objectives states that the roadway system is not designed to efficiently accommodate security screening, but again LAWA 's plans have failed to address a recommended, effective fix of putting weight scales and cameras into the roadway at critical points. These could be monitored automatically at all times. How many check points does LAWA need to avoid creating a security bottleneck? How many cars per hour can be accommodated in any one location? Has LAWA considered a special access for buses and commercial vehicles?

Response:

Security is not an environmental impact and, therefore, is not required to be discussed in the SPAS Draft EIR under CEQA. However, a Security Assessment of the SPAS alternatives is included in Appendix I of the Preliminary LAX SPAS Report pursuant to the Stipulated Settlement and Section 7.G(2) of the LAX Specific Plan. As indicated in Section 5 of the SPAS Security Assessment, while the redesigned entry roadway by itself would not increase airport security, the roadway would provide the opportunity for in-road traffic calming measures to control traffic entering the CTA, which would improve security. As discussed in Section 4.11.2.6.10 of the SPAS Draft EIR, as ground access improvements under each alternative would reduce traffic congestion and curb-front demands, overall security would be enhanced throughout the CTA.

As a program-level document, the SPAS Draft EIR did not include specific improvement projects such as the installation of "weight scales and cameras into the roadway at critical points." Similarly, a study of the number of required checkpoints, the car throughput of each checkpoint, or special access for buses and commercial vehicles was not evaluated as part of SPAS. The dedicated busway associated with Alternatives 1, 2, 8, and 9, and the APM systems associated with Alternatives 3 and 9, would bypass the entry roadways for direct access to the CTA.

Please see Responses to Comments SPAS-PC00130-424 and SPAS-PC00130-495 regarding implementation of security measures at LAX. LAWA has implemented numerous recommendations provided by security experts and agencies including the Transportation Security Administration, Federal Bureau of Investigation, Department of Homeland Security Office of Critical Infrastructure Protection, international experts, and others. The details regarding the security measures considered and implemented is considered Sensitive Security Information under federal law and is therefore not subject to disclosure.

No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00130-153

Comment:

Question: P2-3 Project objectives states that LAX must remain the premier point for all activity to keep the vitality of the region. The SetOntarioFree.com has a study that shows an extra 1.6 million cars are being directed to the LAX area that could be handled in Ontario. Since the area is already gridlocked how much business expenses are wasted by employees and transportation of goods in an unnecessarily gridlocked area where regionalization has not been fostered?

Response:

The content of this comment is identical to comment SPAS-PC00130-151; please refer to Response to Comment SPAS-PC00130-151.

SPAS-PC00130-154

Comment:

Page 2-4 5. Enhance Safety and Security at LAX
During the preparation of the LAX Master Plan, which began in the 1990s, Alternative D was formulated following the events of September 11, 2001 and integrated into the CEQA review process for the LAX Master Plan as the "Enhanced Safety and Security Plan." In now identifying and evaluating alternatives to the Yellow Light Projects, which are key elements of the LAX Master Plan, LAWA is seeking to maintain the ability of the LAX Master Plan, if and as modified by the outcome of the SPAS process. to enhance safety and security at LAX.

Question: Page 2-4 Program Objectives Item 5 calls for enhanced safety and security per Alt D. During the review and approval of Alt D there was a report prepared by RAND Corp which identified many "fixes" that could be incorporated quickly and effectively. How many of those have been done, if any? Did LAWA consider the RAND report when creating its potential designs? What portions?

Response:

Please see Responses to Comments SPAS-PC00130-424, SPAS-PC00130-495, and SPAS-PC00130-851 below.

SPAS-PC00130-155

Comment:

Page 2-4 6. Minimize Environmental Impacts on Surrounding Communities
LAX is a major international airport located within a very urbanized area, with established communities situated directly to the north, east, and south. These communities are affected to varying degrees by existing operations at the airport. Recognizing that these existing effects to the surrounding communities may change based on the alternatives being considered in SPAS, LAWA seeks to identify and apply ways to avoid, reduce, or minimize environmental impacts on surrounding communities. (underlined for emphasis)

Question: page 2-4 Program Objectives item 6 highlighted section states that LAWA is concerned about environmental impacts on surrounding communities. What area do they consider "surrounding" since areas both north including Santa Monica and Culver City, LA County areas, and the entire South Bay is affected (not necessarily impacted by the legal definition). Also all those communities on the arrival flight paths as far away as Palm Springs, but also midway like Lahabra Heights and Monterey Park are also very affected by even slight changes in flight paths or absolute numbers of aircraft operations.

Response:

As described on page 4-641 and shown in Figure 4.9-1 in Section 4.9 of the SPAS Draft EIR, the term "surrounding communities" is used in reference to portions of unincorporated Los Angeles County and the cities of Los Angeles, El Segundo, Inglewood, and Hawthorne that are shown within the SPAS land use study area. An EIR is required to discuss significant impacts that the proposed project will cause in the area that is affected by the project. (Muzzy Ranch Co. v. Solano County Airport Land Use Com'n (2007) 41 Cal.4th 372, 387.) The SPAS Draft EIR analyzes a geographic area that is affected by the project and includes the surrounding communities. The geographic area studied in the SPAS Draft EIR generally coincides with the geographic area of LAWA's Aircraft Noise Mitigation Program (ANMP), since the potential for incompatible land use is primarily related to aircraft noise. Aircraft noise impacts under the Alternatives 1 through 7 that would occur due to changes in the flight path are analyzed in Section 4.9.6 of the SPAS Draft EIR. In addition, Section 4.10.1 of the SPAS Draft EIR analyzes a larger area east of the I-110 (primarily in the city of Los Angeles) where the increased probability of nighttime awakening could occur under SPAS Alternatives 1 through 7. Based on these analyses, changes in the flight path would not affect more remote communities outside of the SPAS land use study area, associated with high noise levels or nighttime awakening. Other jurisdictions and communities outside the SPAS land use study area that have concerns regarding LAX operations can

and do participate in the LAX Community Noise Roundtable (which is comprised of elected officials, community representatives, and LAWA and FAA staff among others). The purpose of the LAX Community Noise Roundtable is to reduce and mitigate the adverse noise impacts that the users of LAX create on the surrounding communities (including those outside the SPAS land use study area) and their environs. In addition, noise complaints may be filed by calling the LAX Noise Complaint Line (424) 64-Noise or completing a form online at http://www331.webtrak-lochard.com/webtrak/lax4.

Regarding changes in the number of aircraft operations, the project would not change the potential for growth at LAX; rather, future passenger activity is forecast to reach 78.9 MAP at LAX by the planning horizon year of 2025 with or without the SPAS alternatives.

SPAS-PC00130-156

Comment:

Page 2-5 Project Characteristics 2.3.1 Alternatives Addressed in this Draft EIR
Problems the North Airfield Reconfiguration was Designed to Address: Under existing conditions, the north airfield does not meet FAA standards for ADG V and VI aircraft under any weather conditions. Failure to meet these standards results in restricted operations when ADG V or VI aircraft utilize the north airfield, impacting operations of all aircraft on the north airfield. Restricted operating procedures increase operational delays and aircraft-related emissions and adversely affect passenger convenience. Additionally, without a centerline taxiway and other airfield improvements, there is an increased risk of incursions and collisions. Further, Runway 24L is not long enough to accommodate some fully-loaded departing aircraft, resulting in higher utilization of the south airfield by these aircraft.

Question: Section 2.3 Project Characteristics
Defining problems; Agreed that neither Alt D nor existing conditions meet full ADG V or VI design standards. Nor would any of the alternatives. The excuse for these is that there is some accommodation necessary for the larger aircraft. What is the quantified impact in seconds and number of these aircraft that impact. As the percentage of these NLA is small and most A380s will not arrive during peak hours how much practical impact is there?

Response:

SPAS Alternatives 1 through 7 provide a broad range of improvement options for the north airfield, each of which responds differently to meeting FAA runway and taxiway separation design standards for Aircraft Design Group (ADG) V and VI aircraft. Table 4.7.2-8 in the SPAS Draft EIR summarizes the extent to which each alternative responds to such standards relative to runways and taxiways in the north airfield. As indicated in the table, Alternative 5 is the alternative most responsive to those standards in meeting ADG V and VI design standards on all runways and taxiways, with the exception of Taxilane D which would only meet ADG V standards.

An airspace simulation analysis (SIMMOD) was conducted for the purposes of the SPAS Draft EIR for Alternatives 1 through 4 to identify operational delays (in minutes and fractions of a minute [seconds]). SIMMOD addresses the design and procedural aspects of air traffic operations and produces measures of runway throughput, aircraft travel time, and aircraft delay. (See Section 1.4.1 of Appendix F-2 of the Preliminary LAX SPAS Report.) The results of these simulation analyses are included in Appendix F-2 of the Preliminary LAX SPAS Report. The simulation analysis determined that, as a result of an increase in the number of operations per day, all the alternatives would result in longer delays. (See pages 107 and 108 in Section 4 of Appendix F-2 of the Preliminary LAX SPAS Report.) As discussed below, the number of ADG V and VI operations will increase markedly from 2009 to 2025.

As provided in Table 8 on page 18 of Appendix F-1 of the Preliminary LAX SPAS Report, ADG V and VI aircraft accounted for 149 operations in the 2009 baseline design day flight schedule. That number is expected to increase to 254 on a peak month average day at LAX in 2025. (See Table 12 on page 26 of Appendix F-1 of the Preliminary LAX SPAS Report.) For additional information regarding the 2009 and 2025 fleet mixes, please refer to Response to Comment SPAS-PC00130-770.

SPAS-PC00130-157

Comment:

Similarly, since an A380 is designed for take off and landings in shorter distances than a 747 then only the very heavily loaded with full fuel are even at issue. How many of these are anticipated by 2025? What is the percentage of total aircraft operations?

Response:

Please see Table 12 in Appendix F-1 of the Preliminary LAX SPAS Report. The 2025 Design Day Flight Schedule (DDFS) assumed 27 Airbus 380-800 daily operations on the Peak Month Average Day (PMAD). This represents 14 Airbus 380-800 aircraft operating on the PMAD, with 13 daily arrivals and 14 daily departures. The Airbus 380-800 operations were assumed to represent 1.9 percent of all operations (2,053 daily operations) on the PMAD in 2025.

SPAS-PC00130-158

Comment:

Page 2-6 Project Characteristics 2.3.1 Alternatives Addressed in this Draft EIR
Problem the Demolition of Terminals 1, 2, and 3 was Designed to Address: Under the LAX Master Plan, substantial portions of Terminals 1, 2, and 3, notably the piers/concourses, would be demolished in order to provide room for the relocation of Runway 6R/24L 340 feet to the south of the existing runway centerline. The existing terminals would be replaced by a linear concourse that would provide aircraft gates and passenger hold rooms but no passenger processing capacity. Under the LAX Master Plan, the passenger processing capacity provided by existing Terminals 1, 2, and 3 would be replaced by new passenger processing facilities in the interior of the CTA (where the existing parking garages are currently located). Only the demolition of Terminals 1, 2, and 3 is a Yellow Light Project.

Question: section 2.1 Problems addressed...
Quantify how much terminal space is needed to handle the 78.9 MAP. Also curb space requirement specifics?

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. The comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR; therefore no further response is required. (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)). Nevertheless, the response below is provided for informational purposes.

In the context of Section 2.3.1 on page 2-6 of the SPAS Draft EIR and the discussion of Master Plan concept for a linear concourse to replace Terminals 1, 2 and 3, the commentor is inquiring about "how much terminal space is needed to handle the 78.9 MAP" and "curb space requirement specifics." Please refer to Response to Comment SPAS-AL00008-29 regarding the capacity of the Alternative 3 linear concourse. Although not mentioned in Response to Comment SPAS-AL00008-29, the same reasoning would apply to the associated linear concourse curb space requirements.

SPAS-PC00130-159

Comment:

Page 2-6 Project Characteristics 2.3.1 Alternatives Addressed in this Draft EIR
...Problem the Ground Transportation Center was Designed to Address: Under the LAX Master Plan, the function of the GTC is to replace CTA curb front for drop off and pick up of passengers and to replace a portion of the private vehicle parking area and all of the commercial vehicle (e.g., taxis, shuttle vans, and limousines) staging area. The GTC was designed to allow closure of the CTA to private

vehicle access and provide the curb front function at a location well removed from the main terminal area to enhance security within the CTA. The GTC, in conjunction with the Intermodal Transportation Center (ITC) and other parking facilities proposed as part of the LAX Master Plan, also provided replacement parking for the existing parking that would be eliminated under the LAX Master Plan, such as in the CTA and Parking Lots C and D. Problem APM 2 was Designed to Address: Under the LAX Master Plan, the function of APM 2 is to provide connection between the planned GTC and the CTA.

Question: section 2.1 Problems addressed...
How many parking spaces are required? How many are lost given that LAWA has called for the ConRAC in Manchester Square? Why isn't Belford Square area used or contemplated for any airport use since it was vacated at the same time as Manchester Square? What is the anticipated number of cars given that LAWA has plans for a people mover (or direct train connection or bus connection)? How many cars does LAWA anticipate will be removed from consideration by the 8 flyaway routes to be developed?

Response:

Table 4.12.1-40 on page 4-1167 in the SPAS Draft EIR provides the Baseline (2009) and Future (2025) public parking supply, demand, and requirements for Alternatives 1, 2, 4, 8, and 9. A more detailed breakdown of the parking proposed under each of these alternatives, and also for Alternative 3, is provided in Table 2-2 in Chapter 2 of the SPAS Draft EIR. Relative to Manchester Square, there is currently no public airport parking within that area; however, the Ground Transportation Center (GTC) proposed for Manchester Square under Alternative 3 would include 7,515 public parking spaces. SPAS Alternatives 8 and 9 (which include a Consolidated Rental Car Facility (CONRAC) at Manchester Square) are proposed to include 4,200 public parking spaces, which would amount to 3,315 fewer public parking spaces at Manchester Square than under Alternative 3. Relative to total public and employee parking proposed under each alternative, Alternatives 1 and 2 would each have 32,905 spaces, Alternative 3 would have 35,712 spaces, Alternative 4 would have 22,986 spaces, and Alternatives 8 and 9 would each have 32,155 spaces - see Table 2-2.

Please see Response to Comment SPAS-PC00130-175 regarding land uses in the Belford area.

Regarding the number of cars that LAWA anticipates under each alternative, including Alternatives 3 and 9 that include APM systems, Table 4.12.2-10 on page 4-1212 of the SPAS Draft EIR provides a detailed breakdown of the vehicle trip generation associated with each alternative during the morning, mid-day, and afternoon peak hours.

Please see Response to Comment SPAS-PC00130-399 for a discussion of the LAWA FlyAway Service. Regarding how many cars LAWA anticipates will be removed from consideration by the establishment of future additional FlyAway stations and routes, LAWA does not have a specific estimate, given that the performance of each new FlyAway will largely depend on the local setting and the particular characteristics of each facility (i.e., is the new FlyAway facility co-located with a major transportation center in a high-density area with high activity levels and different transit modes or is it single facility located in a lower density area, but near a major freeway; does the travel route between the new facility and LAX connect with a freeway network with high-occupancy vehicle (HOV) lanes and do those lanes go directly freeway to freeway, etc.) While LAWA does not have an estimate of cars removed by future FlyAways, LAWA records for the FlyAways that were in operation in 2011, as presented in LAWA's LAX FlyAway Network Emissions Reduction Report Summary, indicate that the four FlyAway bus operations in operation at the time (Van Nuys, Union Station, Westwood and Irvine) saved approximately 1,175,700 annual trips to the Airport.

SPAS-PC00130-160

Comment:

Page 2-6 Project Characteristics 2.3.1 Alternatives Addressed in this Draft EIR Airfield Improvements - Airfield improvements include changes to the runways, taxiways, navigational aids, and service and maintenance roads associated with the north airfield. The primary differences in airfield improvements associated with the various SPAS alternatives pertain to:

- Separation distances between runways and taxiways. Separation distances largely determine the maximum size aircraft that can freely operate on that system under various visibility conditions, and, in certain visibility conditions, would either require FAA approval of special operating procedures (i.e., Modifications of Standards or other forms of operational waivers) or would be prohibited...

Question: P 2.6 Airfield improvements states an obvious that" separation distances determine the maximum size aircraft that can freely operate on that system..." but fails to provide any quantitative information. This section also talks about a centerfield parallel taxiway between runways without referencing any specific slats. In other airports when a CLT was built, how many new incursion opportunities occurred due to an aircraft on the CLT or mistakenly landed on it?

Response:

For more information on runway-taxiway separation distances, please see Tables 3-6 and 3-7 of FAA Advisory Circular (AC) 150/5300-13A Airport Design available at http://www.faa.gov/airports/engineering/airport_design/.

LAWA is not aware of statistics of, or specifics on, other airports with new incursion opportunities presented by a parallel taxiway located between runways. However, as of February 2010, LAWA had approximately 18 months of data that suggested that the south airfield changes have reduced incursion risk on the south airfield at LAX by about 40 percent. The apparent reason for the reduction of incursions was the new centerfield taxiway. The new centerfield taxiway forces aircraft to slow down before crossing Runway 25R and also gives air traffic controllers more flexibility to cross the departure runway.

SPAS-PC00130-161

Comment:

Page 2-6 Project Characteristics 2.3.1 Alternatives Addressed in this Draft EIR

- Whether Runway 6R/24L would be extended 1,250 feet eastward to provide greater departure length in west flow condition that would better accommodate departures of large aircraft on long haul flights and improve the balance between the north airfield and the south airfield relative to such departures;

Question: 2.3 Problems addressed... talks about the need for balance between the two runways and implies that there must be a balance of each type of aircraft. What number of ADG V and ADGV1 aircraft originate from gates on the south and how many originate from gates on the north? If the number is not exactly 50% on each, doesn't this add to the taxiway traffic unnecessarily?

Response:

The content of this comment is similar to comments SPAS-PC00130-511 and SPAS-AL00007-57; please refer to Response to Comment SPAS-PC00130-511 and Response to Comment SPAS-AL00007-57.

The commentor is incorrect in assuming that taxiway traffic will increase if the number of large aircraft originating from gates on the north and south is not 50 percent. Currently, there is an imbalance because large aircraft that cannot depart from the north complex must be taxied to the south complex. (See page 5-80 of the Preliminary LAX SPAS Report.) If those large aircraft were able to take-off from the north airfield, it would improve taxiway traffic, thereby increasing safety and efficiency.

Please see Appendix F-2 of the Preliminary LAX SPAS Report for a discussion of the average delay and taxi time of the individual SPAS alternatives.

SPAS-PC00130-162

Comment:

Page 2-6 Project Characteristics 2.3.1 Alternatives Addressed in this Draft EIR

Separation distances between Runway 6R/24L, Taxiway E, Taxilane D, the adjacent vehicle service road, and the aircraft gates/parking positions at the north end of the CTA, which largely determine the maximum size aircraft that can either freely operate on that system or would be subject to certain limitations, particularly as related to the interface between aircraft going to or from the gates at Terminals 1 through 3 and aircraft taxiing to the east end of Runway 6R/24L for departure.

Question: Page 2-7 highlighted note states that concourse areas and layout of aircraft gates vary between alternatives. When the assessment of efficiencies (travel distance times to get off a runway and get to their gate) were these variances in gate locations used in the calculations? What amount of sensitivity to change in gate locations exists in the efficiency times? What variances impact is there for taxiway availability versus runway separation?

Response:

As described in Appendix F-2 of the Preliminary LAX SPAS Report, the network of ground links representing the LAX airfield (i.e., runways, taxiways, taxilanes, and gates) were updated in the SIMMOD model for each alternative. As such, the model captures any difference in travel time and distance to taxi between two points on the airfield. Similarly, because the gate positions were updated to reflect the alternative specific plans presented in Figures 12, 14, 23, and 29 in Appendix F-2 of the Preliminary LAX SPAS Report, changes in taxi times to the terminals, as well as gate availability were also captured by the model. Statistics detailing the taxi time for arrivals and departures can be found in Tables 6, 9, 11, 13, and 15 in Appendix F-2 of the Preliminary LAX SPAS Report.

SPAS-PC00130-163

Comment:

Page 2-7 Project Characteristics Terminal Improvements
In general, the building lines and APLLs associated with most of the alternatives extend southward, overlapping, to varying degrees, portions of the concourse areas for Terminals 1 through 3, which would require removal (demolition) of those building areas that encroach past the building limit line and/or the elimination or reduction in aircraft size capability of gate parking positions that encroach past the parking limit line. Conversely, the building and parking limit lines associated with several alternatives do not extend as far south as the limit lines defined in the LAX Master Plan, which assumed the movement of Runway 6R/24L 340 feet south and defined the northerly building limits for the Tom Bradley International Terminal (TBIT) West Gates, currently under construction as part of the Bradley West Project, and the future Midfield Satellite Concourse (MSC). In those cases, establishing building and parking limit lines farther north than the current LAX Master Plan limit lines would allow the opportunity for a future northward extension (i.e., an addition to) the north concourses for Bradley West and the MSC.
<u>While the amount of concourse area and the layout of aircraft gates vary between alternatives, all of the SPAS alternatives include no more than 153 passenger gates</u>.
Certain alternatives propose a westerly realignment of the Terminal 3 concourse to provide a wider alleyway between the concourses at Terminals 2 and 3 for aircraft taxiing.
For those alternatives that include development of the new Terminal 0, the existing alignment of Sky Way (the primary access road connecting CTA to southbound Sepulveda and 96th Street Bridge) would be shifted east, into the area now occupied by the Park One parking lot, providing an improved entrance roadway into the CTA. (underline for emphasis)

Question: Page 2-7 highlighted note states that concourse areas and layout of aircraft gates vary between alternatives. When the assessment of efficiencies (travel distance times to get off a runway and get to their gate) were these variances in gate locations used in the calculations? What amount of sensitivity to change in gate locations exists in the efficiency times? What variances impact is there for taxiway availability versus runway separation?

Response:

The content of this comment is essentially the same as comment SPAS-PC00130-162; please refer to Response to Comment SPAS-PC00130-162.

SPAS-PC00130-164

Comment:

Page 2-8 Project Characteristics Ground Access Improvements
Yellow Light projects that are integral parts of the overall ground access system. Such projects include the Consolidated Rental Car Facility (CONRAC), the ITC, the APM connecting the ITC and CONRAC to the CTA, and the West Employee Parking facility. The ground access improvements proposed under the various SPAS alternatives represent different combinations of options to the Yellow Light Projects. Due to integral nature of these key non-Yellow Light projects with the overall ground access system, the SPAS alternatives include proposed modifications to, or proposed deletion of, these non-Yellow Light projects.

Question: P2-8 Ground access improvements. The ITC in Alternative D is in Continental City near the Green Line. Since LAWA has not included it in any of their plans what numerical changes in traffic flow have occurred? How does this impact traffic flows and the assessment of intersections? Although LAWA has done their traffic assessments based on one design day we also know that the access to LAX CTA varies substantially by time of day. The assessments don't appear to assess this type of impact inside or outside of the CTA. What impacts will the time of day have on intersection service level grade?

Response:

The comment is incorrect. The Intermodal Transportation Center (ITC), as envisioned under Alternative D of the LAX Master Plan, is included in SPAS Alternative 3 and has been accounted for accordingly in the SPAS traffic analysis of the alternatives.

As described in Chapter 2 of the SPAS Draft EIR, Alternatives 1, 2, 3, 8, and 9 each include one or more new off-airport facilities such as an Intermodal Transportation Facility (ITF), a Ground Transportation Center (GTC), or an ITC intended to offer passengers alternative locations outside of the CTA to park or be dropped off, and allow them convenient access to the CTA via an Automated People Mover (APM) or consolidated busing operation. Such ground access improvements were included in traffic modeling for the transportation impacts analyses included in Sections 4.12.1 and 4.12.2 of the SPAS Draft EIR.

Section 4.12.1.9, beginning on page 4-1127, of the SPAS Draft EIR presents results for the on-airport transportation analysis which considered impacts at different times of day based on the departures and arrivals level peak hours provided in Table 4.12.1-14 on page 4-1100 to assess the impacts during the each level's peak activity periods. Please also see Section 4.12.1.2 of the SPAS Draft EIR for a discussion of the methodology used to measure project-related on-airport traffic impacts. These peaks periods for on-airport are used in assessing on-airport traffic conditions as they typically represented the peak traffic and congestion on each level of the CTAs roadway networks. For the off-airport transportation analysis, the assumptions used in the reallocation of airport-generated traffic are provided in Section 4.12.2.2.5 of the SPAS Draft EIR. The traffic impact analysis conducted at 200 study intersections during three peak hours under each SPAS alternative is presented in Section 4.12.2.6, and the impacts are summarized in Tables 4.12.2-13 and 4.12.2-19 (prior to mitigation) and in Tables 4.12.2-27 and 4.12.2-33 (with mitigation). If and when a SPAS alternative is approved and individual projects are proposed more detailed project level traffic impact analysis would be conducted to determine in greater detail the on-airport traffic conditions at different times of day. Also, more detailed project-level traffic impact analyses would be conducted for off-airport intersections.

SPAS-PC00130-165

Comment:

Page 2-8 2.3.1.1 Alternative 1
Overview
Alternative 1 is a fully-integrated alternative, consisting of airfield, terminal, and ground access components. The distinguishing airfield improvement feature of this alternative is the movement of

Runway 6L/24R 260 feet north, along with the addition of a centerfield taxiway, the extension of Runway 6R/24L, improvements to Taxilane D and Taxiway E, and relocation of the service road. Terminal Improvements include addition of new Terminal 0, loss or modifications to concourse areas and/or gates

Question: 2.3.1.1. Alternative 1 description. Where are the detail drawings that identifies the number of gates in terminal 0 and their location to be used in the efficiency calculations?

Response:

Appendices F-1, LAX 2009-2025 Passenger Forecast and Design Day Flight Schedule Development, and F-2, North Runway Alternatives Simulation Analysis, of the Preliminary LAX SPAS Report contain detailed drawings showing the number and location of gates for Alternative 1. Please see Figure B to Appendix F-1 and Figure 14 in Appendix F-2.

SPAS-PC00130-166

Comment:

Page 2-9 2.3.1.1.1 Airfield Facilities
Alternative 1 meets FAA airport (runway) design standards for ADG V with a Category II/III outboard runway (Runway 6L/24R) and Category I inboard runway (Runway 6R/24L), and provides sufficient space between Runway 6R/24L and the centerfield taxiway for ADG V aircraft to hold prior to crossing the runway with a pilot line-of-sight of the end of Runway 24L. This alternative provides the FAA standard ADG VI runway-to-taxiway separation between Runway 6L/24R and the centerfield taxiway for approach visibility at or above one-half mile (Category I approaches). Taxiway E and Taxilane D dimensions would meet ADG V standards.

Question: 2.3.1.1.1 Airfield Facilities... States that it meets FAA requirements for ADG V and ADG VI runway to taxiway. Is this statement based on AC150 5300-13 or -13A which goes into effect next month? If the FAA changes requirements (which it is doing) how has LAWA planned to accommodate these changes?

Response:

During development of the SPAS alternatives and preparation of the SPAS Draft EIR, Federal Aviation Administration (FAA) Advisory Circular (AC) 150/5300-13 was the applicable, governing AC. Since that time, the FAA has released AC 150/1300-13A. However, the runway to taxiway separation standards for Aircraft Design Group (ADG) V and VI did not change between AC 150/5300-13 and AC 150/1300-13A. It is speculative to predict what changes may be included in future ACs; it was appropriate for LAWA to develop the SPAS alternatives based on the AC in effect at the time development occurred.

SPAS-PC00130-167

Comment:

Page 2-9 Runway Modifications Runway 6L/24R
- Relocate 260 feet north of current location to accommodate a new centerfield parallel taxiway (see below) and to provide for ADG V separation distances
- Extend 604 feet west so that the RPZ no longer extends over residential areas
- Establish dual displaced thresholds to remove existing residences from the RPZ (east end displaced threshold) and maintain existing westerly aircraft landing heights (west end displaced threshold)
- Widen to 200 feet to meet FAA standards

Question: 2.3.1.1.1 Modification of Runway 24R 604' west... If the runway is extended west, what additional noise will occur on the PDR areas in terms of single event noise? How will this impact the possibility of extra go-arounds over the PDR community? It might be an appropriate time if the runway is fully rebuilt, but is it necessary to expand to 200' wide runway since even the A380 is approved for a 150' wide runway with hardened shoulders?

Response:

As indicated on page 2-9 of the SPAS Draft EIR, Alternative 1, which relocates Runway 6L/24R 260 feet north and extends it 604 feet west, establishes displaced thresholds on both ends of the runway. As such, the westward extension is offset for westerly aircraft landings so that the existing approach profile height is maintained. Departures from Runway 6L/24R to the west are rare, however, and in cases when this operation does occur, LAWA would continue to have in place a noise abatement procedure to continue along the runway heading until reaching the coastline.

In regards to widening the runway to 200 feet, LAX currently has a waiver granted by the Federal Aviation Administration (FAA) to operate the A380 on Runway 6L/24R, which is 150 feet wide. However, as a specific condition of approval, the FAA has stated that "construction of new runway/parallel taxiways for Aircraft Design Group (ADG) VI airplane operations must be in accordance with AC 150/5300-13A, Airport Design." Because LAWA would use the relocated runway for ADG VI operations, the new runway would be required to comply with the FAA's ADG VI standard of 200 feet.

SPAS-PC00130-168

Comment:

Page 2-9 Taxiway Modifications
Centerfield Taxiway
- Construct an 82-foot-wide centerfield taxiway between Runways 6L/24R and 6R/24L, with a centerline separation distance of 500 feet to Runway 6L/24R and 460 feet to Runway 6R/24L, to enhance safety and reduce incursions and other airfield hazards, while providing for ADG V separation distances; also provide exit taxiways from Runway 6L/24R to the centerfield taxiway, taxiways from the centerfield taxiway to and across Runway 6R/24L, and other related airfield taxiway improvements...

Question: If the centerfield taxiway is installed LAWA states that it enhances safety and reduces incursions. The $2M Northside Safety Study paid for by LAWA using the top academic experts chosen by LAWA stated a % improvement but of an extremely small base number resulting in no appreciable improvement. What number of incursions and incidents has LAWA calculated will be alleviated? Does that change if the flight mix changes? What about impacts of control tower movement or staffing? What about new construction which causes increased non-visibility areas?

Response:

As indicated in Section 4.7.2 of the SPAS Draft EIR, the LAX North Airfield Safety Study (NASS) was initiated at the request of City of Los Angeles elected officials. The North Runway Safety Advisory Committee composed of LAX stakeholders was formed to oversee the study, including selection of academic panel members to be involved in the study. The panel consisted of six professors from various universities and various disciplines in Science and Engineering, but who had in common a longstanding interest in issues about aviation safety and efficiency. As indicated on page 4-505 of the SPAS Draft EIR, the academic panel's review of the technical work completed for the NASS had several main conclusions including, but not limited to: the LAX north airfield is extremely safe under the current configuration for the projected 2020 activity forecast; and, certain improvements to, and reconfiguration of, the north airfield would substantially increase airfield safety (i.e., reduce the risk of a fatal runway collision). The academic panel also concluded that, based on safety grounds alone, it would be hard to argue for reconfiguring the north airfield (i.e., given that the baseline level of risk is so low, reducing the risk of a fatal runway collision by a substantial level is of "limited practical importance"). The academic panel's opinion, which represents a subjective value judgment on the importance of reducing the risk of a fatal runway collision, is not shared by the Federal Aviation Administration, the federal agency responsible for the safety of civil aviation.

LAWA is not required to calculate, and has not calculated, the number of incursions and incidents that would be alleviated by improvements to the north airfield, although the NASS indicates that new configurations of the north airfield that include increased runway separation and the addition of a centerfield taxiway would reduce by a substantial percentage (40-55 percent) the risk of a fatal runway collision. The aircraft fleet mix assumed for the SPAS Draft EIR is described in Appendix F-1 of the Preliminary LAX SPAS Report; none of the SPAS alternatives would result in a change to that projected fleet mix. None of the SPAS alternatives propose movement of the air traffic control tower, and staffing

within the tower is the responsibility of the FAA. LAWA maintains ongoing coordination and communication with the FAA regarding airfield visibility from the control tower, and should any proposed construction have the potential to adversely affect the tower's view of the airfield operations area (AOA), as evaluated during preliminary design planning, the necessary and appropriate measures are incorporated into the more detailed planning to address such potential concerns, if any.

SPAS-PC00130-169

Comment:

Page 2-10 Other Airfield-Related Features
- Cover the entire length of the Argo Drainage Channel (9,857 linear feet) such that the weight of an aircraft could be supported within the RSA by converting the existing open unlined channel to a concrete box culvert.

Question: 2.3.1.1.1 Alt 1 features. How much capacity will the Argo Flood Channel have after being converted to a concrete box culvert? Will it be the same or less than current? Will it require the bottom to be moved or lowered resulting in disturbance of the substructure where there is an unknown water source? How has the total volume capacity been calculated for the channel? Does it consider 100 year storms? Fifty year storms? Where will the extra water go and what will it's impact be?

Response:

The SPAS Draft EIR is a programmatic document. Details regarding the Argo Drainage Channel would be considered during project-level planning and design, if Alternatives 1, 5, or 6 are selected for implementation. The design of the subsurface box culvert would provide sufficient capacity to meet the design storm flow for the tributary area based on the proposed improvements recommended in the updated Conceptual Drainage Plan as described in Mitigation Measure MM-HWQ (SPAS)-1 set forth in Section 4.8.7 of the SPAS Draft EIR. As stated in this mitigation measure, the design storm frequency used would be a minimum of a 10-year storm event, which is the minimum design frequency storm for areas without sumps per the City of Los Angeles Bureau of Engineering (BOE) Storm Drain Design Manual, Part G 200 Hydrologic Design Section G21. As required by BOE, the design would ensure that flows from a 50-year storm event would not do any damage to private property. The actual design storm frequency to be used in the design would be determined by LAWA during the project-level engineering design phase, in conjunction with BOE. Following completion, it is expected that the invert elevation would generally be similar to that of the existing channel and would not be substantially deeper than the current open channel. The commentor provides no evidence to support the claim that there is an unknown water source beneath the channel. As noted on page A-8 of the 2008 SPAS NOP, the depth to groundwater at LAX is generally greater than 90 feet and perched groundwater conditions have been noted in the upper 20 to 60 feet at some locations at the airport. As noted in Table 4.8-5 of the SPAS Draft EIR, the change in impervious surface and, therefore, drainage flows, within the Santa Monica Bay watershed, within which the Argo Drainage Channel is located, would range from 0 to 2.1 percent, meaning that there would be no increase or minimal increase in flow as a result of the improvements. After construction of the box culvert, Argo Drainage Channel would continue to function as it does currently, and as outlined in Section 4.1.1.2 of Technical Report 6 of the LAX Master Plan Final EIR. Flows would enter the culvert at the eastern end of the airport, and would be conveyed through the culvert to an existing concrete box drain and ultimately through the Argo outfall to the Santa Monica Bay.

SPAS-PC00130-170

Comment:

Page 2-10 Terminal Facilities
- Construct a new Terminal 0 with seven gates in the western portion of the area now occupied by Park One to replace gates lost or downsized at Terminals 1 through 3

Question: 2.3.1.1.2 Terminal Facilities. States that Terminal 0 will replace lost or downsized gates. What has LAWA done with the existing remote gates? Will they continue to be available? If they are to be removed, how will this be accomplished?

Response:

As indicated under the heading of "Terminal Facilities" on pages 2-10, 2-17, 2-21, 2-30, 2-33, and 2-37 in Chapter 2 of the SPAS Draft EIR, under Alternatives 1, 2, 3, 5, 6, and 7 the west remote gates would be eliminated upon completion of the airfield and terminal improvements. As described on page 1-17 in Chapter 1 of the SPAS Draft EIR, none of the SPAS alternatives include more than 153 passenger gates, which did not include any of the west remote gates. Note that the LAX Master Plan also assumed that the west remote gates would no longer be available for passenger activity.

Currently, the west remote gates accommodate not only passenger operations (deplaning, boarding, and busing of passengers to terminals) but also remain all day and remain overnight operations for aircraft that cannot be accommodated for long periods of time at terminal gates.

Specific plans to render the west remote gates unavailable to passenger activity have not yet been developed. Although passenger activity would no longer be accommodated at the west remote gates, LAWA might reserve the west remote gates areas for remain all day or remain overnight operations.

SPAS-PC00130-171

Comment:

Page 2-10 Terminal Facilities
- Demolish and reconstruct the Terminal 3 concourse and associated gates, with the building centerline shifted 40 feet to the west to increase the width of the alleyway between Terminals 2 and 3 to allow for dual-directional aircraft movement and comply with FAA standards

Question: 2.3.1.1.2 Demo and reconstruction of Terminal 3 40' west to provide better spacing from Terminal 2. This happens to be a good idea that should have been included in all of the alternatives where terminals could be moved. Why wasn't it?

Response:

A reconfigured Terminal 3 was assumed under Alternatives 1, 2, 5, 6 and 7. Please see Section 2.3.1 of the SPAS Draft EIR for the assumed terminal facilities under each of these alternatives.

The remaining alternatives assumed the following Terminal 3 conditions. Alternative 3, as described in Section 2.3.1.3.2 of the SPAS Draft EIR, includes the demolition of Terminal 3, along with Terminals 1 and 2, to be replaced with a linear concourse. Alternative 4, as described in 2.3.1.4.2 of the SPAS Draft EIR, does not assume any changes to any of the LAX terminals. As discussed in Sections 2.3.1.8 and 2.3.1.9, respectively, Alternatives 8 and 9 focus on ground access improvements, as may be paired with the airfield and terminal improvements associated with Alternatives 1, 2, 5, 6, and 7 described above. For these reasons, there was no opportunity to consider including a reconfigured Terminal 3 in Alternatives 3, 4, 8, and 9.

SPAS-PC00130-172

Comment:

Page 2-10 Terminal Facilities
- Demolish and replace the northerly end of the TBIT concourse and associated gates (with new concourse and gates in line with the new Bradley West concourse) to the Alternative 1 APLL Provide the opportunity to extend the northerly end of the future MSC to the Alternative 1 APLL...

Question: 2.3.1.1.2 Demo and replace northerly end of TBIT. Is this demo of the TBIT currently being built? What is assumed in all of the evaluations for aircraft movement efficiency? Will more gates be added? Where? How many?

Response:

As described in Section 2.3.1.1 of the SPAS Draft EIR, Alternative 1 includes the relocation of the Aircraft Parking Limit Line (APLL) associated with the realigned Taxilane D. Alternative 1 APLL would therefore crop the northerly end of the Tom Bradley International Terminal (TBIT), based on its ultimate terminal footprint, should Alternative 1 be implemented. Demolition of the northerly end of the TBIT concourses and associated gates refers to existing TBIT facilities; there would be no demolition of the new concourse area or associated gates currently under construction as part of the Bradley West Project. As depicted in Figure B in Appendix F-1 of the Preliminary LAX SPAS Report, Alternative 1 assumes that TBIT would still have 19 gates, counting towards the 153 passenger gate count. No additional gate beyond the 153 passenger gate count would be required.

The commentor inquired about "what is assumed in all of the evaluations for aircraft movement efficiency?" It is unclear how "aircraft movement efficiency" relates to TBIT terminal facility improvements discussed in the comment. If the commentor meant to inquire about taxiing operations on runway, taxiway/taxilane and apron systems, please refer to Appendix F-2 of the Preliminary LAX SPAS Report regarding airspace simulation, which includes taxiing operations from the runways to the terminal areas.

SPAS-PC00130-173

Comment:

Page 2-10 Terminal Facilities
- The commuter facility currently in use east of Sepulveda Boulevard would be maintained
- West remote gates would be eliminated upon completion of the airfield and terminals improvements

Question: 2.3.1.1.2 Continue use of commuter facility. Is this the AA terminal? What aircraft mix is assumed in the evaluations? How is this considered in the equivalent gate count? Is this done for every one of the options? Why not?

Response:

Section 2.3.1.1.2 of the SPAS Draft EIR refers to the commuter facilities (both terminal and apron facilities) located east of Sepulveda Boulevard that are currently operated by American Eagle (as of November 2012). The SPAS Draft EIR assumes these would continue to be operated by commuter carriers in 2025.

The aircraft fleet mix assumed to operate at these commuter facilities in 2025 includes Embraer 120 Brasilia, Embraer Regional Jet 135/140/145, and Canadair Regional Jet 700.

Each alternative analyzed in the SPAS Draft EIR includes commuter gates at these facilities. As depicted in Appendix F-1 of the Preliminary LAX SPAS Report (Figures B, C, and D), the assumed number of commuter gates at these facilities varies with each alternative.

SPAS-PC00130-174

Comment:

Page 2-10 Terminal Facilities
- The total number of gates used at LAX for scheduled passenger service would be 153

Question: 2.3.1.1.2 West remote gates will be removed. How will they be removed? Will the concrete be changed or will the gates just stop being used so that they become available after 2020? What was assumed for the efficiency calculations? With remotes or without? If used, how does this impact conclusions? Is open space with a roll up stairs and articulated bus still be available for use?

Response:

The content of this comment is similar to comment SPAS-PC00130-170; please see Response to Comment SPAS-PC00130-170 regarding the existence and use of the west remote gates in 2025.

When referring to "efficiency calculations," it is assumed that the commentor is referring to the analysis of aircraft efficiency on the north airfield analyzed in the airspace SIMMOD simulation efforts. As discussed and illustrated in Section 3 and Figures 14, 23 and 29 of Appendix F-2 of the Preliminary LAX SPAS Report, the SPAS Draft EIR SIMMOD modeling analyses assumed the use of 153 passenger gates, which did not include any west remote gates in 2025.

Regarding the future use of "roll up stairs and articulated bus," as discussed in Response to Comment SPAS-PC00130-170, the use of the west remote gates for passenger operations would be eliminated upon completion of the airfield and terminal improvements. In conjunction with elimination of passenger operations at the west remote gates, LAWA might reserve the subject area for "remain all day" or "remain overnight" (RAD/RON) operations, which is the parking of aircraft between flights. With the elimination of passenger operations, as described above, the use of "roll up stairs and articulated bus" at the west remote gates in 2025 would therefore become unnecessary.

SPAS-PC00130-175

Comment:

Page 2-13 2.3.1.1.3 Ground Access Facilities
- Relocate Lincoln Boulevard to the north, outside of the Runway 6L/24R RSA, with a portion below grade and/or tunneled.

Question: Page 2-13 and nowhere in the document is Belford Square area plans mentioned. How can the impacts of LAX be assessed without some assumption of its use?

Response:

The comment refers to the relocation of Lincoln Boulevard, listed as one of the characteristics of the ground access system under Alternative 1. This part of the comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required to this part of the comment because it does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

The question raised in this comment asks how future plans for the Belford area are addressed in the impact analysis for the SPAS Draft EIR. No future land uses are assumed for the Belford area in the SPAS Draft EIR as LAWA has no development plans at this time for this property; any assumptions regarding future land uses would be purely speculative. The impacts of the SPAS alternatives are, and can be evaluated without considering future uses for the Belford area. Impacts associated with any future development of the Belford area would be addressed in environmental documentation prepared at such time as development is proposed.

SPAS-PC00130-176

Comment:

Page 2-13 2.3.1.1.3 Parking
- Generally, no changes to existing CTA parking conditions would occur as a result of SPAS, although future pricing structures may change long-term/short-term composition
- Parking Lot E, would no longer be used for employee parking, although this property could be used for other airport purposes in the future. Changes to the use of this parking area would occur independently from SPAS.

No changes are proposed to Public Parking Lot C
- Parking Lot D would provide approximately 1,944 employee parking spaces. The Jenny Lot east of Parking Lot D would provide approximately 2,000 employee parking spaces. These parking areas were not in use in the 2010 baseline year; however, their use for parking is occurring independently from SPAS.

- Development of the ITF would include approximately 4,900 short-term public parking spaces to facilitate passenger drop off and pick up outside of CTA
- Construct parking within Manchester Square, including 4,200 long-term spaces and 3,500 employee parking spaces
- No public or employee parking is proposed for the area referred to as Continental City

Question: We know that CTA parking will be changing even if LAWA doesn't define the cause as SPAS changes. How are the cumulative impacts established?

Response:

The traffic and transportation-related cumulative impacts associated with the SPAS alternatives were analyzed and documented in Sections 4.12.1, 4.12.1.2. and 4.12.2 of the SPAS Draft EIR. As explained in Section 5.5.12 of the SPAS Draft EIR, cumulative impacts to on-airport and off-airport transportation are incorporated into the analysis provided in Sections 4.12.1 and 4.12.2, respectively. The analyses included any potential effects that future parking capacity for the various alternatives would have on mode choice, trip generation, and trip distribution within the Central Terminal Area (CTA) and surrounding study area.

Table 2-2 in Chapter 2 and Section 4.12.1.6.1 starting on page 4-1090 of the SPAS Draft EIR documents the total parking capacity to be provided under the various SPAS alternatives. As indicated in Section 4.12.1.9.3 and Table 4.12.1 40 of the SPAS Draft EIR, the airport's public parking supply in each of the Future (2025) alternative scenarios is sufficient to accommodate the airport's estimated future (2025) public parking demand for all the alternatives, which are assumed to be 15 percent greater than the space demand to account for fluctuations in vehicle arrivals in the facilities. Therefore, the SPAS Draft EIR concluded that impacts associated with parking would be less than significant.

SPAS-PC00130-177

Comment:

Question: Page 2-13 ground access states that no parking would be placed in Continental City. What is intended to be placed there? Why is it not identified as part of the Master Plan or used to determine the comprehensive impacts?

Response:

Page 2-13 in Section 2.3.1.1.3 of the SPAS Draft EIR pertains to Alternative 1. As indicated therein, under Alternative 1, no public or employee parking is proposed for the area referred to as Continental City. In addition, as discussed and depicted in Section 2.3.1 of the SPAS Draft EIR, no development is proposed at Continental City for any of the other SPAS alternatives, with the exception of an Intermodal Transportation Center proposed at the site under Alternative 3, and parking proposed at the site under Alternative 4. Such uses at the Continental City site under Alternatives 3 and 4 were included in the modeling to determine the traffic impacts associated with Alternatives 3 and 4 discussed in Section 4.12 of the SPAS Draft EIR. At this time, LAWA has made no decision on the long-term use of the Continental City property, should an alternative other than Alternative 3 or 4 be selected. As such, the potential traffic demand for a future development under Alternatives 1, 2, 8, and 9 cannot be determined at this time. If and when a project is proposed that contemplates use of the Continental City property, a traffic impact analysis would be conducted to assess any traffic impacts and potential mitigations as required by CEQA.

SPAS-PC00130-178

Comment:

Question: Page 2-13 and nowhere in the document is Belford Square area plans mentioned. How can the cumulative impacts of LAX be assessed without some assumption of its use?

Response:

The content of this comment regarding future plans for the Belford area is essentially the same as in comment SPAS-PC00130-175; please refer to Response to Comment SPAS-PC00130-175.

SPAS-PC00130-179

Comment:

Page 2-15 Figure 2-2 LAX Specific Plan Amendment Study Draft EIR Alternative 2

Question: Figure 2-2 Why are the relocated taxiways in Alternatives 2 vs. 4 different? There were both supposed to be based on the safely study which LAWA prepared three years ago to do some quick fixes of taxiways for safety improvement.

Response:

Alternative 4 was not based on the referenced safety study. The study to which the comment refers, the Comparative Safety Risk Assessment: Interim Taxiways Safety Improvement Project, was used as the basis for Alternative 2. (Preliminary LAX SPAS Report, pages 5-107, 5-77.) Alternative 4 includes minor airfield improvements, such as increased displacement thresholds, among other things, to incorporate the changes presented in the Runway 6L/24R and 6R/24L Safety Area Practicability Study. (Preliminary LAX SPAS Report, page 5-108.)

The difference in taxiway layouts between Alternative 2 and Alternative 4 is explained in Section 2.3.1.2 and Section 2.3.1.4 of the SPAS Draft EIR. Section 2.3.1.4 states "Alternative 4 represents what would reasonably be expected to occur if all ongoing and reasonably foreseeable non-Yellow Light improvements identified in the LAX Master Plan (i.e., "Alternative D") were implemented, and none of the Yellow Light Projects or any of the identified alternatives to the LAX Master Plan Program were constructed or implemented. Analysis of Alternative 4 will allow decision-makers and the public to evaluate the impacts of simply eliminating the Yellow Light Projects from the LAX Master Plan Program."

SPAS-PC00130-180

Comment:

Page 2-26 2.3.1.5 Alternative 5 Overview
As noted above in Section 2.3.1, the focus of this alternative is on airfield improvements and associated terminal improvements, as may be compared to such improvements proposed under Alternatives 1 through 4. This alternative is compatible with the ground access improvements associated with Alternatives 1 and 2, as well as the ground access improvements associated with Alternatives 8 and 9, described below. The distinguishing feature of this alternative is the movement of Runway 6L/24R 350 feet north. Similar to Alternative 1, a new centerfield taxiway would be constructed, Runway 6R/24L would be extended, Taxilane D and Taxiway E would be modified/improved, and the service road would be relocated. Under this alternative, the taxilane/taxiway improvements would meet FAA design requirements to fully accommodate ADG VI aircraft. (Under Alternatives 1, 2, and 6, the taxiway configuration would either not meet or only partially meet ADG VI design standards, which would impose certain limitations and special requirements during the operation of those aircraft.) The increased runway-taxiway separation requirements under this alternative would cause the aircraft taxiway operations area to extend farther south than under Alternatives 1, 2, and 6, which, in turn, would result in comparatively less concourse and/or gate area for the potential TBIT extension and MSC extension. Under this alternative, a greater portion of Lincoln Boulevard would be below grade and/or tunneled than under Alternative 1. This alternative is illustrated in Figure 2-5. (underline for emphasis)

Question: 2.3.1.5 Alternative 5 States that for "Alternatives 1,2, and 6. the taxiway configuration would either not meet or only partially meet ADG VI design standards... The ARSAC submitted Alternative 7 contained a taxiway that meets ADG VI. How was this considered in the evaluations? Why does the underline statement say that the taxiway doesn't meet the ADG VI standards?

Response:

An EIR need not consider every conceivable alternative to the project. (In re Bay-Delta Programmatic Environmental Impact Report Coordinated Proceedings (2008) 43 Cal.4th 1143, 1163.) Rather, an EIR must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation. (State CEQA Guidelines Section 15126.6(a).) It must include information sufficient to permit a reasonable choice of alternatives so far as environmental consequences are concerned. (Village Laguna of Laguna Beach, Inc. v. Board of Supervisors (1982) 134 Cal.App.3d 1022, 1029.) Here, the SPAS alternatives constitute a reasonable range, sufficient to allow informed decision-making. (See City of Maywood v. Los Angeles Unified School District (2012) 208 Cal.App.4th 362, 419.)

Alternatives 1, 2, 6, and 7 do not meet full ADG VI requirements for taxiways. A summary of north airfield runways and parallel taxiways compliance with FAA Airport Design Standards is provided in Table 4.7.2-8 in Section 4.7.2 of the SPAS Draft EIR. This table lists the differences between all of the alternatives in a tabular format. Please see Chapter 5 of the Preliminary LAX Specific Plan Amendment Study Report which discusses the steps used in the development of the alternative projects ultimately addressed in the SPAS Draft EIR, including the role of the community and SPAS Advisory Committee, in the formulation of "Yellow Light Project" replacement concepts, which ultimately led to the identification of the SPAS alternatives. Please also see Chapter 6 of the Preliminary LAX SPAS Report, which identifies how and to what extent each of the SPAS alternatives provides solutions to the problems the Yellow Light Projects were designed to achieve.

SPAS-PC00130-181

Comment:

Page 2-33 2.3.1.6.3 Ground Access Facilities

Alternative 6 includes airfield and terminal components only. This alternative is compatible with the ground access improvements associated with Alternatives 1, 2, 8, and 9.

Question: 2.3.1.6.2 Alt 6 terminal facilities section states "same as Alternative 1" for facilities and gate configuration. Does this mean that LAWA is including the same Terminal 0 with the same intent of eliminating the remote gates?

Response:

As depicted in Figure 2-6 of the SPAS Draft EIR, Alternative 6 assumes the construction of a new Terminal 0. Section 2.3.1.6.2 of the SPAS Draft EIR also describes that the terminal facilities and gate configuration assumed under Alternative 6 are identical to those assumed under Alternative 1. As stated in Section 2.3.1.1.2 of the SPAS Draft EIR, which describes the terminal facilities under Alternative 1, the west remote gates would be eliminated upon completion of the airfield and terminal improvements.

SPAS-PC00130-182

Comment:

Page 2-33 2.3.1.7 Alternative 7

Question: 2.3.1.6.2 Alt 7 terminal facilities section states "similar to Alternatives 5 and 6" .... Terminal improvements... Does this mean that LAWA is including the same Terminal 0 with the same intent of eliminating the remote gates?

Response:

The commentor refers to Section 2.3.1.6.2 of the Draft EIR, which describes the terminal facilities under Alternative 6. However, the comment is related to Alternative 7. Since the comment is similar to comment SPAS-PC-00130-181, it was assumed that a typographic error was made and that the commentor meant to reference Section 2.3.1.7.2, discussing Alternative 7 terminal facilities.

As depicted in Figure 2-7 of the Draft EIR, Alternative 7 assumes the construction of a new Terminal 0. As stated in Section 2.3.1.7.2, which describes the terminal facilities under Alternative 7, the west remote gates would be eliminated upon completion of the airfield and terminal improvements.

Further, as indicated in Table 2-2, Summary of SPAS Alternatives, and depicted in Figures 2-1, 2-2, 2-5, 2-6, and 2-7, Alternatives 1, 2, 5, 6, and 7 all include construction of a new Terminal 0. As indicated in Table 2-2, the new Terminal 0 would be at the same location and in the same configuration under Alternatives 1, 2, 5, and 6, but would contain slightly less overall square footage under Alternative 7 (325,000 under Alternative 7 compared to 330,000 under Alternatives 1, 2, 5, and 6) due to a more southerly Aircraft Parking Limit Line under Alternative 7. Please see Section 2.3.1.7.2 for further discussion of terminal facilities proposed under Alternative 7.

SPAS-PC00130-183

Comment:

Page 2-34 2.3.1.7.1 Airfield Facilities, Taxiway Modifications, Centerfield Taxiway
- Construct an 82-foot-wide centerfield taxiway between Runways centerline separation distance of 400 feet to each runway, to enhance and other airfield hazards, while providing for ADG V separation distances; from Runway 6L/24R to the centerfield taxiway, taxiways from the Runway 6R/24L, and other related airfield taxiway improvements. (underlined for emphasis)

Question: 2.3.1.7 Alt 7 centerfield taxiway is listed as 82-foot-wide. Is this the same for all centerfield taxiways? Highlighted item on centerfield taxiway indicates 400' separation from each runway. Has LAWA or FAA done any evaluations of safety impact of a distance less than the initial distance between runways when a centerfield taxiway is made? What were the results and where can they be found? Does LAWA and FAA consider the safety the same if an aircraft is on the taxiway or not? Why?

Response:

The north airfield alternative taxiways are being designed to Aircraft Design Group (ADG) VI standards for aircraft with tail heights greater than 66 ft. and wingspans greater than 214 ft. This includes the A380 family of aircraft. Except for SPAS Alternative 3, the north airfield alternatives' centerfield taxiways are being designed based upon standards for Taxiway Design Group (TDG) 7. The TDG 7 standards are further discussed below. The centerfield taxiway assumed under Alternative 3 (i.e., LAX Master Plan Alternative D), was planned based upon former Taxiway Dimensional Standards included in the FAA Advisory Circular (AC) 150/5300-13, Airport Design, in effect at the time the LAX Master Plan was developed. Based on AC 150/5300-13 Change 4, Table 4-1 on page 36, dated November 10, 1994, the minimum taxiway width to accommodate ADG VI aircraft operations was 100 feet.

The updated AC 150/5300-13A, Airport Design, dated September 28, 2012, includes taxiway width standards, runway-taxiway separation standards for ADG VI and Taxiway Design Group (TDG) 7 aircraft. Taxiway design standards are detailed in Table 4-1 and Table 4-2. Table 4-2 provides taxiway width standards for all TDGs. Taxiway width standards are based on the dimensions of the airplane's undercarriage and remain the same for all taxiways at LAX being designed to TDG 7 standards. The minimum taxiway width for aircraft in the TDG 7 is 82 feet. Taxiways designed for other TDG aircraft may have different dimensions.

Runway-taxiway separation standards for ADG-V aircraft are provided by the FAA in Tables 3-6 and 3-7 of AC 150/5300-13A. According to the AC in Section 321(a)(2), these standards are determined by landing and takeoff flight path profiles and physical characteristics of aircraft.

For more information on safety impacts of the north airfield alternatives, please see Section 4.7.2 of the SPAS Draft EIR, as well as Appendix E1-4 and Appendix H-2 of the Preliminary LAX SPAS Report.

SPAS-PC00130-184

Comment:

Question: Is the Terminal 0 the same in these alternatives? What are the differences? Why?

Response:

Please see Response to Comment SPAS-PC00130-182 regarding Terminal 0 proposed under Alternatives 1, 2, 5, 6, and 7.

SPAS-PC00130-185

Comment:

Page 2-37 2.3.1.8 Alternative 8

Question: Several presentations made by LAWA prior to the release of the draft EIR used Alternative 8 to represent no ConRAC and LAWA stated an unofficial desire to delay or eliminate the ConRAC. Do any options show the elimination of the ConRAC?

Response:

As discussed in Chapter 2 of the SPAS Draft EIR, under SPAS, no CONRAC would be developed under Alternatives 1 and 2, nor would one be built under Alternatives 5, 6, and 7 should the airfield and terminal improvements proposed under those alternatives be paired with the ground access system proposed under Alternatives 1 and 2. Only under Alternatives 3, 4, 8, and 9 is a CONRAC proposed to be constructed as part of SPAS. Under Alternatives 3 and 4, the CONRAC would be developed at Lot C and under Alternatives 8 and 9, the CONRAC would be developed in the southern portion of Manchester Square.

SPAS-PC00130-186

Comment:

Page 2-45 Summary of SPAS Alternatives

Question: Table 2-2 shows most alternatives extend runway 24L east 1250' but Alt D is 1280'--why? What causes the 30' difference?

Response:

The 1,250-foot eastward extension of Runway 6R/24L in Alternatives 1, 2, 5, 6, and 7 differs from the 1,280-foot proposed in Alternative 3 because of the relationship between the north-south location of the runway and the alignments of Pershing Drive (to the west) and Sepulveda Boulevard (to the east). Those two streets limit the lengths of Runway 6R/24L.

SPAS-PC00130-187

Comment:

Question: Table 2-2 shows Terminal 0 as 330,000 sq ft in all but Alt 7 when it is built. Why? Are the number of gates the same in each Terminal zero? If not, why not?

Response:

As depicted in Figure 2-7 and described in Section 2.3.1.7.2 of the SPAS Draft EIR, Alternative 7 includes the relocation of the Aircraft Parking Limit Line (APLL) associated with the southerly realignment of Taxilane D. As a result, the northern end of Terminal 0 Concourse would be cropped and its footprint reduced, as detailed in Table 2-2.

As presented in detail in Section 2.3 of the SPAS Draft EIR, a Terminal 0 Concourse was assumed under Alternatives 1, 2, 5, 6, and 7. Based upon the assumed configuration and location of Taxilane D and Taxiway E just north of the northern Central Terminal Area (CTA) terminals, the available footprint of each terminal may vary depending on the resulting location of the APLL for each alternative. Therefore, the numbers of gates at Terminal Concourse 0 may slightly vary.

SPAS-PC00130-188

Comment:

Question: Table 2-2 shows many changes in the terminals with demolitions and reconfigured square feet. How many gates does this represent in each change? What kind of gates? (ie ADG VI dual, single? etc.) Please provide information in terms of gate types AND single gate equivalents so that it can be compared to the Stipulated Settlement number requirement.

Response:

Please see Appendix F-1 of the Preliminary LAX SPAS Report for illustrations of the passenger gate position layouts assumed under Alternatives 1 through 4 (Figures B through D). As discussed in Section 4.3.1 on page 28 of Appendix F-1, Alternatives 5, 6, and 7 were not gated but the results of Alternative 1 gating exercise were assumed to apply to Alternatives 5, 6, and 7. Therefore the information presented below for Alternative 1 can be assumed for Alternatives 5, 6, and 7. Alternatives 8 and 9 were not gated as they do not include terminal or airfield improvements.

On each figure, a summary table is provided which lists the number of assumed gates at each terminal. A nominal gate is indicated by a gate number in a circle. As depicted in Figures B through D and as discussed in Section 2.3.1 on page 2-7 of the SPAS Draft EIR under the heading of "Terminal Improvements," all SPAS alternatives assumed no more than 153 passenger gates. Depending on each alternative, as Aircraft Parking Limit Lines (APLL) movements warranted the closure of one or more passenger gates at terminal concourses, opportunities for the creation of additional passenger gates were assessed with priority given to adjacent terminals.

The table below presents the assumed numbers of gates under SPAS Alternatives 1 through 4 by terminal and Aircraft Design Group (ADG). As used in the LAX Master Plan studies, the ADG IIIa is comprised of Boeing 757 series. As discussed in Section 3.3.3 in Appendix F-1 of the Preliminary LAX SPAS Report, gate dependencies were assumed at locations throughout the terminals. Gate dependency refers to the situation when parking a large aircraft at a particular gate requires that the adjacent gate(s) either be closed or accommodate a smaller aircraft than the nominal gate size would allow (a situation referred to as downsizing).

Note that the table below reflects the ADGs of the largest aircraft that could be accommodated at the gates at any time, regardless on potential downsizing of gates due to gate dependencies. For example, as depicted in Figure B in Appendix F-1 of the Preliminary LAX SPAS Report, Gates 72A and 72B at Terminal 7 are dependent gates. A Boeing 777-200 parked at Gate 72A would require Gate 72B to be closed. However, two Airbus 320-200s could be parked at the same time at Gates 72A and 72B. The ADG count for this pair of gates was therefore counted as one ADG V gate (Gate 72A with a Boeing 777-200) and one ADG III gate (Gate 72B with an Airbus 320-200).

Terminal/ADG	Alternative 1	Alternative 2	Alternative 3	Alternative 4
Terminal 0				
III	6	6	-	-
IIIa	1	1	-	-
Total	7	7	-	-
Terminal 1				
III	9	9	-	11

Terminal/ADG	Alternative 1	Alternative 2	Alternative 3	Alternative 4
IIIa	3	3	-	2
IV	-	-	-	1
Total	1	12	-	14
Terminal 2				
IIIa	-	-	-	2
IV	2	2	-	1
V	6	6	-	7
Total	8	8	-	10
Terminal 3				
III	-	-	-	6
IIIa	1	1	-	3
IV	1	1	-	-
V	6	6	-	3
Total	8	8	-	12
Terminal 4				
III	1	1	1	1
IIIa	2	2	2	2
IV	6	6	6	6
V	4	4	4	4
Total	13	13	13	13
Terminal 5				
IIIa	5	5	5	5
IV	6	6	6	6
V	2	2	2	2
Total	13	13	13	13
Terminal 6				
IIIa	5	5	5	5
IV	6	6	6	6
V	2	2	2	2
Total	13	13	13	13
Terminal 7				
III	2	2	2	2
IIIa	3	3	3	3
IV	3	3	3	3
V	4	4	4	4
Total	12	12	12	12

Terminal/ADG	Alternative 1	Alternative 2	Alternative 3	Alternative 4
Terminal 8				
II	4	4	-	4
III	5	5	8	5
Total	9	9	8	9
TBIT				
III	1	1	1	3
IIIa	-	-	3	-
IV	1	1	-	-
V	9	9	6	6
VI	8	8	8	9
Total	19	19	18	18
North Linear				
II	-	-	2	-
IIIa	-	-	6	-
V	-	-	12	-
Total	-	-	20	-
MSC				
III	-	-	2	-
IIIa	6	6	10	6
IV	1	1	1	1
V	20	20	18	20
VI	2	2	2	2
Total	29	29	33	29
Commuter Positions				
II	10	10	23	10
Total	10	10	23	10
Grand Total	153	153	153	153

SPAS-PC00130-189

Comment:

Page 2-53 Figure 2-10 Existing Facilities Affected by SPAS Improvements

Question: Item notation 9, Urgent Care Facility is shown to be relocated subject to tenant decision. What alternatives force this move?

Response:

As discussed on page 2-55 in Chapter 2 of the SPAS Draft EIR, under all alternatives except Alternative 4, the urgent care medical facility would be removed due to the realignment, or the removal under Alternative 3, of the 96th Street Bridge/Sky Way. The urgent care medical facility could potentially be

relocated elsewhere in the airport area. This facility is privately operated; any decision to relocate would be at the discretion of the facility owners.

SPAS-PC00130-190

Comment:

Page 2-69 Potential Construction Staging Areas

Question: Areas C and D are north of Westchester Parkway adjacent to residences. What usage limitations are specified? There are already uncovered dirt mounds in area D which have been inadequately addressed for at least five months, what actions are planned and what provisions are to be put in place to preclude repetition in future uses?

Response:

Section 4.2.5 of the SPAS Draft EIR identifies the LAX Master Plan commitments and mitigation measures relative to air quality, including for construction activities which would extend to construction staging areas where appropriate, and Section 4.10.3.5 identifies such commitments and mitigation measures related to construction noise impacts. In addition, LAWA maintains a construction hotline (310.649.5292) and an online construction inquiry and complaint form system (http://www.lawa.org/laxdev/CommunityInfo.aspx?id=3689). Regarding the dirt mounds in Area D noted in the comment, clean soils excavated from within the CTA, in conjunction with the installation of a segment of new underground pipelines and utility lines related to the Central Utility Plant Replacement Project, were temporarily stored at the subject staging area site until that segment of pipeline/utility line installation could be completed. Although several more weeks of pipeline/utility line installation remained, LAWA removed the stockpiled soil based on concerns expressed by nearby residents and transferred the soils to Continental City, where they will remain until reused as backfill in the CTA.

SPAS-PC00130-191

Comment:

Question: Area E appears to be Belford Square set aside for potential staging. Is this assumed to be near permanent (or at least beyond the Master Plan? If not, what uses are planned? What kinds of staging are planned? Similarly, what is planned for Manchester Square (F) and Continental City (G)?

Response:

As described on page 2-57 of the SPAS Draft EIR, the vast majority of the Belford area is largely vacant at this time. While it is anticipated that the subject area will be redeveloped in the future with airport-compatible uses, there are currently no specific development plans or schedule. As such, all or portions of the subject site could be available for construction staging in the development of SPAS-related improvements, depending on the location and timing of any future redevelopment of the area.

Similarly, Manchester Square is largely vacant and could be available for construction staging until developed with another use. (See page 2-57 of the SPAS Draft EIR.) As described in Section 2.3 of the SPAS Draft EIR, Manchester Square would be developed for surface parking under Alternatives 1 and 2, a Ground Transportation Center (GTC) under Alternative 3, and a combination of a CONRAC and parking under Alternatives 8 and 9. Under Alternative 4, Manchester Square is assumed to remain vacant unless/until another permanent airport-related land use is designated for the area separate from SPAS.

Relative to Continental City, the property is currently vacant and is proposed for an Intermodal Transportation Center (ITC) under Alternative 3 and a parking structure under Alternative 4. Under the other SPAS alternatives, Continental City is assumed to remain vacant unless/until another permanent land use is designated for the area separate from SPAS.

As also indicated on that page, the potential construction staging areas identified in Section 2.3.1.12, including Areas E, F, and G, are considered generally suitable for the placement of construction trailers/offices, storage of construction materials, and staging of construction activities.

SPAS-PC00130-192

Comment:

Page 2-71 2.3.2.1 Alternative Location

Implementation of any of the SPAS alternatives would not be feasible at any location other than LAX. Pursuant to the Stipulated Settlement, the SPAS will plan for the modernization and improvement of LAX. Implementing the SPAS alternatives at any other location would not accomplish this fundamental goal. The existing facilities at LAX cannot accommodate the existing demand and forecasted increase in the numbers of aircraft, cargo, and passengers without significant delays and a very poor level of service. As the existing facilities are used beyond their design capacity, the level of service provided to the user degrades. This lowering of the level of service may be demonstrated by increased congestion within the passenger terminals, the various surface roads on and around the airport, and on the airfield itself. The consequences of taking no action to solve this problem will result in a loss of air service and declining economic benefits (jobs) for the Los Angeles region. Air service and economic benefits would likely relocate to other regions both within the state of California and to other states. Therefore, any comprehensive solution to meeting the regional demand for transportation must include improvements at LAX. (underline for emphasis)

Question: The sentence in the paragraph makes a strong statement of LAX facility limitations. What is the limiting factor that creates the concern? What is the current capacity of aircraft on the existing runways? What is the current capacity of the existing taxiways? What is the current capacity of the existing gates? What is the current capacity of the current roadways in the CTA and also in the streets surrounding LAX?

Response:

Section 2.2 of the SPAS Draft EIR, when describing project objectives 1 and 2, also describes capacity and other constraints of the existing LAX north airfield and the existing LAX transportation systems, respectively.

The operational efficiency of the LAX airfield was examined as a complete system, not as individual components. Please refer to Sections 2 and 3 in Appendix F-2 of the Preliminary LAX SPAS Report for a description of the terminal, airfield, airspace, cargo, and general aviation areas, as well as metrics detailing aircraft delay and taxi times.

In regards to the capacity of Central Terminal Area (CTA) roadways and roadways in the immediate vicinity of LAX, please refer to Section 4.12 of the SPAS Draft EIR, which addresses the on-airport and off-airport transportation system. This section includes discussion on the CTA curbsides, CTA intersections, arterial roads, highway segments, and ramps that serve traffic approaching and departing the airport environs.

SPAS-PC00130-193

Comment:

Question: While there is already CTA curbside traffic over-congestion, what reconfiguration is needed to handle the 78.9 MAP? How much can be accomplished by the re-routing of traffic as opposed to expanding the amount of curbside space?

Response:

The SPAS Draft EIR defines a series of alternatives that have been analyzed to assess anticipated operations at the 78.9 million annual passenger (MAP) traffic activity levels, identify potential impacts, and define appropriate mitigation measures to address impacts within the Central Terminal Area (CTA).

As described in Section 4.12.1.9.5 of the SPAS Draft EIR, the SPAS alternatives would not have significant impacts on curbside operations compared to baseline (2009) conditions. As described in Section 4.12.1.10.2 of the SPAS Draft EIR, the SPAS alternatives would have cumulatively considerable impacts on curbside operations compared to 2025 future conditions, but these impacts can be mitigated to less than cumulatively considerable levels by Mitigation Measures MM-ST(OA) (SPAS)-1 and MM-ST(OA) (SPAS)-2, neither of which would require expanding the amount of curbside space.

Furthermore, as described in Section 4.12.1.6 of the SPAS Draft EIR, all of the SPAS alternatives seek to reduce the CTA traffic by redistributing traffic to various off-site facilities such as the Intermodal Transit Facility and the Consolidated Rental Car Facility (CONRAC). Please also see Response to Comment SPAS-PC00130-150.

SPAS-PC00130-194

Comment:

Question: The subject paragraph states that everything must be done at LAX to alleviate congestion. If other regional airports increase in capacity doesn't this reduce peak hour needs? What if alternative transportation were available, such as HSR to reduce demand? What was actually considered? The statement that economic benefits would be lost to CA if not at LAX, but what evidence is there that this is true? Isn't the entire regional impacts tied together and that if congestion around LAX were reduced the costs of doing business on the coastal area would reduce thereby INCREASING overall economic benefits? LAWA provided a 2012 LAEDC study that LAX was responsible for about $40 billion in economic impacts as evidence that LAX needs to be expanded whereas a 10-24-2005 LAWA presentation stated, "Contributes $60 billion annually to the regional economy." Since LAWA, as operator, is responsible for the reduction in service at Ontario (or in the case of Palmdale no service), why isn't improvements at those facilities a larger driver for economic benefits?

Response:

The paragraph in Section 2.3.2.1 of the SPAS Draft EIR does not state "that everything must be done at LAX to alleviate congestion." The subject paragraph describes how and why a scenario whereby the proposed SPAS improvements are made at an alternative location (i.e., at a site/facility other than LAX) does not make sense and would not accomplish the fundamental goal of SPAS. While the discussion acknowledges that a likely outcome of not making improvements at LAX would be increased congestion in the future and degraded levels of service, the alleviation of congestion at LAX is not the focus of SPAS. There are several other issues encompassed in the project objectives, such as the need for improvements to the north airfield that support the safe and efficient movement of aircraft at LAX and maintaining LAX's position as the premier international gateway for the region, that are separate from congestion and are specific to LAX that cannot be addressed by making SPAS improvements at an alternative location.

Both LAWA and the LAX Master Plan, of which SPAS is a part, support the regionalization of air travel demand in Southern California, as further discussed in Topical Response TR-SPAS-REG-1. As described therein, the planning of improvements at LAX based on a future passenger activity level of 78.9 MAP is consistent with the previously adopted SCAG 2008 Regional Transportation Plan (RTP) and the currently adopted 2012 RTP/Sustainable Communities Strategy (SCS). The 2012 RTP/SCS takes into consideration the potential implications of the current planning for the California High Speed Rail (HSR) system, as may be integrated with airports in Southern California including the possibility of a station in the vicinity of Bob Hope Airport and a station in the vicinity of LA/Ontario International Airport. The RTP/SCS notes that none of the alternative routes being considered for the California HSR system go anywhere near LAX (see Section 2.3.2 in the Aviation and Airport Ground Access Appendix of the 2012 RTP/SCS). It is beyond the scope of the SPAS project and Draft EIR to address the potential implications of HSR on aviation demand at LAX.

The statement in Section 2.3.2.1 regarding the potential that making no improvements to LAX would lead to degraded level of service and congestion within passenger terminals, on various surface streets around the airfield, and on the airfield which, in turn, would likely result in air service and economic benefits relocating to other regions both within the state of California and to other states pertains

primarily to international travel. The international travel market is highly desired by, and highly competitive between, major airports. The west coast international travel market has long been highly competitive between LAX, San Francisco International Airport, Seattle-Tacoma International Airport, McCarran International Airport in Las Vegas, Nevada, Sky Harbor International Airport in Phoenix, Arizona, and Denver International Airport in Denver, Colorado. Should LAX remain unimproved and passengers and airlines experience increasingly poor levels of service, more delays, and congestion, it is reasonable to anticipate that international air carriers will likely consider and ultimately choose other options.

As noted above, and further discussed in Topical Response TR-SPAS-REG-1, LAWA, through the LAX Master Plan, the SPAS process, and other efforts, supports the regionalization of air travel demand in Southern California. LAWA disagrees that LAWA is responsible for reductions in service at ONT and PMD. Efforts to bring air service to PMD and increase service to ONT are discussed in TR-SPAS-REG-1. As discussed therein, LAWA continues to identify, evaluate, and implement measures to enhance the stability and growth of LA/Ontario International Airport. As indicated in the 2012 RTP/SCS, LA/Ontario International Airport will serve a key role in the regionalization of air travel demand in Southern California, in conjunction with, not in lieu of, the planned future activity level of 78.9 MAP at LAX.

The commentor also raises economic impact issues. However, these are purely economic issues, and thus are not required to be analyzed under CEQA. (State CEQA Guidelines Section 15064(e)).

SPAS-PC00130-195

Comment:

Page 2-71 2.3.2.2 Alternative Designs
Several alternative concepts were formulated and considered during development of the nine SPAS alternatives addressed in this EIR. Chapter 5 of the SPAS Report describes the basis, nature, and characteristics of those early concepts. The SPAS Report is available for review at LAWA's Facilities Planning Division, One World Way (LAX), Los Angeles or online at www.laxspas.org. Three of the airfield improvement concepts initially considered for inclusion in this Draft EIR were subsequently refined or consolidated. Specifically, an airfield improvement concept proposing to relocate Runway 6L/24R 400 feet north, which would meet all FAA standards for ADG VI aircraft, was subsequently refined to meet the basic requirements with only a 350-foot northward move. That refined alternative is Alternative 5 in this Draft EIR. Two other airfield improvement concepts, one proposing to move Runway 6L/24R 200 feet north and the other to move the subject runway 300 feet to the north were consolidated into the 260-foot north move, which is Alternative 1 in this Draft EIR. (underline for emphasis)

Question: The alternatives were stated to have been melded to meet full ADG VI aircraft standards. However, the same argument was used prior to "fixing" the south runway complex. As the "fix" was being instituted the standards were changed and made those runways undesirable for use with NLA. What has been studied to meet the newer, greater separation standards of AC150 5300-13A? If the separation standard is currently resolved by not using the adjacent runway for a short period, what frequency of NLA causes excessive delay? It certainly isn't current conditions or the runways would be closed to NLA traffic.

Response:

The runway-taxiway separation standards in FAA Advisory Circular (AC) 150/5300-13 Airport Design used by LAWA for the preparation of the SPAS Draft EIR do not differ from the runway-taxiway separation standards provided in FAA AC 150/5300-13A Airport Design; therefore, no additional study was performed/required.

Airfield operations were analyzed using the SIMMOD simulation model. Excessive delay due to NLA operations was not observed during the planning horizon (i.e., operations associated with 78.9 MAP in 2025). For more information on the results of the simulation process, please see Appendix F-2 of the Preliminary LAX SPAS Report.

SPAS-PC00130-196

Comment:

Page 2-72 2.3.2.4 Next Generation Technology
The application of NextGen to the SPAS effort was considered by LAWA to determine if any component of NextGen could provide for a viable concept. Although NextGen systems could provide for better ground situational awareness for air traffic controllers and pilots, and it could make airfield operations more efficient, it would not increase safety-related hysical separation distances on the ground to meet ADG V and VI runway and/or taxiway/taxilane separation standards and obstacle free zone requirements. Based on this evaluation, LAWA determined that no component of NextGen technology can provide a viable concept (i.e., a SPAS alternative) and, therefore, NextGen was eliminated from further consideration.

Question: NextGen is a broad category of technology. The FAA has been evaluating and developing numerous elements for safety such as runway status lights, but also other ground and air technological improvements. Where in the EIR are these enumerated and why haven't they been included in the consideration as parts of the solution?

Response:

The contents of this comment are similar to the concerns expressed in comment SPAS-PC00096-5; please refer to Response to Comment SPAS-PC00096-5.

SPAS-PC00130-197

Comment:

Question: The existing airfield has several "non-visibility" areas created by recent projects. How is the design of this SPAS program addressing them?

Response:

Please see Responses to Comments SPAS-PC00130-362 and SPAS-PC00130-577 regarding ATCT line-of-sight.

SPAS-PC00130-198

Comment:

Page 2-74 2.4 Intended Use of this EIR
This EIR will be used by LAWA, the Board of Airport Commissioners, and the Los Angeles City Council to evaluate and consider the potential environmental impacts of each of the SPAS alternatives and to take action relative to amendments to the LAX Specific Plan. Certification of the SPAS EIR would complete the program-level CEQA compliance review for the SPAS process. Depending on the outcome of the SPAS process, additional project-level CEQA review may be required for implementation of the improvements associated with the selected SPAS alternative.
In addition to use of this EIR by the City of Los Angeles, implementation of the selected SPAS alternative may require various federal, state, and local approvals, for which the approving agencies may use this EIR in their respective environmental reviews and decision-making and approval processes. Provided below is an overview of the actions and permits anticipated to be required for the project.

Question: The above paragraph says that project level EIRs "may" be required. Why not "must" be required since there are so many impacting construction details that are not addressed.

Response:

As indicated in the excerpt from page 2-74 of the SPAS Draft EIR, additional project-level CEQA review may be required for implementation of components of the SPAS alternatives, depending on the

outcome of the SPAS process. While the SPAS Draft EIR identifies and evaluates nine alternatives, which the LAWA Board of Airport Commissioners (BOAC) will review and consider, it is premature to say whether any of the alternatives will be approved. Also, second-tier project-level CEQA reviews, if undertaken, could result in another type of CEQA document other than an EIR.

SPAS-PC00130-199

Comment:

In a previous paragraph LAWA dismissed dual runway moves as impractical due to logistics. Several factors on runway movement could be even more confounding that that issue (such as the Manchester tunnel which would need to be removed due to its destabilizing effects when a runway is moved along with the unknown water source impacts)? What other factors does LAWA consider to be cause for impractical phasing decisions?

Response:

Regarding dual runway moves, Section 2.3.2.6, Dual Runway Relocations, of the SPAS Draft EIR presents reasons why such an approach to reconfiguring the north airfield is considered infeasible, impractical, and likely to result in environmental impacts comparable or greater to the alternatives evaluated in detail in the SPAS Draft EIR. Further, Section 2.3.2.6 describes why this alternative is within the range of the alternatives that the SPAS Draft EIR evaluates in detail. An EIR need not consider multiple variations on the range of alternatives evaluated in detail. (Village Laguna of Laguna Beach Inc. v. Board of Supervisors (1982) 134 Cal.App.3d 1022, 1028.) Nor must an EIR consider every conceivable alternative to the project. (In re Bay-Delta Programmatic Environmental Impact Report Coordinated Proceedings (2008) 43 Cal.4th 1143, 1163.) Moreover, an EIR need not analyze alternatives that do not offer significant advantages over the alternatives presented in the EIR, or that constitute a different version of an alternative presented in the EIR. (Sequoia Hills Homeowners Ass'n v. City of Oakland (1993) 23 Cal.App.4th 7045.)

Please see Response to Comment SPAS-PC00130-1012 regarding the north airfield abandoned tunnel segment (referred to by the commentor as the Manchester Tunnel). Please see Response to Comment SPAS-PC00130-41 regarding phasing of project improvements and see Response to Comment SPAS-PC00130-51 regarding sink holes at LAX. The commentor provides no evidence to substantiate the claim that that the area has unknown water sources that would affect runways.

SPAS-PC00130-200

Comment:

Page 2-74 and -75 Federal Actions
- Decisions regarding project eligibility for federal grant-in aid funds or PFC funds for land acquisition, site preparation, runway and taxiway construction, environmental activities, and mitigation;....

U.S. Army Corps of Engineers (USACOE). Key action by the USACOE may include:
- Issuance of a Clean Water Act Section 404 permit if/as needed for impacts to jurisdictional wetlands (i.e., should jurisdictional wetlands be determined to exist within the Argo Drainage Channel).

Question: What commitments or comments have been provided to LAWA regarding project funding during this EIR preparation? What assurances have they received which grants waivers in advance?

Response:

Please see Response to Comment SPAS-PC00096-2 regarding funding sources for SPAS improvements.

No commitments, assurances, or grant waivers have been provided to LAWA regarding project funding for SPAS improvements. As provided in Section 8.6 of the Preliminary LAX SPAS Report, the principal sources of funding for alternative improvements are expected to include, among other things, LAX tenant funds and grants from the Federal Aviation Administration and the Transportation Security

Administration. If assumed funding sources are not available in the future, certain projects would be deferred until funds become available. A more detailed discussion of the funding assumptions for the project is provided in Chapter 8 of the Preliminary LAX SPAS Report.

SPAS-PC00130-201

Comment:

Question: Since earlier sections acknowledge that the USACOE have not been consulted on items such as jurisdictional wetlands and the Argo Drainage Channel when will this be addressed to determine the adequacy of LAWA assumptions?

Response:

As discussed in Section 4.3 of the SPAS Draft EIR, Alternatives 1, 5, and 6 would result in significant impacts to U.S. Army Corps of Engineers (USACOE) jurisdiction associated with the Argo Drainage Channel, which would be reduced to a less than significant level with implementation of mitigation measure MM-BIO (SPAS)-13. As discussed in Section 4.3 of the SPAS Draft EIR, although the USACOE previously determined that upon completion of emergency operations and maintenance activities, the Argo Drainage Channel would no longer be subject to its Clean Water Act jurisdiction, analysis in the SPAS Draft EIR assumes that the Argo Drainage Channel has the potential to continue to be subject to USACOE Clean Water Act jurisdiction. Mitigation Measure MM-BIO (SPAS)-13 requires consultation with USACOE to obtain a final determination of jurisdictional area associated with the Argo Drainage Channel and mitigation for impacts. However, as MM-BIO (SPAS)-13 applies only to Alternatives 1, 5, and 6, it is anticipated that consultation with USACOE would be initiated following the selection of a preferred alternative, if Alternative 1, 5, or 6 were selected, and during the planning stages of the improvements that would result in the impact. If any of the other alternatives are selected, no such consultation would be necessary.

It should be further noted that, if Alternative 1, 5, or 6 were to be selected, USACOE would not be able to issue a Section 404 permit until a Section 401 Water Quality Certification is obtained from the Los Angeles Regional Water Quality Control Board, which in turn would not be able to issue the Water Quality Certification until the EIR has been certified.

SPAS-PC00130-202

Comment:

Page 2-77 2.4.4 Other Actions
Other permits and approvals of specified types, but as yet unknown, may be issued to implement various aspects of the selected SPAS alternative.

Question: Please describe what additional permits and types of approvals LAWA is referring to and the conditions under which they would expect this to occur?

Response:

Section 2.4 of the SPAS Draft EIR lists and describes numerous federal, state, and local permits and approvals that are anticipated to be required in the course of implementing the proposed SPAS improvements, and also acknowledges the possibility that other permits of specified types, but as yet unknown, may also be necessary. This reflects the fact that the current planning and consideration of the SPAS alternatives is only at the conceptual program level and that as additional details and specifications are developed in the future for the approved alternative, it may be determined that certain other permits and approvals are needed. Additionally, development of the SPAS improvements is anticipated to occur over many years, with buildout project to occur in 2025. It is possible, if not likely, that compliance laws and regulations will change over that time, requiring new or different permits and approvals than exist today.

SPAS-PC00130-203

Comment:

Page 3-1 3.1 Land Use Setting
As indicated in Chapter 1, Introduction and Executive Summary, and Chapter 2, Project Description, depicted in Figures 1-1 and 1-2, the SPAS improvement areas are located at LAX, within highlydeveloped, urbanized area consisting of airport, commercial, transportation (i.e., interstate highways), residential uses. West of the project site are the Los Angeles/El Segundo Dunes (Dunes), Environmentally Sensitive Habitat Area (ESHA), and beyond the Dunes is the Pacific Ocean.
Surrounding land uses include the following:
- Open space, recreation, and residential to the north;
- Commercial, industrial, and residential to the east and south; and
- Dockweiler State Beach and Pacific Ocean to the west.
The land use setting for each of the SPAS improvement areas is provided below.

Question: 3.1 Land Use Setting - Surrounding land uses: There are commercial uses to the north as well. What does LAWA consider the use of the Westchester Business District?

Response:

The overview of the land use setting and description of surrounding land uses presented in the text cited by the commentor, which appears on page 3-1 of the SPAS Draft EIR, is intended to provide a general overview of land uses surrounding the airport. More detailed descriptions of surrounding land uses follow this introductory text. While the Westchester Business District and other commercial uses are located north of the airport, the predominant land uses north of the airport are open space, recreation, and residential. The more detailed descriptions which follow the introductory text, specifically the text provided in the discussion of the "North Airfield," identify existing commercial uses, including the Westchester Business District. These uses are also described on page 4-680 and designated in Figure 4.9-6 in Section 4.9 of the SPAS Draft EIR.

SPAS-PC00130-204

Comment:

Question: 3.1 Land Use Setting. Surrounding land uses: in addtion to Docweiler State Beach there are also protected dunes with protect species and other adjacent habitat lands. Why is this not identified when the paragraph above it lists this land use?

Response:

The land use setting description of the Los Angeles/El Segundo Dunes (Dunes) is presented on page 3-1 of the SPAS Draft EIR. The Los Angeles/El Segundo Dunes (Dunes) is not considered a surrounding land use to the west because it is located on LAX property. As described on page 3-1, Dockweiler State Beach and the Pacific Ocean are adjacent to and west of the Dunes.

SPAS-PC00130-205

Comment:

Question: 3.1 Land Use Setting - North Airfield: left out the construction staging and construction support which is home to many dunes of potentially contaminated dirt deposited from other areas of the airfield. How/when will this be reconciled?

Response:

The land use setting description under the heading "North Airfield" presented on page 3-1 of the SPAS Draft EIR, provides an overview of the notable uses related to the SPAS improvement areas. As indicated therein, "Surrounding land uses [i.e., uses around the SPAS improvement areas within the north airfield] include vacant land and the Westchester Golf Course (both on LAX property), and

residential and recreation uses within the community of Westchester to the north" The "vacant land" includes undeveloped parcels within LAX Northside, portions of which are used for construction staging on LAX improvement projects. While those temporary activities in the LAX Northside area may include the stockpiling of excavated soils, such stockpiling does not include contaminated soils. Please see Response to Comment SPAS-PC00130-265 regarding the management and removal of contaminated soils encountered during construction at LAX.

SPAS-PC00130-206

Comment:

Page 3-3 Land Use...
Cultural Resources - The findings of the historical resources surveys of LAWA-owned property and adjacent areas conducted as part of the LAX Master Plan EIR indicated that four buildings within the overall boundary of LAX are considered potentially significant historical/architectural resources: (1) Hangar One (listed on the National Register of Historic Places [National Register]) on the southeastern portion of LAX near the northwest corner of Aviation Boulevard and Imperial Highway; (2) the Theme Building and Setting (eligible for listing on the National Register) in the center of the LAX terminals; (3) the WWII Munitions Storage Bunker (eligible for listing on the National Register) near the western boundary of LAX; and (4) the Intermediate Terminal Complex (eligible for listing on the California Register of Historical Resources [California Register]) on the south side of Century Boulevard between Sepulveda Boulevard and Airport Boulevard. Immediately adjacent to the airport, the Union Savings and Loan Building at 9800 S. Sepulveda Boulevard is eligible for listing on the California Register and for local designation. Eight archaeological resources have been recorded within the SPAS cultural resources study area. Due to the lack of important prehistoric or historic association and/or insufficient integrity, all but one of these sites were determined by the Federal Aviation Administration (FAA) to be ineligible for federal, state, and/or local designation as part of the Section 106 process undertaken for the LAX Master Plan EIS.30
Similarly, with the exception of one site, these sites are not considered to be historical or unique archaeological resources pursuant to CEQA or the Public Resources Code.

Question: 3.1 Environmental Setting - Cultural Resources: Just because the Alt D EIR did not identify the former uses by Native Americans doesn't mean their historic use was not there. What studies has LAWA conducted to identify burial grounds and other significant uses?

Response:

Please see Response to Comment SPAS-PC00130-105 concerning the cultural resources records search and pedestrian surveys conducted during preparation of the SPAS Draft EIR to identify cultural resources within the SPAS study area, including sites formerly used by Native Americans. Please see Response to Comment SPAS-AS00002-1 concerning consultation with the California Native American Heritage Commission and local Native American groups and individuals requesting their assistance in the identification of traditional tribal "cultural places."

SPAS-PC00130-207

Comment:

Page 3-3 Hazards/Hazardous Materials
...With respect to aviation safety, the runways and taxiways within the north airfield at LAX were designed and constructed in the late 1960s. Issues associated with the outdated airfield design include, but are not limited to, the following:
- The north airfield is not fully designed for the largest aircraft types currently in service (i.e., Aircraft Design Group [ADG] V aircraft, such as the Boeing 747-400, and ADG VI aircraft, such as the Airbus A380).

Question: 3.1 Environmental Setting - Hazards/Hazardous Materials talks extensively about waivered conditions for aircraft operation, but fails to discuss the multiple sources of toxic contamination from the former oil field, airport activities and fuel, rocket testing, and chemical contamination related to manufacturing. Why doesn't this section mention the unknown water source and water flow

characteristics which could spread contamination within the airport lands and also to adjacent habituated lands?

Response:

Known contamination within the study area is identified in Section 4.7.3.3 of the SPAS Draft EIR. The commentor provides no substantiation of or evidence to support the claim that there is an unknown water source at the airport that could spread contamination. Moreover, please see Section 4.7.3.5 of the SPAS Draft EIR for a discussion of applicable LAX Master Plan commitments and mitigation measures. As provided in that section, LAWA has adopted a "Procedure for the Management of Contaminated Materials Encountered During Construction." (Page 4-582 of the SPAS Draft EIR.) The Procedure, along with LAX Master Plan Commitment HM-2, will ensure that all contaminated soils and/or groundwater encountered during construction are handled in accordance with all applicable regulations. (Section 4.7.3.5 of the SPAS Draft EIR.)

SPAS-PC00130-208

Comment:

Page 3-4 Hydrology/Water Quality - Much of the SPAS improvement areas are developed and paved, although there are areas of disturbed, undeveloped pervious areas adjacent to the runways in the north airfield and within Manchester Square and Continental City. Surface water from LAX drains into storm drain facilities within the jurisdiction of the County of Los Angeles and the City of Los Angeles, which discharge to either San Pedro Bay, via the Dominguez Channel, or to Santa Monica Bay. The Argo Drainage Channel, a 9,857-foot-long drainage channel, lies to the north of, and approximately parallel to, Runway 6L/24R. This channel is unlined and uncovered across most of the north airfield, becoming a subsurface box culvert at the west end of the airfield before emptying into Santa Monica Bay. The project site is located within the West Coast Groundwater Basin. Groundwater beneath LAX is not used for municipal or agricultural purposes. Due to its largely impervious nature, the project site provides a negligible amount of recharge to the regional groundwater basin. Existing surface water pollutants typically include total suspended solids, oil and grease, metals, and fuel hydrocarbons, as associated with airfield activities and aircraft maintenance. No 100-year floodplain areas are located within the airport boundaries. (underlined for emphasis)

Question: Since LAX is within the Dominguez flood plain why is the 100 year storm not applicable?

Response:

As identified in Section 4.8.3 of the SPAS Draft EIR, a portion of LAX is located within the Dominguez Channel sub-basin. However, none of the project components associated with any of the SPAS alternatives are located within a floodplain, including the 100-year floodplain, as mapped and identified under the National Flood Insurance Program of the Federal Emergency Management Agency.1 Please see Response to Comment SPAS-PC00160-18 regarding use of the 50-year storm event to design major drainage facilities in the City of Los Angeles and Response to Comment SPAS-PC00130-169 regarding the design capacity of the Argo Drainage Channel with implementation of Alternatives 1, 5, and 6.

1. Flood Insurance Rate Map (FIRM) Panels 060337C1754F, 060337C1760F, 060337C1770F, and 060337C1780F. Available: https://msc.fema.gov/webapp/wcs/stores/servlet/FemaWelcomeView?storeId=10001&catalogId=10001&langId=-1

SPAS-PC00130-209

Comment:

Page 3-4 Noise - The existing noise setting at the project site, a very active international commercial airport, is dominated by aircraft activities that occur throughout the day and evening, primarily involving commercial jets. These activities generate noise from aircraft arriving and departing on the north and south runway complexes, aircraft movements on taxiways, and aircraft undergoing maintenance

activities that require engine testing (i.e., engine "run-ups"). Traffic noise from vehicles on-airport and on off-site area roadways and highways, as well as ongoing construction activities at LAX, also contribute to the existing noise setting at and near the SPAS improvement areas.

Question: 3.1 Environmental Setting - Noise. When CNEL is calculated how is the ground air traffic and any maintenance included in the calculations? How is topography included in the application of the INM model? Which version was used? What flight mix was assumed and is it the same one used in determining ground efficiency times from runway to gate?

Response:

The commentor inquires about the various input assumptions used for noise modeling including aircraft ground movement, maintenance activities, and topography for calculating CNEL. The commentor also inquires whether the same aircraft fleet mix was used for the noise analyses from the simulations that were conducted for the SPAS Draft EIR.

The Federal Aviation Administration's Integrated Noise model (INM), Version 7b was used to generate the aircraft CNEL contours, as was explained on page 4-797 in the SPAS Draft EIR. The U.S. Geological Survey (USGS) terrain data for LAX and the surrounding communities were used as one of the input variables in the noise modeling. As described in Section 3.1.1.4 in Appendix J1-1 of the SPAS Draft EIR, the existing Baseline (2009) aircraft fleet mix and operations were derived from the FAA Airport Traffic Control Tower counts and LAWA's noise and operations monitoring system data. Table 3 in Appendix J1-1 of the SPAS Draft EIR provides the average annual day operations and fleet mix for the baseline (2009) conditions. The average annual day operations used for aircraft noise modeling in the future alternative scenarios were developed from the 2025 Design Day Flight Schedule (DDFS) developed for SPAS Draft EIR gating, SIMMOD simulation, and aircraft noise analyses. Table 8 in Appendix J1-1 of the SPAS Draft EIR provides the average annual day operations and fleet mix for the future (2025) conditions. Noise associated with aircraft maintenance activities, such as engine ground run-ups, are not included in the airport CNEL contour calculations, as such activities are very limited, relatively isolated, and do not materially contribute to the airport's overall daily noise levels. Moreover, relative to the SPAS project, the improvements proposed under the various alternatives would not affect future aircraft maintenance and ground-run up activities.

SPAS-PC00130-210

Comment:

Page 3-5 Utilities - The City of Los Angeles Department of Water and Power (LADWP) is the water purveyor for most areas in the City of Los Angeles, including LAX. LAX is served by a trunk line in Sepulveda Boulevard that distributes water to transmission lines running along the airport perimeter. LAX also uses reclaimed water from the West Basin Municipal Water District's (WBMWD) Edward C. Little Water Recycling Facility and has implemented other measures to decrease potable water use at the airport. Sanitary wastewater generated by activities at LAX is treated at the Hyperion Treatment Plant (HTP), a City-owned treatment plant located adjacent to the southwest boundary of LAX, approximately two miles southwest of the CTA. Electric power at LAX is supplied by LADWP. LAWA participates in LADWP's "Green Power for LA" program to purchase electricity from renewable resources and incorporates energy efficiency and conservation into existing buildings and new construction. In addition to obtaining electricity from LADWP, LAWA operates the CUP, which provides heating and air conditioning to the CTA. The CUP also houses a co-generation system that generates electrical power, which is sold to LADWP. The CUP is currently being replaced with a more modern facility with higher capacity and greater efficiency. LAWA has had a comprehensive, facility-wide recycling program at LAX to reduce solid waste generation and disposal since 1992. This program includes collection of recyclable materials generated by LAWA and within airport terminals and airfield areas; collection of materials from airlines and tenants at no cost to participants; independent airline and tenant recycling programs; and source reduction through purchase of recycled products and reuse of materials. Solid waste that cannot be recycled is transferred to the Sunshine Canyon Landfill in Sylmar for disposal.

Question: In other sections of this EIR LAWA acknowledges that the amount of waste will be increasing just because more passengers will be accommodated at LAX. Where are the innovative ways to improve recycle and reuse studied by LAWA?

Response:

LAWA developed a comprehensive, facility-wide solid waste recycling program at LAX in 1992. A number of initiatives have been successfully implemented by LAWA since that time, as discussed on page 4-1360 in Section 4.13.2 of the SPAS Draft EIR, including the collection of recyclable materials generated by LAWA and within airport terminals and airfield areas; collection of materials from airlines and tenants at no cost to participants; independent airline and tenant recycling programs; and source reduction through purchase of recycled products and reuse of materials. LAWA also recycles construction and demolition materials, green waste, batteries, and electronic waste. Donations of packaged food from airline caterers are sent to local food banks. Additional programs are under development, including recycling of coffee grounds and filters into compost, and an airport-wide collection program for cooking oil and grease.

In addition to these efforts, subsequent to the approval of the LAX Master Plan, LAWA adopted the LAWA Sustainable Airport Planning, Design and Construction Guidelines for implementation on all airport projects. These Guidelines provide goals and performance standards for recycling of materials during both construction and operation of airport facilities in accordance with the provisions of LAX Master Plan Commitment SW-1, Implement an Enhanced Recycling Program (see Section 4.13.2.5).

As indicated on page 4-1361 of the SPAS Draft EIR, as a result of the efforts undertaken to date, in 2009, LAWA reached a diversion rate of 66.4 percent. LAWA's goal for LAX is to meet the City's objective of 70 percent diversion by 2015, which is five years ahead of the state goal. LAWA will continue to improve its recycling programs as requirements change.

SPAS-PC00130-211

Comment:

Question: 3.1 Environmental Setting - Utilities
At one time there were some fuel cell experiments done at LAX to provide power. What were the results and where was any potential contamination from them deposited?

Response:

LAWA has never conducted experiments of the ability of fuel cells to provide power. At one time, American Airlines planned to conduct a fuel cell pilot study for their maintenance facility; however, this project was never implemented. LAWA did undertake a hydrogen fueling facility demonstration project to refuel light duty vehicles. The proposed facility consisted of equipment to generate hydrogen gas using electrolysis technology to separate water into hydrogen and oxygen. The facility did not use hazardous materials that could result in contamination.

As stated in response to comments received from the commentor on the Central Utility Plant Replacement Project (CUP-RP) Final EIR (Comment CUP-PC00001-14), "[t]he use of fuel cells would not be feasible as part of the CUP-RP, due to the size constraints and energy inefficiency. The space required to generate 9 megawatts (MW) of power using fuel cell power generation units would exceed the space available for the new CUP-RP. In addition, the fuel cell technology would fail to capture the energy efficiency of co-generation, which allows for combining steam and power production."1 Another factor contributing to the limited market penetration of fuel cell technology for both stationary power and automobile power is the high capital cost.2

LAWA has not identified an application of fuel cell technology that can be accommodated in the constrained space available at LAX and that could function as a meaningful emergency back-up power alternative to diesel generators.

1. City of Los Angeles, Los Angeles World Airports, Los Angeles International Airport Central Utility Plant Replacement Project, Volume 3, page 2-21, October 2009.
2. National Fuel Cell Research Center, University of California, Irvine, Fuel Cell Information - Fuel Cells Explained - Challenges, Available: http://www.nfcrc.uci.edu/2/FUEL_CELL_INFORMATION/FCexplained/challenges.aspx, accessed December 24, 2012.

SPAS-PC00130-212

Comment:

Page 3-5 3.3.1 LAX Development Projects Not Related to the SPAS Elements
LAX development projects that are not related to the SPAS elements include the following: Airfield-Related Improvements

Question: 3.3.1 LAX non-SPAS projects

Where are the hush hangers shown in Alt D and agreed to install by 2015 as a condition of the CA Noise Variance?

Response:

Please see Response to Comment SPAS-PC00130-132 regarding the aircraft ground run-up enclosures (GRE), also known as "hush hangers," as referred to by the commentor.

SPAS-PC00130-213

Comment:

Where is the Continental City activity which appears to be starting?

Response:

The area generally referred to as "Continental City" is located at the northeast corner of Aviation Boulevard and Imperial Highway, and is bounded by Imperial Highway on the south, Aviation Boulevard on the west, W. 111th Street on the north, and the LAX property line on the east. The entire area within Continental City is identified as Construction Staging Area "G" in the SPAS Draft EIR (see Figure 2-15). SPAS Construction Area "G" is also identified as a construction staging and parking area for the Bradley West Project in the LAX Bradley West Project EIR (see LAX Bradley West Project Draft EIR, Figure 2-8, page 2-41) and is identified as a construction staging area for the Runway 7L/25R RSA Project (see Proposed Runway 7L/25R Runway Safety Area (RSA) Project and Associated Improvements Draft Environmental Assessment, Figure 2-8, page 1-43). The site was vacant during the SPAS baseline year (2010); however, the site is used periodically by LAWA Construction and Maintenance and is currently being used as a temporary receiving and storage area for materials and equipment associated with ongoing construction at LAX.

SPAS-PC00130-214

Comment:

What about activity in Belford Square? What is planned there?

Response:

Please see Response to Comment SPAS-PC00130-175 regarding land uses in the Belford area.

SPAS-PC00130-215

Comment:

Page 3-6 3.3.1 LAX Development Projects Not Related to the SPAS Elements

LAX development projects that are not related to the SPAS elements include the following: Terminal-Related Improvements

Question: 3.3.1 LAX non-SPAS projects
What cargo related projects are planned? What about relocations of LAWA staff or LAWA PD?

Response:

Section 3.1.1 of the SPAS Draft EIR lists airfield-related improvements on pages 3-5 and 3-6. As indicated on page 5-21 of the SPAS Draft EIR, cumulative cargo-related projects include electrification of cargo areas and cargo hangar interior renovations (these are listed under Miscellaneous Projects). Page 5-21 also identifies the development of a new consolidated facility that would centralize police, fire, and other public safety administrative operations and functions. No projects that would relocate other LAWA staff are currently planned. Please also see Response to Comment SPAS PC00130-137 regarding future location of a public safety building.

SPAS-PC00130-216

Comment:

Page 3-7 3.3.2 Non-LAX Planned Development
A list of other development projects in the City of Los Angeles and neighboring communities within the vicinity of the project area is provided in Chapter 5, Cumulative Impacts. A total of 140 projects in the LAX area (illustrated in Figure 5-1 and briefly described in Table 5-2) have been identified whose development could occur within the same time frame as SPAS. Information regarding the background development projects is based on site visits and/or consultation with staff from and/or websites of the County of Los Angeles and the cities of Culver City, El Segundo, Hawthorne, Inglewood, and Los Angeles.

Question: 3.3.2 LAX non-SPAS projects
There are numerous residential and commercial projects throughout the areas that are contained within the intersections identified for the traffic study not in Table 5-2. A sanity check item missing is Howard Hughes Center covering multiple large towers (over 1M sq ft). Playa Vista phases are not show either. There is a 140 unit appt bldg on LaTijera/74th just west of the 405 exit being planned as well of several others off Airport blvd also not listed. Which other ones has LAWA not included? What date is the list "as of"? Does LAWA believe that nothing will be built in this area after that time?

Response:

The comment states "there are numerous residential and commercial projects throughout the areas that are contained within the intersections identified for the traffic study not in Table 5-2." The comment also suggests that there are several missing projects from Table 5-2.

As discussed on page 4-1208 of the SPAS Draft EIR, LAWA used a hybrid approach to its cumulative traffic analysis, which used both growth projections from SCAG and a list of projects, which is considered conservative:

"Traffic volume forecasts for future (2025) scenarios were developed based on SCAG's land use projections…This forecasting method accounts for growth in the study area as well as growth outside the study area…Planned development projects in the City of Los Angeles and neighboring communities within the vicinity of the study area are shown in Appendix K2-2…[r]elated project information and the land use growth in the corresponding TAZs were checked against future year model SED and vehicle trip growth and increased as necessary to ensure the model accounted for the likely increase in traffic from the projects."

The list provided in Appendix K2-2 (the same as SPAS Draft EIR Table 5-2) was based upon information collected in 2010 and 2011 (as noted in the Appendix footnotes). Among the projects listed in these tables, referred to in the comment, is a new office building in the Howard Hughes Center (related project #121) and the later phase of Playa Vista (related project #128). These related projects were mapped and checked against the socio-economic data from SCAG which is one of the elements in

the travel demand forecasting model used in the traffic analysis. Wherever necessary to forecast growth within each model zone, socio-economic inputs were increased to account for all known pending development projects.

While LAWA could have elected to rely exclusively upon the projections approach, LAWA used a hybrid approach which is considered conservative. In Neighbors for Smart Rail v. Exposition Metro Line Construction Authority (2012) previously published at 205 Cal.App.4th 552, 141 Cal.Rptr.3d 1, 21-22 (Pending Review by the California Supreme Court on issues unrelated to the ones discussed here), petitioners alleged "that the EIR 'made no attempt to actually quantify the traffic generated by [a specific cumulative project] or even discuss the potential cumulative traffic impacts'…and instead 'merely relied on regional traffic volumes…'" The Court noted that "[t]he lead agency 'had the discretion to set the date of the application for the current Project as the cutoff date to determine which projects should be included in the cumulative impact analysis'." (Id., citing Gray v. County of Madera (2008) 167 Cal.App.4th 1099, 1127-1128.) "Here, the Expo Authority employed the 'summary of projections' approach. The EIR's traffic analysis, based as it is on projected traffic conditions in 2030, discloses 'the severity and significance of the cumulative impacts'…What it does not include is a microanalysis of those impacts as they may be affected at a particular intersections by a particular project that was not under environmental review when the draft EIR was circulated. But there is no requirement for such an analysis where the lead agency has used the 'summary of projections' approach." (Id.)

The 140-unit apartment building that the comment states is "being planned" was not known at the time that the traffic impact analysis was begun and is in the early planning stages.1 In response to this comment, a query was made to the Los Angeles City Planning Department on December 4, 2012 and information on the City's NavigateLA website (http://navigatela.lacity.org/index.cfm) was reviewed. It was found that there is no application currently on file for this project. Such a project would generate only a modest amount of traffic during the analyzed peak hours (fewer than 90 trips in either the AM or PM peak hours); if it were to replace the existing liquor store on the corner of La Tijera Boulevard and 74th Street. The SCAG-forecast growth projections used in the SPAS Draft EIR are considered to account for future development projects that were unknown, such as the 140-unit apartment building mentioned in the comment. In addition, as discussed on page 4-1208 of the SPAS Draft EIR, the fact that the 2025 Future Without Alternatives scenario does not include the natural growth forecast to occur at LAX, but rather attributes it to each of the alternatives, the SPAS Draft EIR analysis provides a very conservative analysis of future traffic impacts.

The commentor raised similar issues several years ago on both the Crossfield Taxiway Project EIR in 2008 (Comment CFTP-PC00002-99) and the Bradley West Project EIR in 2009 (Comment BWP-PC00011-48). As similarly explained in the Bradley West Project Final EIR Response BWP-PC00011-48:

"The proposed office development (i.e., the Entrada Office Tower Project, on the Radisson Hotel site in Culver City was included in the off-airport surface transportation cumulative analysis for the Bradley West Project…Table 4.2-5 in the Draft EIR is considered to contain the most current information provided at the time the document was prepared; however, given the fluid nature of the planning and development process within the local area, the list of projects will continue to fluctuate over time…Any fluctuations not reflected in Table 4.2-5 of the Bradley West Project Draft EIR would be accounted for in the assumed 2 percent growth factor for background traffic used in the off-airport surface transportation analysis for the Bradley West Project."2 (A response substantively similar was also provided for the Crossfield Taxiway Project Final EIR.)

1. TriCal Construction, Inc., 7407 La Tijera New Neighbor on the Block, June 2, 2012, Available: http://www.7407latijera.com/news/new-neighbor-on-the-block/, accessed November 8, 2012.
2. The Bradley West Final EIR, which provides both the comments and responses, is available online at: http://www.ourlax.org/pdf/LAXBradleyWestProjectFEIRVolume8_2.pdf.

SPAS-PC00130-217

Comment:

Page 4-1 Environmental Impact Analysis - Public Services

Question: Page 4-1 Environmental Intro. Shouldn't public services include health care/ trauma care? What about related EMT and the ability to handle disasters?

Response:

Consistent with Appendix G of the State CEQA Guidelines, and with LAFC (LAMC, Section 57.09.01-11), Section 4.11.1 of the SPAS Draft EIR evaluated whether any of the SPAS alternatives would result in restricted emergency access, increased response times, or extended station response distances beyond the standards maintained by the agencies serving LAX and the surrounding communities, or whether they would result in the need for a new fire station or the expansion, consolidation, or relocation of an existing facility to maintain adequate service levels. This analysis complies with CEQA's requirements for analysis of public services, which focuses on the project's potential physical effects on the environment. (See State CEQA Guidelines Section 15358(b) ("Effects analyzed under CEQA must be related to a physical change")).

As discussed in Section 4.11.1 of the SPAS Draft EIR, LAX Master Plan Commitments FP-1, LAFD Design Recommendations, and PS-2, Fire and Police Facility Space and Siting Requirements, as well as enforcement of Federal Aviation Regulations and state and local fire code requirements, would ensure maintenance of adequate fire and emergency response times; LAFD staffing, including EMT and paramedic personnel; equipment; facilities; and emergency access.

Additionally, as described on pages 4-994 through 4-997 in Section 4.11.1 of the SPAS Draft EIR, LAX and surrounding communities are subject to various emergency response and disaster response plans and regulations including the County of Los Angeles Mutual Aid Operations Plan, LAX Airport Emergency Plan, and LAX/Sea Disaster Preparedness Plan.

SPAS-PC00130-218

Comment:

Page 4-2 and -3 Commitments
- The Applicable LAX Master Plan Commitments and Mitigation Measures section lists the LAX Master Plan commitments and mitigation measures applicable to the SPAS alternatives. As background, in conjunction with approval of the LAX Master Plan and certification of the Final EIR in December 2004, the Los Angeles City Council adopted a Mitigation Monitoring and Reporting Program (MMRP)34 to ensure that mitigation measures and LAX Master Plan commitments identified in the Final EIR are implemented. Mitigation measures are activities, policies, or practices designed to avoid or minimize significant environmental impacts. Besides mitigation measures, the MMRP for the LAX Master Plan includes Master Plan commitments. LAX Master Plan commitments were determined to be more appropriate than mitigation measures where: (1) standards and regulations exist with which compliance is already required by the applicable regulatory agency; (2) impacts would be adverse but not significant; and (3) design refinements could be incorporated into the project to reduce or avoid potential impacts. The timing of implementation of LAX Master Plan commitments and mitigation measures is set forth in the LAX Master Plan MMRP. Unless otherwise noted, the impacts analysis for the SPAS alternatives assumes that the applicable LAX Master Plan commitments and mitigation measures would be implemented concurrently with and as part of each alternative. To the extent that the LAX Master Plan commitments and mitigation measures would not reduce significant environmental impacts to a level that is less than significant, SPAS-specific...
- The Impacts Analysis section presents the analysis of impacts for the nine SPAS alternatives for the buildout horizon year 2025. Impacts were compared to the thresholds of significance to determine whether they would be, under CEQA, significant or less than significant. For purposes of determining significance, potential impacts were compared to the environmental baseline conditions, as further described in the Analytical Framework below.

- Level of Significance After Mitigation is a CEQA determination of the significance of a particular impact after implementation of the proposed mitigation measures. This section identifies any significant impacts that cannot be mitigated to a level that is less than significant. These "significant unavoidable impacts" are also listed in Section 7.1, Significant Environmental Effects, of this EIR. The level of significance after mitigation is not included for those environmental topics where no significant impacts would occur and, as a result, where no mitigation measures specific to SPAS are required. (underlines for emphasis)

Question: Since many projects identified in this EIR are were not in the LAX Master Plan and several projects referenced as not being part of the EIR are also not in the Master Plan (such as terminals 1.5 or 2.5 or the midfield check in inside the CTA) how has LAWA identified and included mitigations in the MMRP let alone provide implementation schedules? How are the construction impacts of these projects included?

Response:

As noted by the commentor, many of the projects associated with the SPAS alternatives, such as the ITF and the dedicated busway, were not components of the LAX Master Plan. Rather, consistent with Section V.D.1 of the Stipulated Settlement, these potential projects represent "alternative designs, technologies, and configurations for the LAX Master Plan Program that would provide solutions to the problems that the Yellow Light Projects were designed to address consistent with a practical capacity of LAX at 78.9 million annual passengers."

As explained in the text cited by the commentor, LAX Master Plan commitments and mitigation measures that apply to the alternative projects are identified throughout the SPAS Draft EIR. In addition, new mitigation measures are identified, where required, to address significant impacts associated with the SPAS alternatives. A list of all applicable LAX Master Plan commitments, LAX Master Plan mitigation measures, and SPAS-specific mitigation measures, is provided in Table 1-6 of the SPAS Draft EIR. All of the measures applicable to the selected SPAS alternative, if any, would be included in a SPAS Mitigation Monitoring and Reporting Program (MMRP), which would include the timing of implementation for each measure.

The non-SPAS projects identified by the commentor (i.e., the North Terminals Improvements Project (also referred to as Terminals 1.5 and 2.5) and the "midfield check in inside the CTA", are LAX Master Plan projects. The North Terminals Improvements Project is consistent with the new north linear concourse under Alternative D (i.e., the approved LAX Master Plan). The commentor's reference to a "midfield check in inside the CTA" appears to be a reference to the MSC Passenger Processor, which is consistent with the new passenger terminals that would be constructed in place of the existing CTA parking facilities under Alternative D. Both of these projects would be subject to the mitigation measures in the LAX Master Plan MMRP. Both of these projects are identified as cumulative terminal-related projects on page 5-18 in Section 5.3.2 of the SPAS Draft EIR, and the cumulative impacts of these projects, in conjunction with SPAS and other cumulative projects, are analyzed in Chapter 5, including cumulative construction impacts.

SPAS-PC00130-219

Comment:

Question: Many of the "significant unavoidable impacts" are acknowledged by LAWA as resultant from the growth of flights, passengers, etc. for all alternatives. How has LAWA provided an assessment of these which allows for comparison of the alternatives so that the least of the unavoidable impacts can be chosen and why hasn't LAWA presented possible partial mitigations for these impacts?

Response:

Table 1-5 of the SPAS Draft EIR delineates the unavoidable significant impacts associated with each alternative and indicates, through the use of bold type face, those impacts that are primarily attributable to future growth in airport activity that will occur regardless of the SPAS alternatives. Reduction of unavoidable significant impacts was taken into account in the selection of the environmentally superior alternative in Section 1.5 of the SPAS Draft EIR.

Decision-makers for the SPAS project will take into consideration the environmental impacts associated with each alternative, including unavoidable significant impacts, before taking action on the project. In accordance with CEQA, the SPAS Draft EIR includes feasible mitigation measures to reduce or avoid significant impacts, including impacts attributable to future growth in airport activity (refer to Table 1-6), despite the fact that the increase in passenger activity over time would occur with or without the SPAS alternatives, as stated on page 1-13 of the SPAS Draft EIR.

SPAS-PC00130-220

Comment:

Question: Although detail phasing is generally in a project EIR and since the EIR is willing to consider general phasing of mitigations, why doesn't it address phasing of the key project improvements?

Response:

Please see Response to Comment SPAS-PC00130-41 regarding phasing of project improvements.

SPAS-PC00130-221

Comment:

Page 4-4 Environmental Baseline
The Notice of Preparation (NOP) for the SPAS EIR was first published in March 2008; however, the EIR work effort was temporarily suspended while the North Airfield Safety Study (NASS) was being completed, based on the possibility that the study results would yield new information relative to the range of airfield alternatives being considered for the SPAS Draft EIR (see Section 4.7.2, Safety, for a description of that study). Upon completion of the NASS, work on the SPAS Draft EIR resumed and a revised NOP was published in October 2010.
In accordance with the provisions of CEQA, October 2010 is the baseline date for characterizing existing conditions in the environmental analysis. Where existing conditions data specific to October 2010 were not available or where October 2010, by itself, was not an appropriate representation of baseline conditions, this Draft EIR identifies this fact, explains what data was used to determine existing conditions, and provides evidence of why this information is representative of baseline conditions. For example, in some cases, available reports and other documentation were only available for timeframes preceding 2010. For those topics which relied upon site surveys, such information was collected during preparation of the Draft EIR, typically in 2011. Due to the highly developed nature of LAX and the surrounding communities, and the lack of economic growth in recent years, site conditions at and around LAX have not materially changed. Therefore, the available information in 2009 or 2011 that was used to characterize baseline conditions is considered to be generally representative of 2010 conditions. The methodology discussion for each environmental topic addressed in this section describes the nature, timeframe, and basis of the data used to characterize existing baseline conditions. (underline for emphasis)

Question: Even though a full year was desired, why was it necessary to go back to 2009 when most of the elements of studied have data collected and reported monthly?

Response:

Please see Response to Comment SPAS-PC00130-52 regarding the use of calendar year 2009 as the baseline year for aviation activity levels. As explained in that response, use of a full year's worth of aircraft activity data (for a calendar year) allows for the development of the peak month average day activity, which is required for modeling purposes.

SPAS-PC00130-222

Comment:

4-10 Aesthetics
- Policy P7: Provide and maintain landscaped buffer areas along the southern boundary of Airport Airside and northern boundary of LAX Northside that include setbacks, landscaping, screening, other appropriate mechanisms with the goal of avoiding land use conflicts, shielding lighting, enhancing privacy, and better screening views of airport facilities from adjacent residential areas.

Question: Why is there no complimentary landscape policy for the east and west ends of LAX where there is substantial traffic passing along the north-south routes daily?

Response:

LAX Plan Policy P7 is part of the LAX Plan and is one of the policies governing "Airport Landside" areas which include the Central Terminal Area, and other designated areas included as components of the proposed SPAS alternatives (e.g., GTC and APM). The LAX Street Frontage and Landscape Development Plan Update provides integrated and coordinated landscape design guidelines for new development along the perimeter areas and key entry areas of LAX. As the commentor notes, one of the goals of the LAX Street Frontage and Landscape Development Plan Update is for LAWA to provide and maintain setbacks, landscaping, screening, or other appropriate improvements along those portions of the northerly and southerly airport property boundaries which abut visually-sensitive residential uses to the north and south.

However, as discussed on pages 4-11 through 4-13 in Section 4.1 of the SPAS Draft EIR, in addition to guiding the development of buffers and visual treatments to the north and south, the LAX Street Frontage and Landscape Development Plan Update requires visual treatments and landscaping for other areas along the perimeter and key entryways of LAX. For example, the LAX Street Frontage and Landscape Development Plan Update requires key entry corridors and entryways, such as major boulevards, perimeter roadways, and gateway intersections, to present a strong identity for LAX. As such, these corridors and roadways merit a high level of landscaping and visual treatments that include the creation of interchange gardens, shade trees, planted central medians, public art, and attractive fencing. Key gateway and entry corridors include north-south corridors such as Pershing Drive at the west end of LAX and Aviation Boulevard at the east end. It is important to note that Pershing Drive is bordered on the west by the Los Angeles/El Segundo Dunes (Dunes), which provide views of open space for motorists traveling along Pershing Drive, and along Vista del Mar at the western boundary of the airport property. The LAX Street Frontage and Landscape Development Plan Update calls for the continued maintenance of habitat preserves and undeveloped areas such as the Dunes and associated Habitat Restoration Area. Other key corridors identified in the LAX Street Frontage and Landscape Development Plan Update include Sepulveda Boulevard, and east-west corridors such as Imperial Highway, Century Boulevard, and Lincoln Boulevard, which traverses the northern boundary of the airport northwest from Westchester Parkway.

Furthermore, the LAX Street Frontage and Landscape Development Plan Update requires key facilities, such as the ITF, APM, CTA terminals, CONRAC, and parking garages, that may be visible from various vantage points from the east and west to include landscaping amenities and visual treatments. Such visual treatments would include edge treatments, pedestrian amenities, and other decorative elements. In addition, the LAX Specific Plan requires the development of conceptual design guidelines for new projects, including new central terminals and passenger facilities.

SPAS-PC00130-223

Comment:

Page 4-12 Aesthetics
LAWA committed to updating design-related guidelines and plans, including the LAX Street Frontage and Landscape Development Plan, in order to avoid view degradation and incompatibility between on-site and off-site land uses. The LAX Street Frontage and Landscape Development Plan Update,40 adopted in 2005, fulfills this component of LAX Master Plan Commitment DA-2, and now serves as a basis for reviewing future public and private development projects at LAX....

The objectives set forth in the LAX Street Frontage and Landscape Development Plan Update are identified below:
- Coordinate and enhance the visual and aesthetic appeal of streets, buffer areas, and open space surrounding LAX.
- Maintain and improve safety and security at and surrounding LAX through coordination of street frontage and landscape design with airport security and in compliance with the LAX Wildlife Hazards Management Plan.
- Enhance pedestrian, bicycle, and vehicular circulation on streets internal to and surrounding LAX, and comply with airport security requirements, as feasible and practical.
- Enhance LAX's compatibility with adjacent land uses, neighborhoods, and communities.
- Ensure that street frontage and landscape design is cost-effective, efficient, environmentally sensitive, and sustainable.
- Provide the basis for the design and review of public and private development projects at LAX by establishing a hierarchy of landscape treatments based on airport gateways and public facilities. The LAX Street Frontage and Landscape Development Plan Update also calls for the preparation of a Neighborhood Compatibility Program (NCP), based on commitments made in the LAX Master Plan, which outlines interface treatments along the airport perimeter for the purpose of "ensuring that the airport complements surrounding properties and neighborhoods." The NCP, which is to address all issues relating to compatibility, including landscape buffers, noise, light spillover, odor, and vibration, is to include the following measures to ensure that this policy is achieved

Question: If this plan has been in place since 2005 why haven't improvements been made to the perimeters? is there a schedule to get started?

Response:

The LAX Street Frontage and Landscape Development Plan Update is a set of integrated and coordinated landscape design guidelines for the perimeter areas of LAX that apply to new development at the airport. The Plan is not intended as a commitment by LAWA to affect and/or change existing conditions, nor is it a set of improvements that will be implemented by LAWA. However, as discussed on pages 4-14 and 4-15 in Section 4.1 of the SPAS Draft EIR, LAWA is currently implementing a LAX Beautification Enhancements Program for the purpose of improving the image, function, circulation, and wayfinding of the airport, through the use of architecture, graphics, landscaping, lighting, and art. Several projects that have been completed under the LAX Beautification Enhancements Program include the Imperial/Sepulveda Landscape Improvement Project and the Gateway LAX Enhancement Project. The latest project is the New Face of the CTA Improvements/Enhancements, which will enhance and unify the aesthetic appearance of the CTA. As described on page 5-21 in Chapter 5 of the SPAS Draft EIR, Phase I of the New Face of the CTA Improvements/Enhancements project includes a new canopy and replacement of the roadway light poles at TBIT and other miscellaneous improvements/enhancements. Phase I will be completed by 2013, with the remainder of the project to occur on an ongoing basis.

In addition, LAWA has recently initiated the LAX Northside Plan Update as an independent planning process that will consider and complement other plans and projects underway at LAX. Development of buffer areas and setbacks within the LAX Northside areas would occur with development of the LAX Northside Plan.

SPAS-PC00130-224

Comment:

Page 4-83 Impacts Summary 4.2.1. Introduction

Question: LAWA started an air quality apportionment study in 2006 but has failed to provide any data or information to the public other than a verbal statement that it has finished two and a half phases. What data from this study has been used to evaluate impacts for this EIR. If none, why not? How does the data from this study compare with the assumptions made to result in air quality evaluations. What concentration assumptions were made based on LAWA property boundaries? Did it assume ownership of Manchester Square and Belford Square? What uses were assumed for these properties?

Response:

This content of this comment is similar to comment SPAS-PC00130-36; please refer to Response to Comment SPAS-PC00130-36.

SPAS-PC00130-225

Comment:

Question: There are many particulate studies of PM 0.1 including one on the LAX properties by Froines (UCLA) which concluded that these smaller, more dangerous particles are evident in plumes correlating to takeoffs and landings. The study also showed that the measurement of larger particles were NOT a predictor for the ultra-fine particles.

Response:

As noted in the comment, a number of studies which measured ultrafine particulate matter (UFP, sometimes referred to as PM0.1) have been conducted around airports, as well as around marine ports and along freeways. The study mentioned was conducted by researchers from UCLA led by Dr. John Froines.1 That study focused on measuring UFP, black carbon, and PM2.5. As noted in the comment, UFP and PM2.5 did not correlate well, indicating that PM2.5 is not a good predictor of UFP variation with distance or time.

At this time, UFP and black carbon are not directly regulated by the U.S. Environmental Protection Agency or California Air Resources Board, the agencies with authority to set ambient air quality standards for air pollutants. Since there are no current standards, the South Coast Air Quality Management District has not set CEQA significance thresholds for UFP or black carbon. It is not even known at this time what form a standard or threshold would take. For example, the PM2.5 standard is a mass-based standard with units of micrograms (the mass) per cubic meter of air. The health impact from UFP may not be easily correlated with mass because of the small amount of mass associated with UFP. Examples of possible forms the standard or threshold may take, if established, include the number concentration (number of particles per volume of air), the surface area concentration (total surface area of particles per volume of air), the volume concentration (volume of particles in the air to the volume of air), or some measure of specific compounds or chemicals on the UFP. The form of any such standard is not limited to these examples.

Black carbon and UFP are components of PM2.5 for which ambient air quality standards have been established by both agencies, and the air quality impact analysis in Section 4.2 of the SPAS Draft EIR includes impacts associated with PM2.5. In addition, diesel particulate matter also includes UFP and black carbon fractions. California has established a cancer potency slope factor and a chronic hazard index for diesel particulate matter. Human health risks associated with exposure to project-related diesel particulate matter emissions were evaluated in Section 4.7.1 of the SPAS Draft EIR.

UFP is ubiquitous in the urban environment. It is typically generated from combustion in various types of sources, or by atmospheric photochemical activity that leads to homogenous nucleation (the formation of particles from gas phase molecules).2 High levels of UFP number concentrations, similar to the values in the Froines study for aircraft, have been reported from measurements along freeways in southern California.3

Finally, UFP, black carbon, and other pollutants are being measured as part of the LAX Air Quality and Source Apportionment Study (AQSAS). The third and final phase of this study is currently being conducted, and the final study report is due out in spring 2013. Please refer to Response to Comment SPAS-PC00130-36 for a discussion of the LAX AQSAS.

1. Fanning, E., Yu, R.C., Lu, R., and Froines, J. 2007. Monitoring and Modeling of Ultrafine Particles and Black Carbon at the Los Angeles International Airport, Final Report. Prepared for the California Air Resources Board under ARB Contract No. 04-325. (June 20).

2. Friedlander, S.K. 2000, Smoke, Dust, and Haze - Fundamentals of Aerosol Dynamics, Second Edition, Oxford University Press, New York.
3. Westerdahl, D., Fruin, S., Sax, T., Fine, P.M., and Sioutas, C. 2005. Mobile platform measurements of ultrafine particles and associated concentrations on freeways and residential streets in Los Angeles. Atmospheric Environment, 39:3597-3610.

SPAS-PC00130-226

Comment:

On page 4-84 LAWA acknowledged that "fugitive dust generated by construction activities is a major source of suspended particulate matter..." What has LAWA done to evaluate the contamination in the construction piles placed around the perimeter of LAX which is adjacent to residential and commercial areas?

Response:

The content of this comment is similar to comment SPAS-PC00130-109; please refer to Response to Comment SPAS-PC00130-109.

SPAS-PC00130-227

Comment:

Page 4-88 Meteorology
Airport-specific meteorological data were used to analyze air quality impacts. The data set used consisted of twelve continuous months of hourly surface data collected at LAX for calendar year 2007, the most recent data year available from the SCAQMD's on-airport meteorological station. This data set, provided by the SCAQMD, included ambient temperature, wind speed, wind direction, and atmospheric stability parameters, as well as mixing height parameters from the appropriate upper air station, and was provided "AERMOD-ready," including hourly O3 concentrations from the LAX Hastings monitoring station collected in 2007. The location of the on-airport SCAQMD meteorological and air quality monitoring station is identified in Figure 4.2-1.

Question: Why is CY 2007 considered representative since the number of aircraft (a major contributor) and port activities (another major contributor) were artificially low due to the recession? Also wasn't 2007 abnormal drought conditions that impacts assumptions of wind and atmospheric conditions?

Response:

Meteorological parameters, such as wind speed, wind direction, temperature, rainfall, and relative humidity are not materially affected by airport or marine port operations. These parameters are governed by global movements of mass and energy. For example, the air temperature and relative humidity are really gauges of the thermal energy and water status of the atmosphere, and these are tied to the fundamental energy and water cycles of the earth-atmosphere system 1. Wind is the movement of air mass, driven by regional and global pressure gradients affected by the earth's rotation. Therefore, the selection of meteorological data for modeling is not influenced by economic-related activities.

The selection of the 2007 meteorological data was informed by a screening analysis using the 2009 baseline emissions. Oxides of nitrogen (NOx) are precursors to ozone, NO2, and PM2.5 formation. Therefore, NOx emissions were modeled since it is a critical pollutant to air quality in the region. A comparison of the modeled results of NOx using AERMOD ready meteorological data from LAX for 2005, 2006, and 2007 (provided by the South Coast Air Quality Management District) indicated that 2007 would produce the highest peak 1-hour NO2 concentration. Therefore, the 2007 meteorological data set was used in all air quality impacts analyses.

Finally, a comparison of the wind roses for 2005, 2006, and 2007, did not reveal any substantial differences in wind direction or wind speed. These are the parameters that determine where the emissions travel after leaving the airport. Differences in precipitation do not have an impact on modeled ambient concentrations using AERMOD. Practically speaking, the years with lower precipitation, such

as 2007, would have potentially higher ambient concentrations since less rainout/washout of pollutants would occur.

1. Oke, T.R. 1987. Boundary Layer Climates, Second Edition. Methuen and Company, New York.

SPAS-PC00130-228

Comment:

Page 4-91 Emission Source Types: Aircraft
Information on the number and types of aircraft operations considered at LAX for 2009 and 2025 was developed as part of the LAX SPAS forecasts. The aircraft activity levels for baseline conditions are from calendar year 2009 (i.e., full years' worth of aircraft activity data in order to develop peak month average day activity characteristics to be used in modeling). The aircraft activity levels for future conditions were based on aircraft activity growth forecasts for LAX in the year 2025. These data were used to develop airport simulation models (SIMMOD) of aircraft operations for baseline (2009) conditions and future (2025) conditions. The simulation models used information about facilities and operations to predict specific timing, volume, and location (e.g., runway used) for future aircraft operations. This modeling provides specific information regarding aircraft engine operations, such as time-in-mode (i.e., the amount of time aircraft engines are idling, or being used for taxiing, or are in take-off or landing modes), that is used to estimate aircraft emissions. Detailed SIMMOD runs were completed for Alternatives 1 through 4. For Alternatives 5 through 7, the existing SIMMOD data were reviewed to assess the operational characteristics applicable to those alternatives and adjusted where necessary to reflect the airfield design configuration specific to each alternative. Such adjustments took into account the runway improvements associated with each alternative, particularly whether a runway would be relocated closer to or farther from the CTA, as this would affect aircraft taxiing distance/time, and the extent a runway relocation would result in a loss of aircraft gates on the north side of the CTA, potentially causing aircraft to use more gates on the south side of the CTA.

Question: What does the above paragraph mean? Was actual flight data used from 2009 or was it "approximated and summarized?" Similarly, which aircraft growth forecasts were used and the assumptions made? Several were generated during the past several years ie one in 2006, one for the Part 161 Study, one in 2008, one for the Northside Safety Study. What assumptions were made for the 2009 airport layout and availability of runways and taxiways? What about location and number of gates in use? Was APU use assumed to be 100%, 90% or what? Since LAWA had conducted dispersal and particulate studies on the actual flight field why did it revert to FAA EDMS models instead of actual information?

Question: For an estimation of construction equipment emissions did LAWA use a formula to approximate the number and types of equipment? If LAWA hasn't decided what construction (or when) is to occur and its phasing, how did LAWA estimate maximum amounts for a worst case condition?

Response:

The 2009 aircraft activity and fleet mix are based on actual operations at LAX in 2009. However, typical airport planning is based on a design day flight schedule. To determine the change in airport activity between the existing conditions and the future alternatives, a design day flight schedule is developed for the existing conditions as well as the future conditions under each alternative. This approach allows the same, consistent method to be used on all alternatives and the existing baseline for comparison purposes. For example, to estimate time in mode for taxi and delay it is common practice to model aircraft activity in the airport simulation model (SIMMOD) for the baseline period as well as the future year(s) analyzed in a project's planning reports. As noted above, the actual airport activity from 2009 was used to develop the design day flight schedule for the baseline. The details of the development of the design day flight schedule for 2009, including fleet mix, are presented in Chapter 3 of Appendix F-1 of the Preliminary LAX SPAS Report.

For the SPAS Draft EIR, the future airport activity in 2025 was assumed to be 78.9 million annual passengers for all alternatives, consistent with the 2012 Regional Transportation Plan adopted by the Southern California Association of Governments. The details of the development of the design day

flight schedule for the 2025 alternatives, including fleet mix, are presented in Chapter 4 of Appendix F-1 of the Preliminary LAX SPAS Report. Discussions of various airport activity growth forecasts are presented in Chapter 1 of Appendix F-1 of the Preliminary LAX SPAS Report.

Gate numbers and layouts are presented in Attachment A of Appendix F-1 of the Preliminary LAX SPAS Report, and detailed discussion of gating is included in Appendix F-2 of the Preliminary LAX SPAS Report. Runway use, taxiway use, and general airport operating assumptions are also presented in Appendix F-2 of the Preliminary LAX SPAS Report.

Airport air pollutant concentrations, including PM10 concentrations, monitored at the South Coast Air Quality Management District Southwest Coastal Monitoring Station (also known as the LAX Hastings site) are presented in Table 4.2-3 in Section 4.2.3.3 of the SPAS Draft EIR. This station did not monitor PM2.5 during the baseline time period; therefore, PM2.5 measurements were obtained from the South Coastal Monitoring Station, as noted in Section 4.2.3.3. Because the existing monitoring was conducted at only one location on the airport, air dispersion modeling was conducted for the baseline and future alternatives. The modeling analysis, presented in Section 4.2.6 of the SPAS Draft EIR, was used to predict existing and future pollutant concentrations, including particulate matter concentrations, around the airport property line and in the Central Terminal Area. Modeling must also be done to analyze future impacts, since it is impossible to monitor future conditions. Modeling was conducted using FAA's EDMS model because the FAA requires its use to evaluate air quality impacts of proposed projects for regulatory purposes.

The auxiliary power unit (APU) usage for both the baseline and 2025 conditions was based on the EDMS default assumption that APUs would operate 13 minutes for each arrival and 13 minutes for each departure, or a total of 26 minutes for a landing and takeoff operation (LTO) cycle. This assumption is conservative since most of the existing passenger gates at LAX have preconditioned air and 400 hertz (Hz) power hookups that would allow the aircraft to plug in and shut off the APU. The APU emissions for each alternative under two operating flight rules (visual flight rules and instrument flight rules) are presented in Attachment 2 of Appendix C of the SPAS Draft EIR. These emissions are summarized in Section 4.2 of the SPAS Draft EIR, Table 4.2-4 (baseline) and 4.2-13 (future alternatives).

The method used to estimate construction emissions is described in Section 4.2.2.1 of the SPAS Draft EIR. The construction emission estimation methodology is summarized below:

- The analysis started with the detailed construction analysis that was performed for the LAX Master Plan, Alternative D. That analysis, contained in the LAX Master Plan EIR, included construction related emissions for various projects (runway movements, taxiway movements, terminal building demolition and construction, roadway improvements, etc.).
- Next, the construction emission estimates for the LAX Master Plan Alternative D were updated to account for current emission factors developed by the California Air Resources Board and included in its OFFROAD and EMFAC models. The total construction emissions associated with Alternative D, if it had been started today, are summarized in Appendix C of the SPAS Draft EIR, Attachment 1, Page 2 (Table 1, page 4 of 342) under the line item titled "Program Total (tons)" 1.
- Construction emissions of the SPAS alternatives start with the updated Alternative D emissions, then remove the major projects included in Alternative D that have already been completed (e.g., South Airfield Improvement Project and Crossfield Taxiway Project).
- Alternative 3 is essentially the completion of the LAX Master Plan Alternative D, thus once the completed projects were removed, the remaining updated Alternative D construction emissions represent the Alternative 3 construction emissions, shown in Appendix C of the SPAS Draft EIR, Attachment 1, Page 1 (Table 1, page 1 of 342).
- Total program emissions for all other alternatives were estimated using the ratio of construction costs for specific projects/activities within the given alternative to the construction cost for that project/activity under LAX Master Plan Alternative D. The construction costs for each SPAS alternative are shown in Appendix G of the Preliminary LAX SPAS Report, and the resulting ratios for each project/activity are shown in Appendix C of the SPAS Draft EIR, Attachment 1, page 2 (Table 1, page 4 of 342, far right columns).
- The program total construction emissions in tons for each alternative (Appendix C of the SPAS Draft EIR, Attachment 1, pages 1 and 2 (Table 1, pages 1 through 4 of 342) are multiplied by 2000 (converting tons to pounds), divided by 11 years (construction duration), and divided by 300 days per

year (working days per year) to obtain annual average daily emissions. This estimate would assume that every project or activity would be construction simultaneously for the 11 year duration. This average daily emission is multiplied by a factor of 2 to estimate the peak daily construction emissions.
- The peak daily construction emissions are summarized in Table 4.2-10 in Section 4.2.6.1 of the SPAS Draft EIR.

1. The printed version of Table 1 in Attachment 1 of Appendix C does not show the rows associated with major projects of the LAX Master Plan that have already been completed (e.g., South Airfield Improvement Project and Crossfield Taxiway Project). However, the emissions from these completed projects are included in the totals shown in the Program Total (tons) line for Alternative D.

SPAS-PC00130-229

Comment:

Page 4-100 4.2.3.4 Existing Airport Emissions
The baseline (2009) airport-related emissions, including those from aircraft, GSE, and APU operations, on-airport and off-airport roadways, parking lots and structures, and the CUP are shown in Table 4.2-4.

Question: Were the baseline values shown in Table 4.2-4 measured or estimated by modeling? Subsequent sections state that the main drivers of these values is increased ground traffic and air traffic. Since most of the alternatives assume the same numbers of vehicles and aircraft, how are the smaller differences among alternatives displayed to give decision makers a frame of reference as to the significance of the differences (even if all are designated as significant, not mitigatable)?

Response:

Mobile source (such as aircraft, trucks, cars, ground support equipment, and construction equipment) emissions are not routinely measured, except by regulatory agencies to develop emission factors. Therefore, the existing (baseline) emission inventories presented in Table 4.2-4 in Section 4.2.3.4 of the SPAS Draft EIR are modeled using the same emission factors that the South Coast Air Quality Management District uses to estimate emissions in the South Coast Air Basin.

As discussed in Section 4.2.6 of the SPAS Draft EIR, increases in air traffic and ground traffic relative to the existing conditions drive the increases in SO2, PM10, and PM2.5. Specifically, SO2 emissions are from aircraft and APUs while fugitive road dust (PM10 and PM2.5 fractions), which is the major source of increased particulate matter emissions, are from vehicular ground traffic. Although the number of flights is the same for all of the 2025 alternatives, the taxi and delay times are different. In addition, vehicle miles traveled by ground traffic also varies between alternatives due to different parking locations under the different alternatives. The affect that the differences in aircraft taxi and delay, and vehicle miles traveled have on emissions can be seen in Attachment 2 of Appendix C of the SPAS Draft EIR. These results are summarized for each alternative in Tables 4.2-13 and 4.2-14 in Section 4.2.6.3 of the SPAS Draft EIR. Detailed evaluations for aircraft taxi and delay times are included in Section 2 (for baseline) and Section 3 (for 2025 alternatives) in Appendix F-2 of the Preliminary LAX SPAS Report. Ground traffic volumes are included in Appendix K1 (on-airport transportation) and Appendix K2-8 (off-airport transportation) of the SPAS Draft EIR.

SPAS-PC00130-230

Comment:

Page 4-105 Table 4.2-8 Construction-Related Air Quality Mitigation Measures Not Quantified in the Construction Emissions Inventories....
Post a publicly visible sign with the telephone number and person to contact regarding dust complaints; this person shall respond and take corrective action within 24 hours. Fugitive Dust

Question: Since the measure noted above has not been followed on several occasions for several months at a time, how is the estimate of impacts valid?

Response:

The content of this comment is similar to comment SPAS-PC00130-109; please refer to Response to Comment SPAS-PC00130-109.

SPAS-PC00130-231

Comment:

Page 4-105 -106 LAX Master Plan - Mitigation Plan for Air Quality; MM-AQ-3, Transportation-Related Mitigation Measures.
This measure applies to mass transit, surface traffic, and on-site parking facilities. The principal feature of MM-AQ-3 is to replicate and expand the current LAX FlyAway service to other communities within regions of Los Angeles County. This initiative also includes a public outreach program to encourage the use of both the existing and new facilities. For the mitigated emissions inventory presented in Section 4.6.8.5 of the LAX Master Plan Final EIR, only emissions reductions associated with the new FlyAway capacity were quantified to account for the ensuing decrease in VMT regionwide combined with less traffic congestion in the vicinity of the airport and the use of clean-fueled buses used in FlyAway service. The remaining, secondary, transportation-related air quality mitigation measures contained in MM-AQ-3 may also be implemented to help ensure the emission reduction goals of the LAX Master Plan Final EIR and MMRP are achieved.

Question: Little of the FlyAway outreach has been accomplished that is required in the Settlement Agreement. What assumptions are made by LAWA about what is to be accomplished since this section talks about "equally feasible and practical, but that are not specifically identified in the MMRP, may also be considered." What was assumed complete in the assessments?

Response:

LAWA provides detailed information on the LAWA website about the FlyAway program and other alternative modes of transportation to and from LAX (lawa.org/welcome_LAX.aspx?id=132), and also provides FlyAway information brochures at transit centers, such as Union Station, and to major employers upon request as part of their transportation demand management/trip reduction programs.

The LAX FlyAway program was expanded since development of the LAX Master Plan to include FlyAway connections at Union Station in downtown Los Angeles, in Westwood/UCLA, as well as continued use of the original FlyAway station in Van Nuys. Although LAWA also initiated FlyAway service to and from the Irvine Transit Center in Orange County, that service was terminated on August 31, 2012 due to low ridership. LAWA staff continues to work on establishing additional FlyAway sites. The next FlyAway service, connecting LAX with the Metro Exposition light rail line at its Expo/LaBrea station, was approved by the LAWA Board of Airport Commissioners in October 2012 and is expected to begin service in spring 2013. Other potential LAX FlyAway locations which LAWA staff is currently evaluating for service include Santa Monica, Long Beach, Torrance, Hollywood, and Glendale.

The percentage of passengers using the FlyAway service during the peak arrival and peak departure periods in the 2009 baseline is included in Table 4.12.1-5 (page 4-1073) in Section 4.12.1.3.11 of the SPAS Draft EIR. The percentage of passengers assumed to use FlyAway service during the peak arrival and peak departure periods in the 2025 alternatives are included in Table 4.12.1-15 (page 4-1103) in Section 4.12.1.7.2 of the SPAS Draft EIR. FlyAway use by passengers was between 1.49 and 1.90 percent for the 2009 baseline during peak arrival and departure periods, and is estimated to be up to 3.1 percent in 2025. While the existing FlyAway routes demonstrate a consistent and mature level of passenger demand, this change does not substantially alter the number of private vehicles driving to or from LAX; thus, the FlyAway impact on the emissions for each alternative were not specifically quantified, and the analysis did not assume any reduction in emissions as a result of the FlyAway service. However, LAWA remains committed to developing and providing FlyAway service.

The commentor is also referred to Response to Comment SPAS-AR00002-15.

SPAS-PC00130-232

Comment:

Page 4-106 Table 4.2-9 Transportation-Related Air Quality Mitigation Measures
- Provide free parking and preferential parking locations for ultra low emission vehicles/super low emission vehicles/zero emission vehicles (ULEV/SULEV/ZEV) in all (including employee) LAX lots; provide free charging stations for ZEV; include public outreach to reduce air emissions from automobiles accessing airport parking...
- Expand LAWA's rideshare program to include all airport tenants Additional Ridership

Question: How much of the above parking has been assigned and how much will be assigned in the future? What is the schedule for doing so? How much and what percentage of rideshare is currently occurring now, what is the target?

Response:

Applicable LAX Master Plan Mitigation Measure MM-AQ-3, Transportation-Related Mitigation Measures, provides for free parking and preferential parking locations for ultra-low emission vehicles/super low emission vehicles/zero emission vehicles (ULEV/SULEV/ZEV). In addition, LAWA has partnered with the Department of Water and Power to install 32 public access electric vehicle charging stations at LAX. A number of electric charging stations are currently available in Parking Structure P1 in the Central Terminal Area, next to Terminal 1. LAWA's Rideshare Program includes 66 vanpools, 88 carpool program participants, 320 free monthly transit passes, and numerous marketing and advocacy activities to recruit and retain program participants. Currently, about 26 percent of LAWA's employees are participating in the Rideshare Program, saving over 1,000 vehicle trips to LAWA facilities every day. In 2011, LAWA met the required Average Vehicle Ridership (AVR) Target under South Coast Air Quality Management District Rule 2202 for the 7th consecutive year.

SPAS-PC00130-233

Comment:

Page 4-107 Air Quality LAX Master Plan Community Benefits Agreement; X.A., Electrification of Passenger Gates. This provision requires that all passenger gates newly constructed by LAWA shall be equipped with and able to provide grid electricity to parked aircraft (for lighting and ventilation) from and after the date of initial operation and that LAWA will ensure that all aircraft (unless exempt) use the gate provided grid electricity in lieu of electricity provided by operation of an auxiliary or ground power unit.

This provision would apply in conjunction with construction or modification of passenger gates that occurs as a result of implementing any of the SPAS alternatives, specifically Alternatives 1, 2, 3, 5, 6, and 7.

Question: There is also a requirement to address existing gates as well as new ones. What percentage and how many do not provide grid electricity availability? What is the completion schedule? How many new gates are planned to replace old ones? Will those gates be kept closed until electricity is available? If a unit fails, what is the target to get it back on line?

Response:

LAWA has installed preconditioned air and gate power from the grid at all of its passenger gates in the Central Terminal Area. LAWA plans to include preconditioned air and gate power at all future gates under the SPAS alternatives.

SPAS-PC00130-234

Comment:

Question: General air quality. When taxiways are closed for extended periods causing longer than programmed routes to gates is there a way this is included in the air quality modeling?

Response:

Taxiway closures are not considered part of the normal airport operation. The intent of the CEQA air quality impact analysis in Section 4.2 of the SPAS Draft EIR is to compare the future impacts of various potentially viable alternatives to the existing (baseline) conditions. This comparison is best made when comparing normal existing baseline operations with normal future operations and is appropriately done at a programmatic level, in light of the fact that the SPAS Draft EIR is a programmatic EIR. Given the range of taxi and delay times considered in the air quality impact analysis for visual flight rule and instrument flight rule conditions, it is likely that emissions associated with a short-term taxiway shutdown would fall within the range of emissions provided in Tables 4.2-13 and 4.2-14 in Section 4.2.6.3 of the SPAS Draft EIR. Emissions for each flight rule condition are presented in Attachment 2 of Appendix C of the SPAS Draft EIR.

SPAS-PC00130-235

Comment:

Page 4-108 to -111 4.2.6.1 Construction Emissions Impacts Analysis
Peak daily construction emissions for Alternatives 1 through 9 are presented in Table 4.2-10. To provide a more representative basis of comparison between all nine alternatives, the emissions of those alternatives that focus solely on airfield and related terminal improvements (Alternatives 5, 6, and 7) were combined with the range of emissions that could occur under various ground access improvements scenarios. Similarly, the emissions of those alternatives that focus solely on ground access improvements (i.e., Alternatives 8 and 9) were combined with the range of emissions that could occur under various airfield/terminal improvements scenarios -- see Notes 2 and 3 in Table 4.2-10. In so doing, the total potential emissions associated with these focused alternatives can be better compared to the emissions associated with the "fully integrated" alternatives (i.e., Alternatives 1 through 4, which consider...

Question: Since LAWA has failed to do more than a program level review, how is it determining the amount of construction required? What did it assume was necessary for the tunnels, utilities, and water flow mitigation work? Did LAWA include the amounts of construction work necessary to move and change Lincoln Blvd and Sepulveda? How was the amount of work determined? The SPAS report cost section lists some numbers, but does not provide assumptions made. Almost all emissions in Table 4.2.10 show "threshold significant." Has LAWA made recommendations on how to reduce these numbers? Where?

Response:

The SPAS Draft EIR analyzes the nine SPAS alternative at a programmatic level of conceptual planning. As discussed in Section 4.0 of the SPAS Draft EIR, CEQA authorizes the preparation of a "program EIR" when the project at hand consists of a program, regulation, or series of related actions that can be characterized as one large project. Typically, such a project involves actions that are closely related either geographically or temporally. Program EIRs are typically prepared for general plans, specific plans, and regulatory programs. Generally speaking, program EIRs analyze broad environmental effects of the program with the acknowledgment that site-specific environmental review will be required when future development projects are proposed under the approved program. (State CEQA Guidelines Section 15168.) An EIR prepared for "program level" entitlements "need not be as detailed as an EIR on the specific construction projects that might follow." (State CEQA Guidelines Section 15146(b).) As discussed by the California Supreme Court "it is proper for a lead agency to use its discretion to focus a first-tier EIR on only the general plan or program, leaving project-level details to subsequent EIR's when specific projects are being considered." (In re Bay-Delta Programmatic Environmental Impact Report Coordinated Proceedings (2008) 43 Cal.4th 1143.) LAWA's preparation of a programmatic analysis of the SPAS project was appropriate and consistent with the level of detail currently known about the various SPAS alternatives as no design or engineering plans, or construction phasing plans or schedules are currently available for any of the alternatives. Please also see Response to Comment SPAS-PC00130-142 for further discussion of the appropriateness of the programmatic review conducted for the SPAS project.

Please refer to Response to Comment SPAS-PC00130-228 for a discussion of the methodology used to estimate construction emissions. Table 4.2-7 and Table 4.2-8 in Section 4.2.5 of the SPAS Draft EIR

summarizes the approximately 17 mitigation actions identified to address construction-related emissions.

SPAS-PC00130-236

Comment:

Pages 4-120 to Table 4.2-13 and 4.2-14 Incremental Project Operational Emissions Compared to Baseline (2009) Conditions and Future (2015)
...The vast majority of the aircraft emissions increases shown in Table 4.2-13 are due to the anticipated growth in aircraft activity. Within Table 4.2-14, the incremental aircraft emissions associated with each alternative in 2025 are measured against the 2025 emissions of Alternative 4. The same aircraft activity level and fleet mix are assumed for all alternatives in 2025. As such, the incremental aircraft emissions shown in Table 4.2-14 are only influenced by the differences in the airfield configuration specific to each alternative.

Question: Since detailed gate layouts are not assumed in the "Program level" of this document, how were the gate assignments (and therefore types of aircraft for emission calculation) determined? Related, how did LAWA estimate the time to gate for each class of aircraft since the locations of airlines (and their particular types used) could change substantially between now and 2025?

Response:

The development of gate layouts for the SPAS alternatives is included Chapter 2 (2009 baseline) and Chapter 3 (2025 alternatives) in Appendix F-2 of the Preliminary LAX SPAS Report. The aircraft taxi and delay times for each alternative are also included in each of these chapters. See Response to Comment SPAS-PC00130-235 for a discussion of the appropriateness of the programmatic review conducted for the SPAS project.

SPAS-PC00130-237

Comment:

Pages around 4-147 There are Peak Operational Concentration Figures for each Alternative presented.

Question: What is the color coding of the areas on the figures represent? The highest concentration items for the varied parameters are shown on each figure and are different for each alternative. Is there a summary overview chart that explains why each alternate is different? What can be done to mitigate?

Response:

The colored items in Figures 4.2-2 through 4.2-8 of the SPAS Draft EIR simply show the areas and facilities that would be constructed under the given alternative. The peak concentrations for each alternative are summarized in Table 4.2-15 and Table 4.2-16, and Section 4.2.6.4 of the SPAS Draft EIR includes discussions of the pollutant concentration impacts for each alternative including a summary of the major contributors to the significant impacts. LAX Master Plan Mitigation Measures MM-AQ-3 (expansion of the FlyAway service and measures identified in Table 4.2-9) and MM-AQ-4 in Section 4.2.5 of the SPAS Draft EIR summarize approximately 17 mitigation actions that will be applied to operational sources under each SPAS alternative.

SPAS-PC00130-238

Comment:

4.3 Biological - skipped others are submitting separately

Page 4-218 Figure 4.3-7 Vegetation/Land Uses and Sensitive Species: Navigational Aids - Alternative 1
Page 4-227 Figure 4.3-8 Vegetation/Land Uses - Alternative 2
Page 4-229 Figure 4.3-9 Vegetation/Land Uses and Sensitive Species: Navigational Aids - Alternative 2

Question: There are black rectangles shown near the end of runway 6L (just north) and in the dunes which are not identified by coded legend colors. Similarly there is a black bar in Figure 4.3-8 just north of 6L but 1/3 from the west end. The black bars in Figure 4.3-9 are similar to the Alt 1 version. These bars are in each alternative figure. What do they represent? What is their function or impacts?

Response:

It is unclear which black bars the commentor is referring to in Figures 4.3-7, 4.3-8, and 4.3-9, as well as the other figures in Section 4.3 of the SPAS Draft EIR. The commentor may be referring to the blue rectangles that depict existing navigational aids that would be removed with implementation of the SPAS alternatives, and the red rectangles that depict proposed navigational aids for each of the SPAS alternatives. If the figures were reproduced in black and white, the existing and proposed navigational aids would appear as black rectangles. Color copies of the SPAS Draft EIR were made available for public review at Los Angeles World Airports, Capital Programming and Planning Division (formerly Facilities Planning Division), One World Way, Los Angeles, CA 90045 and via the internet at www.laxspas.org. Color copies were also made available at six area libraries. The SPAS Draft EIR is available at http://www.lawa.org/laxspas/Draft_EIR.aspx (accessed October 24, 2012).

SPAS-PC00130-239

Comment:

Page 4-339 Figure 4.5-1 Surveyed Historical resources

Question: Several underground, lead lined air raid/bomb shelters were constructed at LAX. These are not shown in the diagram. Where are they located?

Response:

Underground bunkers were constructed as part of a Nike missile surface-to-air defense battery that was established by the Army in the mid-1950s in the northwest corner of the airport (current location of Jet Pets). The launch facilities were destroyed in the early 1990s with the construction of Westchester Parkway. The Nike site itself is not considered to be a historical resource because the Nike launch facilities were destroyed and are no longer extant. Even if there are unknown remnants of the missile testing site, the site is not a historical resource as defined under State CEQA Guidelines Section 15064.5. As noted on page 4-362 of the SPAS Draft EIR, CA-LAN-2385H is a recorded site of historic debris at the same location as the missile site, and may be associated with the Nike facility. CA-LAN-2385H is not a historical resource or a unique archaeological resource under State CEQA Guidelines Section 15064.5 and Section 21083.2 of the Public Resources Code, respectively. As noted on page 4-360 of the SPAS Draft EIR, CEQA prohibits the disclosure of information about the specific location of archaeological sites (State CEQA Guidelines Section 15120(d)). Therefore, none of the archaeological sites are shown in Figure 4.5-1 of the SPAS Draft EIR, which only depicts locations of historical resources.

SPAS-PC00130-240

Comment:

4.6 Greenhouse gases -skipped others are submitting separately

4.7 Health Risk -skipped others are submitting separately

Response:

It is noted that the comment package on the SPAS Draft EIR submitted by ARSAC contains comments related to greenhouse gases (comments SPAS-PC00130-820 and SPAS-PC00130-880) and human health risk (comments SPAS-PC00130-92, SPAS-PC00130-106, SPAS-PC00130-450, SPAS-PC00130-451, SPAS-PC00130-452, SPAS-PC00130-454, and SPAS-PC00130-455).

SPAS-PC00130-241

Comment:

4.7.2 Safety information is in Appendix G2

Page 4-485 Table 4.7.2-1 Birdstrikes at LAX by Year

Question: How many bird strikes occurred on the north complex versus the south runway complex? The number of events does not appear to be a function of number of aircraft operations since 2001 was the highest and the variance of strike numbers is quite high. What explanation is given for the variability?

Response:

According to the FAA Wildlife Strike Database, between January 1, 2001 and December 31, 2011, there were a total of 753 birdstrikes reported at LAX.1 Of those, 334 birdstrikes occurred in the north airfield and 294 occurred in the south airfield; no location for the remaining 125 birdstrikes was provided in the FAA Wildlife Strike Database.

Reporting of wildlife strikes with civil aircraft in the United States is voluntary but strongly encouraged by the FAA. Thus, increases or decreases in the number of birdstrikes reported at LAX are not necessarily associated with the number of aircraft operations, but rather also take into account the reporting of birdstrikes by aircraft operators to the FAA. A 2009 FAA report on the trends in wildlife strike reporting under this voluntary system indicated that the overall reporting rate was 39 percent; that "there is a significant positive trend [increase] observed in overall strike reporting from 1990 to 2008"; and that "there has been a decline or stabilization in the reporting of damaging strikes since 2000." 2

The potential for birdstrikes associated with the SPAS alternatives is addressed in Section 4.7.2 of the SPAS Draft EIR. The most important factor in the occurrence of birdstrikes is the presence or absence of bird attractants on or very near the airfield. As indicated on page 4-484 of the SPAS Draft EIR, LAX uses anti-perching devices on structures such as signs, lights, fences, and building edges. In accordance with FAA Advisory Circular 150/5200-33B, Hazardous Wildlife Attractants on or Near Airports, the airfield is maintained to avoid the ponding of water, the growth of vegetation, and the development of other conditions that may serve as attractants to nuisance wildlife, including birds. As indicated on page 4-569 of the SPAS Draft EIR, under all of the alternatives, no new facilities would be constructed or operational conditions implemented that would serve as attractants to birds. In accordance with FAA requirements, the airfield would continue to be maintained to avoid the ponding of water, the growth of vegetation, and the development of other conditions that may serve as attractants to nuisance wildlife, including birds. Therefore, impacts under all of the alternatives with respect to birdstrikes would be less than significant.

1. The number of birdstrikes for the year 2011 in Table 4.7.2-1 of the SPAS Draft EIR reflect reported birdstrikes on the FAA's Wildlife Strike Database listed as of December 20, 2011; thus, the number of overall reported birdstrikes in Table 4.7.2-1 (723) is lower than the total reported birdstrikes (753) listed for the period January 1, 2001 through December 31, 2011 on the FAA's Database as accessed on November 30, 2012.
2. U.S. Department of transportation, Federal Aviation Administration, DOT/FAA/AR-09/65, Trends in Wildlife Strike Report, Part 1-Voluntary System 1990-2008; Available http://www.airporttech.tc.faa.gov/safety/downloads/09-65.pdf.

SPAS-PC00130-242

Comment:

Page 4-486 Safety
The ALP for LAX was updated in conjunction with the FAA's issuance of the Record of Decision in 2005 for the LAX Master Plan Improvements. That ALP update includes a plan sheet for future conditions (i.e.,buildout of the LAX Master Plan improvements) and a plan sheet for current airport conditions. The ALP plan sheet for current airport conditions is in the process of being updated by LAWA, in coordination with the FAA, to incorporate improvements completed since 2005, such as the South

Airfield Improvement Project (SAIP), the Crossfield Taxiway Project (i.e., Taxilane R), and the new Airport Rescue and Fire Fighting (ARFF) station, as well as other recent and pending near-term improvements at LAX. Depending on the outcome of the SPAS process, the LAX ALP may need to be amended to reflect the airport modifications identified by LAWA. Such amendment of the LAX ALP would first require completion of the NEPA review process by the FAA and issuance of a Record of Decision specific to the proposed ALP modifications. It is common at airports throughout the country to have facilities depicted on ALPs that depart from FAA Airport Design Standards in order to meet local site conditions and constraints. Such differences do not compromise safety. Operational changes and restrictions are made to preserve an acceptable level of safety.... (underline for emphasis)

Question: When updating to 'current" will LAWA/FAA include both Crossfield Taxiways planned (ie S and T) or just S as built?

Response:

The latest update of the LAX Airport Layout Plan (ALP), signed by the Federal Aviation Administration (FAA) on September 24, 2012, reflects the construction of Taxilane S, and the future construction of Taxilane T. The completion of construction specifications and bid documents for Taxilane T is currently underway. The ALP is available for review upon request to LAWA (SPAS Contact Person: Diego Alvarez as indicated on SPAS public notices and SPAS website).

No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00130-243

Comment:

Question: Since the ROD has approved the mod of standards for handling ADG V and ADG VI and the FAA uses these operational changes then these operations are "safe." Does LAWA or the FAA predict when the frequency and number of operations would make changes or restrictions not practical?

Response:

The FAA and LAWA work together to implement the Modification of Standards (MOS) for handling Aircraft Design Group (ADG) V and VI aircraft. These MOS applications are done on a case-by-case basis and the conditions the FAA and LAWA agree to for approval are tailored to preserve an acceptable level of safety. Currently, no MOS which has been approved for LAX details a frequency or number of operations which would make the MOS impractical. However, providing for airfield improvements that meet FAA design standards reduces the need for, and number of, MOS applications or waivers for north airfield alternatives, which, in turn, allows for more efficient movement of ADG V and ADG VI aircraft. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00130-244

Comment:

Page 4-488 Safety
Of particular relevance to the SPAS alternatives are the runway to taxiway separation requirements related to large aircraft, as follows:
Aircraft Design Group (ADG) V Aircraft (e.g., B747)
- 400 feet - Good visibility (approach visibility >1/2 mile)
- 500 feet - Low visibility (approach visibility <1/2 mile)
- ADG VI Aircraft (e.g., A380)
- 500 feet - Good visibility (approach visibility >1/2 mile)
- 550 feet - Low visibility (approach visibility <1/2 mile)

Relative to the existing (baseline) configuration of the north airfield at LAX, the two existing runways (Runways 6L/24R and 6R/24L) are separated by 700 feet, which allows simultaneous arrivals and departures during good visibility conditions. In low visibility conditions, Air Traffic Control (ATC) will not land or depart aircraft simultaneously on Runways 6R/24L and 6L/24R; however, ATC can clear two aircraft for landing on adjacent runways if the trailing aircraft has a visual sighting of the aircraft ahead. In addition, ATC has a procedure called "2 increasing to 3" where they can clear an aircraft to land in low visibility conditions after an aircraft on the adjacent runway has begun its takeoff roll, as long as the arriving aircraft is at least two miles out.
To the south of Runway 6R/24L is Taxiway E, which meets FAA Airport Design Standards for ADG V aircraft during periods of good visibility. The movement of the A380, an ADG VI aircraft, on Taxiway E during poor visibility conditions is only allowed with the observance of several restrictions and special conditions set forth by FAA, specific to that taxiway. During good visibility conditions, the A380 can operate on the full length of Taxiway E with no restrictions on 6R/24L due to an approved MOS from FAA. Vehicular traffic on the adjacent service road is restricted anytime an A380 is on Taxiway E. During CAT I conditions, not more than one ADG VI aircraft can be on the first 3,000 feet of the taxiway from the runway threshold.
South of Taxiway E is Taxilane D, which is separated by 300 feet, with a service road between them for most of its length. Based on FAA design standards, the maximum size aircraft that can operate on this existing taxilane ranges from ADG III in the eastern portion to ADG VI between Taxiway R and Taxiway S in the western portion, with the difference being defined by variations in its and the service road's alignment and nearby obstructions (i.e., parked aircraft, etc.). (underline for emphasis)

Question: Since there is an approved MOS for moving ADG VI along taxiway E during good visibility, how often is IFR required at LAX? How many aircraft ops can be accommodated in IFR before movement along taxiway E is impacted? If taxiway E is made to accommodate Grp VI is this a mute question?

Response:

As noted in Figure 1 in Appendix F-2 of the Preliminary LAX SPAS Report, Instrument Flight Rule (IFR) conditions exist for approximately 4.1 percent of operations.

Section 3.4 in Appendix F-2 of the Preliminary LAX SPAS Report describes the modeling assumptions and delay metrics for Alternative 4, which represents what would reasonably be expected to occur if all ongoing and reasonably foreseeable non-Yellow Light improvements identified in the LAX Master Plan were implemented, and none of the Yellow Light Projects or any of the identified alternatives to the LAX Master Plan Program were constructed or implemented. IFR conditions were modeled in this analysis and the results can be found in Table 15.

If Taxiway E is made to be a full Group VI taxiway, all restrictions or the MOS associated with the current Taxiway E and ADG VI operations would be eliminated, as they would no longer be necessary.

No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00130-245

Comment:

Page 4-492 Runway Safety
The FAA completed an RSA evaluation and analysis for LAX in 2006, in accordance with FAA Order 5200.8, Runway Safety Area Program, to reconsider the adequacy of existing RSAs at LAX.389 The FAA determined that none of the RSAs at LAX met current standards but all are practicable to improve. U.S. Congressional House Rule 3058 provides the statutory requirements that airports must comply with current RSA requirements by December 31, 2015. In light of the above, a Runway Safety Area Practicability Study was conducted by LAWA identifying, evaluating, and recommending preferred RSA improvement solutions for LAX runways within operational, environmental, and financial constraints. 390 The Runway 7L/25R Study was finalized and submitted to the FAA for their review and determination in December 2009. These improvements are currently scheduled to take place in 2013.

Identification of potential solutions for noncompliant RSAs in the north airfield was included in an evaluation completed in April 2010.391 The analysis noted that permanent RSA compliance solutions for these runways can be integrated into all the SPAS build alternatives, such as by extending the eastern end of Runway 6R/24L and by covering the eastern portion of the Argo Drainage Channel for Runway 6L/24R. The FAA has acknowledged that implementation of solutions to RSA compliance issues in the north airfield may not be practicable by December 31, 2015, particularly given overall runway improvements associated with the SPAS alternatives, including RSA improvements, are not proposed to be completed by 2015. The FAA and LAWA are coordinating on the identification and evaluation of potential interim solutions.

390 Although the 2006 RSA evaluation by FAA found none of the RSAs at LAX to comply with current requirements, the FAA acknowledged that RSA improvements for Runway 7R/25L would be made with the LAX Runway 25L Relocation and Outer Taxiway Project (South Airfield Improvement Project), which has since been completed. As such, it was not necessary to identify solutions for Runway 7R/25L in the Runway Safety Area Practicability Study; however, RSA improvements to the other runway within the south airfield complex - Runway 7L/25R - would still be needed and were, therefore, addressed in the Practicability Study.
391 Ricondo & Associates, Inc., Runway 6L-24R & 6R-24L Safety Area (RSA) Practicability Study, April 2010.

Question: What accommodation has been agreed to by the FAA? With the impending release of AC150/5300-13A are there any changes that will affect these agreements? Where are the documents in footnotes 390 and 391 available?

Response:

LAWA is currently working with the FAA to identify permanent or interim solutions for improving the north Runway Safety Areas (RSA). This may include implementing the recommended solutions in the RSA Practicability Study or through improvements resulting from the SPAS effort. Because all RSA improvements will meet FAA standards, there are no changes in the release of Advisory Circular 150/5300-13A that would impact the RSA improvements. Footnote 390 is located in Section 4.7.2 of the SPAS Draft EIR. Footnote 390 is a text note, quoted by the commentor, and does not contain a direct reference to any specific document. Footnote 391 references the RSA Practicability Study. LAWA compiled copies of the references used in the preparation of the SPAS Draft EIR pursuant to Public Resources Code Section 21092(b)(1) and Section 15087(c)(5) of the State CEQA Guidelines, including references that were cited in footnotes to the SPAS Draft EIR. These documents were available for review at LAWA's Administrative offices during the public comment period and continue to be available for review upon request to LAWA (SPAS Contact Person: Diego Alvarez as indicated on SPAS public notices and SPAS website).

SPAS-PC00130-246

Comment:

Question: Has any runway approach changes been made or are any contemplated to respond to the RPZ not being fully clear?

Response:

Yes. Alternatives 1, 5, and 6 include a western extension of Runway 6L/24R and a westerly shift in the displaced (landing) threshold for Runway 24R, which, in turn, shifts the existing RPZ for Runway 6L/24R westward such that existing homes are no longer located within the RPZ (see Table 4.7.2-16 on page 4-569 of the SPAS Draft EIR).

SPAS-PC00130-247

Comment:

Page 4-498 Runway Safety Based on FAA guidelines, Table 4.7.2-4 delineates the calculated declared distances for runways in the north airfield. To date, declared distances for LAX have not been added to the ALP.

Question: Since offsets have been in place at LAX for some time, why have the declared distances not been added to the ALP since release in 2005? Does this impact safety or is this just an administrate exercise?

Response:

Page 4-498 of the SPAS Draft EIR describes that declared distances is the independent treatment of each of the four runway performance characteristics: take-off run, take-off distance, accelerate stop distance and landing distance. To date, only displaced thresholds for Runways 6R and 25R have been implemented. As defined in Footnote 12 on page 1-14 in Section 1.2.2 of the SPAS Draft EIR, a displaced threshold is a runway threshold located at a point other than the physical beginning or end of the runway. The portion of the runway so displaced may be used for takeoff but not for landing. Landing aircraft may use the displaced area on the opposite end for roll out.

The implementation of only a displaced threshold does not require the publication of declared distances in the Airport Layout Plan (ALP). If at any time declared distances in addition to displaced thresholds are implemented at LAX, they will be added to the ALP. As indicated in Footnote 11 on page 1-14 in Section 1.2.2 of the SPAS Draft EIR, declared distances are used by pilots to calculate available take-off and landing distances for a particular runway. This ensures that pilots can safely use a runway based on their aircraft types and loads. The fact that LAWA has not implemented declared distances at LAX, has no bearing on safety.

SPAS-PC00130-248

Comment:

Page 4-499 Figure 4.7.2-4 Parcels Within RPZ Baseline Conditions (2010)
Notes: 3/ For planning purposes, all runways are assumed to have approaches with minimums less than 3/4 mile.

Question: What does note three mean? If the approach is > 3/4 mile how does this impact RPZ and safety?

Response:

As shown in Table 3-8 of Federal Aviation Administration (FAA) Advisory Circular (AC) 150/5300-13A, Airport Design, the dimensional standards for the Runway Protection Zone (RPZ) are dependent upon the wake turbulence category and aircraft approach category of the most demanding aircraft using the runway, as well as the most restrictive approach visibility minimums. As each of these criteria grow, the dimensional standards of the RPZ increase. As such, in order to provide a conservative analysis of future land uses within the RPZ, all runways were assumed to have approach visibility minimums less than 3/4-mile as this produces the dimensionally largest RPZ. The land uses and object clearing criteria remain the same regardless of wake turbulence category, aircraft approach category, or approach visibility minimums.

SPAS-PC00130-249

Comment:

Page 4-501 Other FAA/LAWA Safety Measures

The FAA and LAWA have worked together in recent years to deploy new technologies and enhanced training to improve airfield safety at LAX. The following provides a summary of these recent and ongoing improvements:
- Airport Movement Area Safety System (AMASS) was installed and fully operational at LAX in 2003. AMASS is a radar-based system that tracks ground movements and provides an automatic visual and audio alert to tower controllers when it detects potential incursions or collisions on runways and taxiways.
- Enhanced airfield signs, lighting, and pavement markings to FAA updated standards have been installed.
- In 2009, Airport Surface Detection Equipment, Model X (ASDE-X) was installed at LAX. ASDE-X provides a more precise surface detection technology than AMASS by providing accurate target position and identification information and thus gives controllers a more reliable view of airport operations. A Phase 1 upgrade to the multi lateration receiver units was completed in 2011 and a Phase 2 enhancement and upgrade to the ASDE-X equipment is scheduled for installation at LAX in 2013.
- Recurrent training takes place with all airport, airline, and FAA personnel with access to or control of the LAX airfield movement areas (runways, taxiways, and service roads).
- The FAA and LAWA are deploying Runway Status Lights (RWSL) technology at LAX. This tool increases situational awareness for aircrews and airport vehicles and thus serves as an additional layer of runway safety against incursions. A Prototype Program (Phase 1) has been installed and operating since June 2009. LAX was the first airport to have RWSLs installed on multiple runways.
- In February 2010, LAWA and the FAA entered into a Memorandum of Agreement for a full implementation (Phase 2) of RWSL technology. This is to include upgrading existing prototype equipment and new installations on both north and south runway complexes. The design was completed in May 2011; however, the FAA informed LAWA that same month that the implementation schedule was on hold due to budgetary constraints. Based on discussions between LAWA and the FAA in December 2011, the FAA is re-evaluating the scope and budget with the goal of initiating the implementation in 2012. In order for the safety benefit of this technology to be fully realized, an airfield geometry designed to accommodate modern aircraft is needed.
- As part of the overall goal of improving operational safety at LAX, the FAA has made procedural changes since 2007 that are related to airspace operations.

Question: What other improvements, such as more extensive ground movement tracking system which includes all vehicles, are available to improve flight field safety? When can they be implemented? How would improving tower staffing help? Runway status lights were only partially installed three years ago. Why is it taking so long to complete installation of the rest of the airfield coverage? What other situational awareness systems should be installed at LAX for safety?

Response:

While the FAA and LAWA continue to work together in evaluating the characteristics and feasibility of other improvements, the list provided on pages 4-501 and 4-502 of the SPAS Draft EIR delineates the current nature and status of recent and ongoing improvements at LAX. Please refer to Response to Comment SPAS-PC00096-5 for a discussion of the safety improvements analyzed in the SPAS Draft EIR.

SPAS-PC00130-250

Comment:

Page 4-502 to 4-504 North Airfield Safety Studies
Seven independent assessments of north airfield safety were completed. The following is a summary of each of these studies.
- LAX North Airfield Special Peer Review, March 2007 - A special peer review process involving airport industry experts was formed to objectively review the facts concerning the north airfield improvements (i.e., various options for increasing the separation distance between Runways 6L/24R and 6R/24L,

adding a centerfield parallel taxiway, and modifying the locations designs of taxiway/runway intersections) and to provide the group's insight and advice on the best solution and way to move forward. The Peer Review Group consisted of 13 aviation experts from the private, airport, and public sector with experience in planning, engineering and operations of major U.S. airports. The Peer Review Group393 evaluated the north airfield from the perspectives of operational safety, airfield balance, and efficiencies. They found that there is a definite need for improvements to the north airfield, that doing nothing is not an option, and massive terminal demolition is not feasible. The Group concluded that shifting the northerly runway 340 feet northward offers maximum safety, balance, and efficiency advantages. This option provides for new large aircraft operations, does not impact the apron/gate terminal infrastructure, presents fewer construction phasing impacts, and provides for a full-length center taxiway to promote safe and efficient aircraft landing and takeoff operations.

- Analysis of LAX North Airfield Alternatives, May 2007 - An analysis of LAX north airfield alternatives was prepared by the International Aviation Management Group, Inc.,394 an aviation planning firm headed by a professor of Airport Operations and Management from Embry Riddle Aeronautical University. The purpose of this study was to provide expert and objective guidance as to which alternatives being considered for the SPAS at the time (i.e., provide more separation between runways by moving Runway 6L/24R north by either 100 feet or 340 feet, or moving Runway 6R/24Lsouth by either 100 feet or 340 feet, or keeping runways in current locations) were most appropriate for further study as they relate to operational safety, aircraft compatibility, capacity, and environmental considerations. The study determined that the alternatives that provided an additional runway separation of 340 feet (LAX Master Plan Alternative D [340 feet south] and 340-foot north alternative) were the most appropriate for further study, while the least appropriate alternatives were the no additional separation and the 100-foot south concepts.
- Los Angeles International Airport North Airfield Assessment, May 2007 - A north airfield assessment was prepared by URS Corporation,395 a large multi-disciplinary worldwide aviation-consulting and engineering firm. The study examined options for reconfiguring the north airfield to address airfield safety related to runway incursions, the need to accommodate ADG VI aircraft, operational efficiencies, and cost factors. The study concluded that several aircraft types create operational challenges to the existing airfield and that addition of a center taxiway, which could occur if there was more separation between the existing runways, would eliminate several risks and problems. The study recommended, based upon FAA standards, pursuing relocating Runway 6L/24R 350 feet northerly and increasing its runway takeoff length. Current FAA design standards require greater separation between parallel runways and between runways and taxiways than what exists in the north airfield today, to safely and efficiently accommodate larger aircraft.
- Los Angeles International Airport Modernization - Tomorrow is Now, May 2007 - Twenty-two members of the Airline Pilots Association (ALPA) 396 formed a committee to present their findings and recommendations in a presentation entitled "Los Angeles International Airport Modernization - Tomorrow is Now." ALPA is an international organization of over 60,000 pilots representing over 40 airlines that is heavily engaged in safety issues and improvements for the airline industry. The ALPA Committee recommended that Runway 6L/24R be relocated northward to provide 623 feet, but not less than 550 feet, of runway to taxiway separation and that mirroring the separation on the south airfield is not an option.
- LAX North Airfield Proposed Runway Configuration - Safety Risk Assessment, May 2007 - The Washington Consulting Group, Inc. (WCG)397 led a panel of subject matter experts through a safety risk assessment on the north airfield proposed runway configurations. WCG is an Air Traffic Management Systems and Air Traffic Controller Training firm that is expert in conducting an FAA defined Safety Risk Management (SRM) Study. The SRM panel was to identify operational hazards, analyze associated risks, and establish mitigating strategies to ensure the safe and expeditious management of air traffic and then specifically develop and prioritize improvements that will increase the level of airfield safety. The analysis by panel produced a list of ten preliminary hazards associated with aircraft operating on the existing north airfield. Table 4.7.2-5 describes the ten hazards.
- LAX North Airfield Safety Study (NASS) - Following the completion of the five studies described above, City of Los Angeles elected officials requested preparation of an additional independent safety study, referred to as the LAX NASS, and formed the North Runway Safety Advisory Committee (NRSAC) composed of LAX stakeholders to oversee the study. The study's objective was to "inform decision makers on the scope and severity of operational safety problems of the north airfield and a range of potential solutions." The primary aim of the study was to estimate as specifically as possible the level of future safety associated with each of the alternate configurations of the north airfield, and, secondarily, look at capacity implications of each. In support of the safety study, LAWA contracted with

NASA Ames in May 2008, to perform detailed airfield simulation modeling, and with a six member Academic Panel in July 2008, made up of distinguished professors and aviation safety efficiency experts from the Massachusetts Institute of Technology; Virginia Polytechnic Institute and State University (Virginia Tech); University of California, Berkeley; George Mason University; and University of Maryland.
The Preliminary NASS Report was released in February 2010, and the Final Report with all supportive documentation was submitted in May 2010.398 The following were the Academic Panel's main conclusions:
- The LAX north airfield is extremely safe under the current configuration for the projected 2020 forecast.
- New configurations of the north airfield that include increased runway separation and the addition of a centerfield taxiway would reduce by a substantial percentage (40-55 percent) the risk of a fatal runway collision.
- Since the baseline level of risk is so low, reducing that risk by a substantial level is of "limited practical importance."
- The 340-foot north alternative significantly improves the operational efficiency of LAX and it would improve safety.
- Based on safety grounds alone, the Panel found it hard to argue for reconfiguring the north airfield.
- FAA's Response to the NASS Report - In response to the NASS Report, the FAA's Office of Airports, Office of Accident Investigation and Prevention, Runway Safety Office, Western Pacific Regional Flight Standards Division, and the Air Traffic Organization conducted a detailed review of the study and identified several critical flaws in the assumptions, methodology, and conclusions. In April 2010, the FAA Administrator provided FAA's comments and position on the NASS and the north airfield in a letter to the Mayor of Los Angeles and to Los Angeles World Airports. 399 The FAA stated that they strongly disagree with the study's main conclusion that reducing the risk of a fatal runway collision is of limited practical importance and the study's conclusion that reconfiguring the north airfield on the grounds of safety alone is not a compelling argument. Besides taking issue with several of the assumptions, methodologies, and uses of data in the report, the FAA made the following statements:
- The only complete and single-most significant solution for LAX's safety and efficiency needs must include airfield geometry designed to accommodate modern aircraft. Everything possible must be done to make the north airfield as safe as it can be.
- North airfield safety and efficiency would be greatly improved by further separating the two runways and constructing a center taxiway between them. This would address equally important issues of standards, safety, and efficiency.
- FAA firmly believes the 40-55 percent reduction in risk would be more than sufficient justification for the reconfiguration of the north airfield on safety grounds alone.

Question: What information was provided to the review panels to support their conclusions? What number of aircraft operations and flight mix was assumed? What budget were they given to conclude that "massive terminal demolition is not feasible."? What efficiency advantages did they find since the comprehensive NASA study and this DEIR results disagree with that conclusion? Did the Peer Review Group identify the new safely failure modes of erroneous landings on the taxiways experienced at other airports? Are these center taxiways more effective at airports with much larger land areas?

Response:

Copies of the seven independent assessments of north airfield safety summarized on Section 4.7.2 of the SPAS Draft EIR are contained in Appendices H-1 through H-7 of the Preliminary LAX SPAS Report. The information provided therein, including any descriptions of analysis methodology and assumptions, is what is currently available. The comment does not raise any environmental issue or address the adequacy of the environmental analysis included in the SPAS Draft EIR. Rather, it raises funding and economic questions, which need not be discussed because economic effects of a project shall not be treated as significant effects on the environment. (State CEQA Guidelines Section 15131(a).) Because a lead agency need only respond to comments that raise significant environmental issues, no further response is required. (State CEQA Guidelines Section 15204.)

SPAS-PC00130-251

Comment:

Question: There was only one comprehensive study, the NASS to which the FAA was a significant participant. The DEIR lists seven studies, but in the context of the statements there were eight. The Academic Panel responded to the FAA conclusions and found fault with their methodology. Why are the AP responses to the FAA assertions not included in this DEIR?

Response:

The question raised in this comment deals with the same issue discussed in comment SPAS-PC00130-728; please refer to Response to Comment SPAS-PC00130-728.

SPAS-PC00130-252

Comment:

Page 4-510 Table 4.7.2-7 Runway Incursions/Incidents at LAX (2001-2011)
... For the FAA, an incident without an aircraft in potential conflict -- such as an unauthorized aircraft crossing an empty runway -- was previously defined as a "surface incident" and not a runway incursion. The new definition means that some incidents formerly classified as surface incidents are instead classified as C or D category runway incursions, which are low-risk incidents with ample time and/or distance to avoid a collision. The classification of the most serious kinds of runway incursions, Categories A and B, remains unchanged.

Question: There are no category A or B shown for either complex in the table. There was an event in 2011 where a landing aircraft missed an aircraft waiting to take off on 25R by less than 75 feet. Is it true that the FAA fails to post events until the full evaluation is complete? What else is not included in the totals presented? Seven 2011 category C are shown for the north airfield. Please identify their causes and correlate to the design changes in the alternatives. Under the new definitions when two aircraft back into each other is this counted as two?

Response:

Regarding the 2011 runway incursion event suggested by the commentor, LAWA airfield operations staff has reviewed the reports for all runway incursions in 2011 and has no record of the event described by the commentor.

Regarding the question of whether the FAA fails to post events until the full evaluation is complete, the FAA reviews "possible runway incursions" on a monthly basis. According to FAA Air Traffic Control (ATC), the runway incursion determination will typically take one to two months.

Regarding the question of "what else is not included in the totals presented [in Table 4.7.2-7 of the SPAS Draft EIR]", the Draft EIR includes all information necessary to analyze the safety of the SPAS alternatives. However, there was an incident on January 21, 2011 where four baggage carts being towed broke away and ended up in the Runway Safety Area of Runway 25R. The incident was reported to airfield operations, the errant carts were retrieved by airfield operations and the responsible carrier, and a runway inspection was conducted to confirm that no additional carts were near the runway. The incident does not meet the definition of an operator error, a pilot deviation, or a vehicle pedestrian deviation, as set forth in FAA Order 7050.1A Runway Safety Program Order, which states "surface events which cannot clearly be attributed to a mistake or incorrect action by an air traffic controller, pilot or pedestrian will be classified as 'other'."

Regarding a description of seven 2011 Category C incursions shown in Table 4.7.2-7 for the north airfield, the following describes each event.

February 24, 2011(1414 hrs.): A white van with a trailer entered Runway 24L northbound at Taxiway E16 delayed for approximately 15 seconds and exited Runway 24L at Taxiway E17 southbound without approval. A departing aircraft was on departure roll on Runway 24L approaching Taxiway E10 when the ASDE-X runway safety warning system indicated, "warning runway 24 left occupied." Air Traffic

Control Local 2 was alerted of the deviation by the ASDE-X safety logic alert and did not amend departing aircraft's takeoff clearance due to the position, speed, and configuration of the aircraft. Subject aircraft departed without incident. LAWA Operations at LAX was notified of the incident and escorted the van away from the runway environment and provided the vehicle operator's information. At the time of the incident, Runway 24R was closed for monthly inspections. The vehicle operator advised he thought he was entering a closed runway. This incident was classified as a Vehicle Deviation.

March 5, 2011 (2211 hrs): An aircraft was instructed to line up and wait on Runway 24L at Taxiway V. The subject aircraft entered Runway 24L at intersection E8. A second aircraft was cleared for takeoff at the full length of Runway 24L (Taxiway Victor), and was instructed, "at taxiway victor, runway two four left line up and wait, caution wake turbulence." The first aircraft entered Runway 24L at Taxiway E8, and the second aircraft's takeoff clearance was cancelled prior to beginning its takeoff roll and was taxied off the runway. This incident was classified as a Pilot Deviation.

May 14, 2011 (1310 hrs.): An arriving aircraft landed on Runway 24R, exited at Taxiway AA, and was given instructions to hold short of Runway 24L. The pilot of the arriving aircraft read back the hold short instruction. A departing aircraft was issued takeoff clearance on Runway 24L. As the departing aircraft passed Taxiway Y on departure roll, the pilot of the arriving aircraft advised they had passed the Runway 24L hold bars. The departing aircraft became airborne prior to Taxiway Z. Safety Logic did not alert. This incident was classified as a Pilot Deviation and Runway Safety.

June 10, 2011 (2210 hrs): An arriving aircraft landed on Runway 24R, was instructed to hold short of Runway 24L at Taxiway AA, and the pilot read back the hold short instructions correctly. A departing aircraft was cleared for takeoff on Runway 24L. The pilot of the departing aircraft stated they were rolling with the red lights (referring to the runway status lights). The pilot of the arriving aircraft stated they had passed the hold short bars for Runway 24L. The ASDE-X was out of service and safety logic did not alert. On departure roll the pilot of the departing aircraft was informed that the arriving aircraft was past the hold bars at Taxiway AA. The departing aircraft became airborne without further incident. This incident was classified as a Pilot Deviation.

June 29, 2011 (2202 hrs): An arriving aircraft landed on Runway 24R and exited at Taxiway Z, and the pilot was instructed to hold short of Runway 24L. The pilot read back the hold short instruction. A departing aircraft was cleared for takeoff on Runway 24L. The arriving aircraft was observed to be past the hold bar and traffic control was notified. The departing aircraft was departure roll approaching Taxiway W when traffic control reissued the hold short instruction to the arriving aircraft, which was acknowledged. The ASDE-X Safety Logic issued a Runway 24L "occupied" warning. The departing aircraft rotated at Taxiway Y approximately 1,337 feet prior to Taxiway Z. This incident was classified as a Pilot Deviation.

June 30, 2011 (2153 hrs): An arriving aircraft landed on Runway 24R and exited on Taxiway AA. The pilot was instructed to hold short of Runway 24L and the pilot read back the instructions. A departing aircraft was in position for departure on Runway 24L. Controller cleared the departing aircraft for takeoff and pilot advised he had red lights. The arriving aircraft had crossed the hold bars at Taxiway AA. Controller immediately cancelled takeoff clearance, and then crossed the arriving aircraft across Runway 24L. This incident was classified as a Pilot Deviation.

November 19, 2011 (1110 hrs): An arriving aircraft crossed the Runway 24L hold short line on Taxiway AA when a departing aircraft was on departure roll. The pilot of the arriving aircraft read back the Runway 24L hold short instructions correctly. The pilot of the departing aircraft advised he observed red Takeoff Hold Lights (THLs) on departure roll and aborted takeoff. Controller canceled the departing aircraft's takeoff clearance and the subject aircraft stopped after rolling approximately 300 feet. The Controller team became aware of the runway incursion when the pilot of the departing aircraft reported the red THLs and aborted takeoff. Controller asked if arriving aircraft had crossed the Runway 24L hold bar; the reply was affirmative. Safety Logic did not alert. Pilot of the arriving aircraft stated during the investigation they were attempting to brake smoothly, were anticipating approval to cross Runway 24L, and passed the Runway 24L hold bars. This incident was classified as a Pilot Deviation.

The causes of the aforementioned Category C runway incursions do not pertain to the airfield design changes associated with the proposed alternatives.

Regarding the question of whether "Under the new definitions when two aircraft back into each other is this counted as two?" the event described by the commentor would likely be considered a "surface incident" and according to ATC, this type of event would be counted as one incident.

No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a).)

SPAS-PC00130-253

Comment:

Page 4-512 Runway Safety
Part 77 imaginary surfaces provide a means of identifying objects that require a more detailed safety analysis. This analysis, performed by the FAA, considers the airspace operations and safety requirements applicable to the Part 77 surface, as well as the nature, location, and extent of the object's penetration into the Part 77 surface. The analysis requires detailed runway design and engineering data not available at this conceptual level of planning, and would occur during the normal course of FAA review and approval of proposed airfield improvements. The analysis would set forth and define the appropriate means and measures to address potential safety concerns related to objects located within the Part 77 surface. As described above in Section 4.7.2.3, options for addressing potential safety hazards associated with objects located within controlled airspace areas can range widely and can include (1) doing nothing (i.e., for low-risk objects); (2) placing high-visibility markings and lighting on the object to make it highly visible to pilots and indicating such objects on avigation maps; (3) lowering, reducing, or removing the object, and; (4) modifying an approach or departure procedure to allow aircraft to safely navigate around or above an object that penetrates a Part 77 surface. The most appropriate option(s) would be determined in conjunction with detailed airfield improvement engineering and would be subject to FAA review and concurrence prior to FAA approval of an ALP amendment for such an airfield modification. . . . (underline added for emphasis)

Question: This section acknowledges that the Westchester Business District is within the RPZ. The underlined section above states that a Part 77 surface analysis requires more depth than currently available. How, then, can LAWA promise anyone that they will not have to remove our businesses without a commitment from the FAA? What is to stop the FAA from changing their mind after making a verbal or even written commitment to LAWA? If the approach is changed to be closer to homes and businesses doesn't this transfer some risk to those on the ground?

Response:

As indicated in the SPAS Draft EIR text presented in the comment, there are several options that may be considered relative to addressing potential safety hazards associated with incompatible structures and uses located within an RPZ. However, a determination as to the appropriate option cannot be made until a complete evaluation of potential safety hazards can be conducted in consultation with the FAA, after which more detailed levels of planning and engineering on the selected option will be completed. It would be premature and speculative to say at this time, prior to FAA consultation, whether incompatible structures or land uses within the RPZs would stay, be modified, or be removed. While CEQA requires a lead agency to use its best efforts to find out and disclose all that it reasonably can, if, after thorough investigation, a lead agency finds that a particular impact is too speculative for evaluation, it should note its conclusion and terminate discussion of the impact. (State CEQA Guidelines Sections 15144-15145.) Note that Section 4.7.2 of the SPAS Draft EIR includes an analysis of potential indirect or secondary impacts associated with modification or removal of structures and uses within the RPZ, should that occur in the future.

SPAS-PC00130-254

Comment:

Page 4-514 and 515 Table 4.7.2-8
Summary of North Airfield Runways and Parallel Taxiways Compliance with FAA Airport Design Standards

Question: The subject table shows runway separations from between 700' to 1050' but separations less than current spacing between the proposed center taxiway to a runway by as much as 300'. How is this presented as safer? All Taxiway E ADG sizes allowed are shown to be the largest, ADG VI except Alt D with Taxilane D being a mixture of ratings with less than ADG V for parts currently, but all reasonable changes including no additional separation being ADG V. It also shows runway to taxiway separation is BETTER if the runway is not moved! Based on this safety design standards Alternative 2 is superior. How is this reconciled with the desire to expand north?

Response:

Please see Responses to Comments SPAS-PC00130-63, SPAS-PC00130-260, and SPAS-PC00135-2 regarding the safety and operational benefits of a centerfield taxiway.

SPAS-PC00130-255

Comment:

Page 4-524 Hydrology/Water Quality
Potentially affected areas are mostly developed/urbanized; hence, surface hydrology is characterized primarily by runoff flowing across impervious surfaces into the existing storm drain system, and water quality is characterized by typical urban storm water pollutants (i.e., oil and grease, metals, nitrogen, fecal coliform, trash, etc.). Implementation of the above measures could result in reduced surface runoff to the extent that existing structures and impervious surfaces are removed, and also reduce or change urban stormwater pollutants to the extent existing urban uses are taken out of service or replaced with lower intensity uses. Construction activities associated with the removal or modification of existing structures could result in short-term erosion and sedimentation and other construction-related water quality pollutants (i.e., from fueling/servicing of construction equipment, storage of materials including temporary stockpiles of demolition debris, etc.). Mitigation of such construction-related pollutants would be accomplished through adherence with the requirement of the State Water Resources Control Board General (Construction) Permit (2009-0009-DWQ). Hydrology and water quality impacts are anticipated to...

Question: This section states that the major issue is surface runoff, but if this area has unknown sources from Centinela Creek and feeds the Dominguez flood plain, can the underground water create more problems and potential flooding than the surface water when there are major utilities needing to be moved and a six lane tunnel being removed along with the modification of the Argo Drainage Channel?

Response:

The analysis referenced in this comment does not pertain to the direct impacts of the SPAS alternatives. Rather, pages 4-522 through 4-526 provide an analysis of secondary or indirect environmental impacts that may occur if measures to address potential airspace obstructions or incompatible structures/uses within RPZ areas require the removal or modification of existing structures and/or uses. The subject analysis includes discussion of potential measures to reduce impacts. Given that neither the need for, nor the nature of, actions to modify or remove existing structures or uses have been determined and will not be known until sometime in the future, it would be premature and speculative to reach a final significance conclusion at this time, or to delineate specific mitigation measures for impacts that are unknown at this time. While CEQA requires a lead agency to use its best efforts to find out and disclose all that it reasonably can, if, after thorough investigation, a lead agency finds that a particular impact is too speculative for evaluation, it should note its conclusion and terminate discussion of the impact. (State CEQA Guidelines Sections 15144 and 15145.) If and when removal, modification or acquisition actions were required, the discretionary approvals associated with such

actions would be subject to environmental review under CEQA, at which time feasible mitigation measures to reduce potential impacts to a less than significant level would be required.

In any event, if such removals or modifications were to occur, they would not require relocation of major utilities because removal or modification of existing structures would all occur above ground, whereas major utilities are located beneath the ground surface. Moreover, such removals or modifications of existing land uses would not require alterations to the Argo Drainage Channel as the uses within the RPZ are located to the northeast of the airport, whereas the Argo Drainage Channel is located on airport property, over 1,000 feet from the nearest use within the RPZ. It is unclear what the commentor is referring to in the reference to removal of a six lane tunnel. If this is a reference to the north airfield abandoned tunnel segment, removal of this tunnel segment would similarly not be associated with the removal or modification of existing structures and/or uses within the RPZ. The commentor provides no evidence in support of the statement that the area has unknown sources from Centinela Creek. As indicated on pages 4-524 and 4-525 of the SPAS Draft EIR, indirect effects, if any, are expected to be associated with surface water. Adverse indirect impacts from groundwater are not anticipated.

SPAS-PC00130-256

Comment:

Page 4-525 Land Use and Planning
The potentially affected areas are designated in the City's General Plan for Commercial (Community) land use. Similarly, the subject areas are zoned for commercial uses, primarily C1-Light Commercial and C2-General Commercial. The removal of existing uses would not require a General Plan amendment or a change in zoning. The potential replacement of existing uses with other uses compatible with an RPZ would need to be reviewed in light of the provisions of the existing zoning relative to permitted and conditional uses. In general, however, the removal of existing uses and replacement with lower intensity uses is not expected to conflict with the existing land use plans for the area. Similarly, it not expected to create physical or functional incompatibility with existing land uses nearby. To the extent that implementation of any measures required to address potential airspace obstructions or incompatible structures/uses requires the removal of existing uses, implementation of LAX Master Plan Commitment RBR-1, Residential and Business Relocation Program, and LAX Master Plan Mitigation Measure MM-RBR-1, Phasing for Business Relocations, would reduce impacts associated with business relocation. With implementation of the commitment and mitigation measure, impacts related to business relocation would likely be reduced to a level that is less than significant; however, as noted above, it would be premature and speculative to reach a final significance conclusion at this time regarding this type of potential secondary impact.

Question: If the construction destroys the Lincoln Blvd and Sepulveda Blvd intersection then traffic on Sepulveda, which Westchester Business District relies, will cause major losses if/when construction takes an extended period. Coupled with many closures and forced move of hundreds of businesses there can be a significant impact. When will this be evaluated? It should be done as part of the SPAS process, not wait until a project level EIR is prepared because the consequence is too great.

Response:

Based on the current concepts for the proposed realignment of Lincoln Boulevard under SPAS Alternatives 1, 5, and 6 shown in Figures 2-1, 2-5, and 2-6 of the SPAS Draft EIR, which indicates that the proposed realignment would begin about 500 feet west of Sepulveda Boulevard, it is speculative to suggest at this point that construction would "destroy" the Lincoln Boulevard/Sepulveda Boulevard intersection. It is also speculative to suggest that construction would cause "major losses" and there would be "many closures" and "hundreds of businesses" would be forced to move. The commentor provides no substantial evidence or any other information in support of those claims.

The likelihood, nature, location, and timing/duration of construction-related impacts associated with the realignment of Lincoln Boulevard, should one of the aforementioned alternatives be approved, are would be addressed in conjunction with the development of more detailed design and construction plans. Based on such information, a second-tier project-specific CEQA document would be prepared that discloses detailed project-specific impacts and mitigation measures.

The commentor's recommendation that such analysis should be completed now and "not wait until a project level EIR is prepared" is inconsistent with CEQA tiering principles. It is appropriate for a first-tier program level EIR to defer detailed descriptions and impact analysis of individual projects in the program to future project-level CEQA documents. (State CEQA Guidelines Section 15383; Koster v, County of San Joaquin (1996) 47 Cal.App.4th 29,37.)

Please also see Topical Response TR-SPAS-LR-1 for additional discussion pertaining to construction impacts associated with the realignment of Lincoln Boulevard.

SPAS-PC00130-257

Comment:

Page 4-525 Transportation
...Construction activities associated with the removal or modification of existing structures would result in temporary construction-related traffic and possible lane closures and detours...

Question: The DEIR indicates that Terminal 3 will be rebuilt in a different location. How will only a lane detour occur in the CTA when the upper roadway is attached to Terminal 3 at its present location? When LAWA (or CalTrans) starts moving Lincoln Blvd to a totally new location below grade, how can this be achieved with a possible lane closure?

Response:

Section 4.12.1.9.4 of the SPAS Draft EIR discloses the impacts of construction on traffic within the airport at a program level of detail. As indicated in that section, "In the current absence of specific construction plans, schedules, and approaches for the SPAS alternatives, which would be determined during more detailed planning and design stages in the future, it is not possible to conclude whether the on-airport transportation system construction impacts would be fully mitigated by the aforementioned [LAX Master Plan commitments and mitigation] measures. As such, construction impacts to the on-airport transportation system are considered at this time to be significant." Detailed information on the impacts of construction on traffic within the airport would be developed during project-specific design and CEQA reviews, should a SPAS alternative be selected for implementation. It is appropriate for a first-tier program level EIR to defer detailed descriptions and impact analysis of individual projects in the program to future project-level CEQA documents. (State CEQA Guidelines Section 15383; Koster v. County of San Joaquin (1996) 47 Cal.App.4th 29,37.)

Relative to off-airport construction-related traffic impacts that may occur in conjunction with implemental of the SPAS alternatives, including those involving the relocation of Lincoln Boulevard, Section 4.12.2.6.3 of the SPAS Draft EIR addresses such impacts. Similar to on-airport traffic impacts, the analysis notes that specific off-airport traffic impacts associated with construction activities depend on the specifics of the construction program for each improvement, as would be determined during project-level planning and CEQA review. The analysis concludes with an acknowledgement that construction-related traffic impacts could, at times, be significant and unavoidable on streets surrounding LAX. Regarding Lincoln Boulevard realignment, please also refer to Topical Response TR-SPAS-LR-1.

SPAS-PC00130-258

Comment:

Page 4-527 Air surfaces
. . . The improvements proposed at the east end of Runway 6R/24L and the covering of the eastern end of the Argo Drainage Channel would bring the RSAs for the north airfield into compliance with FAA standards....

Question: This DEIR indicates that LAWA has not consulted USCOE on modifications to the Argo Channel. If this causes flooding to occur onto the runways how long will the north airfield be closed? How long can operations on one half of the airport support the full complement of arrivals?

Response:

The Argo Drainage Channel is not under control of the U.S. Army Corps of Engineers (USACOE), although USACOE has regulatory authority over jurisdictional areas associated with the Argo Drainage Channel and mitigation for impacts. A jurisdictional delineation was conducted by Glenn Lukos Associates for the SPAS alternatives. The results of the report are provided in Appendix D-2 of the SPAS Draft EIR. The report summarizes the preliminary findings of Glenn Lukos Associates pertaining to the jurisdiction of the USACOE and the California Department of Fish and Game (CDFG) regarding USACOE and CDFG jurisdictional areas. Consultation with these agencies would occur prior to implementation of an alternative that would have the potential to affect the Argo Drainage Channel (i.e., Alternatives 1, 5, and 6), as outlined in Mitigation Measure MM-BIO (SPAS)-13. Please also see Response to Comment SPAS-PC00130-201 regarding USACOE jurisdiction and Response to Comment SPAS-PC00130-433 regarding flooding associated with conversion of the Argo Drainage Channel to a concrete box culvert.

SPAS-PC00130-259

Comment:

Page 4-547

"As indicated in Table 4.7.2-8, implementation of Alternative 5 would increase the separation distance between Runways 6L/24R and 6R/24L from 700 feet to 1,050 feet, but would not change the existing capabilities relative to allowing simultaneous arrivals and departures."

Question: This (or similar statement) is made for each of the alternatives which increases runway separation. How much improvement is due to the runway separation versus how much is due to the taxiway separation improvement?

Response:

Runway-runway and runway-taxiway separation standards can be found in Chapter 3 of FAA Advisory Circular (AC) 150/5300-13A Airport Design.1 Increasing runway-runway separation may, depending on the separation, allow arrival and departure operations from both runways simultaneously. An increase in runway-taxiway separation may allow larger aircraft to use the runway or taxiway. Additionally, an increase in runway-taxiway separation also allows greater flexibility in their use during low visibility weather conditions.

The purpose of the proposed increase in runway-runway separation at LAX is to add a parallel taxiway between the two runways to become compliant with the runway incursion mitigation requirements outlined by FAA AC 150/5300-13A Airport Design.

1. Available: http://www.faa.gov/airports/resources/advisory_circulars/index.cfm/go/document.information/documentID/1019951).

SPAS-PC00130-260

Comment:

Page 4-548 Other Safety Considerations
As described above in Section 4.7.2.3, numerous safety studies have been prepared relative to aircraft operations on the north airfield. While the nature, approach, and scope of analysis may differ between the studies, there is general consensus between the studies that increased separation between runways and the addition of a centerfield parallel taxiway can reduce the potential for a runway collision or incursion and enhance safety, <u>particularly as related to future operations involving a greater number of large aircraft</u>. Additionally, the safety benefits of relocated and redesigned runway crossing points along the last-third of Runway 6R/24L, including the advantage of pilot visibility to the end of the runway, were noted in some of the studies. The airfield improvements proposed under Alternative 5 provide for these desired safety improvements. (underline for emphasis)

Question: Although the above statement states "general consensus...addition of a centerfield parallel taxiway (CFT) can reduce potential for a runway collision or incursion..." a blanket statement of this type needs proof. Again, what if any is added by the CFT as opposed to fixing the other taxiways and/or changing the location of exit ramps from the runway? How much safety is lost by having the taxiway closer to an adjacent runway as opposed to the larger separation between the two runways? How much does positioning of the gates relative to the landing area impact safety if moved to locations where the landing site is beyond the gate and must taxi back on a fully separated taxiway?

Response:

The statement to which commentor refers is supported by the conclusions of the safety studies referenced in Section 4.7.2 of the SPAS Draft EIR. The LAX North Airfield Safety Study (NASS), for example, concluded that new configurations of the north airfield that included increased runway separation and the construction of a centerfield taxiway would reduce the risk of a fatal runway collision by a substantial percentage. (See Section 4.7.2 of the SPAS Draft EIR.) The current airfield design is outdated, and has insufficient side-by-side passing clearances between certain types of aircraft arriving/departing on runways and aircraft on nearby taxiways.

The addition of a midfield parallel taxiway between the two runways is also being proposed, in part, to be compliant with the current version of FAA Advisory Circular (AC) 150/5300-13A Airport Design. The AC includes the runway incursion mitigation design strategies which were recommended in FAA Engineering Brief #75. In particular, Section 411(b) of FAA AC 150/5300-13A states "Do not provide direct access from a high speed exit to another runway."

LAWA is not aware of statistics of, or specifics on, other airports with new incursion opportunities presented by a parallel taxiway located between runways. However, as of February 2010, LAWA had approximately 18 months of data that suggested that the south airfield changes have reduced incursion risk on the south airfield at LAX by about 40 percent. The reduction of incursions can be attributed, at least in part, to the addition of the centerfield taxiway. The new centerfield taxiway forces aircraft to slow down before crossing Runway 25R and also gives air traffic controllers more flexibility to cross the departure runway.

Due to the acceptance of Airport Improvement Program (AIP) funding and Passenger Facility Charge (PFC) funds, LAWA is required to adhere to current FAA guidance for airport design standards incorporated in the FAA Advisory Circulars. The north airfield does not meet current AC 150/5300-13A standards for high-speed exit taxiways.

Additionally, all runway-taxiway separations were proposed in accordance with FAA AC 150/5300-13A Airport Design.

The following statement made by the commentor is unclear: "How much does positioning of the gates relative to the landing area impact safety if moved to locations where the landing site is beyond the gate and must taxi back on a fully separated taxiway?" The commentor discusses three different concepts: positioning of landing area or site; relative positioning of gates; and safety.

It is unclear what the commentor considers as the "landing area" or "landing site." Landings occur starting at the threshold (or displaced thresholds on Runways 6R and 25R) of each of the four runways. In general, an aircraft has the ability to use the entire runway length beyond the threshold to complete its landing operation. Therefore, a landing area or site could be any point along the entirety of the runway after the threshold.

Regarding the "positioning of the gates relative to the landing area," except for the proposed addition of Terminal 0 and the Midfield Satellite Concourse (MSC), the SPAS Draft EIR did not analyze the relocation of any existing terminal gates beyond the current general area of the CTA. Opportunities for "positioning of the gates relative to the landing area" are very limited within the central core area in between Runways 6R/24L and 7L/25R, or outside the CTA.

As it relates to the SPAS Draft EIR analyses, the relocation of the "landing site" or runway to a location father from the existing terminal gates, and any associated safety impacts, has been analyzed under Alternatives 1, 5, and 6 (northerly relocation of Runway 6L/24R).

SPAS-PC00130-261

Comment:

Page 4-553 Implementation of Alternative 5 would not involve construction of a runway within 10,000 feet of a solid waste landfill or create an attractant to birds. In general, implementation of this alternative would enhance aircraft safety and efficiency, as summarized above, particularly with respect to better achieving compliance with FAA Airport Design Standards for operation of large aircraft. The 350-foot northward shift of Runway 6L/24R would, however, result in a northward shift of the Part 77 imaginary surfaces placing portions of two multi-story structures within Part 77 Surfaces. As described above, there are several options available to address potential safety hazards associated with objects being located within controlled airspace areas, ranging from doing nothing (i.e., for low-risk objects), to placing high-visibility markings and lighting on the object to make it highly visible to pilots and indicating such objects on avigation maps, to lowering, reducing, or removing the object, and, in some cases, an approach or departure procedure will be modified to allow aircraft to safely navigate around or above an object that penetrates a Part 77 surface. The most appropriate option(s) would be determined in conjunction with detailed airfield improvement engineering and would be subject to FAA review and concurrence prior to FAA approval of an ALP amendment for such an airfield modification. Such measures would reduce this safety impact to a level that is less than significant. Secondary or indirect impacts associated with implementation of such options could range from no impact, such as in the case of low-risk objects that do not require any safety measures, to impacts typically associated with removal of an object/structure, such as temporary construction-related air quality, noise, and traffic impacts, visual impacts (i.e., changes in existing appearance), and land use impacts. Such secondary or indirect impacts would be similar to those described at the end of the impacts analysis for Alternative 1 above.

Question: Based on the above statement and this applies to all alternatives: although incursions are important from a safety point, a larger panel of experts and the FAA have stated that excursions are, in general, more serious. This doesn't seem to be addressed in most of these discussions. As you move runways closer to residences and commercial properties doesn't the potential impact of an excursion increase? Where is this addressed? How much less safe is the movement of operations closer to homes and commercial property? If the plan by LAWA is to mitigate impacts on the Westchester Business district by relocating into the Northside Development area what risks are increased and by how much?

Response:

Runway excursions are events in which planes deviate suddenly and sharply from their intended paths. The comment provides no evidentiary support, nor specific reference or citation in support of the claim that excursions are, in general, more serious than incursions. The FAA sets various airport design standards, including but not limited to those related to runway safety areas (RSAs) and runway protection zones (RPZs), that provide a safe environment for aircraft operations. Section 4.7.2 of the SPAS Draft EIR addresses RSA and RPZ considerations applicable to each SPAS alternative, including a delineation of the relationship between these safety zones and existing uses nearby. As described therein, any relocation of a runway would be accompanied by relocation of the RSA and RPZ (i.e., if a runway is moved, the applicable safety buffer zones and other associated safety requirements go with it). Compliance with these safety requirements is intended to reduce risks to any facilities (both on and off an airport) to the feasible. Section 4.7.2 addresses the potential for modification or removal of incompatible structures or uses being required within Part 77 imaginary surfaces or RPZ areas for certain alternatives; however, the need for, and nature of, such actions will not be determined until more detailed levels of planning for the selected alternative, if any. Such a determination would be made in consultation with the FAA. Please see Response to Comment SPAS-AL00007-26 regarding incompatible structures in RPZs. In the event that acquisition and relocation of uses within the Westchester business district is required, implementation of LAX Master Plan Commitment RBR-1, Residential and Business Relocation Program, would address acquisition and relocation impacts. The future development of LAX Northside may offer the opportunity for local business to relocate to that

area, should they so choose. Any future development within LAX Northside would be subject to FAA safety standards, including those related to Part 77 imaginary surfaces and RPZs, relative to operations in the north airfield under any alternative.

SPAS-PC00130-262

Comment:

Pages 4-569 and 570 Table 4.7.2-16 Summary of Safety and Efficiency Enhancements to the North Airfield Operations

Question: Why was the airside redesigned in the alternatives such that Taxilane D was enhanced to ADG VI for Alternatives 3,5 but only ADG V for Alternatives 1,2,6,7 ? The main difference appears that Alt 5 moves/rebuilds terminal 3, why weren't the others?

Response:

The Preliminary LAX SPAS Report and SPAS Draft EIR focused on potential alternative designs, technologies, and configurations that would provide solutions to the problems that the Yellow Light Projects were designed to address. Nine alternatives offering various options to the Yellow Light Projects are addressed within the SPAS Draft EIR. A range of options were put forth in an effort to balance various benefits and drawbacks of each.

In Alternatives 3 and 5, for example, Taxilane D would be relocated to comply with ADG VI standards. However, as explained in Section 2.3.1.3 and 2.3.1.4 of the SPAS Draft EIR, respectively, in both Alternative 3 and 5, the Aircraft Parking Limit Line would be moved south and the terminal facilities would be modified, resulting in the elimination of gates. For more information on the effect of each alternative on LAX airside and landside operations, please see Section 6.3 of the Preliminary LAX SPAS Report.

An EIR need not consider every conceivable alternative to the project. (In re Bay-Delta Programmatic Environmental Impact Report Coordinated Proceedings (2008) 43 Cal.4th 1143, 1163.) Rather, an EIR must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation. (State CEQA Guidelines Section 15126.6(a).) It must include information sufficient to permit a reasonable choice of alternatives so far as environmental consequences are concerned. (Village Laguna of Laguna Beach, Inc. v. Board of Supervisors (1982) 134 Cal.App.3d 1022, 1029.) Here, the SPAS alternatives constitute a reasonable range, sufficient to allow informed decision-making. (See City of Maywood v. Los Angeles Unified School District (2012) 208 Cal.App.4th 362, 419.)

SPAS-PC00130-263

Comment:

Page 4-571 4.7.2.7 Mitigation Measures

Alternatives 1 through 9 would not have a significant impact with respect to safety; therefore, no mitigation is required.

Question: If the primary reason for runway and taxiway movement is for "safety" why is there "no significant impact?"

Response:

Under CEQA, the purpose of an EIR is to identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided. (Public Resources Code Section 21002.1(a).) The fact that LAWA is proposing improvements to the north airfield to support the safe and efficient movement of aircraft at LAX has no bearing on whether the airfield improvements themselves would result in significant environmental effects.

That said, the determination of significant impacts related to safety is based on the thresholds of significance presented in Section 4.7.2.4 of the SPAS Draft EIR. As indicated therein, a significant safety impact would occur if the direct and indirect changes in the environment that may be caused by the particular SPAS alternative would result in one or more of the following future conditions:

- Construction of runways within 10,000 feet of a solid waste landfill.
- Construction of facilities or implementation of operational conditions that would serve as attractants to birds.
- A compromise in aviation safety or an aviation safety hazard for people in the project area.

Based on the analysis, and supporting substantial evidence, for each of the alternatives addressed in Section 4.7.2, it was determined that none of the alternatives would have a significant impact with respect to safety.

Safety is one of several reasons why LAWA is proposing improvements to the north airfield. As described in Section 2.2 of the SPAS Draft EIR, LAWA is seeking to provide north airfield improvements that support the safe and efficient movement of aircraft at LAX; specifically, such improvements:

- Are consistent with FAA design standards for the largest aircraft types currently in service and anticipated for the future (ADG V and VI aircraft) for all weather conditions;
- Minimize modifications of standards, waivers, or operational restrictions, all of which reduce airfield efficiency and level of service;
- Reduce the potential for airfield hazards, including incursions, and enhance the overall safety of airfield operations through runway and taxiway design;
- Accommodate a greater percentage of departing aircraft, thereby increasing airfield efficiency;
- Provide sufficient areas at the ends of the runways for holding arriving flights and sequencing departing aircraft; and
- Minimize or eliminate the extent to which Runway Protection Zones overlay residential areas.

SPAS-PC00130-264

Comment:

Page 4-577 4.7.3 Hazardous Materials Table 4.7.3-1 Existing Soil and Groundwater Contamination and Remediation Status Note 1This list includes only those sites with known contamination, as determined through database and information from LAWA personnel.

Question: Where was past rocket fuel testing done on the northside? Which areas on the south and west have fuel dispensed that pose a significant possibility of leakage? What other potential contamination sites exist based on type of land use airport operation? Where are the lead lined fallout shelters? Why were only those identified by LAWA in a database listed in this table?

Response:

Underground bunkers were constructed as part of a Nike missile surface-to-air defense battery that was established by the Army in the mid-1950s in the northwest corner of the airport (current location of Jet Pets). The launch facilities were destroyed in the early 1990s with the construction of Westchester Parkway. It is not known if rocket fuel testing was conducted at the site or if these were lead-lined fallout shelters at the site, and the commentor provides no evidentiary support that such testing was conducted on the LAX Northside or that lead-lined shelters exist. Please see Response to Comment SPAS-PC00130-113 regarding the identification of contaminated sites in the study area. As indicated in that response, the sites identified in the SPAS Draft EIR were based on a records search performed by EDR, which includes local, state, and federal databases of properties with known or potential contamination, as supplemented by LAWA's knowledge of contaminated properties. The fuel farm is located on the west side of the airport, north of World Way West. Fuel is also stored in other locations throughout the airport. Storage of fuel in above ground and underground tanks must adhere to stringent regulations. Underground storage tanks must meet requirements for construction standards, leak detection, and spill and overfill protection. Above ground storage tanks of a certain size require secondary containment. These regulations serve to reduce occurrences of releases. In addition,

tenants who store greater than a threshold quantity of petroleum products, which vary depending on vessel type and size, are required to maintain Spill Prevention Control and Countermeasure (SPCC) plans in accordance with federal and state requirements. With inclusion of these regulations, as well as required spill maintenance plans, none of these storage locations have a significant potential for leakage.

The commentor's reference to lead-lined fallout shelters does not raise any significant environmental issues or question the adequacy of the SPAS Draft EIR. An EIR's project description should not provide extensive detail beyond that needed for evaluation and review of the project's environmental impacts. (State CEQA Guidelines Section 15124.) Here, the SPAS Draft EIR analyzes the project at a programmatic level. It is appropriate for a program-level document to defer detailed descriptions and impact analysis of individual project in the program to future project-level review. (State CEQA Guidelines Section 15383; Koster v. County of San Joaquin (1996) 47 Cal.App.4th 29, 37.) If any project-level review reveals additional structures that could contribute to hazardous materials, including lead-lined fallout shelters, the environmental impacts of those structures would be analyzed in detail and mitigation measures would be identified at that time.

SPAS-PC00130-265

Comment:

Question: Must these sites be cleaned up before or during project construction? Are the costs for this clean up included in the cost estimates? Since there are underground springs and water flow under LAX has the distribution of contaminants been evaluated? When this contaminated dirt has been moved to staging areas are these cleaned up? Is there testing data to confirm? Where is this data and how is it presented and available to the public?

Response:

The questions in this comment pertain to page 4-577 of the SPAS Draft EIR, which contains a table that identifies existing soil and groundwater contamination at LAX or within the acquisition areas. The commentor provides no substantial evidence to support the claim that there are underground springs under LAX or that the SPAS alternatives would result in the distribution of contaminants from the sites identified in Table 4.7.3-1. There are no known underground springs at LAX. Groundwater aquifers exist at depth below the surface at LAX, which are comprised of various mixtures of sand, gravel, silt, and clay. Groundwater is present in pore spaces between these materials, and typically flows from higher to lower groundwater elevations. Groundwater typically flows at significantly lower rates than surface water. Section 4.7.3.3 of the SPAS Draft EIR discusses the existing conditions at the project site, including known soil and groundwater contamination within the hazardous materials study area. The approximate locations of identified soil and groundwater contamination on the existing LAX property and within the acquisition area for the SPAS alternatives are shown in Figure 4.7.3-1. Sites with significant soil and/or groundwater contamination and that are undergoing remediation activities are discussed on pages 4-576 and 4-581 of the SPAS Draft EIR. As indicated in the SPAS Draft EIR, the distribution of contaminants in groundwater from these sites has been evaluated or evaluation is planned or underway. The most widespread groundwater contamination at LAX is associated with the Continental Airlines Aircraft Maintenance Facility on the west side of the airport. Groundwater contamination at this site has not migrated west of Pershing Drive. An extensive groundwater remediation effort is underway at this site.

Impacts associated with contaminated soils and groundwater are addressed in Section 4.7.3 of the SPAS Draft EIR. As indicated in that section, during construction activities, previously unidentified soil and/or perched groundwater contamination could be encountered. Contaminated soils that would be excavated during construction of SPAS improvements, or contaminated groundwater encountered during construction, would be cleaned up prior to or during construction. LAX Master Plan Commitment HM-1 addresses clean up of sites with known contamination prior to construction and LAX Master Plan Commitment HM-2 addresses the handling of contaminated materials encountered during construction. With implementation of these commitments, impacts associated with contaminated soil or groundwater would be less than significant.

In particular, LAX Master Plan Commitment HM-2 was designed to ensure that any potential effects from contaminated materials encountered during construction would be less than significant. In order to facilitate the implementation of this LAX Master Plan commitment, in 2005 LAWA adopted the "Procedure for the Management of Contaminated Materials Encountered During Construction" ("Procedure") for application to all LAX Master Plan projects. This Procedure provides detailed guidance for implementing HM-2, especially for projects involving excavation and grading of soils. The Procedure has provisions for, among other matters, preparing detailed plans for handling previously unknown areas of contaminated soil encountered and spills of hazardous materials that occur during construction, including provisions for preparing detailed health and safety and soils management plans, and for testing and segregating contaminated soils for proper disposal outside landfills. While the Procedure focuses on previously unknown contaminated materials, its provisions for handling, storing, and disposing of contaminated materials also apply to contaminated materials that LAWA already has identified, or will identify before the start of construction in the area of contamination. By following HM-2 and the Procedure that implements it, the environmental effects of grading, excavating and other construction activities associated with SPAS that involve handling of contaminated materials would be less than significant. As a result, potential impacts associated with contamination of soil or groundwater and exposure of workers to hazardous materials in areas that may be contaminated would be less than significant.

Section 4.7.3 of the SPAS Draft EIR also addresses the potential for contamination from SPAS improvements. As indicated in that section, activities associated with the operation of all the SPAS alternatives would increase the chances of a spill or release of substances that could result in contamination of soil or groundwater. However, the handling and storage of hazardous substances are stringently regulated, as are releases of hazardous materials, including emergency response and clean up requirements. In addition, compliance with the Procedure would ensure that spills and releases associated with the SPAS alternatives would not create a hazard to the public or the environment, and would not result in contamination of soil or groundwater. Therefore, impacts would be less than significant.

Soils that have been stockpiled at construction staging areas as part of past or ongoing construction activities at LAX were sampled prior to transport in accordance with LAWA's Procedure for the Management of Contaminated Materials Encountered During Construction, and with federal, state, and local laws. Contaminated soils are not stockpiled on the airport but, rather, are handled in accordance with federal, state, and local laws and regulations and LAWA's procedures.

SPAS-PC00130-266

Comment:

Page 4-582 HM-2. Handling of Contaminated Materials Encountered During Construction.
Prior to the initiation of construction, LAWA will develop a program to coordinate all efforts associated with the handling of contaminated materials encountered during construction.411 The intent of this program will be to ensure that all contaminated soils and/or groundwater encountered during construction are handled in accordance with all applicable regulations. As part of this program, LAWA will identify the nature and extent of contamination in all areas where excavation, grading, and pile-driving activities are to be performed. LAWA will notify the appropriate regulatory agency when contamination has been identified. If warranted by the extent of the contamination, as determined by the regulatory agency with jurisdiction, LAWA will conduct remediation prior to initiation of...

Question: Taxiway S, for instance, was recently constructed and dirt excavated. This soil was near the fuel farm and subsequently moved to staging areas. Where is the documentation that this soil was tested? Was the staging area tested for contamination? If this soil was moved from one staging area to another how was it tracked and documented?

Response:

Please see Response to Comment SPAS-PC00130-265 regarding testing of soil associated with past construction activities at LAX.

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00130-267

Comment:

Page 4-586 Hazardous Materials
Due to the extent of the VOC contamination associated with the Park One (Former Honeywell/Allied Signal Aerospace) site, it is possible that remediation will still be underway when construction of Terminal 0 and the redesigned entry roadways is initiated. Remediation for this site consists of an SVE system that includes small aboveground vessels for treating the soil vapor, pipes connecting the dry wells to the vessels, and groundwater monitoring wells. Due to the extent of excavation needed for the Alternative 1 improvements, it is likely that part, or all, of the remediation system would have to be removed during construction, if it is still in operation at the time the SPAS improvements are constructed. This would entail destruction of the extraction wells and removal of underground piping and aboveground vessels. Removing the active remediation system at Park One for an extended period would interfere with existing clean up efforts. However, temporary cessation of remediation would not have any impacts on human health as groundwater beneath the site is not used for municipal purposes and contaminated soils lie beneath asphalt and would not be exposed.

Question: Since the groundwater will be contaminated from this site and the water is then allowed to flow into the ocean what regular testing is done to ensure safety?

Response:

Contamination at the Park One site (former Honeywell/Allied Signal Aerospace facility) is addressed in Section 4.7.3 of the SPAS Draft EIR. As indicated in Table 4.7.3-1 of the SPAS Draft EIR, soil and groundwater contamination have both been identified at the site. However, as noted on page 4-576, current remediation at the Park One site (former Honeywell/Allied Signal Aerospace facility) is focused on soil contamination. Further investigation of groundwater contamination is anticipated to occur in order to determine if remediation is required and, if it is so determined, to identify the nature of the remediation. Groundwater contamination from this site is primarily migrating to the east of the site. Westerly flow of contaminated groundwater has been limited to just west of Sky Way.1 Contrary to the statement in this comment, contaminated groundwater from the site has not migrated to the Pacific Ocean.

As provided in Section 4.7.3 of the SPAS Draft EIR, none of the SPAS alternatives would either cause or contribute to groundwater contamination at the Park One site. However, all of the alternatives except Alternative 4 would involve some degree of excavation at the Park One site that may conflict with the subsurface remediation system, if it is still in operation at the time the SPAS improvements associated with these alternatives are constructed. With implementation of LAX Master Plan Commitment HM-2, Procedure for the Management of Contaminated Materials Encountered During Construction ("Procedure") this impact would be less than significant. Please see Response to Comment SPAS-PC00130-265 for further discussion of the Procedure.

1. AMEC Environment and Infrastructure, Former Honeywell Sepulveda Site Soil and Groundwater Investigation Report - Northwest Quadrant, Prepared for Honeywell International, Inc., March 30, 2012.

SPAS-PC00130-268

Comment:

Page 4-599 Hydrology 4.8.2 Methodology
The various sources and methodologies used for the hydrology and water quality analyses are consistent with the methodologies as applied in Technical Report 6, Hydrology and Water Quality

Technical Report, and Technical Report S-5, Supplemental Hydrology and Water Quality Technical Report, of the LAX Master Plan Final EIR. Relevant portions of those documents are incorporated by reference and summarized in this section (see Section 1.6 in Chapter 1, Introduction and Executive Summary, regarding where these documents are available for public review)....
413 Similar to Manchester Square, the Belford residential area is also being acquired under the Aircraft Noise Mitigation Program; however, the Belford Area is not included in the hydrology and water quality analysis because none of the SPAS alternatives propose a future reuse of that area.

Question: 4-599 LAWA acknowledges this is tiered and relies on old Alt D reports. One has to question their accuracy. The Manchester Tunnel which extends Lincoln Blvd under the north runway could not have been considered at that time because the key LAWA managers were denying its existence until about two years ago!

Response:

The SPAS Draft EIR is not tiered off of the LAX Master Plan Final EIR, although, as stated in Section 1.7 of the SPAS Draft EIR, portions of the LAX Master Plan Final EIR are incorporated by reference. The commentor provides no substantiation for the claim that the analysis of hydrology and water quality conducted for the LAX Master Plan Final EIR is inaccurate. The north airfield abandoned tunnel segment has no effect on, and is not affected by, hydrology or water quality at LAX. The tunnel segment is a below ground structure that runs beneath Runway 6L/24R. The structure has no entrance or exit but, rather, can only be accessed via manholes. LAWA has not denied the existence of the tunnel segment. Please see Response to Comment SPAS-PC00130-1012 for more details regarding the north airfield abandoned tunnel segment.

SPAS-PC00130-269

Comment:

Question: 4-599 Note 413 states that the hydrology report excludes Belford Square because none of the alternatives propose a future reuse of the area. How does a Master Plan not cover a significant piece of LAWA property? What is planned for this area?

Response:

Please see Response to Comment SPAS-PC00130-175 regarding land uses in the Belford area.

SPAS-PC00130-270

Comment:

Page 4-601 Operational Impacts Wet Weather Flows
Estimating the mass of pollutant load discharged to a water body requires knowledge of surface water runoff volume, discharge location, and pollutant load sources for a given area. Pollutants transferred out of the HWQSA by wet weather flows are the result of non-point pollution sources. A commonly accepted method is to estimate pollutant loads on an average annual basis using average pollutant concentration data from relevant published storm water investigations and monitoring, combined with estimates of annual average runoff from the project area. The U.S. Environmental Protection Agency's (USEPA) National Urban Runoff Program's (NURP) Final Report presents the results of an extensive runoff sampling and analysis program that consisted of collecting samples from more than 2,300 separate storm

Question: This analysis appears to assume that the wet weather runoff is "normal" as if it were from a residential or commercial street setting. Since it's known that many of the areas within airside are particularly contaminated it would be reasonable to assume more contaminants in the runoff. Where is this documented and how is it controlled?

Response:

The commentor is incorrect in its assertion that "it's known that many of the areas within airside are particularly contaminated" and provides no citations, information, or evidence in support of that claim. Section 4.7.3 of the SPAS Draft EIR addresses all known contamination at LAX. As described therein, and summarized in Table 4.7.3-1 and accompanying Figure 4.7.3-1, several specific sites at or near LAX have been evaluated relative to known or suspected soil or groundwater contamination, and the vast majority of those sites are now characterized as "case closed," indicating that contamination, if any, has been addressed to the satisfaction of regulatory agencies. Additionally, the majority of contamination issues at LAX have been associated with leaking subsurface fuel tanks and underground fuel lines, many of which are beneath paved surfaces. Notwithstanding that the comment mischaracterizes the airport relative to known contamination, the limited contamination that does exist primarily occurs below the surface and would have no contact with surface water runoff. Please refer to Response to Comment SPAS-PC00130-265 for a discussion of LAX Master Plan Commitments HM-1 and HM-2 which address clean up of sites with known contamination prior to construction and the handling of contaminated material encountered during construction. With implementation of these commitments, impacts association with contaminated soil or groundwater would be less than significant.

As discussed on pages 4-601 through 4-603 in Section 4.8 of the SPAS Draft EIR, the pollutant load calculations used Event Mean Concentration (EMC) taken from several sources for different types of land use in the various alternatives. For airport operations and airport open space land uses, EMC data were taken from a combination of monitoring data from runoff monitoring at airports compiled by the American Association of Airport Executives (AAAE), and data from transportation land uses compiled by the Los Angeles County Department of Public Works (LACDPW), which represents higher traffic volume streets. Therefore, these EMCs assume runoff quality that is typical from airports and roadways and are considered a reasonable basis for estimating loads from SPAS-related activities, as supported by substantial evidence in the SPAS Draft EIR.

SPAS-PC00130-271

Comment:

Page 4-604 Hydrology/Water Quality 4.8.3 Existing Conditions
The affected environment for this evaluation includes the HWQSA. The baseline conditions for drainage and water quality are described separately below.
As previously noted, the only hydrology issue considered for this analysis is drainage. Drainage is discussed as it relates specifically to the management of the systems designed to convey storm water runoff to prevent flooding as well as to the potential to cause or increase the potential for erosion or siltation. The environmental setting with respect to drainage and the potential for flooding focuses on the existing drainage system at LAX, as well as the off-site drainage facilities to which the drainage system at LAX discharges and regulatory issues that apply in designing drainage and flood control structures....
Note 429 The Conceptual Drainage Plan provides the basis by which detailed drainage improvement plans associated with LAX Master Plan projects are to be designed in conjunction with site engineering specific to each LAX Master Plan improvement project.

Question: 4.8.3 Only hydrology issue consider is drainage. Why were other issues ignored? Why are the LA City and County reports not referenced as noted in the body of the document except for a 2005 City plan? Note 429 simply states that there is a Conceptual Drainage Plan.

Response:

As explained on page 4-599 in Section 4.8 of the SPAS Draft EIR, impacts related to groundwater supply and recharge, and inundation by seiche, tsunami, and mudflow, were addressed in the 2010 SPAS NOP and do not require further analysis in the SPAS Draft EIR. Under CEQA, EIRs should focus their discussion on potentially significant impacts, and may limit discussion of other impacts to a brief explanation of why the impacts are not potentially significant. (Public Resources Code Section 21002.1(e).)

It is unclear to which Los Angeles City and County reports the commentor is referring. Federal, state, and local requirements pertaining to hydrology and water quality are discussed on pages 4-608 through

4-611 of the SPAS Draft EIR. In addition, as discussed in the Section 4.8 of the SPAS Draft EIR, and noted in this comment, the Conceptual Drainage Plan provides the basis by which detailed drainage improvement plans associated with LAX Master Plan projects are to be designed in conjunction with site engineering specific to each LAX Master Plan improvement project.1

1. City of Los Angeles, Los Angeles World Airports, Los Angeles International Airport Conceptual Drainage Plan, June 2005.

SPAS-PC00130-272

Comment:

Page 4-630 4.8.6.6 Alternative 6
Alternative 6 focuses on airfield and terminal improvements only. However, as noted in Section 4.8.2, for purposes of this analysis, impacts associated with ground access improvements are also considered. The distinguishing changes considered in this analysis relative to hydrology and water quality are the northerly movement and westerly extension of Runway 6L/24R, conversion of a portion of the unlined Argo Drainage Channel into a concrete box culvert (1,400 linear feet), conversion of open space to accommodate the realignment of Lincoln Boulevard, conversion of industrial area for the ITF, and conversion of the Manchester Square area to parking use. (underline for emphasis)

Question: 4.8.6.6 Alternative 6 analysis of Hydrology/Water Quality talks about extension of Runway 24R west but this was (and is) not part of the submitted plan by petitioners. What was the reason for ignoring the petitioner input?

Response:

LAWA staff considered all input received during the formulation of the SPAS alternative. Chapter 5 of the Preliminary LAX SPAS Report discusses the concept development process, including the steps used in the creation of the alternatives projects and the community involvement. (See also Chapter 4 of the Preliminary LAX SPAS Report.) Appendices D-1, D-2, and E1-01 of the Preliminary LAX SPAS Report provide further detail as to the community involvement process and concept development. As provided in those appendices and in Chapter 4 and Chapter 5, LAWA engaged the public throughout the alternatives formulation process, and incorporated many of the public's suggestions into the final SPAS alternatives.

As indicated on page 2-30 of the SPAS Draft EIR, Alternative 6 is proposed to extend Runway 6L/24R 604 feet west so that the existing RPZ at the east end of the runway no longer extends over residential areas, which responds to one of the SPAS project objectives, as presented on page 2-2 of the SPAS Draft EIR.

SPAS-PC00130-273

Comment:

Page 4-632 4.8.6.7 Alternative 7 Hydrology
Under Alternative 7, the total impervious area within the HWQSA would increase by 61 acres as compared to baseline conditions of 3,082 acres. Since much of the area surrounding the airport in both the Santa Monica Bay and Dominguez Channel watersheds is developed (i.e., impervious) under baseline conditions, this change would represent a marginal increase (2.0 percent) in regional impervious area.
The changes in impervious area would only occur within the Dominguez Channel Watershed, and would represent an increase of 5.5 percent (see Table 22 in Appendix H, Hydrology and Water Quality). As noted above, previous studies indicate that, under baseline conditions, the conveyance capacity of drainage infrastructure within the Argo sub-basin and Imperial sub-basin (including both the Pershing and Imperial components of the sub-basin) is adequate for the LADPW 50-year storm, while the Dominguez Channel sub-basin infrastructure would flood under these same conditions. Detailed analysis of the Dominguez Channel sub-basin capacity under this design storm for Alternative 7 was not conducted given the conceptual level of planning associated with all SPAS alternatives at this time as

discussed in Section 4.8.2. As shown in Table 4.8-5, the increase in impervious surface in the portion of the HWQSA tributary to Dominguez Channel is 5.5 percent, which would result in a net increase in peak flow rates to be conveyed by the drainage systems serving these areas. As previously noted, the Dominguez Channel is currently over capacity off-site and downstream from LAX; therefore, a 5.5 percent increase in peak

Question: Why was 50 year storm condition chosen instead of the 100 year storm condition given the criticality of LAX air operations?

Response:

The hydrology analysis for the SPAS Draft EIR did not calculate design flows associated with the various SPAS alternatives. Rather, as explained on pages 4-600 and 4-601 of the SPAS Draft EIR, the analysis of drainage impacts was conducted by evaluating changes in impervious surface area with implementation of the alternatives compared to baseline conditions. The text quoted by the commentor pertains to a prior study of drainage at LAX (referenced in Footnote 430 on page 4-607 of the SPAS Draft EIR), which was based on a 50-year storm event. The 50-year storm event is the maximum design storm event used by LADPW and LACDPW to design large capital drainage facilities. Storm events greater than this are extremely rare and facilities are not typically designed for these larger events. Large storm events, such as the 100-year storm event, may result in short-term, localized flooding but occur so infrequently (i.e., there is a 1% probability that that such an event would occur in any given year) and would remain for a very limited period of time before flows would recess to the storm drain that investment in much larger infrastructure is not warranted unless there are special conditions such as sumps, for which a 50-year event is used as the design storm.1 Similar hydrologic design standards are typical for most local public agencies with drainage responsibilities in California and other states, including the City of Los Angeles and the Los Angeles County Department of Public Works.2 Larger storm events with return frequencies such as 100-year or greater are generally only used when designing flood control dams and reservoirs by agencies such as the U.S. Army Corps of Engineers.3

1. City of Los Angeles, Department of Public Works, Bureau of Engineering, City of Los Angeles Manual Part G, Storm Drain Design, Hydrologic Design (G 200), June 1973.
2. Los Angeles County Department of Public Works, Hydrology Manual, January 2006.
3. U.S. Army Corps of Engineers, Engineering and Design - Hydrologic Engineering Requirements for Reservoirs, Publication Number: EM 1110-2-1420, October 31, 1997.

SPAS-PC00130-274

Comment:

Page 4-638 4.8.7 Mitigation Measures Hydrology and Water Quality
Compliance with the Conceptual Drainage Plan, developed in accordance with LAX Master Plan Commitment HWQ-1, would ensure that impacts to hydrology and water quality associated with Alternative 3 would be less than significant. Therefore, no mitigation specific to SPAS is required for this alternative.

Question: 4.8.7 Mitigation Measures for Hydrology and Water Quality states that since Alt D was less than significant then so is any SPAS alternative based on Alt D. At the time of Alt D the Manchester Tunnel was unknown to LAWA and therefore the impact of underground, unknown sourced water was not considered. Now that this is known LAWA should have done more analysis. What are the results and impacts or mitigations now necessary?

Response:

The commenter misstates the conclusions reached in Section 4.8 of the SPAS Draft EIR. As evidenced by Section 4.8.6 of the SPAS Draft EIR, each proposed alternative was evaluated separately for impacts to hydrology and water quality. Because Alternative 3 must comply with the Conceptual Drainage Plan, developed in accordance with the LAX Master Plan, the impacts to hydrology and water quality were found to be less than significant. Similarly, to address impacts to hydrology and water

quality for other alternatives, Mitigation Measure MM-HWQ (SPAS)-1 was identified. The mitigation measure would revise and update the Conceptual Drainage Plan, to account for changes in the nature, location, design, and timing, if known, of the improvements under a specific alternative. With the implementation of MM-HWQ (SPAS)-1, as indicated in Section 4.8.7 of the SPAS Draft EIR, the hydrological and water quality impacts of Alternatives 1, 2, and 4 through 9 would be reduced to a less than significant level. The SPAS Draft EIR was prepared with a sufficient degree of analysis to provide decision makers with information which enables them to make a decision which intelligently takes account of the environmental consequences of the project. (State CEQA Guidelines Section 15151.)

The commentor does not provide any factual basis or substantive evidence for the proposition that unknown source water exists at or near the Manchester Tunnel. Please see Response to Comment SPAS-PC00130-1012 regarding the north airfield abandoned tunnel segment (referred to by the commentor as Manchester Tunnel).

SPAS-PC00130-275

Comment:

Page 4-638 4.8.7 Mitigation Measures Hydrology and Water Quality
The CDP revision and update will provide the basis and specifications by which detailed drainage improvement plans shall be designed in conjunction with site engineering specific to each improvement associated with any selected SPAS alternative, as well as the remaining LAX Master Plan improvements that would not change due to the SPAS alternative, including, if necessary, improvements to address increased erosion and sedimentation. Consistent with the requirements for the 2005 CDP, the drainage system design and identification of needed improvements shall be based upon providing flood protection for a minimum 10-year storm event. As also required in the 2005 CDP, water quality treatment BMPs, which may include infiltration basins/systems, bioretention, vegetated swales, detention/retention basins/systems, media filtration, water quality inlets, catch... (underline for emphasis)

Question: 4.8.7 Mitigation measures. LAWA again states that it bases its Conceptual Drainage Plan (CDP) on the old LAX Plan. However new factors have been raised such as the need to run artesian wells for several years in order to build the Manchester tunnel. These have apparently not been taken into consideration and should be updated. Further, since the potential issue of sandy soil combined with an unknown water source creates more serious consequences from not providing adequate flood protection. This means that LAWA should have provided more adequate mitigation in its plan for beyond a min 10-year storm event. Rather it should have addressed the 50 year or 100 year event to reduce potential consequences. Please provide this information and updated impacts.

Response:

As noted in footnote 429 on page 4-604 of the SPAS Draft EIR, the CDP prepared for the LAX Master Plan provides the basis by which detailed drainage improvement plans associated with LAX Master Plan projects are to be designed in conjunction with site engineering specific to each individual improvement project. The CDP is a valid document and would serve as the foundation for any revisions necessary to address the SPAS alternatives. Please see Response to Comment SPAS-PC00130-1012 regarding the north airfield abandoned tunnel segment (referred to by the commentor as Manchester tunnel) and a discussion of artesian wells as related to construction activities. The commentor provides no evidence to substantiate the claim that unknown water sources or sandy soils would adversely affect flood protection. Please see Response to Comment SPAS-PC00130-169 regarding the design criteria for drainage facilities at LAX and the appropriateness of using a 10-year storm event as the minimum standard for CDP revisions.

SPAS-PC00130-276

Comment:

Page 4-649 Figure 4.9-2 Los Angeles County Airport Land Use Plan Land Use Compatibility Table

Question: The Los Angeles County Airport Land Use Plan, 1991 quoted in the subject table shows "Caution. Review Noise Insulation Needs" for residential land use category from 60 CNEL. Where are the reports in the DEIR showing this review? Contours shown are for 65 CNEL.

Response:

While the Land Use Compatibility Table shown in Figure 4.9-2 of the SPAS Draft EIR provides a general indication of the compatibility relationship between certain types of land uses and various levels of community noise exposure, its primary application in the ALUP pertains to the siting of new uses and the recycling of incompatible land uses, as evidenced in General Policies G-1 and G-2 on page 12 of the County ALUP. Those two policies state, respectively: "Require new uses to adhere to the Land Use Compatibility Chart" and "Encourage the recycling of incompatible land uses to uses which are compatible with the airport, pursuant to the Land Use Compatibility Table." (The "chart" and "table" referenced in these two policies both refer to the same Land Use Compatibility Table in the ALUP.) In addition, ALUP Policy N-3 provides that agencies should utilize the table listing land use compatibility for airport noise environments in evaluating projects within the planning boundaries.

The Land Use Compatibility Table is advisory, and the note "Review Noise Insulation Needs" for uses that are categorized as "Caution" in the subject table is advisory to the land use jurisdictions considering the approval of new uses that fall into that category. Relative to the potential need to add sound insulation to homes that may be newly exposed to aircraft noise levels in excess of 65 CNEL, the application of such noise insulation is administered in accordance with the LAX Aircraft Noise Mitigation Program described in Section 4.9.5 of the Draft EIR. Regarding the use of 65 CNEL for identification of significant impacts, as defined on page 4-684 of the SPAS Draft EIR, the 65 CNEL noise contour is the appropriate threshold used to determine aircraft noise impacts based on criteria presented in 14 CFR Part 150; FAA Order 5050.4B; FAA Order 1050.1E; Title 21 California Code of Regulations; and the Caltrans California Airport Land Use Planning Handbook. The ALUP further clarifies on page 10 that the 60-65 CNEL noise contour more accurately represents the annoyance factor associated with smaller but lower flying aircraft for general aviation airports (e.g., Hawthorne, Santa Monica, Torrance). The ALUP also states that for commercial airports, such as LAX, the 65-70 CNEL contour boundaries will be used.

Nevertheless, for informational purposes Section 4.10.1 of the SPAS Draft EIR depicts the 60 CNEL noise contour for Alternatives 1, 2, 3, 4, 5, 6, and 7 and Section 4.9.6 identifies those non-residential noise-sensitive facilities that would be exposed to increases of 3 CNEL between the 60 and 65 CNEL noise contours compared to 2009 baseline conditions.

SPAS-PC00130-277

Comment:

Page 4-654 4.9 Land Use Planning
The LAX Northside area provides for the development of uses that are consistent with airport needs and neighborhood conditions, while also serving as an airport buffer zone (comprised of compatible development and landscape) for the Westchester community. It may also serve as a relocation area for businesses displaced by the implementation of the LAX Master Plan...
Note 481 LAX Northside, part of the LAX Master Plan approved by the City of Los Angeles in 2004, is an approved airport development project that includes future development of 4.5 million square feet of commercial and airport-related industrial land uses to be built on 340 acres of vacant land located north of Runway 6L/24R (the northern most runway at LAX) along and north of Westchester Parkway. Currently, LAWA is engaged in the LAX Northside Plan Update, which is considering development of a different land use mix, including mixed-use, community/civic space, office/education/research space, and airport support uses, on 340 acres.

Question: How can the above uses for the LAX Northside be applied if the existing 1982 Northside Plan was negated by changes assumed in the approval of Alternative D? Is this assuming completion of a new Northside Plan by LAWA? The above paragraph states that it may service as a relocation area for displaced businesses. Must the rezoning of the Northside be completed before this is accomplished?

Response:

The referenced discussion on page 4-654 of the SPAS Draft EIR is based on the existing LAX Plan. The LAX Plan and LAX Specific Plan are the land use regulatory documents applicable to LAX including the LAX Northside area. As described on page 4-39 in Section 4.1 of the SPAS Draft EIR, future development within LAX Northside would be subject to height restrictions, setback requirements, and landscape guidelines as set forth in Appendix A of the LAX Specific Plan, as well as the 1989 LAX Northside Design Plan and Guidelines. The implementation of these conditions would promote a visually open landscaped northern boundary, and setbacks and height limits would reduce aesthetic impacts associated with the airfield modifications. Allowable uses within the LAX Northside area include a variety of commercial, retail, office, business park, research and development centers, hotels, light industrial, and open spaces uses, as delineated in Appendix A of the LAX Specific Plan. This range of allowable uses would permit the types of existing uses displaced by the implementation of the LAX Master Plan. Relative to the SPAS alternatives, Figure 2-11 in Chapter 2 of the SPAS Draft EIR delineates the parcels that would be acquired under the SPAS alternatives and Table 2-5 of the SPAS Draft EIR provides a breakdown of which parcels would be acquired under each of the relevant SPAS alternatives. Existing facilities affected by SPAS alternatives are shown in Figure 2-10 and described in Table 2-3.

Businesses that may be displaced by a SPAS alternative may be able to relocate to a number of other LAWA-owned properties, which could include the LAX Northside. A relocation into the LAX Northside is not contingent on the completion of a new land use plan for LAX Northside (i.e., the Northside Plan Update), as noted in Footnote 481 on page 4-654 of the SPAS Draft EIR, nor would it require rezoning of LAX Northside.

SPAS-PC00130-278

Comment:

Page 4-657 LAX Plan The policies most pertinent to SPAS-related land use issues include:
Land Use - LAX Northside

Question: When quoting the LAX Plan policies why did the DEIR left out P2 and P3 for the LAX Northside as it relates to SPAS? These two policies are P2. Provide community outreach efforts to property owners and occupants through measures such as public notification and public meetings, when new development on airport property is in proximity to, and could potentially affect, nearby residential uses. P3, Orient LAX Northside development to encourage access from Westchester Parkway and other roadways internal to LAX Northside. Since LAWA is stating that this will be used as a relocation site one would expect that these policies would also be adhered to.

Response:

The policies identified in Section 4.9 of the SPAS Draft EIR are those most applicable to SPAS-related land use issues. LAX Northside policies P2 and P3 in the LAX Plan apply to development within LAX Northside, and do not apply to the SPAS alternatives. As indicated in Section 4.9.6 of the SPAS Draft EIR, no changes are proposed to LAX Northside, with the exception of the Lincoln Boulevard realignment under Alternatives 1, 5, and 6. LAWA would adhere to Policies P2 and P3 as development within LAX Northside is proposed, including the LAX Northside Plan Update currently underway as described in Footnote 481 on page 4-654 in Section 4.9. Please see Response to Comment SPAS-PC00130-277 regarding relocation of displaced businesses within LAX Northside.

SPAS-PC00130-279

Comment:

Question: Although policies were not listed in order of the LAX Plan, the DEIR deleted only Safety policy P6. Consult with the Los Angeles Fire Department during the design phase of facilities to review plans and incorporate recommendations that enhance airport safety. Why?

Response:

Pursuant to the thresholds of significance identified in Section 4.9.4 of the SPAS Draft EIR, a significant land use impact would occur if the direct and indirect changes caused by a particular SPAS alternative would result in a conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. (See State CEQA Guidelines, Appendix G, Section X(b).) Therefore, the policies identified in Section 4.9 of the SPAS Draft EIR are those that were adopted for the purpose of avoiding or mitigating environmental effects. Safety policy P6 applies to fire protection and was not adopted for the purpose of avoiding or mitigating an environmental effect. This policy is addressed as part of LAX Master Plan Commitment FP-1, LAFD Design Recommendations. LAX Master Plan Commitment FP-1 is applicable to all SPAS alternatives (see pages 4-1003 and 4-1004 in Section 4.11.1 of the SPAS Draft EIR).

SPAS-PC00130-280

Comment:

Question: The DEIR delineated "most pertinent" policies of the LAX plan and failed to list any Security policies such as:
P1. Evaluate, develop and improve, as necessary, Central Terminal Area, Intermodal Transportation Center, and Satellite Terminal FlyAway security - both physical and operational - as part of overall security improvements at LAX.
P2. Develop entry security improvements in the Central Terminal Area by limiting access by non-secure private, public and commercial vehicles.
P3. Design and construct facilities that provide for security of passengers by providing multiple levels of security screening procedures while maintaining ease of use.
P4. Provide law enforcement and fire facilities to enhance the ability to respond to emergency situations and facilitate coordination with other emergency response agencies.
Why does LAWA feel that security policies are not important enough to identify in the document? Why is Circulation and Access also ignored? What about Noise, Hazardous Waste, and Design policies?

Response:

Pursuant to the thresholds of significance identified in Section 4.9.4 of the SPAS Draft EIR, a significant land use impact would occur if the direct and indirect changes caused by a particular SPAS alternative would result in a conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. (See State CEQA Guidelines, Appendix G, Section X(b).) Therefore, the policies identified in Section 4.9 of the SPAS Draft EIR are those that were adopted for the purpose of avoiding or mitigating environmental effects. The policies cited by the commentor relate to security, including limits on access and facility design, not environmental effects. Therefore, they were not reviewed in Section 4.9 of the SPAS Draft EIR.

The EIR does analyze security, circulation and access, noise, hazardous waste, and design policies in sections more appropriate for such analysis. Security measures related to the SPAS improvements are addressed in Section 4.11.2 of the SPAS Draft EIR. Appendix I of the Preliminary LAX SPAS Report also assesses the security characteristics of the SPAS alternatives in comparison to existing conditions. These conclusions are summarized in Section 6.3 of the Preliminary LAX SPAS Report.

Chapter 2 and Sections 4.12.1 and 4.12.2 of the SPAS Draft EIR describe project components that are related to Circulation and Access policies regarding direct links between Airport Airside and Airport Landside facilities, regional mobility, transit ridership, and other improvements proposed under the SPAS alternatives.

Sections 4.9 and 4.10.1 of the SPAS Draft EIR describe applicable project components and LAX Master Plan commitments and mitigation measures directly related to Noise policies, including updating and expanding LAWA's ANMP, updating facilities to accommodate new large aircraft (NLA), and using over-ocean procedures during nighttime, when weather permits.

Section 4.7.3 of the SPAS Draft EIR addresses the handling of hazardous materials and presents applicable LAX Master Plan commitments in conformance with Hazardous Waste policy P1. Section 4.1 of the SPAS Draft EIR presents relevant Design policies on page 4-11 of the SPAS Draft EIR.

SPAS-PC00130-281

Comment:

Page 4-663 LAX Street Frontage and Landscape Development Plan Update

Question: Has LAWA ever distributed or circulated this Plan for comment or is it considered an internal policy statement only? The one objective listed in the DEIR of "Enhance LAX's compatibility with adjacent land uses, neighborhoods, and communities." is laudable, but what other things does this plan call for? Since it hasn't been updated since 2005, are there any updates?

Response:

Please see Response to Comment SPAS-PC00130-223 regarding the LAX Street Frontage and Landscape Development Plan Update. The LAX Street Frontage and Landscape Development Plan Update was cited in footnote 40 of the SPAS Draft EIR, is included in the administrative record, and was available upon request at LAWA's Capital Programming and Planning Division (formerly Facilities Planning Division), Room 208, One World Way, Los Angeles, California and continues to be available for review upon request to LAWA (SPAS Contact Person Diego Alvarez, as indicated on SPAS public notices and SPAS website). The LAX Street Frontage and Landscape Development Plan Update was not distributed for public review and comment as it is an internal policy document that does not require public input. However, the Plan includes applicable LAX Master Plan commitments identified in the LAX Master Plan Draft EIR and Supplement to the Draft EIR, which were circulated for public review and comment in 2001 and 2003, respectively. There have not been any updates to the LAX Street Frontage and Landscape Development Plan since March 2005. As described in Response to Comment SPAS-PC00130-223, LAWA has been and continues to implement a LAX Beautification Enhancements Program to improve the image, function, and circulation of the airport.

Additional components of the LAX Street Frontage and Landscape Development Plan Update, including objectives, standards, and planning areas, are presented on pages 4-11 through 4-13 in Section 4.1 of the SPAS Draft EIR.

SPAS-PC00130-282

Comment:

Page 4-664 4.9.3.3 Existing Incompatible Land Uses
Aircraft Noise Mitigation Program
The City of Los Angeles, as the airport proprietor, addresses incompatible land use within the communities surrounding LAX pursuant to the land use compatibility requirements of the California Airport Noise Standards (California Code of Regulations, Title 21, Subchapter 6, Section 5000 et seq.). LAX operates under a variance to the California Airport Noise Standards (Noise Standards) that was effective February 13, 2011 and was issued for a period of three years.487 The variance remains in effect so long as LAWA submits another application one month prior to the expiration date and continues to demonstrate that programs are being implemented to reduce noise impacts. Under the variance, LAWA...

Question: What penalties occur if LAWA fails to adhere to the four items listed? Has LAWA provided the quarterly reports within the prescribed 45 days? Several other variance conditions were stipulated such as the requirement for hush houses for maintenance/testing of aircraft. How has this provision and others not listed been incorporated into the program level plans? If not, why not?

Response:

The commentor discussed LAWA's commitment to comply with the specific requirements imposed by conditions of the current noise variance for LAX. As part of the provision to the California Airport Noise Standards, LAWA is required to comply with the conditions related to the Aircraft Noise Mitigation Program (ANMP) as outlined on pages 4-664 through 4-667 in Section 4.9.3.3 of the SPAS Draft EIR. As part of the program, LAWA continues to submit to the State of California Department of

Transportation (Caltrans) and the County of Los Angeles the required Quarterly Reports which depict the noise impact area, and report on the incompatible land uses along with the daily and annual CNEL values at each monitoring station (this aspect of the variance procedure is not relied upon to reduce or avoid impacts). Quarterly Report submittal for LAX is currently behind schedule due to a backlog that was created when LAWA installed a new noise monitoring system. This new system was approved for use by Caltrans in 2010, and LAWA was some six quarters behind in submitting these reports at that time. LAWA has been in contact with the County and State, as oversight agencies, informing them of the issues and the schedule for catching up with the backlog. LAWA is diligently working to get caught up with the backlogs and will make the quarterly reports available to the public on the LAX Noise Management website (http://www.lawa.org/welcome_lax.aspx?id=1090) as soon as practical.

SPAS-PC00130-283

Comment:

Page 4-665 Noise Variance

As summarized in the ANMP tables updated for 2010,491 all incompatible land uses within the 1992 fourth quarter 65 CNEL noise contour or within 65 CNEL areas extending beyond the 1992 contour based on the most recent quarterly report, are eligible for participation in the ANMP. Although the area significantly impacted by noise has been reduced since 1992, and a number of parcels within the 1992 contour are no longer exposed to noise levels of 65 CNEL and higher, all incompatible residential, school, church, and hospital parcels within the 65 CNEL noise contours defined above are eligible for mitigation under the ANMP.492

Question: Has the FAA notified LAWA of changes to the applicability of the 1992 contour? How is this included in the baseline and subsequent comparisons of noise impacts?

Response:

The commentor inquires about the use of the 1992 contours for the existing Aircraft Noise Mitigation Program (ANMP) at LAX.

The FAA notified LAWA in 2010 that any amendment to the existing sound insulation passenger facility charge (PFC), or any new application for PFCs for the purpose of sound insulation, would need to utilize the current FAA approved noise contour; in this case, the Alternative D 2015 65 CNEL contour. The FAA also established a transition period during which LAWA could spend its own revenue within a current program area through the end of 2015 - so long as those properties were also within the FAA's current 60 CNEL contour.

Title 21 of the California Code of Regulations, Subchapter 6 (also known as the California Airport Noise Standards) requires that LAWA have a program in place to bring into compatibility those properties that are part of the Noise Impact Area. The Noise Impact Area is defined within Title 21 as those incompatible land uses within the 65 CNEL contour, and such area is presented in the airport's most current Quarterly Report. Therefore, as discussed on page 4-665 of the SPAS Draft EIR and as consistent with the notification received by LAWA from the FAA, properties located within the latest Quarterly Report contour are potentially eligible for participating in the mitigation program.

In early 2011 LAWA, staff met with the staff for each of the affected programs, including the City of El Segundo, City of Inglewood, and the County of Los Angeles, to discuss the fact that "the clock was ticking" on the existing programs. LAWA's intention was to maximize the number of dwellings within each jurisdiction that could be insulated prior to the end of 2015.

The baseline noise contours are not impacted by the 1992 contour referenced in the comment letter. (See Section 4.10.1.3 of the SPAS Draft EIR for discussion of baseline.) See Sections 4.10.1.7 and 4.10.1.8 of the SPAS Draft EIR for discussion of post mitigation significance conclusions.

SPAS-PC00130-284

Comment:

Page 4-666 Noise Variance
...As presented in the ANMP tables, of the 33,165 residential units identified within the ANMP contours at that time, approximately 12,402 previously incompatible dwelling units were made compatible.

Residential sound insulation had been completed for 1,241 units in unincorporated Los Angeles County; 4,827 units in the City of Los Angeles; 677 units in El Segundo; and 2,971 units in Inglewood. Dwelling units have also been made compatible through land recycling, including approximately 816 units in Inglewood and 1,870 units in the City of Los Angeles. El Segundo's residential sound insulation program also includes additional units within the 60 CNEL noise contour identified for the approved LAX Master Plan and is funded by the FAA through the end of 2015.493 The number of units receiving sound insulation under El Segundo's program is not formally published.49...

Question: How many units remain unmitigated? If jurisdictions in El Segundo, LA County, and Inglewood are allowed to include air conditioners as part of the mitigation, why is the FAA opposed (and LAWA not fighting for) this for LA residents?

Response:

Under the LAWA Aircraft Noise Mitigation Program (ANMP) as of July 1, 2012, the total number of units unmitigated is 14,543, which includes areas around LAX as well as areas around Ontario International Airport (i.e., City of El Segundo 3,265; City of Inglewood 4,620; City of Los Angeles 1,867; Los Angeles County 3,976; and City of Ontario 815).

Regarding whether air conditioners are included as part of the mitigation program, the FAA had been opposed to air conditioners in Climate Zone 6, which is a State-appropriated climate zone. Climate Zone 6 is the area for homes at/adjacent to the ocean, west of I-405. The reasoning was that temperatures at the beach were cooler than areas inward from the beach and did not justify the cost of installing air conditioning when positive ventilation systems would suffice. The jurisdictions in the noise mitigation program are in Climate Zone 6 (City of El Segundo, parts of the City of Los Angeles - Westchester, Playa del Rey), Climate Zone 8 (City of Inglewood, parts of the City of Los Angeles - South LA, LA County), and Climate Zone 10 (City of Ontario). The City of Los Angeles, for the areas of Westchester and Playa del Rey, which are in Zone 6, did not receive air conditioning as it was not approved at that time under the FAA guidelines. The City of Los Angeles residents in South Los Angeles did however, receive air conditioning as they are in Climate Zone 8.

The City of El Segundo, which is also in Climate Zone 6, independently pursued a practice of installing air conditioning units instead of installing positive ventilation systems. The City of El Segundo terminated that practice in 2010 to maximize the use of exiting funds for sound insulation work.

SPAS-PC00130-285

Comment:

Question: The same section discusses a Part 161 Noise Study. Why has it not been completed? Does the Part 161 Noise Study use the same aircraft fleet mix assumptions as the noise contour studies? If not, why not?

Response:

Please see Response to Comment SPAS-PC00130-131 regarding the status of the Part 161 Study. The LAX Part 161 Study and the SPAS Draft EIR analyzed two different forecast years, 2017 and 2025, respectively. Therefore, no valid comparison could be drawn because 8 years separate the two forecast.

SPAS-PC00130-286

Comment:

Page 4-667 LAWA Voluntary Residential Acquisition/Relocation Program

Question: Footnote 498 lists a BOAC action to establish the Voluntary Acquisition Project for both Manchester Square and Belford Square. How does one get a copy of this very old item since it's not on-line? Most people were aware of the MS aspects, but few, if any knew Belford Square was a part as it was never shown in other documents or even Alt D. It was raised in SPAS early on, but LAWA has not responded to potential uses recommended.

Response:

The Relocation Plan for the Voluntary Acquisition and Relocation Program was the subject of Resolution No. 21093, which was approved by the Board of Airport Commissioners on July 18, 2000. Copies of the Resolution and the Relocation Plan are available for review at LAWA, Capital Program and Planning Division, 1 World Way, Los Angeles, CA. The Resolution authorized the Executive Director to open the voluntary property acquisition program to all property owners and provide relocation services to all owners and tenants in the Manchester Square and Airport/Belford areas. The Plan, the Initial Study/Mitigated Negative Declaration that accompanied the plan, and the Board item all refer to both Manchester Square and Airport/Belford. The LAX Master Plan Final EIR included a detailed description of the voluntary acquisition program on page 4-144, which indicated that the acquisition included units within both Manchester Square and the Airport/Belford area. The Airport/Belford area is addressed in relevant sections of the LAX Master Plan including, most notably, Section 4.2, Land Use. Both the description of Alternative D in Chapter 3, Alternatives (Including Proposed Action), and the land use analysis of Alternative D, indicate no development plans are proposed for the Belford area under Alternative D (pages 3-81 and 4-295 of the LAX Master Plan Final EIR, respectively) and the area was assumed to remain vacant. The Airport/Belford area was not a subject of the SPAS Draft EIR, as the area is unrelated to the Yellow Light Projects or the analysis of alternatives to the Yellow Light Projects.

SPAS-PC00130-287

Comment:

Page 4-668 Land Use and Planning LAX Master Plan Draft Relocation Plan

The Draft Relocation Plan includes parcel-level detail for the properties proposed for acquisition under the approved LAX Master Plan, an assessment of relocation effects, and procedures for implementing LAWA's LAX Master Plan Relocation Assistance Program (RAP) in accordance with applicable laws, regulations, and policies.500,501 The Plan includes an inventory of acquisition and relocation properties, an assessment of acquisition and relocation needs, and an assessment of relocation opportunities. No residential uses are proposed for acquisition. The LAX Master Plan program identifies approximately 34 businesses located on approximately 77 acres that would be acquired to accommodate airport development.

Question: Where are these documents available for review and how do these properties relate to any of the alternatives?

Response:

The LAX Master Plan Draft Relocation Plan is available at: http://ourlax.org/publications.aspx. The LAX Master Plan Relocation Assistance Program is a component of the Draft Relocation Plan. The proposed property acquisition areas identified for 2015 Alternative D of the LAX Master Plan are listed in Table 9-2 and shown in Figure 2.7-1 of the Draft Relocation Plan.

The acquisition areas identified in the LAX Master Plan Draft Relocation Plan include many of the same parcels proposed for acquisition under the SPAS alternatives, as shown in Figure 2-11 and listed in Table 2-4 of the SPAS Draft EIR. Specifically, Table 2-5 and Figures 2-12, 2-13, and 2-14 of the SPAS Draft EIR identify which parcels would be acquired under Alternatives 1, 2, 3, 4, 8, and 9. In addition,

Table 4.9-5 in Section 4.9 of the SPAS Draft EIR presents a comparison of acquisition areas by land use for the applicable SPAS alternatives. As noted in Table 4.9-5, no acquisition is proposed for Alternatives 5, 6, and 7 since these alternatives focus on airfield and terminal components only, although acquisition would be required for the ground access components with which these alternatives would be paired.

SPAS-PC00130-288

Comment:

Page 4-673 Table 4.9-4 Summary of Existing Off-Airport Residential Uses and Non-Residential Noise-Sensitive Facilities in the Study Area

Question: What does Title 21 compatible and Title 24 compliant mean?

Response:

The terms "Title 21 Compatible" and "Title 24 Compliant" parcels are identified in Footnote 2 of Table 4.9-4 on page 4-673 of the SPAS Draft EIR. As described on pages 4-664 and 4-665 in Section 4.9.3.3 of the SPAS Draft EIR, Title 21 Compatible refers to those residential properties within the Noise Impact Area (defined by the 65 CNEL noise contour) that are deemed compatible through either sound insulation to achieve interior noise levels below 45 CNEL, or conversion to a compatible use (e.g., from a residential to industrial use).

Title 24 Compliant means that residential units within the identified parcels were constructed in conformance with the California Noise Insulation Standards (California Code of Regulations, Title 24, Part 2, Appendix Chapters 12 and 12A), which requires that multi-family dwelling units constructed in areas of high noise levels (i.e., greater than 65 CNEL) include sound insulation to reduce interior noise levels to 45 CNEL.

SPAS-PC00130-289

Comment:

Page 4.9 Land Use Planning Westchester-Playa Del Rey Community Plan
... Most of the topography is level except for an amount of varied, hillside terrain located in the northwest and west portions of the Plan area where there are significant coastal bluffs. The land use consists primarily of low to low-medium density residential uses, with commercial uses concentrated near the transit corridors of Lincoln Boulevard, Sepulveda Boulevard, and Century Boulevard. Residential land uses account for approximately 2,357 net acres with approximately 22,794 dwelling units, of which 49 percent are multi-family units. Concentrations of multifamily residential uses are located near La Tijera Boulevard and Manchester Avenue.524... (underline for emphasis)

Question: Many of the areas within Westchester as well as PDR are also hilly with peaks and valleys which amplify sound from aircraft. The DEIR characterization is inaccurate. How has this been used in the evaluation for sound impact?

Response:

The commentor states that the characterization of the Westchester and Playa del Rey topography in the SPAS Draft EIR is inaccurate. The description of topography, as provided on page 4-680 in Section 4.9.3.4 of the SPAS Draft EIR. It is acknowledged that other areas within Westchester and Playa del Rey are hilly with peaks and valleys; however, this generalized description was not used to evaluate noise impacts, but rather, noise impacts were evaluated based on noise exposure contours and grid point analysis, which incorporated digital topographic data from the U.S. Geological Survey into the model input. The noise analysis methodology is described on pages 4-796 and 4-797 in Section 4.10.1.2 of the SPAS Draft EIR. Aircraft noise impacts are analyzed in Sections 4.10.1.6 and 4.9.6 of the SPAS Draft EIR. The commentor is also referred to responses to the same comments/questions posed by ARSAC in Responses to Comments SPAS-PC00130-209, SPAS-PC00130-468, and SPAS-PC00130-937.

SPAS-PC00130-290

Comment:

The concentration of multifamily residential uses is also misleading. It is south of Manchester and east of Airport not as described. How was this description used in the evaluation of impacts?

Response:

The commentor also suggests "the concentration of multifamily residential uses is also misleading. It is south of Manchester and east of Airport not as described." The commentor appears to be referencing language on the top of page 4-680 which states "concentrations of multi-family residential uses are located near La Tijera Boulevard and Manchester Avenue."' (Emphasis added.) The description of multi-family residential uses being near La Tijera Boulevard and Manchester Avenue includes multi-family residential areas south of Manchester Avenue and east of Airport Boulevard. The description in the SPAS Draft EIR is accurate and consistent with the requirements of CEQA. (See State CEQA Guidelines Section 15125(a) ["the description of the environmental setting shall be no longer than is necessary to an understanding of the significant environmental effects of the proposed project and its alternatives."]

However, as discussed under Responses to Comments SPAS-PC00130-209, SPAS-PC00130-289, SPAS-PC00130-468, and SPAS-PC00130-937 much more detailed topographic information was used for modeling aircraft noise. Furthermore, the actual concentration of residential uses in the land use and the noise analyses was based on LAWA data as updated by 2010 census data. As analyzed in Section 4.9.6 for Alternatives 1 through 7, some noise-sensitive uses in Westchester-Play del Rey would be newly exposed to high noise levels and would be significantly impacted prior to completion of sound insulation.

SPAS-PC00130-291

Comment:

Page 4-684 Land Use 4.9.4 Thresholds of Significance

A significant land use impact would occur if the direct and indirect changes in the environment caused by the particular SPAS alternative would result in one or more of the following future conditions:
- Conflict with any applicable land use plan, policy, or regulation (including, but not limited to, the general plan, specific plan, local coastal program or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.
- Create physical incompatibility with existing land uses through increased aircraft noise exposure.

Question: Please define what the second bullet "create physical incompatibility" means.

Response:

As stated on page 4-684 of the SPAS Draft EIR, per the second threshold of significance referenced by the commentor, a SPAS alternative would "create physical incompatibility" through increased aircraft noise exposure that would conflict with existing land uses, as defined by State and federal standards. Based on these standards, described on pages 4-641 and 4-642, and as further analyzed in Section 4.9.6 of the SPAS Draft EIR, incompatible land uses would result when residential and non-residential noise sensitive facilities are newly exposed to noise levels of 65 CNEL or higher; increases of 1.5 CNEL or higher within the 65 CNEL or higher noise contours; or outdoor private habitable areas, parks, or schools newly exposed to noise levels of 75 CNEL or higher under Alternatives 1, 2, 3, 4, 5, 6, and 7 compared to 2009 baseline conditions.

SPAS-PC00130-292

Comment:

Page 4-692 Consistency with Land Use Plans - On-Airport Land Table 4.9-5
General Comparison of Acquisition Area Land Use - SPAS Alternatives
No acquisition is proposed under Alternatives 5, 6, and 7 since these alternatives only include airfield and terminal components.

Question: The DEIR indicates no acquisition is anticipated by the DEIR. When will LAWA acknowledge that movement of runways north will require acquisition of a significant portion of the Westchester Business District and some homes? How will these costs be accounted for in the SPAS report which is a part of the DEIR by reference?

Response:

The content of this comment is similar to that of comments SPAS-AL00007-26 and SPAS-AL00007-27; please refer to Responses to Comments SPAS-AL00007-26 and SPAS-AL00007-27.

SPAS-PC00130-293

Comment:

Section 4.10 Noise

Question: It appears that the 1992 Contour was not used and that a new baseline contour was recalculated. Is that correct?

Response:

The commentor is correct. The "1992 Contour" was not used in the SPAS Draft EIR. As described in Section 4.10.1.1.4 of the SPAS Draft EIR and in Appendix J1-1 of the SPAS Draft EIR, the aircraft noise analyses conducted for the SPAS Draft EIR included an evaluation of baseline (2009) conditions.

SPAS-PC00130-294

Comment:

Question: Table 4.10.1-5 lists schools expected to be impacted by above 55 interior dBA. Why is St. Bernards not listed despite being in the 65 CNEL contour. Why?

Response:

Contrary to the suggestion in the comment, Table 4.10.1-5 on page 4-822 of the SPAS Draft EIR does not show "schools expected to be impacted." This table shows the Time Above (TA) 84 dBA noise metric under baseline conditions. The TA-84 metric is the number of minutes per school day that exceed an exterior noise level of 84 decibels Lmax which equates to an interior noise level of 55 dBA Lmax at a grid point. Saint Bernard High School does not have any TA-84 value listed in the table despite being in the 65 CNEL for the following reasons. First, the aircraft CNEL noise contour is calculated based on annual conditions with average operations occurring in a 24 hour period including day, evening, and nighttime. Second, the TA-84 metric for Saint Bernard High School is computed only for daytime operations (8:00 a.m. - 4:00 p.m.) and the INM model did not generate any reportable values at this location. Saint Bernard High School is discussed, however, in Table 4.10.1-6 of the SPAS Draft EIR.

SPAS-PC00130-295

Comment:

Question: What does Alt 1 "no additional improvements" mean? Alt 1 moves 24R 265' north and Table 4.10.1-9 matches earlier population exposure increase numbers. "No additional improvements" is more equivalent to LAX upgrade alternatives 3 or 4 of the Plan. Alt 2 is correctly described as no greater

separation but with 24L extended east. What is the true meaning of the referenced "no additional improvements"?

Response:

As described on page 4-796 in Section 4.10.1.2 of the SPAS Draft EIR, an alternative with "no additional improvement" would include only a runway extension for compliance with the Runway Safety Area (RSA) regulations, which would not materially change the operating conditions of the existing airfield. Alternative 4 of the SPAS represents a "Future (2025) Conditions Without Airfield Improvements" scenario, also referred to as "2025 'No Additional Improvements' Conditions."

SPAS-PC00130-296

Comment:

Question: The ANSI Awakening Probability figures look like the CNEL noise contours, but at night the aircraft are operating in "over ocean" about 80% of the time. Explain the reason for the % probabilities mirroring the contours. What explains the drop in awakenings in 2025? Is this based on Leq8 instead of CNEL and that changes differently than CNEL?

Response:

As described in Section 4.10.1.2.3.1 of the SPAS Draft EIR, the nighttime awakenings prediction methodology used for the SPAS analysis is the American National Standards Institute (ANSI), "Quantities and Procedures for Description and Measurement of Environmental Sound-- Part 6: Methods for Estimation of Awakenings Associated with Outdoor Noise Events Heard in Homes," ANSI S12.9-2000/Part 6, 2008. As indicated therein, the ANSI methodology accounts for the multiple noise events over the course of an entire night, which is defined as the period between 10:00 p.m. and 7:00 a.m. The LAX Over-Ocean Operations occur only between midnight and 6:30 a.m.; consequently, there are still numerous LAX flight operations occurring over land within the time period addressed under the ANSI methodology. The shapes of the ANSI awakening probability contours presented in Section 4.10.1 of the SPAS Draft EIR are generally comparable to the CNEL contours also presented in that section because both analyses utilize the same fleet mix, flight paths, and operational assumptions in the evaluation of each alternative (limited to the hours of 10:00 p.m. to 7:00 a.m.).

It is unclear what exactly the commentor means by "What explains the drop in awakenings in 2025?" To the extent the commentor is referencing Table 4.10.1-58, this table summarizes the nighttime awakening comparison of the various alternatives to 2025 No Additional Runway Improvements. As shown in this table, there would be some reductions in the probability of awakening under some of the alternatives in comparison to 2025 No Additional Runway Improvements. As described in Response to Comment SPAS-PC00166-1 "[t]he density of the population is not constant across the area exposed to noise above 65 CNEL or higher; consequently while the area of exposure may be similar among alternatives, the numbers of persons, dwellings or non-residential noise-sensitive facilities varies among the alternatives." (SPAS Draft EIR page 1-84.) Similar discussion was also provided in Section 4.10.1.6.8 of the SPAS Draft EIR.

The probabilities of nighttime awakenings are not based on Leq(8), CNEL, or any other standard noise metric, but rather represent a statistical probability of awakening based on the series of single event aircraft noise occurrence occurring at specific times over the course of the night, with certain weighting assumptions applied to specific time periods during the night. For additional details regarding the Nighttime Awakening methodology, please see SPAS Draft EIR Section 4.10.1.2.3.1.

SPAS-PC00130-297

Comment:

Question: Figure 4.10.1-17 is a sample of contours calculated for 60 CNEL et. al. but it's impossible to compare with the baseline condition to see changes. Please provide an overlay with the baseline for each alternative.

Response:

The baseline 60 CNEL contour was provided in Figure 4.10.1-11. Nevertheless, per the request of the commentor, a series of figures (Figures 1 through 7, attached) has been prepared that illustrate the aircraft noise contours associated with each SPAS alternative alongside the aircraft noise contours associated with baseline (2009) conditions for 60 CNEL and higher contour levels.

SPAS-PC00130-298

Comment:

Question: Taking an overview of the contours and awakening the bottom line is that the south gets better, the northeast gets worse most and the north increases about in proportion to the amount the runway moves. This is the basic conclusion from Table 4.10.1-55 regarding CNEL and from Table 4.10.1-57 disruptions are about the same regardless of what alternative is chosen again reinforcing the notion that it doesn't matter which is chosen overall, but the noise is definitely worse on the north regardless of which is chosen. It's not said in these few words, but is this the conclusion we should be drawing?

Response:

The commentor is referred to Section 4.10.1 of the SPAS Draft EIR for discussion of aircraft noise methodology, analysis, and conclusions. As analyzed in Sections 4.10.1.6 and 4.9.6 of the SPAS Draft EIR, noise impacts on surrounding communities vary by alternative and not in proportion to the northward movement of Runway 6L/24R. Please also see Response to Comment SPAS-PC00130-126 for additional explanation of aircraft noise impacts to surrounding communities based on the relocation of Runway 6L/24R northward under Alternatives 1, 5, and 6.

SPAS-PC00130-299

Comment:

Question: Doing a sanity check on the aircraft numbers used for noise needs some clarification. In 2001 68MAP resulted from 800K ops or about 85 passengers per aircraft. Given the increase in load factor and increase in aircraft size that number should increase to about 110 passengers per aircraft or about 78 MAP. Was this the basis for the assumptions made?

Response:

For the purposes of the SPAS Draft EIR aircraft noise analyses, a number of average annual day (AAD) operations was assumed and was derived by dividing the assumed number of total annual operations by 365. Refer to Section 2.3.2 and 3.1.1.4 and subsequent tables in Appendix J1-1 of the SPAS Draft EIR for a discussion of the concept of AAD and the assumed numbers of AAD operations in the 2009 baseline conditions.

Similarly, the number of AAD operations in 2025 was derived by dividing the assumed number of total annual operations in 2025 by 365. The development of the 2025 Design Day Flight Schedule (DDFS), discussed in Section 4 in Appendix F-1 of the Preliminary LAX SPAS Report, resulted in a number of peak month average day (PMAD) total daily operations of 2,053. Note that this number of operations is indicative of a PMAD, as opposed to an AAD number of operations needed to model aircraft noise. In order to convert a PMAD number of operations into an AAD number of operations, the PMAD number was extrapolated to approximately 707,151 annual operations. By dividing the resulting number of annual operations by 365, an AAD number of 1,937.4 operations was identified. As discussed in Section 4.10.1 of the SPAS Draft EIR, the 2025 AAD number was rounded to be 1,937 daily operations.

SPAS-PC00130-300

Comment:

Question: A key assumption raised was over ocean ops from midnight to 6:30 AM however in order to get to 78 MAP there will have to be many more flight late at night because peak hours will be maxed out

around 70 MAP. If over ocean ops ends up turning around at 2 AM instead of midnight then the awakening numbers will change dramatically as well as the CNEL bands because of the night penalty on more flights. How will this impact the contours and the conclusions drawn?

Response:

As described in Section 4.10.1.3.1 of the SPAS Draft EIR, during late night hours (midnight to 6:30 a.m.), Over-Ocean procedures are in place at LAX and route both arrivals and departures over the ocean.

The average annual day operations used for aircraft noise modeling in the future alternatives were developed from the 2025 Design Day Flight Schedule (DDFS) developed for the SPAS Draft EIR (see Chapter 4 in Appendix F-1 of the Preliminary LAX SPAS Report). Therefore, the aircraft noise analyses accounted for the increase in nighttime operations from the baseline (2009) conditions to the projected operations associated with 78.9 million annual passengers (MAP) in 2025. The 2025 DDFS established 2,053 daily operations commensurate to a 78.9 MAP activity level. There is no evidence to support the commentor's statement that "in order to get to 78 MAP there will have to be many more flight late at night because peak hours will be maxed out around 70 MAP."

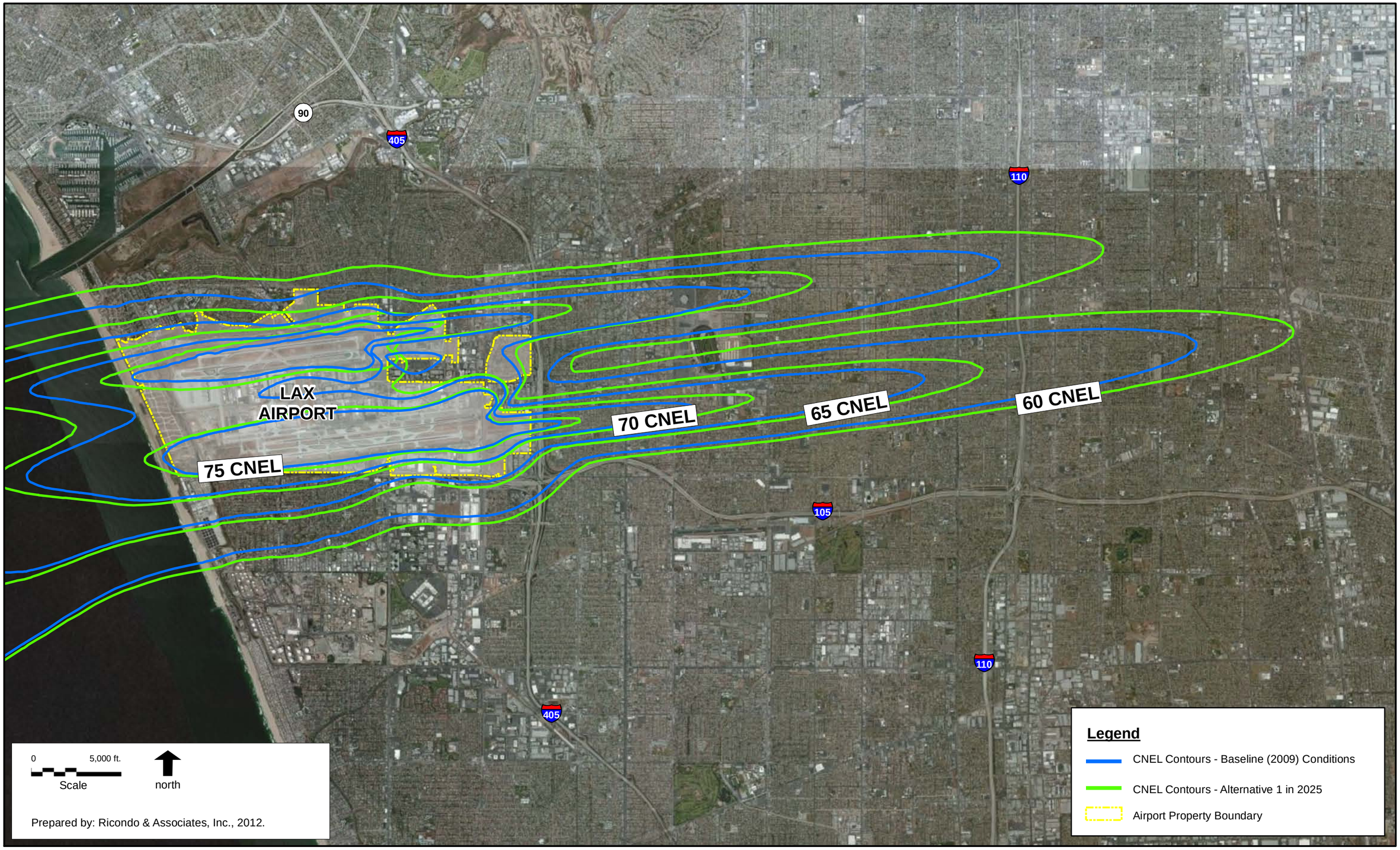
There is also no evidence to support the remaining portion of the comment regarding "over ocean ops ends up turning around at 2 AM instead of midnight." It is true that changing any of the input variables could result in a change in the aircraft noise contours. However, substantial evidence supports the assumptions relied upon and the conclusions reached in the DDFS.

SPAS-PC00130-301

Comment:

Page 4-930 4.10.1 Aircraft Noise Shifting Noise to Compatible Areas
Shifting Noise to Compatible Areas
Because of obstacles to the direct reduction of aircraft noise levels, it is more effective for airport operators to focus on the noise abatement methods that shift noise from sensitive areas (such as residential neighborhoods) to compatible areas (such as industrial areas). This can be accomplished through changes in runway use and arrival or departure routes or through facility changes on the airport itself, such as the modification of runways or the construction of noise barriers.
Runway Use and Flight Route Changes
The use of particular runways for aircraft landings and takeoffs is dictated by several factors, including the length of the runway, the runway gradient (or slope), the instrument approach procedures available to the runway, the minimum departure climb requirements from the runway, and the wind and weather. It is possible to establish runway use programs that encourage the use of runways that direct aircraft over compatible land uses and away from noise-sensitive areas, although allowances for exceptions must be made in recognition of the many other factors influencing the selection of runways for safe flight operations. LAWA previously established and currently implements the Preferential Runway Use Policy to reduce aircraft noise impacts to noise-sensitive uses (i.e., aircraft departures typically occurring on the inboard runways and aircraft arrivals typically occurring on the outboard runways, thereby placing the noisier of the two types of operations away from noise-sensitive uses).
Subject to certain limitations, aircraft routes can also be altered so that aircraft tend to fly over compatible areas and away from the most noise-sensitive areas. However, numerous constraints on the design of flight routes must be considered before changes are made. In large metropolitan areas with multiple airports, the volume of aircraft alone creates serious constraints. Flight routes must be designed to ensure the safe separation of aircraft and to ensure that arrivals and departures from each airport can be made safely and with relative efficiency. The control of aircraft in flight is the responsibility of the FAA. Thus, if airport operators desire to pursue changes in aircraft flight routes, they must coordinate with the FAA in undertaking the studies required to determine if the modifications are feasible.

Question: Since the FAA So Cal Metroplex redesign is in process, how would these changes impact the contours and the conclusions? Would the approach and take off route changes overshadow that of the runway movements? How about the increase in aircraft? What constitutes a shifting of noise by the definitions fostered by the FAA?



LAX Specific Plan Amendment Study Final EIR	**CNEL Contours Overview Baseline (2009) Conditions and Alternative 1 in 2025**	**Figure 1**

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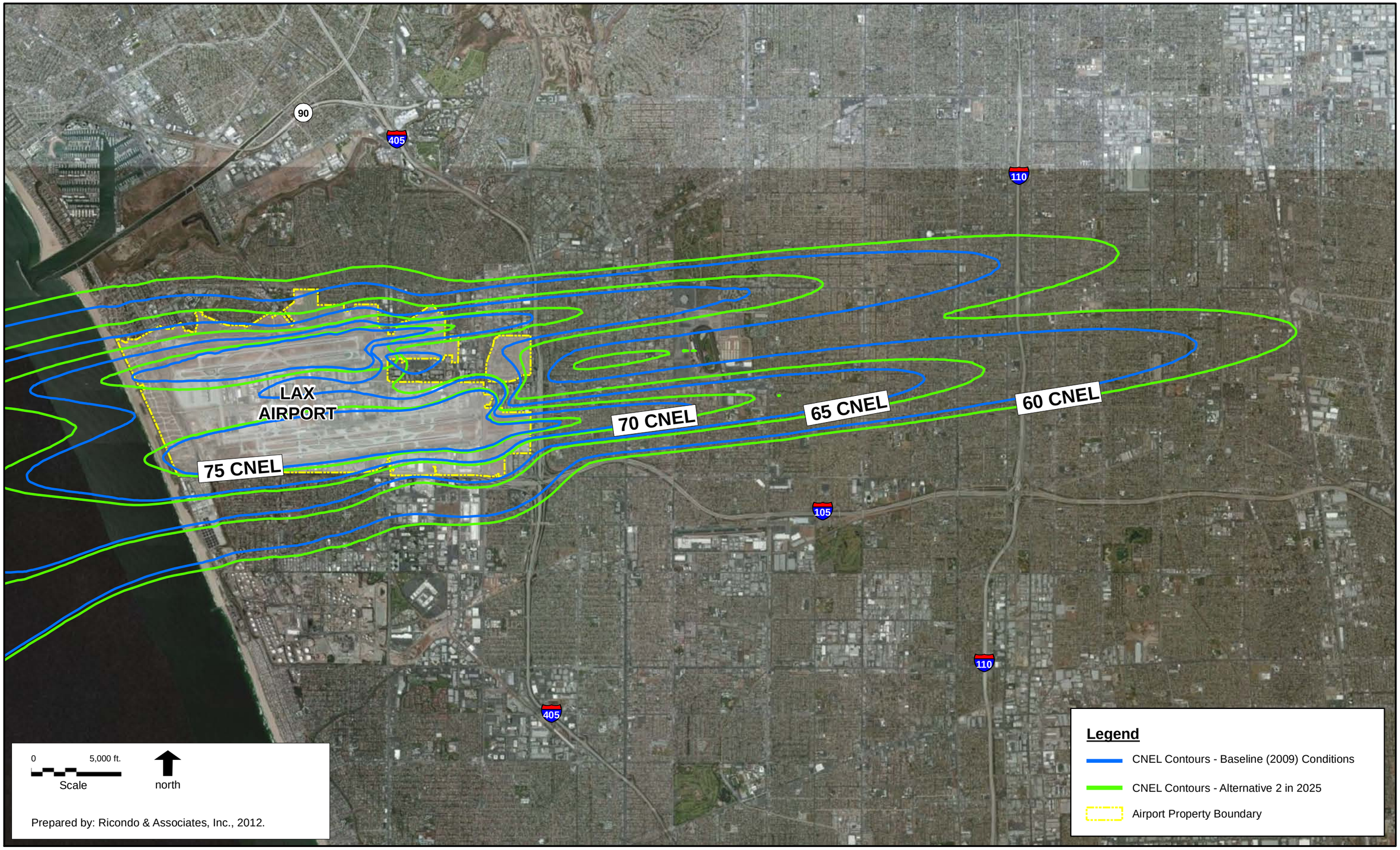

LAX Specific Plan Amendment Study Final EIR	**CNEL Contours Overview Baseline (2009) Conditions and Alternative 2 in 2025**	**Figure 2**

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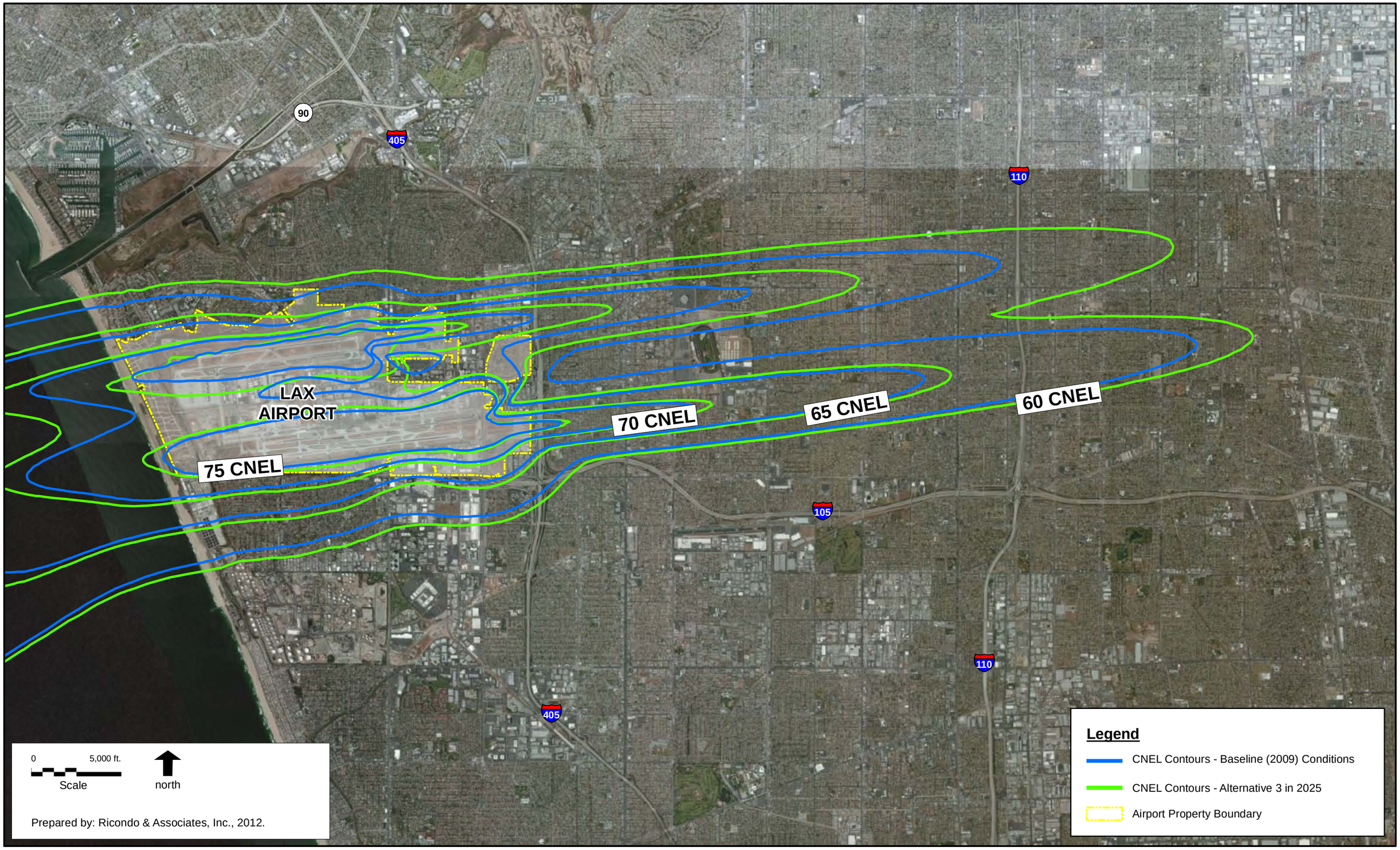

LAX Specific Plan Amendment Study Final EIR	**CNEL Contours Overview Baseline (2009) Conditions and Alternative 3 in 2025**	**Figure 3**

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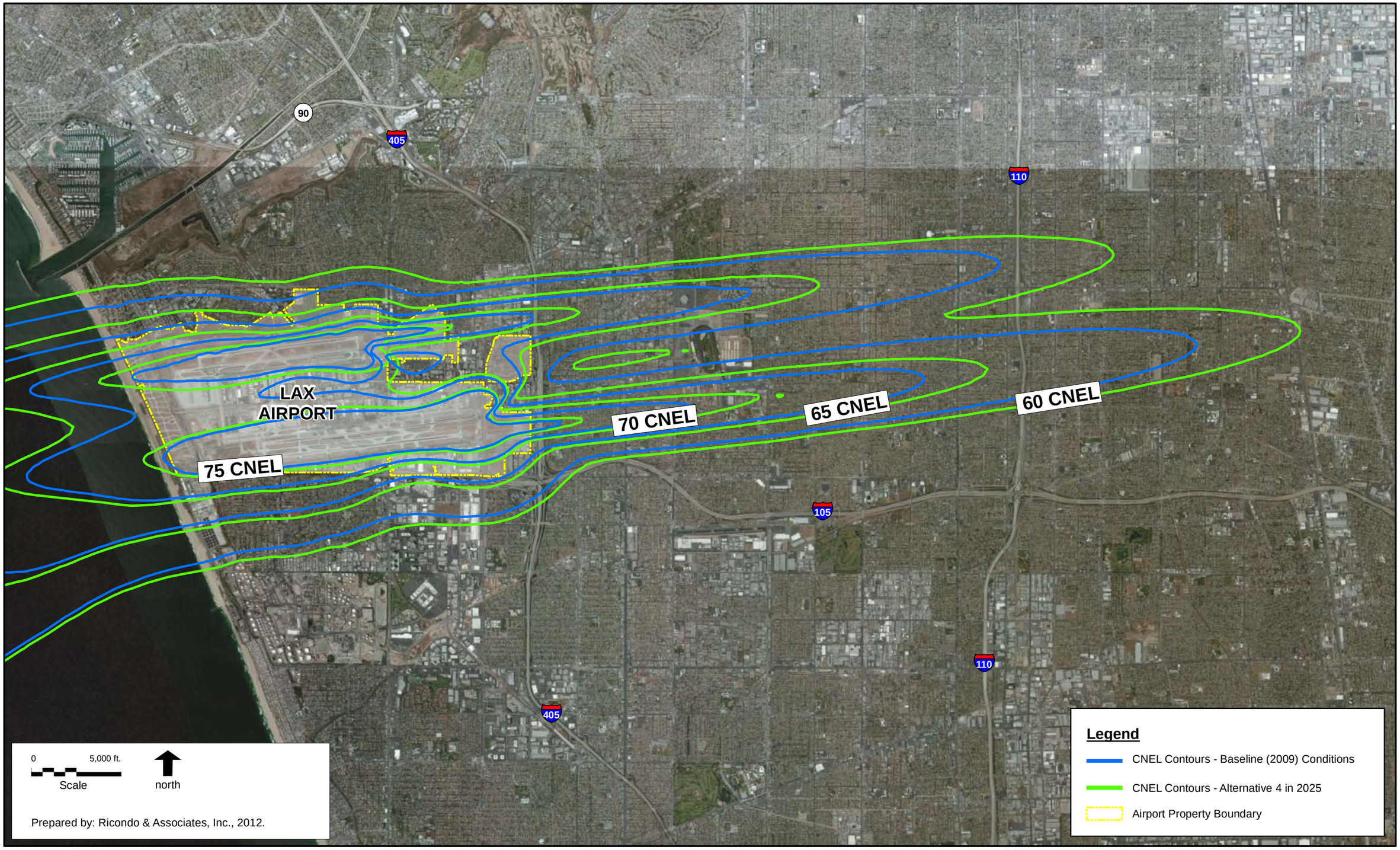

LAX Specific Plan Amendment Study Final EIR	**CNEL Contours Overview Baseline (2009) Conditions and Alternative 4 in 2025**	**Figure 4**

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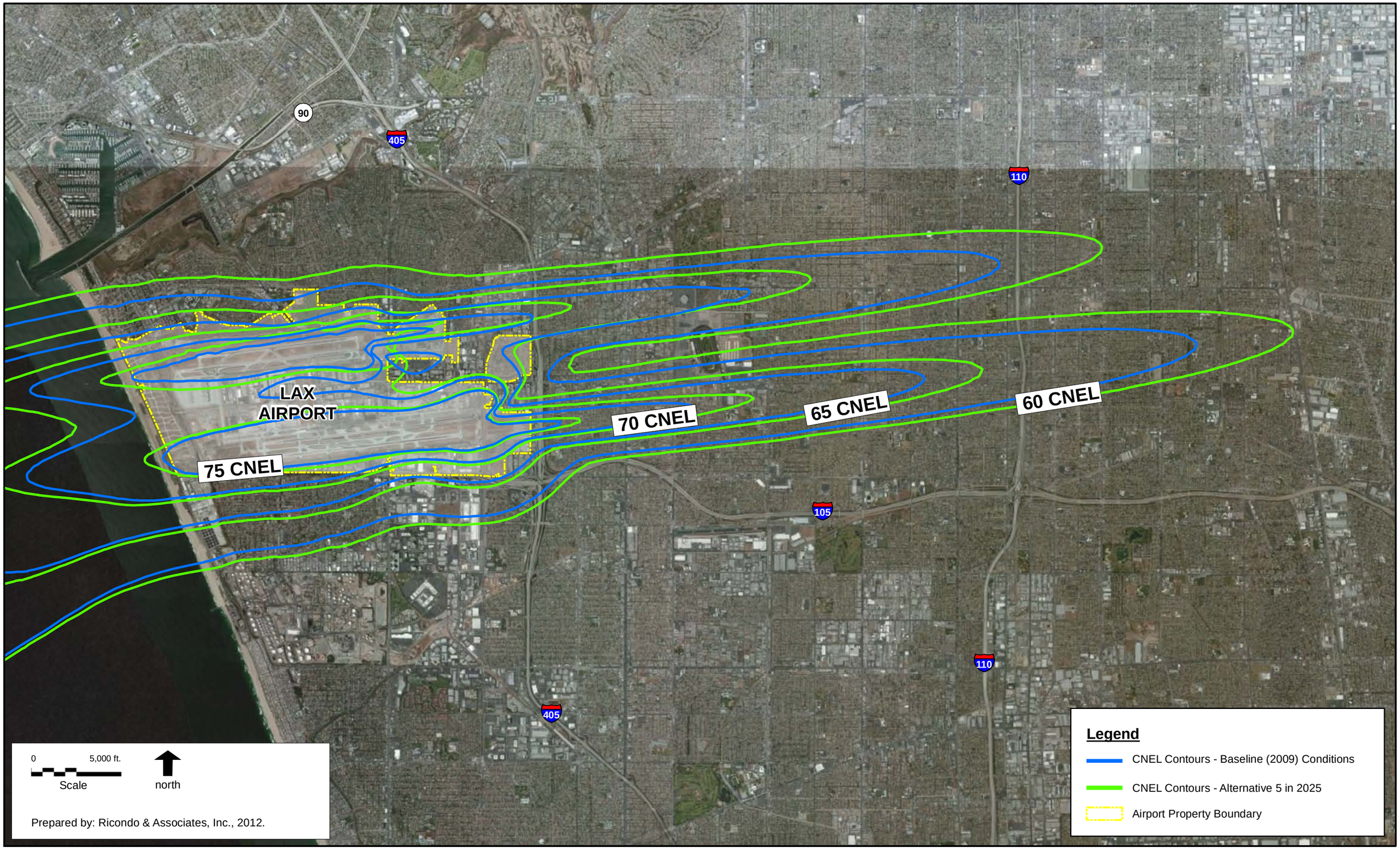

LAX Specific Plan Amendment Study Final EIR	**CNEL Contours Overview Baseline (2009) Conditions and Alternative 5 in 2025**	**Figure 5**

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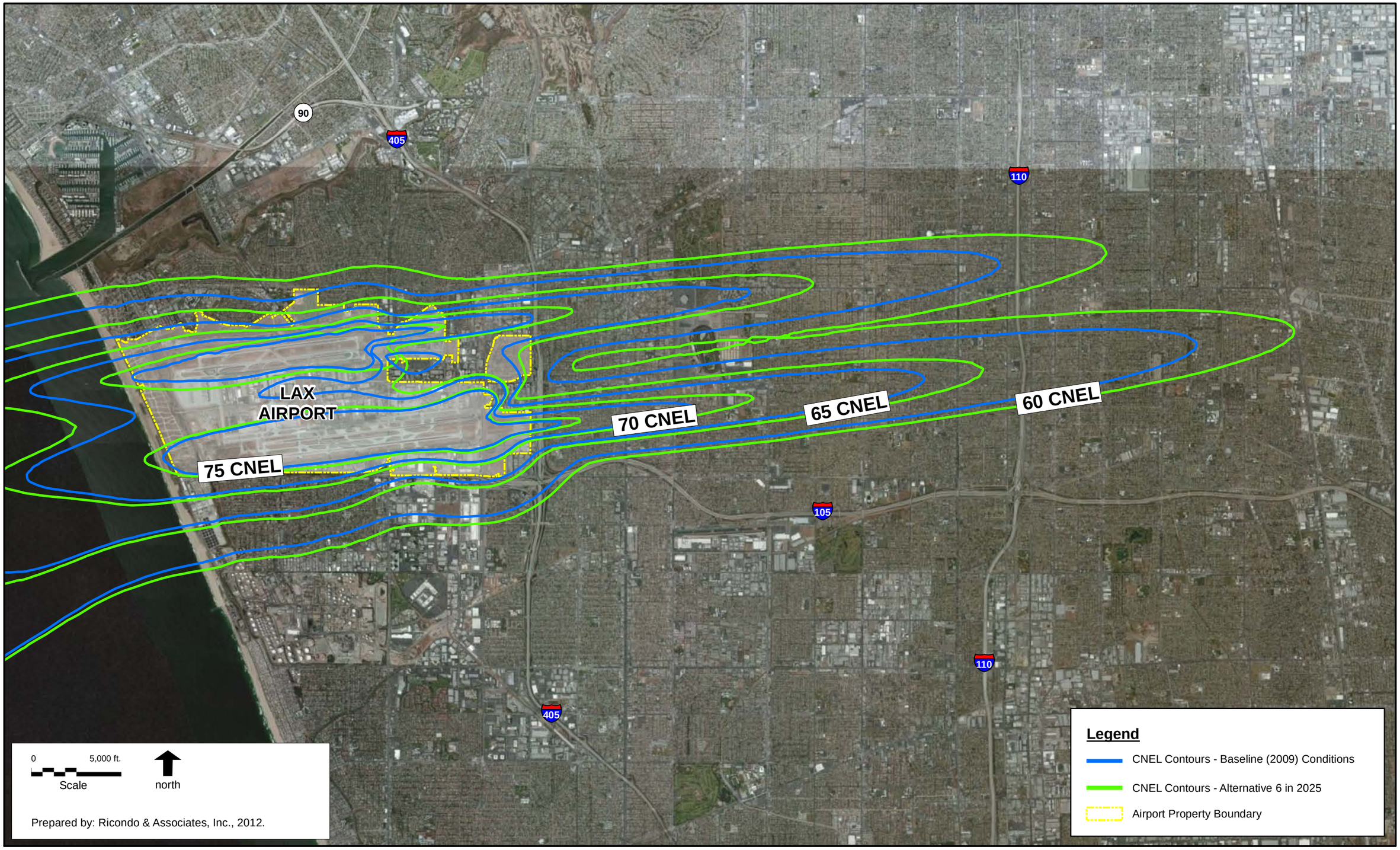

LAX Specific Plan Amendment Study Final EIR	**CNEL Contours Overview Baseline (2009) Conditions and Alternative 6 in 2025**	**Figure 6**

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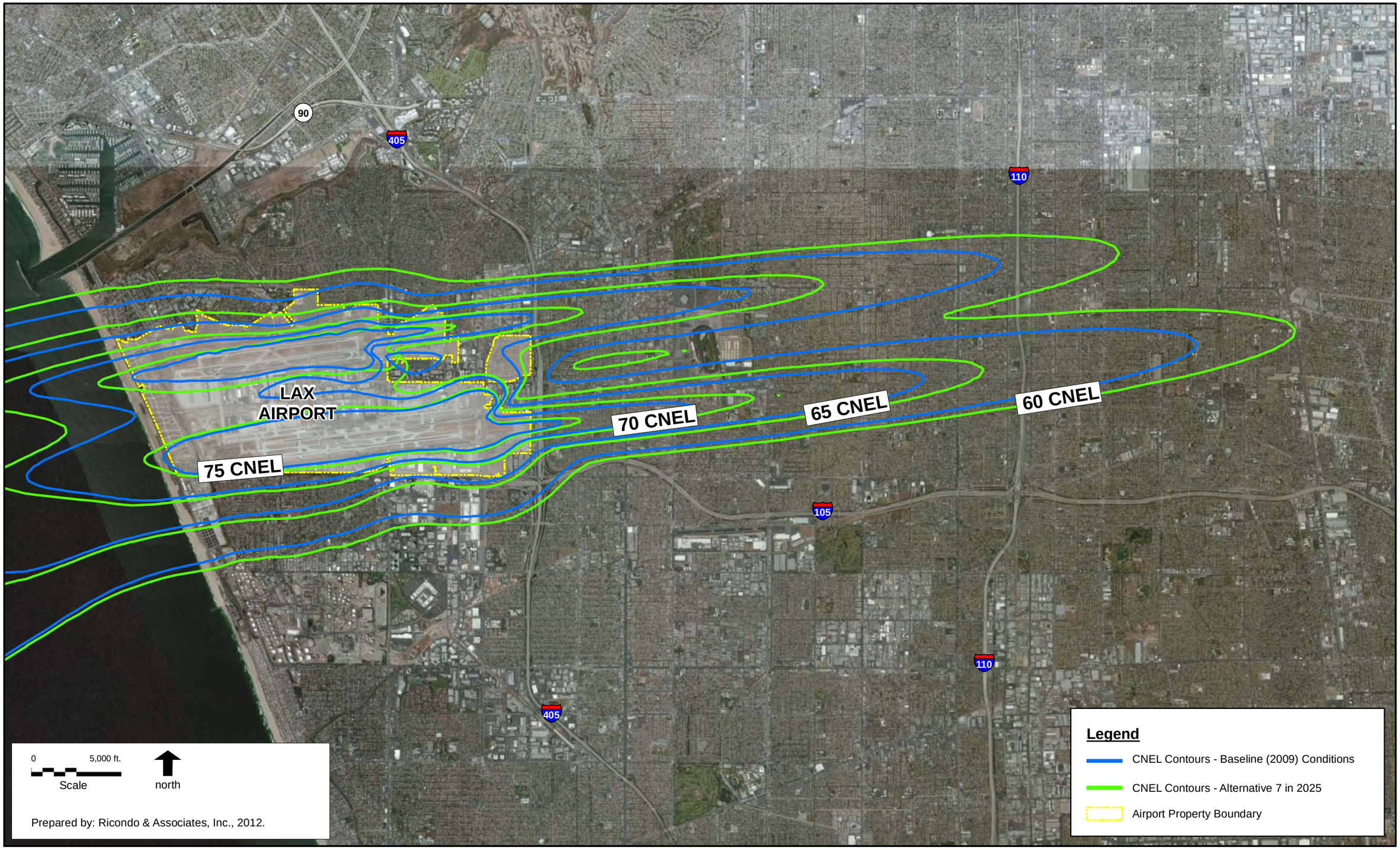

LAX Specific Plan Amendment Study Final EIR	**CNEL Contours Overview Baseline (2009) Conditions and Alternative 7 in 2025**	**Figure 7**

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Response:

The commentor in inquiring about the SoCal Metroplex redesign and the potential impacts of such a redesign on the conclusions of the SPAS Draft EIR. The commentor in essence is recommending use of the list of projects approach rather than the projections approach to the cumulative impact analysis. (See State CEQA Guidelines Section 15130(b).) The CEQA lead agency, in this case LAWA, has discretion to determine the appropriate methodology to conduct a cumulative impact analysis. The SPAS Draft EIR used a projections approach for the cumulative aircraft noise analysis which was supplemented with additional information, such as the Average Annual Day Activity Levels (AAD). This approach is consistent with CEQA and was described in Sections 5.2 and 4.10.1.1.4 of the SPAS Draft EIR, and Sections 2.3.2, and 3.2 through 3.8 in Appendix J1-1 of the SPAS Draft EIR. (Please also see Response to Comment SPAS-PC00130-216.)

The SoCal Metroplex redesign (Southern California Optimization of Airspace and Procedures in the Metroplex -- OAPM) is in the early planning stages. No proposed airspace and procedures designs or alternatives have yet been developed. The Southern California OAPM began with the preliminary study phase in August 2011. The design phase of the project began on October 15, 2012. The environmental evaluation of the proposed design will begin in the second half of 2013 and is projected for completion in December 2014. Additional information regarding the OAPM can be downloaded from the FAA's website at: http://www.faa.gov/nextgen/implementation/pbn_initiatives/media/OAPM.pdf. Due to the status of the SoCal Metroplex redesign, it would be speculative to analyze the effects of this project on the conclusions in the SPAS Draft EIR. CEQA does not require analysis of speculative impacts. (State CEQA Guidelines Section 15145.)

Any potential interaction between the environmental effects of the LAX SPAS and the proposed Southern California OAPM design, including changes in approach and departure routes and runway use, will be best considered in the OAPM environmental studies when additional detail is known about the OAPM project.

The FAA has no specific regulatory or policy definitions of "shifting of noise."

SPAS-PC00130-302

Comment:

4.10.2 Road Traffic Noise -skipped
4.10.3 Construction Traffic -skipped

Response:

It is noted that the comment package on the SPAS Draft EIR submitted by ARSAC contains comments related to road traffic noise (comments SPAS-PC00130-134 and SPAS-PC00130-135) and construction traffic (comments SPAS-PC00130-141, SPAS-PC00130-142, and SPAS-PC00130-349).

SPAS-PC00130-303

Comment:

Page 4-955 Figure 4.10.3-1 Construction Noise Analysis
Sensitive Noise Receptor Areas and Potential Construction Staging Areas

Question: Why are none of the construction staging areas on the south/west end of LAX along Pershing near the cement recycle activities since LAWA already modified the Imperial/Pershing intersection islands?

Response:

It is conceivable that the area southeast of the Pershing Drive/World Way West interchange would be used for some construction staging, as it is currently for other projects at LAX. The majority of

improvements proposed under the SPAS alternatives are located in the northern and eastern portions of the airport. Other than the West Employee Parking that would developed under Alternative 3, there are no SPAS-related improvements near the subject area, making it less likely to be used for SPAS-related construction staging than other areas described in the SPAS Draft EIR. As discussed on page 4-950 of the SPAS Draft EIR, the seven potential construction staging areas are located in the general vicinity of the improvements proposed under the alternatives.

SPAS-PC00130-304

Comment:

Page 4-975 Transit noise
Figure 4.10.4-1 provides an overview of several different types of non-project specific noises from transit sources and, for comparison, non-transit sources, and what the typical sound level is in A-weighted decibels (dBA) for those sources. Traffic noise, defined as unwanted sound, is associated with highway/transit projects and is usually in the form of loud or persistent noises from cars, trucks, and buses. Traffic noise, as may occur along the busway proposed under Alternatives 1-2 and 8, is generated primarily from engines/transmissions, mufflers, wind shear, and tire contact with the roadway. APM noise, as may occur under Alternatives 3 and 9, is generated primarily from electric control systems and traction (electric) motors, gear systems, wind shear, and contact between wheels and the rails. While train horns and crossing notification systems can also be typical noise sources for APM/light rail systems, this is not considered to be a concern relative to Alternatives 3 and 9, since the proposed APM systems would be exclusive grade-separated alignments with no vehicle or pedestrian crossings along the routes

Question: 4.10.4.2.1 Transit Noise. This section states that train horns and crossing notifications are not considered because they would be grade separated. The articulated buses will not be grade separated and may have to use their horns as they weave through traffic. Is this considered in the evaluation?

Response:

It is unknown at the current conceptual level of planning whether the LAWA buses that would operate on the elevated/dedicated busway system (Alternatives 1, 2, and 8) would be articulated buses (i.e., a bus with dual rigid passenger compartment sections connected at a common pivot point), standard single-section, or other design.

The occasional use of a vehicle horn, as allowed under Section 27001 of the California Vehicle Code when reasonably necessary to insure safe operation, is not recognized within the FHWA transit analysis guidelines as being a notable noise source requiring analysis, as compared to noise from train horns or other audible notification systems near at-grade crossings. Notwithstanding that occasional vehicle horn noise is not considered a significant noise source, the operation of buses on the SPAS elevated/dedicated busway would be grade-separated with the exception of the west end of the route, within the CTA and on the return leg at Sepulveda Boulevard and 96th Street, where there are no noise-sensitive uses. Further, honking of horns within the CTA is not expected to be noticeable in comparison to existing conditions, nor is this location in close proximity to noise-sensitive receptors.

SPAS-PC00130-305

Comment:

Page 4-990 4.10.4.7.3 Summary of Impacts Transit Noise
Alternatives 1, 2, and 8 would result in significant transit noise impacts at noise-sensitive receptors (hotels) associated with the elevated/dedicated busway system proposed under these alternatives. Although Alternative 8 proposes the same elevated/dedicated busway system as that of Alternatives 1 and 2, the average daily transit noise levels and associated impacts of Alternative 8 would be comparatively greater due to greater number of hourly operations during the daytime hours (i.e., 128 trips per hour versus 54), which is mostly attributable to the CONRAC proposed under Alternative 8.
Alternatives 1 and 2 would result in a significant transit noise impact at two hotels (Four Points Sheraton and Hilton Hotel), while Alternative 8 would result in a significant transit noise impact at three hotels (Courtyard by Marriott, Four Points Sheraton, and Hilton Hotel).

Question: If the rail line (either Green Line or Crenshaw LAX Line) went into the CTA what impacts would be improved? What service level improvements would be seen?

Response:

Regarding the questions of what impacts would be improved and what service level improvements would be seen if the Metro Green Line or Crenshaw/LAX Line went into the CTA, it would be speculative to guess at the answers given that there are currently no approved Metro plans for such scenarios. Metro is currently evaluating options to connect both the Green Line and the Crenshaw/LAX Corridor project to the airport through the Airport Metro Connector Project. This project was identified as a cumulative project in Section 5.3 of the SPAS Draft EIR. However, based on Metro's most recent timelines for a potential project,1 it was determined that is was not reasonably foreseeable that the project would be operational within the SPAS horizon year for the purposes of the SPAS cumulative impact analysis. As discussed on page 4-1199 in Section 4.12.2 of the SPAS Draft EIR, "options to extend the Metro Green Line to LAX are currently being studied by Metro. However, given that this proposed extension to LAX is in its early environmental planning stage, has not been approved, and if approved would not be operational until after the SPAS horizon year, it was not included in the 2010 or 2025 scenarios."

1. Los Angeles County Metropolitan Transportation Authority, Planning and Programming Committee Report: Metro Green Line to LAX, April 18, 2012. This Report identifies a date of 2028 for the Airport Metro Connector Project. The Report states that America Fast Forward would accelerate the date to 2018. However, funding in the America Fast Forward program is limited and Metro, to date, has not applied for funding through that program for the Airport Metro Connector Project. Moreover, Measure J, a local ballot initiative that would have raised funds to accelerate funding and construction of certain Metro projects, was not passed by Los Angeles County voters in November 2012.

SPAS-PC00130-306

Comment:

Page 4-1013 4.11 Fire Protection

Question: The statement is made repetitively that because a center line taxiway will be present the demand on the fire stations will be reduced. However, there will be a substantial growth in passengers at LAX and isn't 95% of all fire department calls for paramedic services? Where is that considered? How much more paramedic services will be required?

Response:

Regarding the statement that the SPAS alternatives would result in substantial growth in passengers at LAX, as stated on page 1-13 of the SPAS Draft EIR, the project would not change the potential for passenger growth at LAX; rather, future passenger activity at LAX is forecast to reach 78.9 MAP at LAX with or without the SPAS alternatives. As discussed in Section 4.11.1 of the SPAS Draft EIR, LAX Master Plan Commitments FP-1, LAFD Design Recommendations, and PS-2, Fire and Police Facility Space and Siting Requirements, as well as enforcement of FAR and state and local fire code requirements, would ensure maintenance of adequate fire and emergency response times, staffing, equipment, facilities, and emergency access.

SPAS-PC00130-307

Comment:

Page 4-1019 4.11 Law Enforcement

Question: The section again mentions general efficiencies plus TSA, and ICE efficiencies will reduce stress on law enforcement. However, as the number of passengers grows doesn't crime and general civil police support increase? Where is that discussed? Also specialized support should go up as the

number of operations continues to increase. Where is that discussed? Why aren't roadway cameras and weight scales mentioned as well as other security enhancing equipment and procedures?

Response:

The efficiencies referenced in the SPAS Draft EIR and noted by the commentor are specific to efficiencies within the north airfield due to airfield improvements associated with the SPAS alternatives. Specifically, Section 4.11.2 of the SPAS Draft EIR concludes that airfield improvements associated with the SPAS alternatives would enhance the safety and efficiency of the north airfield, and ground access improvements would reduce emergency response and the potential for automobile collisions and automobile/pedestrian conflicts, improving the overall safety and security characteristics of the airport. The EIR concludes that there would be decreased demand on law enforcement services associated with airfield accidents and automobile collisions. However, the EIR acknowledges that development of new terminal areas and ground access facilities, and the increase in passenger activity over time, could increase demand for law enforcement services and police functions compared to baseline conditions due to expanded terminal areas and increases in passenger activity over time. (Note that the increase in passenger activity over time would occur with or without the SPAS alternatives, as stated on page 1-13 of the SPAS Draft EIR.) As stated in Section 4.11.2, significant impacts on law enforcement services due to new facilities and modifications would be avoided with implementation of LAX Master Plan Commitment LE-1, Routine Evaluation of Manpower and Equipment Needs, which would ensure that LAWAPD and LAPD continue to routinely evaluate and provide additional officers, supporting administrative staff, and equipment to keep pace with forecasted increases in activity and development at LAX in order to maintain a high level of law enforcement services. LAX Master Plan Commitment, LE-2, Plan Review, would ensures that LAPD, LAWAPD, and other law enforcement agencies would be consulted to review plans so that, where possible, environmental contributors to criminal activity, such as poorly-lit areas, and unsafe design, are reduced.

Increased needs for specialized support and other security enhancing equipment and procedures related to federal law enforcement agencies at LAX, such as the Transportation Security Administration (TSA), United States Customs and Border Protection (CBP), United States Immigration and Customs Enforcement (ICE), Drug Enforcement Administration (DEA), and the Federal Bureau of Investigation (FBI), would continue to be routinely evaluated by these federal agencies in accordance with existing and future TSA and other pertinent regulatory requirements.

The SPAS Draft EIR evaluates the potential for the SPAS alternatives to affect the provision of law enforcement services at a program-level of detail. The EIR is not required to identify and evaluate the efficacy of specific security measures at the airport.

SPAS-PC00130-308

Comment:

Page 4-1043 4.12.1 On-Airport Transportation

Question: Section 4.12 Page 4-1043 the evaluations use an average day, but shouldn't the calculations be done to see what happens on a peak day as well? Doesn't capacity have to be able to handle the peaks?

Response:

The on-airport traffic analysis for the SPAS Draft EIR was prepared to assess the anticipated traffic operations during the peak hours of an average busy day of the peak month (i.e., Peak Month Average Day (PMAD)). As shown in Table 4.12.1-2 on page 4-1057 on the SPAS Draft EIR, this activity level typically represents a busy day in the peak month of August for LAX.

The generally accepted practice for analyzing roadway systems is to evaluate conditions during a busy peak period that is lower than the absolute peak hour. This is because the conditions during the absolute peak hour would occur for a brief period during the year. Designing facilities for this type of rare occurrence (i.e., expected to occur periodically, but only for brief periods) is generally not considered good practice or a wise use of resources. It is an acceptable trade-off to plan facilities such

that additional congestion would be experienced during peak-seasonal conditions such as Thanksgiving and Christmas when passengers will expect some additional level of congestion. Furthermore, analyzing impacts using traffic conditions that would be expected on an absolute peak day (or hour) at some point in the remote future would not provide decision-makers with useful information, because these conditions would far exceed the actual activity levels that would be experienced during the peak hours occurring in the years leading up to that future year.

SPAS-PC00130-309

Comment:

Page 4-1043 4.12.1 On-Airport Transportation
659 As further described in the introduction to Chapter 4, "baseline conditions" used in the analysis of certain environmental topics, such as air quality, aircraft noise, and traffic, were based on a full year's worth of airport operations data in order to best delineate the relevant existing operational characteristics of the airport. The Notice of Preparation (NOP) for the SPAS EIR was published in October 2010 and while that time period is used to define "baseline conditions" for most other topics in the EIR impacts analysis, that specific point in time does not account for the fluctuations in airport activities that typically occur through the course of a year and would not accurately represent the existing conditions relevant to air quality, aircraft noise, and traffic. As such, LAX activity data for Calendar Year 2009 (i.e., a full year's worth of airport activity data prior to publication of the NOP) is taken into account in defining "baseline (2009) conditions" for the On-Airport Transportation analysis.

Question: Note 659 discusses baseline conditions and the desire for a full year of data. The argument is that a full calendar year would be from start of 2009, but why, for instance was it not July to July or something closer to the 2010 NOP date?

Response:

Please see Response to Comment SPAS-PC00130-52 regarding the use of 2009 as the baseline year for aviation activity levels. As explained in that response, use of a full year's worth of aircraft activity data allows for the development of the peak month average day activity, which is required for modeling purposes.

SPAS-PC00130-310

Comment:

Page 4-1044 On-Airport Transportation
This comparison is provided for the purpose of identifying impacts pursuant to the requirements of CEQA; however, it is hypothetical in nature given the underlying assumption that all of the ground access improvements proposed to be completed by 2025 under each alternative theoretically exist today and apply to the baseline (2009) condition.

Question: 4.12.1 states (highlighted) "does not include any increase in on-airport traffic from natural growth in passenger activity levels anticipated to occur at LAX by 2025." How is this even a logical situation since LAWA has stated throughout the document that they expect 2025 to have 78.9 MAP regardless of alternatives chosen or no improvements?

Response:

CEQA requires consideration of a project's impacts relative to existing (baseline) conditions. Given that components of the SPAS alternatives (i.e., the project) include transportation system improvements, such as the ITF, the GTC, an elevated busway or APM system, etc., that would change travel modes and trip distribution at the airport, the SPAS on-airport traffic impacts analysis includes a scenario that focuses on how existing (baseline) traffic conditions would change strictly as a result of those improvements. While the on-airport traffic analysis also includes a scenario that evaluates future (2025) traffic conditions with the SPAS alternatives ground transportation improvements, the inclusion of airport activity growth between 2009 and 2025 in that analysis makes it difficult to distinguish traffic impacts that are attributable to the SPAS improvements from traffic impacts that are attributable to the airport

growth occurring independent of SPAS. The analysis scenario described above whereby the SPAS improvements are assumed but the future growth is not included enables the reader and decision-makers to better understand how the SPAS-related improvements alone would affect existing (baseline) traffic conditions.

SPAS-PC00130-311

Comment:

Page 4-1044 On-Airport Transportation
That future (2025) scenario does not include any of the ground access improvements proposed under the various SPAS alternatives, and also does not include any increase in on-airport traffic from natural growth in passenger activity levels anticipated to occur at LAX by 2025. Rather, that "Future (2025) Without Alternative" condition assumes the same 2009 passenger activity levels daily flight schedules as in the baseline (2009) condition, and serves as the basis for comparison for the "Future (2025) With Alternative" condition scenario. The Future (2025) With Alternative traffic condition scenarios consists of: (1) the baseline (2009) physical conditions and configuration of the CTA plus reasonably foreseeable on-airport ground access system improvements anticipated to occur by 2025, independent of, and separate from, SPAS; (2) the 2025 passenger levels and daily flight schedules; (3) reasonably foreseeable regional (nonairport) programmed improvements and ambient growth in off-airport traffic, as may affect on-airport traffic; and (4) the proposed SPAS improvements associated with each of the alternatives. It is important to note that the impacts analysis associated with comparing the Future (2025) With Alternative condition to the Future (2025) Without Alternative condition is very conservative, because the increase in on-airport traffic volumes assumed for each with-alternative scenario would actually be attributable to natural growth in passenger activity predicted to occur at LAX by 2025 regardless of SPAS. (underline for emphasis)

Question: 4.12.1 states (highlighted) "does not include any increase in on-airport traffic from natural growth in passenger activity levels anticipated to occur at LAX by 2025." How is this even a logical situation since LAWA has stated throughout the document that they expect 2025 to have 78.9 MAP regardless of alternatives chosen or no improvements?

Response:

This content of this comment is identical to comment SPAS-PC00130-310; please refer to Response to Comment SPAS-PC00130-310.

SPAS-PC00130-312

Comment:

Page 4-1046 On-Airport Transportation
On-Airport Traffic Data Collected in 2009 - As noted above, data collected for the Bradley West Project EIR was supplemented with additional data collected in 2009. This included data from the in-pavement vehicle loop detector system which records the volume of all traffic entering and exiting the CTA and the AVI system which uses transponders to record the number and types of AVI equipped commercial vehicles entering and exiting the CTA. These counts representing baseline (2009) conditions were collected for Fridays in August 2009. Since August is considered to be the peak month for airport-related passenger and traffic activity at LAX, and Fridays are typically the busiest day of the week for the airport roadway system, the new intersection turning movement counts were collected for the departures level on Friday, August 14th and for the arrivals level on Friday, August 21st and 28th during the a.m., mid-day, and p.m. commuter peak periods. Video from August 2008 obtained at the entrance to the CTA and at the departures level roadway in front of the Tom Bradley International Terminal (TBIT) from the airport's Closed Circuit Television (CCTV) system was also used to serve as a source for traffic counts and vehicle classification.

Question: P 4-1046 how was the 2006 data compared with and combined with the 2008 data as well as the August 2009 data? Were there significant differences in the older data from the Oct 2 and Oct 9 2009 data? What were they?

Response:

2006 traffic data was not used in the SPAS Draft EIR. The reference to 2006 data on page 4-1046 of the SPAS Draft EIR refers to the 2006 LAX Air Passenger Survey. The information from the 2006 LAX Air Passenger Survey was used to obtain general passenger characteristics related to vehicle mode of access, regional approach patterns, origin and destination (O&D) percentages, and passenger show up profiles that would not change significantly over the period of time analyzed. Footnote 665 on page 4-1046 of the SPAS Draft EIR explains that the 2006 survey provides a reasonable representation of the current conditions and that use of the 2006 O&D data for estimating the traffic activity for the SPAS alternatives provides a more conservative impact assessment than would have occurred if more recent O&D data from 2011 were used for the analysis.

As discussed on page 4-1046 in Section 4.12.1.2.1 of the SPAS Draft EIR, traffic data from 2008 was used as supplemental information for purposes of refining the primary data set from 2009. Specifically, videos from the Closed Circuit Television (CCTV) camera system was collected in 2008 and used to determine the percentage of various vehicle modes using the Central Terminal Area (CTA) roadways. The percentage of vehicle modes observed in 2008 was then applied to 2009 total traffic volumes to estimate the volume of vehicles by mode accessing the CTA in 2009. There were no major transportation improvements or operational modifications that would create a significant change in vehicle allocation between 2008 and 2009; therefore, it can be reasonably assumed that the 2008 observations remain valid for 2009.

As discussed in Section 4.12.1.2.1 of the SPAS Draft EIR, data from October 2009 were also used to supplement the primary August 2009 data set and to provide additional refinement for use in preparing detailed mode-specific analysis. The traffic volumes from the October 2009 data set were generally lower than the traffic volumes from August 2009. This is logical because passenger activity is lower in October as compared to the peak month of August. To account for this difference in magnitude and as stated on page 4-1047 of the SPAS Draft EIR, all data collected in October was adjusted to represent peak month August activity using available airline passenger schedules, Automatic Vehicle Identification (AVI) counts, and in pavement loop detector counts. It is a reasonable and accepted practice to obtain and use supplemental data sources to supplement and refine a primary data set.

SPAS-PC00130-313

Comment:

Page 4-1046 On-Airport Transportation
Note 665 Applied Management & Planning Group, 2006 Air Passenger Survey Final Report Los Angeles International Airport, December 2011. The 2006 survey is the most recent complete published passenger survey for LAX. Although an updated passenger survey was undertaken in 2011, the survey results are still in the process of being compiled and reviewed. Preliminary results of the 2011 survey data, subject to further review and confirmation, show an increase in connecting passenger percentages, suggesting that LAX is becoming less of an "Origin and Destination" (O&D) airport, which, in turn, reduces vehicle trips to and from the airport. For the purposes of this EIR analysis, the information contained in the 2006 survey is still considered to be reasonably representative of the existing airport traffic conditions and trip generation, which provides a more conservative impacts analysis than if airport trips were reduced based on lower proportions of O&D activity.

Question: Note 665 states that LAWA is relying on a 2006 survey. Since economic conditions were much worse in 2006 and traffic was lower along with changes in the Open Skies conditions how is this six year old study whose data is necessarily earlier a valid use?

Response:

The passenger activity levels at LAX in 2006 were not substantially different from those in 2011. Specifically, the passenger activity level at LAX in 2006 was approximately 61.0 million annual passengers (MAP) and the passenger activity level at LAX in 2011 was 61.9 MAP, a difference of only about 1.5 percent. This minor difference in passenger activity levels between 2006 and 2011 is consistent with, and supportive of, the statement on page 4-1046 of the SPAS Draft EIR that "the information contained in the 2006 survey is still considered to be reasonably representative of the

existing airport traffic conditions and trip generation." Any changes in economic and "Open Skies conditions" between 2006 and 2011 would have been reflected in the 2011 passenger activity level.

Regarding the commentor's concern about "Open Skies conditions," the United States began pursuing Open Skies agreements in 1979, and, by 1982 it had signed twenty-three bilateral air service agreements worldwide, mainly with smaller nations, and that was followed in the 1990s by agreements with individual European states.1 In addition to bilateral Open Skies agreements, the United States has negotiated two multilateral Open Skies accords: (1) the 2001 Multilateral Agreement on the Liberalization of International Air Transportation (MALIAT) with New Zealand, Singapore, Brunei, and Chile, later joined by Samoa, Tonga, and Mongolia; and (2) the 2007 Air Transport Agreement with the European Community and its 27 Member States (http://www.state.gov/e/eb/tra/ata/index.htm - accessed on December 22, 2012). Two additional multilateral agreements with Asian counties were signed in 2009, calling for a calibrated and gradual implementation in each contracting state (http://en.wikipedia.org/wiki/Open_skies - accessed on December 22, 2012). In summary, Open Skies agreements have existed for over 30 years and it is reasonable to assume that any resultant changes in international passenger activity at LAX would be already be accounted for in the passenger activity levels at LAX in both 2006 and 2011. As noted above, there is not a significant difference in the MAP levels for each of those years.

Please refer to Response to Comment SPAS-PC00130-312 for additional explanation of the use of the 2006 LAX Air Passenger Survey.

Additionally, the 2006 LAX Air Passenger Survey was not directly used to determine traffic volumes but rather to estimate passenger behavior and the result effect that this behavior would have on the traffic activity within the Central Terminal Area (CTA). For example, these data were used to determine percentage of passengers that use specific vehicle modes, where passengers park their vehicles, number of passengers within each travel group, and the distribution of time that a passenger arrives before their departing flight, among other information. While changes in economic conditions compared with 2006 could produce an effect on overall passenger activity accessing the airport, the passenger behavior metrics derived from the survey and used for the SPAS Draft EIR analysis would not be expected to change as a result of changes in the economic conditions.

1. Wikipedia, Open Skies, Available: http://en.wikipedia.org/wiki/Open_skies, accessed December 22, 2012.

SPAS-PC00130-314

Comment:

To further supplement the existing data sets, additional data were collected during field surveys conducted on Friday, October 2nd, 2009, and Friday, October 9th, 2009 between 10:30 a.m. and 12:30 p.m. on the departures level, and between 8:30 p.m. and 10:30 p.m. on the arrivals level. Specifically, the following surveys were conducted:
Intersection turning movement counts - for intersections along Center Way
- Vehicle classification survey - at lower level entrance to the airport
- Vehicle dwell time survey - at Terminals 1, 4, and 7
- Vehicle license plate survey - at Terminal 1 and Terminal 7 lower level curbsides
- Public parking garage entry counts - Parking Garages 1, 3, and 7

The survey data represents activity on a typical busy day on the CTA roadways and curbsides at LAX. Survey times were established based on the peak passenger activity in the CTA which was determined from the 2008 (design day) gated passenger schedule. After reviewing and compiling the field data, the results were adjusted from October 2009 conditions to August 2009 conditions using multiple control data sources including passenger schedules, AVI, and inpavement loop detector data as well as turning movement volumes.

Question: The above section talks about vehicle dwell time at Terminals 1, 4, & 7. Were there differences in dwell time by lime of day? How did the number of traffic officers change the amount of dwell time? Was there a difference in dwell time noted for passengers with or without baggage to be

checked? Were the differences significant? Was a preponderance of the traffic due to business travel or personal? Did dwell times change significantly when buses were competing for the same curb space?

Response:

As discussed on page 4-1047 in Section 4.12.1.2.1 of the SPAS Draft EIR, dwell time information collected in October 2009 was obtained during peak roadway activity periods. Dwell time data collection was limited to peak periods to provide a representation of the dwell times that would be expected during the peak hour conditions analyzed in the SPAS Draft EIR. These peak period dwell times generally reflect the level of enforcement that was in place during busy periods, the times required to actively load and unload a vehicle, and the effects of vehicle congestion that may impede a vehicle from departing a curbside location. Non-peak periods were not analyzed for the SPAS Draft EIR and, therefore, dwell time information was not collected during those non-peak periods. Consequently, a comparison of peak period dwell times with dwell times from other times during the day cannot be provided.

Dwell times represent the total time a vehicle is waiting at the curbside to either pick up or drop off a passenger. These commercial vehicles will be accommodating passengers carrying different amounts of baggage and with different trip purposes (business and personal travel). Dwell time data cannot be directly correlated with baggage and trip purpose and, therefore, cannot be reported. However, the dwell time data collected during the peak period does provide a composite of the dwell time for vehicles loading and unloading passengers with baggage and with different trip purposes. The composition of passengers with baggage and by trip purpose is not assumed to vary in the future to the extent that the dwell time required to actively load and unload a vehicle during the peak hour would change.

The active dwell times required to load and unload a vehicle in the peak hours are not expected to change in the future conditions. However, with additional traffic volume, the non-active dwelling or waiting for the curbside space will increase and is considered as a part of the curbside analysis. For example, for commercial vehicle curbside loading, all commercial vehicles must load from the lane adjacent to the curbside which is defined as single lane loading in on page 4-1074 in Section 4.12.1.3.13. Therefore under these circumstances, any utilization above 100 percent represents vehicles either waiting for space or choosing to load/unload passengers from the adjacent non-curbside lane.

SPAS-PC00130-315

Comment:

Page 4-1047 On-Airport Transportation
666 In probability theory, a Poisson process is a stochastic process which counts the number of events and the time that these events occur in a given time interval. The time between each pair of consecutive events has an exponential distribution with parameter ʎ and each of these inter-arrival times is assumed to be independent of other inter-arrival times.

Question: P 4-1047 CTA Traffic Conditions Baseline Was there any changes in signage between the survey times? Was there any construction or changes to where the buses and taxis were instructed to stop? How would a change in airlines location from one terminal to another impact the numbers calculated?

Response:

There were no known signage changes or construction activity during the data collection period that would have had an effect on bus and taxicab operations or other baseline conditions defined in the SPAS Draft EIR.

As discussed on page 4-1047 in Section 4.12.1.2.1 of the SPAS Draft EIR, the baseline trip generation and trip distribution models were correlated to the airline schedules that were in place at that time. Future airline schedules that include expected changes in the distribution of airline passengers between terminals are a direct input into the future trip generation and trip distribution models. Therefore,

anticipated changes in airline passenger activity, including the relocation of activity between terminals, are reflected in the traffic analyses prepared for the SPAS Draft EIR.

SPAS-PC00130-316

Comment:

Page 4-1048 Prepare Level of Service Analysis
Prepare Level of Service Analysis - The roadway model provides a quantitative representation of the traffic operations associated with the CTA curbsides, CTA roadways, and CTA intersections as needed to assess the potential effects of project traffic. Model outputs were post-processed to calculate the Level of Service (LOS) for each terminal building curbside and curbside roadway segment during each peak period analyzed. This model uses peak hour vehicle volumes combined with average dwell time by vehicle mode to estimate the demand for curbside frontage on both the departures and arrivals levels. To account for non-uniform arrival rates during the peak-hour, the model applies a statistical "surge" factor based on a Poisson666 arrivals distribution to obtain an estimate of occupied "spaces" during the peak hour. These estimated space requirements are multiplied by the average length of the vehicle (including a buffer to represent the space between two parked vehicles and lost space due to parking inefficiencies) to determine the demand for curbside frontage in linear feet. The linear distance representing these stopped vehicles was then divided by the linear curbside length along the terminal frontages to calculate a ratio that is used to define curbside LOS which is further discussed in Section 4.12.1.3.13 below.

Question: P4-1048 4.12.1 On-Airport Transportation How would a backup of traffic going into the CTA impact the traffic dwell time? IE As traffic builds up the parked car may not stop all the way next to the curb in order to be able to get out after dropping off the passenger. This reduces the amount of practical, usable curb space. How was this considered in the calculations?

Response:

The effects of a backup of traffic entering the Central Terminal Area (CTA) are dependent upon the location and cause of the backup. For example, a constraint at the traffic signal in advance of Terminal 1 could create a condition that could meter or otherwise reduce the rate at which traffic reaches the downstream curbside. This metering effect could potentially decrease the total dwell time at the curbsides as compared to what would be expected if the true demand were accommodated.

In order to provide a conservative approach, the curbside analysis does not consider any decrease in curbside traffic dwell times that could result as a result of any upstream congestion. As discussed in Section 4.12.1.2.1 of the SPAS Draft EIR, the dwell times used for the SPAS Draft EIR are based on data that were collected during busy curbside periods and are representative of the order-of-magnitude that would be expected during peak periods.

The effects of varying levels of curbside activity, vehicles not parking directly at the curbside, and the impact on curbside operations and the adjacent through lanes are measured by the curbside utilization factors that are used to define curbside roadway levels of service. Section 4.12.1.2.1 of the SPAS Draft EIR discusses the preparation of the level of service analysis.

Please see Response to Comment SPAS-PC00130-149 regarding estimated curbside demand.

SPAS-PC00130-317

Comment:

If cars have to go around multiple times to pick up or drop off a passenger how does this impact the calculations due to the increase in lane changes that will be necessary?

Response:

Vehicles that pass the Central Terminal Area (CTA) curbside multiple times before picking up an arriving passenger are classified as "recirculating vehicles" in the trip generation model.

As discussed in Section 4.12.1.2.1 of the SPAS Draft EIR, license plate surveys conducted in October 2009, traffic volumes on the airport ramps, northbound East Way and West Way were used to calculate the percentage of the CTA traffic that recirculates. Experience shows that the volume of recirculating traffic can vary depending upon many factors including the level of enforcement at the curbside, weather delays, and the availability and location of alternative waiting areas such as cell phone lots. Recirculating vehicles create additional inefficiency in curbside operations by increasing the total volume passing the curbside and by creating turbulence related to driving slowly and pausing in the through lanes or even intermittent stops at the curbside. These trip types have been estimated from data and the additional trips generated by these recirculating vehicles have been reflected in the analyses prepared for the SPAS Draft EIR. The effects of recirculating traffic on CTA roadway and curbside operations are captured by the increased volume from recirculating traffic that is subsequently used to calculate curbside utilization.

Please refer to Response to Comment SPAS-PC00130-149 for discussion of curbside utilization.

For purposes of estimating future traffic conditions in the SPAS Draft EIR, it was assumed that the proportion of recirculation traffic would be similar to existing (baseline) conditions.

SPAS-PC00130-318

Comment:

Page 4-1048 Prepare Level of Service Analysis
Note 669 The on-airport transportation analysis includes Alternatives 1, 4, 8, and 9. The on-airport transportation analysis results for Alternative 1 are identical to those for Alternatives 2, 5, 6, and 7, and any reference to results from Alternative 1 can be consider valid for Alternatives 2, 5, 6, and 7. Alternative 3 was not considered for the on-airport transportation analyses.

Question: Footnote 669 on future traffic conditions page 4-1048 states that results for Alt 1 are same as those for Alts 2, 5,6, or 7. Since 5,6,7 do not include a busway or APM but Alts 1,2 use a busway, how is this justified?

Response:

Alternatives 5, 6, and 7 could be paired with the ground transportation system improvements proposed under either Alternatives 1, 2, 8, or 9. Although Alternatives 5, 6, and 7 focus on airfield and terminal improvements, they are not "stand alone" alternatives, as explained in on page 2-8 in Section 2.3.1 and in the Footnote 660 at the bottom of page 4-1043 of the SPAS Draft EIR.

The statement in footnote 669 on page 4-1048 in Section 4.12.1.2.2 of the SPAS Draft EIR refers to the on-airport traffic analysis which is limited to an evaluation of the Central Terminal Area (CTA) roadways, curbsides, and intersections. For the alternatives analyzed in the SPAS Draft EIR, the difference in traffic volumes within the CTA occurs as a result of the redistribution of traffic to various off-site SPAS development components such as the Intermodal Transportation Facility (ITF), Ground Transportation Center (GTC), and Consolidated Rental Car (CONRAC). In Alternatives 1, 2, 5, 6, and 7 all off-site components proposed as a part of SPAS are identical. The implementation of a bus way would redirect a proportion of the buses that would otherwise access the airport from Century Boulevard ramps and Skyway ramps. However, once they reach the on-airport roadways, the traffic levels are essentially identical for Alternatives 1, 2, 5, 6, and 7 within the CTA. Therefore, the analyses and any resulting traffic impacts would be identical with Alternatives 1, 2, 5, 6, and 7.

SPAS-PC00130-319

Comment:

Page 4-1050 4.12.1.3.2 On-Airport Landside Facilities
The on-airport landside facilities are comprised of the CTA curbsides, roadways, and public parking facilities. The two-level on-airport curbside and roadway network is accessed from the following three off airport roadways:

- Century Boulevard
- Sepulveda Boulevard
- 96th Street Bridge/Sky Way

Question: Sec 4.12.1.3.2 On-Airport Landside Facilities lists three accesses: Century, Sepulveda, and 96th St Bridge. During SPAS briefings we were told that traffic entering the CTA was 1/3 from Century, 1/3 from Sepulveda south and 1/3 from Sepulveda north (which would include 96th St bridge). We were also told that the amount of traffic from the three entry sources differed substantially by time of day. Were the time of day studies completed? What were the results? How will they impact back up of traffic in the CTA? How does this specifically impact terminal 1? Are the terminal 1 impacts different from points further into the CTA? The "annual traffic studies" recently posted on the LAWA website do not address this critical question that is necessary to assess what mitigations can work most effectively.

Response:

As discussed in Section 4.12.1.3.9 of the SPAS Draft EIR, hourly traffic volumes accessing the Central Terminal Area (CTA) by time-of-day were analyzed to evaluate peak hour conditions for the on-airport roadway system within the CTA occurring on an average day of the peak month (PMAD). Separate peak hour conditions were analyzed to represent the peak hour conditions that would occur on the CTA departures level curbside roadway system as well as the peak hour condition that would be expected to occur on the arrivals level of the CTA. The peak departures period occurs from 9:59 a.m. to 10:59 a.m.; the peak arrivals period occurs from 10:59 a.m. to 11:59 a.m. These peak hour conditions represent the highest total traffic within the CTA for the PMAD condition and, therefore, provide a conservative condition for addressing the potential on-airport transportation impacts that would be expected to occur under the various SPAS alternatives.

Please see Response to Comment SPAS-PC00130-308 for a discussion of the PMAD condition. The traffic conditions adjacent to Terminal 1 were analyzed as a part of the SPAS Draft EIR and the results of level of service analysis is presented in Table 4.12.1-18 and Table 4.12.1-19 starting on page 4-1110 of the SPAS Draft EIR.

In addition to the on-airport transportation analysis, which is based on peak activity during the peak departures and peak arrivals periods, the off-airport transportation analysis, documented in Section 4.12.2 of the SPAS Draft EIR, was conducted to assess potential project-related impacts on the off-airport roadway system, including intersections along Century Boulevard and Sepulveda Boulevard that carry traffic using the ramps referenced in the comment. These off-airport analyses were prepared for the a.m. and p.m. commuter peak hours as well as the airport mid-day peak hour.

SPAS-PC00130-320

Comment:

Page 4-1057 4.12.1.3.7 Peak Month Activity
Monthly traffic data in the vicinity of LAX over the past eight years were reviewed to identify the typical peak month of traffic activity associated with airport operations. The average daily traffic (ADT) volumes accessing the CTA by month for January 2003 through December 2010 are provided in Table 4.12.1-2. As shown in bold within Table 4.12.1-2, CTA traffic reached peak activity during the summer months of July and August. August is typically the peak month for airport roadway traffic followed closely by July. For the purpose of this analysis, August 2009 was used as the peak month for traffic data.

Question: Table 4.12.1-2 CTA Average Daily Traffic Volume shows an average day in each month and then a total which includes only one day of the month! When these numbers are extrapolated to corrected totals the number of trips into the CTA is still less than 0.5 per passenger. Is there a breakdown of types of vehicles to match this table (ie bus which holds 10, bus that holds 30, van or taxi holding 4) so that a reasonable number of trips into the CTA matches with the MAP?

Response:

The commentor's concern that Table 4.12.2.1-2 "includes only one day of the month" suggests that the commentor may be misinterpreting how average daily traffic volumes within the CTA are used in the

table. In Table 4.12.2.1-2, an average daily traffic volume is presented for each month in the year. In order to calculate the average daily traffic volume for each year represented in the table, the monthly average daily traffic volumes are added together, and divided by twelve. Table 4.12.1-2 is provided to illustrate monthly Central Terminal Area (CTA) traffic activity for the purposes of identifying the peak months for which airport-related traffic is highest and to show year-to-year changes in the average daily traffic volume. The million annual passengers data are shown for informational purposes and to illustrate a general correlation between airline passenger activity and CTA roadway traffic activity.

As discussed in Section 4.12.1.2.1 of the SPAS Draft EIR, the on-airport traffic analyses provided in the SPAS Draft EIR are based on peak hour activity on an average day of the peak month (PMAD). Direct correlation of peak hour traffic volumes with annual passenger data are not assumed in this study and are not relevant to the analysis; therefore, these data are not provided in the SPAS Draft EIR.

SPAS-PC00130-321

Comment:

Page 4-1067 Figure 4.12.1-5 Arriving and Departing Passenger Flow at Curbside Baseline and Figure 4.12.1-9 2025 Arriving and Departing Passenger Flows at Curbside for SPAS Alternatives

Question: The numbers of vehicles in this chart are inconsistent with those from other sections and seem low. Translating the baseline into specific hourly numbers results in a total annual count of 139250 monthly or about 50 MAP instead of the 61 MAP in 2009. The values for 2025 is closer and calculates to about 73 MAP. How were these values determined and if they are off how does it impact the LOS conclusions? Even if they are off, however, it is noted that there is substantial congestion now and it will continue in 2025. The future estimate of arrivals and departures appears to represent about 72-73 MAP not the 78.9 listed for all alternatives in the summary section. If this is low, are the calculations for impact also low which will result in worse than predicted levels of service?

Response:

The passenger flow profiles provided in the Figures 4.12.1-5 and 4.12.1-9 of the SPAS Draft EIR represent the rolling hourly volume of origin and destination (O&D) passengers on an average day of the peak month (PMAD) shown at the time of day they would be anticipated to be served at the Central Terminal Area (CTA) curbside. The activity represented in these charts does not include connecting passengers who do not access the landside and consequently do not require ground transportation services. The million annual passenger (MAP) levels the commentor is attempting to compare with the data in the charts includes connecting activity, which needs to be accounted for to make an accurate comparison of these charts. As discussed on pages 2 and 3 in Appendix F-3 of the Preliminary LAX SPAS Report, O&D passenger percentages are derived from data collected for U.S. Department of Transportation T-100 Segment Airline Traffic reporting. As Table 3 in Appendix F-3 indicates, a modest decrease in the percentage of domestic connecting passengers for 2025 is projected, and the percentage of connecting international passengers is expected to stay the same.

Peak hour data cannot be accurately correlated with MAP levels given the high level of variability in peaking during the day. Furthermore, the relationship between peak hour activity and daily activity may not hold constant over time as airline schedules change and react to capacity considerations by developing additional peaks within the day or even flatten peaks by filling in the shoulder hours adjacent to a peak period. For those reasons, it is more accurate to compare the growth in daily passenger activity depicted in the chart with growth in MAP levels (with consideration of any changes in connecting passenger activity between 2009 and future MAP levels). The information in Figure 4.12.1-5 of the SPAS Draft EIR represents a condition where 67,408 daily arriving passengers and 68,784 departing passengers were processed on the 2009 PMAD. The information in Figure 4.12.1-9 of the SPAS Draft EIR represents a future condition where 95,453 daily arriving passengers and 96,948 departing passengers would be processed on the 2025 PMAD. By comparing the growth in daily passenger activity between 2009 and 2025, it is estimated that arriving passenger activity on a PMAD will increase by 40.9 percent and departing passenger activity on a PMAD will increase by 41.6 percent. The percentage growth in MAP levels from 2009 (61 MAP) and 2025 (78.9 MAP) is approximately 29 percent which represents the growth in annual passenger activity. The design day flight schedule used in this analysis represents passenger activity volumes expected on a PMAD at LAX and is expected to

be representative of a higher growth rate (approximately 41 percent) when compared to annualized growth in passenger volumes (approximately 29 percent).

SPAS-PC00130-322

Comment:

Page 4-1073 4.12.1.3.12 Vehicle Trip Generation and Distribution Model Calibration
The purpose of developing the vehicle trip generation and distribution model is to have a tool that accurately projects future vehicle volumes based on a future passenger volume. Before the model could be used to project future peak hour traffic volumes, it was necessary to calibrate the model to ensure that the results would reliably predict actual observed baseline traffic conditions as represented by the balanced roadway volumes. This process involved comparing model output for the CTA's departures and arrivals peak hours with roadway and curbside traffic data from the balanced roadway network. A review of the passenger data for August 2009 indicated that, for model validation purposes, the departures peak hour occurred between 9:59 a.m. - 10:59 a.m., and the arrivals peak hour occurred between 10:59 a.m. - 11:59 a.m.

Question: 4.12.1.3.12 Model Calibration What was the percentage off of 2009 actuals to the 2009 predicted? In other words, what accuracy was determined for the model prediction?

Response:

The trip generation model discussed in Section 4.12.1.3.11 on pages 4-1062 and 4-1073 of the SPAS Draft EIR is calibrated to within 6 vehicle trips based on inbound traffic volumes from actual turning movement counts collected during the design day calibration hour. This equates to difference in actual inbound traffic volumes compared to model generated inbound traffic volumes of 0.3 percent and 0.2 percent respectively for the upper and lower level World Way North and Sky Way intersections during the Departures and Arrivals level peak hours based on turning movements provided on page 4-1115 in Table 4.12.1-20 of the SPAS Draft EIR.

Further, the trip distribution model is calibrated to be within +/- 24 vehicles on any of the major links within the CTA. For the purpose of this analysis, a "major link" would be defined as any portion of World Way North, World Way South, East Way, West Way, or Center Way. Based on link traffic volumes provided in Table 4.12.1-12 beginning on page 4-1084 of the SPAS Draft EIR, the calibration error for a low volume major link such as Link CF (Center Way South, east of P4 exit on the lower level) could be as much as 8.57 percent, while the calibration error for a high volume major link such as Link UE (Westbound Would Way North, west of East Way intersection on the upper level) could be as much as 1.0 percent. Based on these comparisons, the model outputs calibrate well to the observed traffic conditions within the CTA.

The higher error of 8.57 percent was on a low volume link and equates to a low actual vehicle volume error when considered on a macroscopic level. For example, on a link with an actual volume of 10 vehicles and a modeled output of 5 vehicles, the error would equate to 50 percent. For Link CF, with an actual volume of 327 vehicles and modeled volume of 280 vehicles, the actual volume error is 27 vehicles. Compared to a network wide volume of 2,709 vehicles, these 27 vehicles would not affect calibration or the level of service calculations.

SPAS-PC00130-323

Comment:

Page 4-1083 Table 4.12.1-10 Peak Hour CTA Signalized Intersection Turning Movement Volumes and Level of Service Analysis -Baseline (2009) Conditions

Question: General question regarding methodology is that this effort is only done during a couple peak hours. In the SPAS meetings we're told that entry into the CTA is about 1/3 Sepulveda going south, 1/3 Sepulveda going north, and 1/3 Century going west. The issues is that it is not consistent by time of day where during the day Century is frequently empty as opposed to later in the evening when it is totally backed up. The assumption is that it has to do with 405 congestion encouraging people to get off the

freeway before getting to Century. How can this be taken into account with the modeling? What will it take to get representative answers about level of service during peak arrival or departure hours when total traffic including non-airport traffic results in a shift of total traffic peak hours?

Response:

As discussed in Section 4.12.1.3.13, beginning on page 4-1074, of the SPAS Draft EIR, the on-airport intersection analysis, like the on-airport curbside and roadway analyses, focused on both the arrivals and departures peak hours for the hours and intersections listed in Table 4.12.1-10. As discussed on pages 4-1076 and 4-1077 of the SPAS Draft EIR, off-airport congestion is among the factors that may limit the number of vehicles entering the CTA. However, to provide a conservative analysis, the SPAS Draft EIR assumes that an unconstrained environment such that all future (2025) demand desiring access to the CTA roadway system will be able to access the CTA. Using this SPAS Draft EIR traffic modeling assumption, congestion on the I-405 Freeway would not impact vehicles entering or exiting the CTA, nor would it shift the peak hours.

The SPAS Draft EIR conducted a program-level traffic impact analysis. Please see Responses to Comments SPAS-PC00139-142 and SPAS-PC00130-235 for a discussion of the appropriateness of the programmatic environmental review conducted for the SPAS project. Should one of the alternatives for SPAS be approved, a more detailed project-level planning and CEQA analysis would be conducted using micro-simulation to assess the performance of the individual projects for that alternative, including on-airport intersections for additional time periods. Also, to evaluate the traffic impacts of constrained conditions, the micro-simulation model used to evaluate on-airport conditions may be extended off-airport to include at least one signalized intersection to the north and south along Sepulveda Boulevard and two signalized intersections to the east along Century Boulevard to better assess the impacts of off-airport traffic on vehicles both entering and exiting the CTA.

SPAS-PC00130-324

Comment:

Page 4-1139 CTA Intersection Impacts
Table 4.12.1-29 delineates the contribution of Alternative 1-2 to cumulative impacts by comparing the signalized intersection operations for the Future (2025) With Alternative 1-2 traffic conditions measured against the Future (2025) Without Alternative traffic conditions. As shown in Table 4.12.1-29, implementation of Alternative 1-2, in conjunction with other cumulative projects, would not result in a change to the volume to capacity levels of on-airport intersections that exceeds the aforementioned thresholds, with the exception of the World Way South and Center Way intersection (Intersection #9) during the arrivals level peak hour. The cumulative impact to this intersection is considered to be significant, and the contribution of Alternative 1-2 to this cumulative impact would be cumulatively considerable. This impact is unavoidable as potential measures to mitigate this impact are infeasible, as explained in Section 4.12.1.10.2 below.

Question: Generally, there are not a lot of changes to the CTA configuration so it is expected that vehicle traffic LOS will remain poor. Has the amount of curb space been calculated to ensure good LOS? How do "non-SPAS" projects such as Terminal 1.5 or Terminal 2.5 fit into the calculations? Were they included? Is there a summary list of these projects? What are they?

Response:

As discussed in Section 4.12.1.6, the SPAS Draft EIR identifies a series of improvements and mitigation measures that are expected to produce future operating conditions that provide acceptable operating conditions along the Central Terminal Area (CTA) curbside roadways. These improvements include off-site facilities such as the Intermodal Transportation Facility (ITF), Ground Transportation Center (GTC), and Consolidated Rental Car Facility (CONRAC) that would allow for a reduction in traffic activity within the CTA with resulting operational benefits. This improvement in performance is explained as a part of the Response to Comment SPAS-PC00130-326.

The amount of curbspace and the effects on CTA curbside and roadway Level of Service (LOS) has been calculated and considered in the analysis. Refer to Response to Comment SPAS-PC00130-149 for information related to curbside utilization and the effect on level of service.

The future configuration of the CTA is expected to change significantly with the addition of non-SPAS improvements such as the Midfield Satellite Concourse Processor, Terminal 1.5, and Terminal 2.5 as described on pages 4-1094 through 4-1096 in Section 4.12.1.6.2 of the SPAS Draft EIR. Non-SPAS improvements are listed in that section. These non-SPAS improvements are considered in the on-airport traffic analysis of the CTA roadways where traffic has been distributed to these facilities for future year analyses.

SPAS-PC00130-325

Comment:

Page 4-1167 Table 4.12.1-40 Public Parking Demand - Capacity

Question: If the demand is as low as predicted, is it still possible that there are times of the day that the lots will be full? What is planned to level out demand?

Response:

Table 4.12.1-40 on page 4-1167 of the SPAS Draft EIR provides the Baseline (2009) and Future (2025) public parking supply, demand and requirements for Alternatives 1, 2, 4, 8 and 9. As noted in the table, the future parking demand is assumed to be 85 percent of the parking requirements. Additionally, Section 4.12.1.6.2 on page 4-1094 explains that the construction of a proposed Midfield Satellite Concourse (MSC) passenger processor building would require the existing parking structures P2B and P5 be demolished. However, depending on the configuration of the future processor building, some replacement parking may be constructed as part of that project.

As stated in Section 4.12.1.9.3 on page 4-1165 of the SPAS Draft EIR, and based on assumptions developed by the LAWA SPAS Draft EIR team, the future public parking demand was assumed to be 15 percent greater than the space demand to account for fluctuation in vehicle arrivals in the facilities. [Even with this assumption there is still approximately 12.2 percent of the parking spaces available to account for any minor fluctuations in parking demand. The level of detail provided in the SPAS Draft EIR is consistent with the requirements of CEQA. (See also San Joaquin Raptor Rescue Center v. County of Merced (2007) 149 Cal.App.4th 645 ["[Plaintiffs'] argument is essentially that greater specificity was needed [for the traffic analysis] --i.e., that the EIR should have specified whether trucks sometimes enter and leave the site "unevenly" over time. We hold that such minute detail was not required in the analysis in question."]; see also Merced Alliance for Responsible Growth (2012) 2012 WL 5984917 [Unpublished; "[Petitioner] wrote that sales of consumer shopping goods in some months are vastly higher than in August, and the peak month of the year for shopping centers is as much as 39 percent higher than in August. [Petitioner] reasoned that movement in and out of Wal-Mart distribution centers likely would be higher by about the same proportion. 'Hence,' [Petitioner] argued, 'the trip generation estimates, particularly the estimates of truck traffic, do not represent a peak or 'design level' or necessarily even an average trip generation for the Project.'… The EIR stated that the time period used was 'representative of average conditions.' To the extent [Petitioners] claim that traffic studies must use a project's peak period of operation to estimate project-generated trips, and CEQA bars the alternative method of using an average or representative period of operation, the challengers offer no authority for this position. This appears to be no more than a disagreement between experts over methodology."] Additionally, as noted in Footnote 662 on page 4-1045 in Section 4.12.1.2 of the SPAS Draft EIR, "A shortfall in parking spaces is not considered an environmental impact for the purposes of CEQA, nevertheless this Draft EIR addresses this issue."

SPAS-PC00130-326

Comment:

Page 4-1168 Table 4.12.1-41 Summary of Curbside impacts

Question: The impacts shown in the chart are "no" for virtually everything, yet we know that the CTA is already gridlocked during peak hours and the passenger handling need will be increased dramatically by 2025. How is this reconciled with the observation that LOS is already poor and traffic will be increasing substantially as the number of passengers increases.

Response:

The comment states that "the CTA is already gridlocked during peak hours" and suggests that impact summary Table 4.12.1-41 contains inconsistencies. While existing conditions are important issues for LAWA, existing conditions are not impacts of the proposed SPAS alternatives. (See State CEQA Guidelines Sections 15125(a) and 15126.2(a); see also Watsonville Pilots Association v. City of Watsonville (2010) 183 Cal. App. 4th 1059 ["The FEIR was not required to resolve the [existing] overdraft problem, a feat that was far beyond its scope"].)

As discussed in Section 4.12.1.9.2 of the SPAS Draft EIR, under all alternatives, future curbside activity would decrease relative to baseline conditions in a number of areas as a result of the relocation of certain commercial modes to off-site facilities such as the Intermodal Transportation Facility (ITF), Ground Transportation Center (GTC), and Consolidated Rental Car facility (CONRAC) and a 5 percent reduction of private vehicles (POV) demand to remote "kiss-and-ride" facilities for passenger pick up and drop off. The passengers using these relocated modes would be consolidated into high-capacity buses or APM for transport into the CTA which results in a net decrease in total traffic using the Central Terminal Area (CTA) roadways and curbsides. Consequently, the relocation of these modes results in a reduction of curbside activity compared to baseline conditions which translates into an improvement curbside operations.

Furthermore, as explained in Section 4.12.1.6.2 on pages 4-1094 through 4-1096 of the SPAS Draft EIR, with the construction of the Midfield Satellite Concourse Passenger Processor, Terminal 1.5, and Terminal 2.5, the passenger activity on all CTA curbsides was redistributed and the total available linear footage of curbsides in the airport was increased. Also in the future (2025), rental car shuttles and private parking shuttles, were consolidated and split into three routes with one route serving Terminals 1 and 2 and the Passenger Processor, a second route serving Terminal 3, TBIT, and Terminal 4, and a third route serving Terminals 5, 6, and 7. This operation produces a reduction of the number of shuttles accessing the individual curbsides and an improved curbside level of service as compared with the baseline.

Please see Section 4.12.1.2 of the SPAS Draft EIR for detailed discussion of the methodology for the on-airport curbside traffic impact analysis.

SPAS-PC00130-327

Comment:

Page 1183 4.12.2 Off-Airport Transportation
4.12.2.1 Introduction
The off-airport transportation analysis for the SPAS alternatives addresses traffic-related impacts outside the airport boundaries, including arterial roads, highway segments, and ramps that serve traffic approaching and departing the airport environs. This analysis also considers remote facilities that serve airport-related functions, such as parking and offairport cargo. The impacts of passengers, employees, cargo, ancillary, and collateral development (nonairport activities on airport property) on off-airport roads are also included. Impacts to on-airport transportation associated with operation of the SPAS alternatives are addressed in Section 4.12.1, On- Airport Transportation.
The primary focus of the analysis presented in this section is on changes in existing (baseline) traffic conditions that would result from the ground access improvements proposed under each SPAS alternative. Additionally, the off-airport transportation analysis completed for the SPAS alternatives accounts for increases in airport-related traffic that would occur in conjunction with increases in airport

passenger activity projected to occur by 2025, the buildout horizon year for the SPAS alternatives. Such future growth in passenger activity levels at LAX is independent of the SPAS alternatives and would occur even if no improvements were implemented.

Question: Page 4-1183 Off-Airport Transportation states that the growth in passenger activity levels is independent of SPAS and would occur regardless of projects to the same 78.9 maximum. The question, then, is what traffic capacity enhancements are proposed that will reduce the impacts on airport service and surrounding communities. This section appears to imply that there isn't much to do to improve the situation. Is that correct? What if the traffic were spread to other regional airports? Would service levels improve? What about mass transit improvements? Will that improve the level of service?

Response:

The discussion in Section 4.12.2.1 on page 4-1183 discloses the fact that growth in airport passenger activity levels that is anticipated to occur at LAX by 2025 irrespective of the SPAS alternative will result in increased traffic at the airport. Section 2.3 of the SPAS Draft EIR describes the ground transportation system improvements associated with each SPAS alternative that are intended to better accommodate existing and future traffic at and around the airport and improve traffic conditions.

As indicated in Section 2.3 of the SPAS Draft EIR, all of the SPAS alternatives, except for Alternative 4, include ground transportation improvements that would be integrated with the future Metro Crenshaw/LAX Transit Corridor and Station, which would enhance the use of public transit to and from LAX and, in turn, reduce airport-related vehicle trips. Section 4.12.2 provides an analysis of off-airport traffic for each alternative, and identifies mitigation measures to further reduce the impacts of airport-related traffic on surrounding communities. Please see Topical Response TR-SPAS-T-1 for further discussion regarding transit options into LAX. Additionally, those alternatives, again with the exception of Alternative 4, include the development of an elevated/dedicated busway or APM system to help reduce airport-related traffic impacts in and near the CTA. Alternatives 3, 4, 8, and 9 include development of a proposed CONRAC, which would include a single consolidated shuttle system to replace the number of individual rental car company shuttles that currently operate at the airport. This is also intended and designed to reduce local impacts from airport-related traffic. Regarding spreading traffic to other airports in the region, please see Topical Response TR-SPAS-REG-1. Traffic impacts that would occur at these airports are discussed in Section 6.2 of the SPAS Draft EIR.

SPAS-PC00130-328

Comment:

Page 4-1183 Off-Airport Transportation
Footnote 679 The airfield and terminal improvements associated with Alternatives 5 through 7 could ostensibly be paired with the ground access improvements proposed under Alternatives 1-2, 8, or 9. Given that Alternatives 5 through 7 would accommodate the same passenger loads as all other alternatives, the traffic impacts associated with Alternatives 5 through 7 would be the same as addressed herein for Alternatives 1-2, 8, and 9, depending on which set of ground access improvements one of those alternatives is paired with.

Question: Footnote 679 page 1183 states that "...Given that Alternatives 5 through 7 would accommodate the same passenger loads as all other alternatives, the traffic impacts associated with Alternatives 5 through 7 would be the same..." This is saying that there is no capacity improvement for any of the runway alternatives! So why spend the major dollars for no improvement since the Northside Safety Study showed that the safety improvement is minuscule when the percentage improvement is tied to the degree of safety.

Response:

The commentor misconstrues the statement in footnote 679 on page 4-1183 of the SPAS Draft EIR. While it is true that all the alternatives would accommodate the same passenger loads (i.e., 78.9 MAP), a lack of capacity change does not equate to a lack of airfield operational improvement. For instance, the alternatives propose different changes and modifications that increase safety and efficiency of the north airfield, consistent with the project objectives. (See Section 1.2.1 of the SPAS Draft EIR.)

Section 2.2 of the SPAS Draft EIR describes existing problems associated with the outdated airfield design, which include, but are not limited to, the following:

- LAX does not have an airfield, in either the north complex or the south complex, that is fully designed for the largest aircraft types currently in service (i.e., Aircraft Design Group (ADG) V aircraft, such as the Boeing 747-400, and ADG VI aircraft, such as the Airbus A380).
- The north airfield configuration requires non-standard operating procedures, which are not optimal for safety and increase aircraft delay.
- The primary north airfield departure runway (6R/24L) is too short for certain larger aircraft (e.g., fully-loaded Boeing 747-400) on long-haul flights, requiring those aircraft to taxi to the south airfield, resulting in less efficient operations and disproportionate environmental impacts.
- The outdated airfield design creates a situation where aircraft are at increased risk of hazards. Those hazards include potential collisions with other aircraft, such as when a landing aircraft might move in the path of a departing aircraft (incursion). Other potential hazards include, but are not limited to, insufficient side-by-side passing clearances between certain types of aircraft arriving/departing on runways and aircraft on nearby taxiways. Such hazards contribute to the potential for conflicts between taxiing aircraft and ground vehicles on runways, taxiways, and nearby service roads.
- With one exception, the north airfield configuration does not comply with FAA Runway Safety Area (RSA) requirements.
- The north airfield high-speed taxiways are not in compliance with FAA Engineering Brief No. 75.
- The north airfield does not provide sufficient areas at the end of the runways for holding arriving flights and sequencing departing aircraft.
- The existing Runway Protection Zone (RPZ) associated with Runway 6L/24R includes residential uses.

The discussion in Section 2.2 goes on to describe what LAWA seeks to address those problems, including improvements that:

- Are consistent with FAA design standards for the largest aircraft types currently in service and anticipated for the future (ADG V and VI aircraft) for all weather conditions;
- Minimize modifications of standards, waivers, or operational restrictions, all of which reduce airfield efficiency and level of service;
- Reduce the potential for airfield hazards, including incursions, and enhance the overall safety of airfield operations through runway and taxiway design;
- Accommodate a greater percentage of departing aircraft, thereby increasing airfield efficiency;
- Provide sufficient areas at the ends of the runways for holding arriving flights and sequencing departing aircraft; and
- Minimize or eliminate the extent to which Runway Protection Zones overlay residential areas.

The impacts of the various alternatives on the ability of large aircraft to land at the north airfield, the efficiency of operations at the north airfield, and other alternative-based impacts are discussed throughout the SPAS Draft EIR.

SPAS-PC00130-329

Comment:

Page 4-1201 Table 4.12.2-6 Estimated Project Alternative Transit Demand
Footnotes: 1Assumes an Average Vehicle Ridership Factor of 1.4. 2Assurnes a 5% public transit mode share.

Question: What is the basis of these two assumptions? Wasn't a factor of 1.7 determined by LAWA in the past? Isn't public transit currently only 3% or does this include taxis, shuttles, et. al. not just buses and trains?

Response:

The methodology for estimating future transit demand is described on pages 4-1200 and 4-1201 of the SPAS Draft EIR. As stated therein, the use of the 1.4 average vehicle ridership factor is consistent with

the assumptions provided by Metro on page D-5 of the 2010 Congestion Management Program for Los Angeles County. The 2006 LAX Air Passenger Survey (dated December 2007) showed approximately 1 percent of air passengers use public transit to access the airport, and that all airport-related trips had an average of 1.7 riders per vehicle. The 2006 survey indicated that 1 percent of LAX passengers use public transit (transit buses and light rail transit) to access the airport, a percentage that does not include private transit (taxis and shuttles). The assumptions used in the SPAS Draft EIR analysis provide a more conservative estimation of future year 2025 transit trips than would the assumptions stated in the comment, given the anticipated increase in transit demand due to the planned connection to the Crenshaw/LAX Light Rail corridor and continued expansion of Metro's transit services in the study area. Further, in order to provide a conservative analysis, no reductions to the project trip generation estimates presented in Section 4.12.2.2.4 of the SPAS Draft EIR were made in the traffic impact analysis to account for potential increases in transit ridership above the current level of approximately five percent. Please also see Response to Comment SPAS-AL00003-11.

SPAS-PC00130-330

Comment:

Page 4-1204 Figure 4.12.2-2 LAX SPAS Traffic Model Components
Peak Period to Peak Hour Factors Derived from Traffic Counts...

Question: Were the off airport peak hours chosen based on the airport traffic or the rest of the traffic patterns? Since there is limited north-south capacity that is generally full whether LAX is at peak or not this should be evaluated and solutions sought.

Response:

As discussed on page 1195 of the SPAS Draft EIR, the morning and afternoon peak commute hours were based upon the localized peak conditions (the highest one hour periods between 7:00 and 9:00 a.m., and between 4:00 p.m. and 6:00 p.m.). During these traditional morning and afternoon commuter "rush" hours, background traffic is typically highest. The peak hour of airport-generated traffic, the mid-day peak hour (the highest one hour period between 11:00 a.m. and 1:00 p.m.) was also analyzed to ensure that the potential traffic for impacts associated with the SPAS alternatives was fully evaluated and, to the extent feasible, mitigated.

The comment also states "since there is limited north-south capacity that is generally full whether LAX is at peak or not this should be evaluated and solutions sought." Existing conditions were disclosed in Section 4.12.2.3.2 of the SPAS Draft EIR. The impact analysis of the SPAS alternatives on off-airport intersections was provided in Section 4.12.2.6 and mitigation measures identified in Section 4.12.2.7.2. To the extent the commentor is suggesting mitigating existing conditions, this is beyond the scope of the SPAS EIR and the requirements of CEQA. (See State CEQA Guidelines Sections 15125(a) and 15126.2(a); see also Watsonville Pilots Association v. City of Watsonville (2010) 183 Cal. App. 4th 1059 ["The FEIR was not required to resolve the [existing] overdraft problem, a feat that was far beyond its scope"].) To the extent the commentor is suggesting analysis of a time period outside of the AM, MD, or PM peak hours, this additional analysis is not required. Such impacts would be expected to be similar to or less than those disclosed during the three peak hours (the peak hour of background traffic and the peak hour of the generator), and would therefore not provide additional useful information. (See State CEQA Guidelines Section 15204(a); see also San Joaquin Raptor Rescue Center v. County of Merced (2007) 149 Cal.App.4th 645 ["[Plaintiffs'] argument is essentially that greater specificity was needed [for the traffic analysis] --i.e., that the EIR should have specified whether trucks sometimes enter and leave the site 'unevenly' over time. We hold that such minute detail was not required in the analysis in question."]

SPAS-PC00130-331

Comment:

Page 4-1205-6 Table 4.12.2-7 and text "As shown in Table 4.12.2-7, the LAX SPAS Traffic Model meets and exceeds the guidelines for model accuracy in the a.m., m.d., and p.m. peak hours for unconstrained roadways;" and "As shown in Table 4.12.2-8, the model demand volume estimates

closely match count volumes for uncongested locations (i.e., model volumes only higher by 4 percent or less). For congested locations, the model's peak hour demand volumes are higher than the constrained peak hour counts by 24 percent and 18 percent in the a.m. and p.m. peak hours, respectively. Therefore, the LAX baseline year (2010) traffic model is considered to be valid to 2010 traffic conditions and acceptable for forecasting future year traffic volumes.... Reasonably foreseeable and funded improvements were included if they would be constructed by 2025 (see Appendix K2-1).

Question: If the model assumes unconstrained roadways is this a valid assumption? Why?

Response:

The comment states that the model assumes unconstrained roadways and asks if this is a valid assumption. The travel demand forecasting model does not make assumptions, but rather relies on input data, compiled by traffic modeling experts consistent with methods and practices accepted among professional traffic consultants, and mathematical algorithms in order to forecast traffic demand on roadways. 1

The roadways contained within the model structure are not unconstrained. The roadway inputs to the model reflect parameters such as speed and capacity that result in volume forecasts reflecting the built environment. These forecasts can then be used in a traffic operations analysis to forecast level of service (LOS) etc. This approach is intended to provide analysis results that are accurate and sensitive with respect to the actual roadway network. Details regarding the traffic modeling methodology assumptions on the roadway network are available in Section 4.12.2.2.2 on page 4-1202 through 4-1205 of the SPAS Draft EIR.

1. California Transportation Commission, 2010 California Regional Transportation Plan Guidelines, April 12, 2010 and Transportation Research Board, National Cooperative Highway Research Program Report 716 Travel Demand Forecasting: Parameters and Techniques, Washington DC 2012.

SPAS-PC00130-332

Comment:

Question: How sensitive is the traffic around LAX to the number and location of the parking slots? Can the model be used to recommend changes? Was this done? When calculating LOS values for the intersections the value of use/volume capacity is shown. If a street has major traffic on one street and limited to none on the second is the LOS artificially better? Even if "accepted practice" allows this can this be reviewed and solutions sought?

Response:

The comment asks how sensitive traffic patterns around LAX are to the number and location of parking spaces, whether the model can be used to recommend changes and if it was used to do so. The comment also asks how the level of service methodologies used in the SPAS Draft EIR traffic analysis calculate volume-to-capacity ratios at an intersection when traffic is heavier on one street than on another.

The development and use of the travel demand forecasting model developed for the traffic analysis is described in Section 4.12.2.2.2 of the SPAS Draft EIR. As stated, the model represents LAX as a series of traffic analysis zones (TAZs) where trip generators within the airport are, or would be, located (the Ground Transportation Center, the Central Terminal Area, parking lots, air cargo facilities, etc.). The model is used to evaluate alternative configurations of these elements and, in fact, the SPAS Draft EIR fully evaluates a range of alternatives that included different locations for major project elements, including public parking. For example, Alternative 4 includes relocation of parking for private cars as described on page 4-1214 of the SPAS Draft EIR. The level of service methodologies used in the traffic analysis are described on pages 4-1194 through 4-1196 of the SPAS Draft EIR. As stated therein, the Circular 212/Critical Movement Analysis (CMA) and Intersection Capacity Utilization (ICU) methodologies use the traffic volumes and lane capacities on the conflicting, or critical, movements to calculate the overall volume-to-capacity ratio of an intersection, which is then used to identify its

operating level of service (LOS A through LOS F). The Highway Capacity Manual (HCM) methodology is similar but calculates average vehicle stopped delay for the most constrained approach or movement at stop-controlled intersections and then relates that delay to the operating level of service. The detailed level of service worksheets in Appendix K2-6 of the SPAS Draft EIR show these calculations for each of the 200 study intersections for each analyzed scenario and for each SPAS alternative, including which movements and which approaches carry the heaviest traffic volumes. This information was used in the development of the recommended mitigation measures that are presented in Section 4.12.2.7 of the SPAS Draft EIR.

SPAS-PC00130-333

Comment:

Page 4-1307 4.12.2.7.2 Recommended Mitigation Program
Implementation of LAX Master Plan Commitments ST-9, ST-12, ST-14, ST-17, ST-18, ST-19, ST-20, ST21,716 and ST-22 and LAX Master Plan Mitigation Measure MM-ST-14 would reduce construction-related off-airport transportation impacts associated with Alternatives 1-2, 3, 4, 8, and 9. No additional measures are available to address construction-related off-airport transportation impacts at this stage of planning. There would be significant impacts to some CMP arterial monitoring intersections and freeway monitoring stations under Alternatives 1-2, 3, 4, 8, and 9. Physical mitigation is available for Intersection 26 (La Cienega Boulevard and Centinela Avenue) as shown below under MM-ST (SPAS)-10. No additional measures are feasible and available to address the impacts to other impacted arterial and freeway facilities.

Question: Since LAX is only allowed to pay for improvements in proportion to the traffic directly from/to LAX is there any estimate how much money would be required to implement the mitigations identified even if not all can be identified at this time? What is the total cost? What is LAWA's share?

Response:

The comment correctly recites the traffic mitigation measures that are recommended in Section 4.12.2.6.3 and Section 4.12.2.7 of the SPAS Draft EIR to address the identified impacts in the construction and operation periods of each alternative. LAWA is committed to mitigating traffic impacts as feasible and appropriate. Detailed cost estimates for the identified mitigation measures have not yet been prepared and are not required to be prepared in connection with environmental review under CEQA. Implementation of mitigation measures that lie outside the City of Los Angeles would require the review and approval of other agencies, as stated on page 4-1285 of the SPAS Draft EIR, and would be dependent on that approval. The final set of traffic mitigation measures for the SPAS project depends on which SPAS alternative is ultimately selected by the decision-makers, if any. Cost estimates will be prepared as specific improvement projects are implemented at the project level.

SPAS-PC00130-334

Comment:

The mitigations all relate to intersections. How about signage to direct airport traffic onto LaCienega to Century during the day when both streets are relatively empty?

Response:

The comment is incorrect in stating that the traffic mitigation measures all relate to intersections. The traffic mitigation program presented in Section 4.12.2.7.2 of the SPAS Draft EIR includes a Transportation Demand Management Program (Mitigation Measure MM-ST (SPAS)-1), which provides for the promotion and expansion of LAWA's successful vanpool program to reduce airport-related traffic.

The comment suggests that changeable signage could be used to "direct airport traffic onto La Cienega Boulevard to Century during the day when both streets are relatively empty." Based upon the wording of the comment (1) it is unclear whether the commentor is suggesting diverting drivers onto La Cienega Boulevard or Century Boulevard, (2) the commentor does not specify which drivers are suggested for

diversion (i.e., the source of the diverted drivers), and (3) the commentor does not specify whether this suggestion is relevant to all of the alternatives or one of the alternatives.

At this time, there is no evidence to suggest that providing additional changeable signs farther from the airport would reduce or avoid a significant impact. As discussed in Section 4.12.2.2.1 of the SPAS Draft EIR and further described in Response to Comment SPAS-PC00130-34, La Cienega Boulevard and Century Boulevard are already two of the key roadways providing access to LAX. Static guide signs are currently posted along the major approach and departure routes in the LAX areas to assist motorists in locating LAX and the freeway network. There is also a permanent, overhead changeable message sign on westbound Century Boulevard east of Airport Boulevard. In addition, LAWA owns and operates portable changeable message signs that are deployed for various incidents, construction detours, or special events, These signs provide information regarding airport security alerts, accidents, lane closures and other unexpected traffic conditions (information that is often not well conveyed by common GPS navigation systems).

Many drivers also already have access to GPS navigation systems (either mounted in the car or accessible by cell phone), which provide real time traffic conditions which enable drivers to make personalized routing decisions based upon traffic conditions.

To the extent the commentor is also suggesting changeable signs in other locations, other infeasibility factors are also relevant. The commentor raised similar suggestions in 2009 on the Bradley West Project Draft EIR. As LAWA explained in Response to Comment BWP-PC00011-45, in some locations the suggestion is socially infeasible:

"In 2005, the Los Angeles Department of Transportation, as part of their Westchester Intelligent Transportation System improvement project, planned to install permanent, overhead changeable message signs on the approaches to LAX. LAWA and LADOT staff discussed the possibility that LAWA could request LADOT to display electronic messages on these signs during unique occurrences at the airport, such as airport security alerts and information regarding alternate parking locations if CTA parking was full. LADOT planned to use the signs to inform drivers of accidents, lane closures due to construction, and other unexpected traffic conditions. These signs were planned to be located away from the CTA entrances in order for drivers to have time to process the messages and change their routes accordingly. The proposed locations were southbound Lincoln Boulevard near La Tijera Boulevard, southbound Sepulveda Boulevard south of 76th Street/77th Street and westbound Century Boulevard west of Concourse Way. However, public opposition to the proposed signs, culminating with a public meeting held on January 17, 2006 at which several area residents expressed their view that the signs would lead to additional traffic through their community, resulted in LADOT withdrawing its plans to install changeable message signs on Lincoln and Sepulveda Boulevards."

Nevertheless, if and when a SPAS alternative is selected, and site specific development progresses, an appropriate program of on-site and off-site signage will be developed to assist motorists consistent with LADOT's transportation planning functions (see Los Angeles Administrative Code Section 22.481(a).). Please also see Responses to Comments SPAS-PC00130-360 and SPAS-AL00004-29 regarding the programmatic nature of SPAS.

SPAS-PC00130-335

Comment:

Page 4-1330 4.13.1 Energy
LAWA operates a CUP at LAX, which provides heating and cooling to the Central Terminal Area (CTA). The CUP houses a co-generation system that generates electrical power, which is sold to the City of Los Angeles Department of Water and Power (LADWP). In addition to producing electricity, the CUP's cogeneration729 facility reduces fuel usage by 10 to 30 percent compared to separate electricity and heat processes. 730 Additional information regarding the CUP is provided below.

Question: The Scattergood Power Generation Plant is about to change over the next five years and there will be significant excess natural gas generated at Hyperion Water Treatment Plant which was being provided to Scattergood. Has LAX explored using some of that gas to support its power needs?

When will solar panels be installed on the roofs of all buildings? Has LAWA investigated low profile wind turbines near the runways?

Response:

Please see Response to Comment SPAS-PC00130-480 regarding the use of alternative energy at LAX, including solar and wind power, and the availability of energy supplies to serve the SPAS improvements. Please also see Response to Comment SPAS-AR00002-8 regarding the use of solar power at LAX. During planning for the LAX Central Utility Plant Replacement Project, LAWA was considering the use of digester gas from the Hyperion Treatment Plant (HTP) as an alternative energy source for use in the replacement CUP. However, use of digester gas from HTP was found to be infeasible for the CUP. The City of Los Angeles Department of Public Works (LADPW) currently has alternative plans for use of the digester gas generated at HTP. LADPW's Wastewater Capital Improvement Program for Fiscal Year 2011/2012 through 2020/2021 includes a digester gas co-generation facility that will self-generate power at HTP for internal use at the treatment plant to offset use of power from the City of Los Angeles Department of Water and Power.1

1. City of Los Angeles, Department of Public Works, Bureau of Sanitation, Wastewater Capital Improvement Program - Fiscal Years 2011/12 - 2020/21, page 184.

SPAS-PC00130-336

Comment:

Page 5-2 Cumulative Impacts Table 5-1 Summary of Cumulative Land Use Assumtions

Question: Table 5-1 Westchester-PDR area is a bedroom community with considerably more people during the day and is a major thru way for transportation from the South Bay to West LA/Santa Monica (with people stopping here. How was this considered? See the W-PDR Community Plan EIR for details.

Response:

As described on pages 5-1 and 5-2 of the SPAS Draft EIR, CEQA requires a discussion of cumulative impacts, which includes a list of past, present, and reasonably anticipated future projects producing cumulative impacts, or a summary of projections contained in an adopted general plan or related planning document designed to evaluate regional or area-wide conditions. The purpose of Table 5-1 is to provide background for the evaluation of cumulative impacts based on the adopted growth projections set forth in the Southern California Association of Governments (SCAG) 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) for population, households, and employment. The reasonably foreseeable growth occurring in the SPAS study area, including Westchester and Playa del Rey, is based on the demographic projections adopted by SCAG as extrapolated for 2025, the year of project buildout. SCAG's forecasts are developed in consultation with jurisdictions such as the City of Los Angeles and are derived in part from the potential buildout of communities pursuant to their approved land use plans. The adopted growth projections are used by SCAG to identify regional transportation improvements, including those in the Westchester-Playa del Rey area.

Section 4.12.2 of the SPAS Draft EIR analyzes the traffic impacts of the SPAS alternatives on affected intersections and roadways in the Westchester-Playa del Rey area (as well as other off-airport locations). Traffic added by the SPAS alternatives is evaluated by comparison to both existing traffic conditions and future without-alternative traffic conditions.

SPAS-PC00130-337

Comment:

Page 5-12 Cumulative Impacts

Question: Only one of the office buildings #121 is shown in the list for Howard Hughes yet there are half a dozen approved including a dozen story building. Why are these not included?

Response:

Please see Response to Comment SPAS-PC00130-216 regarding the related projects, including the Howard Hughes Center, considered in the off-airport transportation analysis for the SPAS alternatives.

SPAS-PC00130-338

Comment:

Page 5-17 5.3.1 Airfield-Related Improvements

Question: Where is the additional RONs listed in previous EIRs or the 3 Hush hangers previously promised and required in 2015 by the CalTrans noise variance? What about new projects like the Runway Status Lights (there are many upcoming improvements on this). What about control tower projects/changes to address the several non-visibility issues that remain and new ones created by the TBIT design? What improvements to the remote gates are planned? As outsiders it is not for us to guess what LAWA has in mind.

Response:

Section 5.3 of the SPAS Draft EIR identifies reasonably-foreseeable projects that, in conjunction with implementation of SPAS, have the potential to result in cumulative impacts. The list of LAX development projects includes projects that are in the planning or implementation stages at this time and about which sufficient information is known to determine cumulative impacts.

It should be noted that the proposed West Aircraft Maintenance Area is proposed to include a RON apron area and a ground run-up enclosure (i.e., GRE, referred to by the commentor as a "hush hangar"), as stated in the description of this project on page 5-17 of the SPAS Draft EIR. Installation of Runway Status Lights is also identified as a cumulative project (see page 5-18). Five RON spaces were included in the development of Taxiway R (also known as the Crossfield Taxiway Project), and addressed in the EIR for this project, which is also identified as a cumulative project on page 5-17. Please also see Response to Comment SPAS-PC00130-132 regarding previous commitments and requirements pertaining to the provision of ground run-up enclosures at LAX.

Under the Bradley West Project, improvements to the FAA-operated Airport Traffic Control Tower (Control Tower) to address line-of-sight issues, such as the installation of additional cameras, are being implemented. As part of the future Midfield Satellite Concourse project, FAA and LAWA will evaluate the need for additional facilities to address line-of-sight issues. As such future facilities have not yet been identified, specific projects are not reasonably foreseeable and, therefore, were not included in the list of cumulative projects in Chapter 5 of the SPAS Draft EIR.

Regarding improvements to the remote gates, no improvements are planned, with the exception of upgrades to LAWA-owned passenger boarding bridges, which are being implemented airport-wide (see page 5-17 of the SPAS Draft EIR).

SPAS-PC00130-339

Comment:

Page 5-18 5.3.2 Terminal-Related Improvements

Question: The list presented fails to mention the parking structure bridges or terminal 0 add-ons or cargo improvements or terminal 1.5 or terminal 2.5. As outsiders it is not for us to guess what LAWA has in mind.

Response:

Section 5.3.2 of the SPAS Draft EIR identifies past, present, and reasonably foreseeable terminal-related projects at LAX whose impacts are considered in the SPAS Draft EIR, in conjunction with the impacts of the SPAS alternatives, as part of the cumulative analysis. As described in Section 2.3 and depicted in Figures 2-1, 2-2, 2-5, 2-6, and 2-7 of the SPAS Draft EIR, Terminal 0 is a component of SPAS Alternatives 1, 2, 5, 6, and 7 and, therefore, is not included on the list of cumulative projects identified in Section 5.3.2. However, Section 5.3.2 does identify the north terminals improvements, also referred to as Terminals 1.5 and 2.5. Cargo improvements considered in the cumulative impacts analysis are included in the list of miscellaneous projects in Section 5.3.3 of the SPAS Draft EIR, as are ongoing parking structure repairs. The commentor's reference to "parking structure bridges" appears to be a reference to existing pedestrian bridges that connect parking structures to terminals. Modifications to pedestrian bridges are considered ongoing maintenance and miscellaneous improvement projects and are identified as miscellaneous terminal improvements for purposes of the cumulative impact analysis in the SPAS Draft EIR. Please see pages 5-17 through 5-22 for a description of the ongoing and planned maintenance-related improvements at LAX. Please also see Response to Comment SPAS-PC00130-756 regarding maintenance of parking structures and pedestrian bridges.

SPAS-PC00130-340

Comment:

Question: When is LAWA going to create a comprehensive list and generate a ROM cost estimate for all of these projects so that BOAC can actually plan on how it can finance them?

Response:

A financial plan for all of the airport-related development projects identified in Chapter 5 of the SPAS Draft EIR is beyond the scope of the SPAS project and is not required by CEQA. However, as explained in Section 8.5 of the Preliminary LAX SPAS Report, and detailed in Table 8-1, a rough-order-of-magnitude cost estimate is provided for LAX Base Development Projects for Fiscal Year 2012 through Fiscal Year 2025, as well as for each of the SPAS alternatives. Chapter 8 identifies funding sources and estimates financial impacts associated with the SPAS alternatives.

SPAS-PC00130-341

Comment:

Page 5-21 5.3.3 Infrastructure/Security Improvements
CTA Second Level Roadway Expansion Joint and Deck Repairs - Repair and/or replacement of expansion joints and bearing pads on the CTA upper level roadway as well as repair and sealing of cracks of the roadway surface. Scheduled for completion in 2014.

Question: What about the creeping rust issues that requires more than resealing? What about the additional security issues recommended by RAND more than seven years ago and reiterated by the Israeli consultations? I.e. Blast Glass installations, cameras embedded into the roadway entrances, weight scales in the roadway, and more?

Response:

The comment does not identify reasonably foreseeable probable future projects that should have been added to the SPAS Draft EIR cumulative impact analysis. Please see Response to Comment SPAS-

PC00130-411 regarding the CTA Second Level Roadway Expansion Joint and Deck Repairs project related to the issue of rust. Security improvements recommended by the RAND Corporation, including blast glass, are addressed in Response to Comment SPAS-PC00130-424.

SPAS-PC00130-342

Comment:

Page 5-22 5.3.4 Land Development and Miscellaneous Improvements
Manchester Square/Belford - In conjunction with residential acquisition occurring under the Aircraft Noise Mitigation Program, voluntary land acquisition within the Manchester Square and Belford areas will continue on an ongoing basis and involve the demolition of acquired structures. Following demolition, properties are fenced, landscaped, and maintained.

Question: What is planned in these locations so that impacts can be assessed and included?

Response:

Land uses are planned in Manchester Square as part of all of the SPAS alternatives with the exception of Alternative 4, as described in Chapter 2 of the SPAS Draft EIR. Specifically, under Alternatives 1 and 2, Manchester Square would be used for airport-related parking. Under Alternative 3, a Ground Transportation Center would be constructed in Manchester Square. Under Alternatives 8 and 9, Manchester Square would be used for a CONRAC and parking. Although Alternatives 5, 6, and 7 focus on airfield improvements only, these alternatives would be paired with the ground access features of Alternative 1, 2, 8, or 9. Please see Response to Comment SPAS-PC00130-175 regarding speculation about future land uses in the Belford area.

SPAS-PC00130-343

Comment:

Page 1655 Cumulative Impacts 5.5.2 Air Quality

Question: When will the three year late air quality apportionment study be released? Why is none of the first two phases considered in the evaluations for this DEIR?

Response:

This content of this comment is similar to comment SPAS-PC00130-36; please refer to Response to Comment SPAS-PC00130-36.

SPAS-PC00130-344

Comment:

The questions in this attachment are in addition to those previously attached that came from various members for LAWA to answer and are in no particular order:

Question: The Master Plan is to allow for future LAX growth and effectiveness within a regional network. How was HSR or other major rail considered in the design to facilitate accesses?

Response:

The question regarding High Speed Rail (HSR) was also raised in comment SPAS-PC00130-194; please refer to Response to Comment SPAS-PC00130-194.

SPAS-PC00130-345

Comment:

Question: How does this DEIR account for AC150/5300-13A changes (the draft released several months ago and went into effect September 30, 2012) that increased space requirements for ADG V and VI? Similarly, the FAA is starting phase 2 of the Southern California Metroplex airspace redesign in October 2012. How has this been considered in the design of the airport since it can modify approach paths and change environmental impacts?

Response:

Tables 3-6, 3-7, and 4-1 of FAA Advisory Circular (AC) 150/5300-13A detail the runway-taxiway and taxiway-taxiway separation standards for Aircraft Design Group (ADG) V and VI aircraft. The separation standards are equivalent to those which were found in previous FAA AC 150/5300-13.

Please refer to Response to Comment SPAS-PC00130-301 regarding the Southern California Metroplex airspace redesign.

SPAS-PC00130-346

Comment:

Question: Please confirm that any building or facility in Lot C will be no higher than one floor and fulfills the runway safety area and runway protection zone areas requirements without waiver.

Response:

As depicted in Figures 4.7.2-6, 4.7.2-8, 4.7.2-10, 4.7.2-12, 4.7.2-14, 4.7.2-16, and 4.7.2-18 in Section 4.7.2.6 of the SPAS Draft EIR, the Runway Safety Areas (RSA) for Alternatives 1 through 7 do not extend into Lot C. As such, Lot C is not required to meet the RSA object clearing criteria defined by the Federal Aviation Administration (FAA) in Advisory Circular (AC) 150/5300-13A, Airport Design.

The figures noted above also depict the Runway Protection Zones (RPZ). As seen in the figures, the RPZs do not encompass the entirety of Lot C. Any portion of Lot C outside the RPZ boundary would not be subject to the FAA standards for above-ground objects defined by AC 150/5300-13A. For those portions of Lot C that fall within the RPZs, the FAA states that is "desirable to clear the entire RPZ of all above ground objects." However, RPZ clearance is not mandated. As such, there is no one-story limit within the RPZ as suggested by the commentor.

The FAA does not grant waivers for RPZs that do not comply with FAA guidance.

SPAS-PC00130-347

Comment:

Question: Please address the potential consequences in the table below:

Action
Removal or mitigation of the 1960s six lane, 740' Manchester tunnel that was to extend from Lincoln on the north to El Segundo was decommissioned because it was destabilizing the runways. It remains under the current runways.
Potential Consequence
LAWA estimated $14M whereas it was $1 OM to add a "welcome to LAX sign" in the median of Sepulveda. We're told it could be several $billion to do it right. Not doing it right could cause major sink hole problems. It's related to an unknown underground water source.
There's also a concern of leeching contamination from the airfield or from the Park One (Garrett and Rocketdyne did fuel and rocket testing on the north areas).
During the years the tunnel was built they had to run an artesian well. There was steam and water in the tunnel during the drought. LAWA has refused to check the tunnel since the rains.

Response:

The commentor has not provided any substantial evidence or factual basis supporting the assertion that the SPAS alternatives could cause major sink hole problems or that there is an unknown underground water source. Please see Response to Comment SPAS-PC00130-1012 regarding the north airfield abandoned tunnel segment (referred to as the Manchester tunnel by the commentor). Please see Response to Comment SPAS-PC00130-51 regarding sink holes at LAX and Response to Comment SPAS-PC00130-265 regarding groundwater contamination. Please see Response to Comment SPAS-PC00096-2 regarding funding for the SPAS improvements.

SPAS-PC00130-348

Comment:

Action
The Major Hyperion sewer lines goes right where they want to put the runway.
Potential Consequence
They may need to move the sewers. It will be a long, expensive process because they don't know the precise locations.

Response:

Please see Topical Response TR-SPAS-LR-1 for a discussion of outfall sewers beneath LAX. There are two outfall sewers that lie beneath the north airfield, the NCOS and NORS. These are the same outfall sewers that lie beneath the portion of Lincoln Boulevard that would be relocated under Alternatives 1, 5, and 6. Although the north airfield lies farther south than Lincoln Boulevard, the depth to these outfall sewers beneath the north airfield is similar to their depth beneath Lincoln Boulevard (i.e., approximately 65 feet). Construction of the north runway improvements would not require relocation of these outfall sewers.

SPAS-PC00130-349

Comment:

Action
Realignment north of the runway necessitates Lincoln Blvd movement by LAWA or CalTrans. The DEIR calls for Lincoln into a tunnel or below grade plus a new interface with Sepulveda Blvd.
Potential Consequence
Major loss of N-S traffic capacity for extended period, 405 already gridlocked. Again, cost is a major factor along with interruption of traffic and Westchester Business District (if it survives).

Response:

Please see Response to Comment SPAS-PC00046-3 regarding impacts to the off-airport transportation system to the north of the airport.

SPAS-PC00130-350

Comment:

Action
Argo Flood Channel (they call ditch) would need to be turned into a covered, limited capacity flow channel.
Potential Consequence
Messing with this area could cause changes to the underground water. Inadequate capacity could flood the runways or north into Westchester. It might even impact the north terminals after a major 50 or 100 years storm. Is the permeable covering on the ditch strong enough to hold a fully loaded A380? If not, what technology will be used to ensure that it is?

Response:

Please see Response to Comment SPAS-PC00130-169 regarding the design capacity of the Argo Drainage Channel improvements proposed under Alternatives 1, 5, and 6. As noted in this response, the design of the facility would provide sufficient capacity to meet the design storm flow for the tributary area. If the capacity of the channel were exceeded, no impacts to the north terminals or to Westchester would result. Rather, the area upstream of the culvert inlet would be affected for a short time until water that had temporarily ponded upstream could be drained back into the channel once the peak of a large storm had passed. The commentor provides no evidence to support the claim that converting the open channel to a box culvert would modify underground water in the area. As noted on pages 2-10, 2-29, and 2-33 of the SPAS Draft EIR, the concrete box culvert would be designed to support the weight of aircraft, including a fully-loaded A380.

SPAS-PC00130-351

Comment:

Question: What capacity must the people mover be capable of handling from the Consolidated Rental Car facility to the CTA?

Response:

The APM systems proposed as a part of Alternatives 3 and 9 have been developed at a program level of planning. Should one of these alternatives with an automated people mover (APM) be approved, further design and analyses for both the consolidated rental car facility (CONRAC) and the APM would be undertaken to more precisely determine the peak passenger demand levels associated with the CONRAC and the necessary capacity of the APM to accommodate the CONRAC demands along with the demands of the other airport-related transportation facilities that are also served by the APM (i.e., the Intermodal Transportation Facility and future Metro Crenshaw/LAX Transit station under Alternative 9 and the Intermodal Transportation Center under Alternative 3).

In general terms, however, relative to the commentor's question of "What capacity must the people mover be capable of handling from the Consolidated Rental Car facility to the CTA," the peak hour demand of the CONRAC can be roughly approximated by multiplying the peak hour passenger activity level projected for LAX in 2025 by the rental car mode splits. In other words, by taking the estimate of how many passengers would be arriving at or departing from LAX during peak hours, as estimated at "curbside" (i.e., passengers within the terminal area that are on connecting flights and would not utilize surface transportation at LAX were not counted), and multiplying that number by the mode split percentage estimated for rental cars (i.e., the percentage or passengers that would be utilizing a rental car for transportation to or from the airport, instead of by private vehicle, or shared-ride shuttles, or bus, etc.) the number of rental car passengers traveling on the APM system can be generally estimated. As indicated on page 4-1096 of the SPAS Draft EIR and shown in Figure 4.12.1-9 on the next page, it is estimated that 7,197 passengers would be at curbside during the arrivals peak hour at LAX in 2025 and 6,610 passengers would be there during the departures peak hour. Table 4.12.1-15 on page 4-1103 of the SPAS Draft EIR delineates the passenger transportation mode splits estimated for the arriving peak hour and the departing peak hour in 2025, with 9.5 percent and 10.8 percent of passengers utilizing rental cars during those respective peak hours (Note: Although those percentages are shown in the table relative to rental car shuttles under Alternatives 1, 2, 4, and 8, which are the alternatives that do not propose an APM, the use of those percentages multiplied against the peak hour passenger estimates provides an indication of the approximate number of passengers utilizing rental cars regardless of whether they use a shuttle or an APM to get between the CTA and the rental car company lot). Based on those calculations, approximately 684 rental car passengers would be utilizing the APM during the arriving peak hour and 714 rental car passengers would be utilizing the APM during the departing peak hour. To account for rental car company employees or other related staff that may also be traveling during those times, an additional ten percent ridership can be assumed, bringing the totals to 752 APM riders during the arriving peak hour and 785 APM riders during the departing peak hour. Again, as indicated above, these estimates are only rough approximations based on information developed at the program level of planning, and more precise demand estimates and corresponding capacity requirements would be determined in conjunction with more detailed planning and analysis for both the CONRAC and the APM in the future, should Alternative 3 or 9 be selected for approval.

SPAS-PC00130-352

Comment:

Question: When applying the SIMMOD model did LAWA take the numbers of each type of aircraft and plug them in to predict which runways for landing and takeoff they would logically be assigned to by the FAA? Is the model validated to ensure safe spacing distances and to match available runway capacity?

Response:

As stated on page 3 in Appendix F-2 of the Preliminary LAX SPAS Report, the Design Day Flight Schedule (DDFS) was simulated independently for each modeled runway operating configuration. As such, the aircraft type for each operation is entered into the model and allows for individualized ground and airspace procedures to be applied. Specifically, the separation standards specified in the Los Angeles Tower Local Control Standard Operating Procedures (SOP) were applied.

As discussed in Section 1.4.2 in Appendix F-2 to the Preliminary LAX SPAS Report, the SIMMOD model used for the SPAS Draft EIR analyses was originally developed and calibrated using actual performance data in 2005. It was subsequently verified and revalidated in 2007 and 2009 based upon updated operational performance data.

In response to this comment, the following sentence has been added to the end of the second bullet on page 3 of Appendix F-2 of the Preliminary LAX SPAS Report: "The simulation model was subsequently verified and revalidated in 2007 and 2009 based upon updated operational performance data." Please see Chapter 3 of the Final LAX SPAS Report.

Following FAA Air Traffic Control procedures, runway assignment for each SIMMOD model was initially determined by the route flown, which is based on the geographic location of the destination or arrival city. In some instances, aircraft routing was adjusted by the model due to metering related to operational demand. For more information, see Section 1.4.5 of Appendix F-2 of the Preliminary LAX SPAS Report.

SPAS-PC00130-353

Comment:

Question: What "special handling" was necessary for the north or south complex since the specific aircraft available for inclusion is airline gate assignment dependent and since they appear to have used the "black box" method of not using specific gate locations how does the model know if an aircraft was destined for a gate on the north or south or for that matter specific area of gates since not all aircraft fit into all gate locations?

Response:

Sections 4.3.2 and 4.3.3 of Appendix F-1 of the Preliminary LAX SPAS Report describes the methodology and assumptions utilized for assigning terminals and gates to each flight in the Design Day Flight Schedule (DDFS). This assigned terminal and gate for each operation was entered into the SIMMOD model. SIMMOD is a planning tool used to recreate air traffic operations for, among other things, the terminal area airspace. It is a network-based model in which airspace and ground facilities and routes are described as a composite of nodes and links.

Upon an aircraft's arrival at LAX, the SIMMOD model checks that the assigned gate is available. In the event that the aircraft's assigned gate is occupied, the model identifies other suitable gates that the aircraft may use. Parameters used for identification of a suitable alternative gate included being located in the same terminal (serving as a geographical proxy for airline location), type of aircraft that can be accommodated, and blocking of adjacent gates. In the event that no suitable alternative gate is available, aircraft were taxied to predetermined holding locations until such time that a suitable gate became available. In response and to provide additional information regarding the gate assignment of aircraft in SIMMOD, this paragraph has also been added to page 42 in Section 2.1.1.2 of Appendix F-2

of the Preliminary LAX SPAS Report. Please see Chapter 4, Corrections and Additions to the Preliminary LAX SPAS Report.

The assumptions upon which the DDFS and SIMMOD relied were reasonable, and supported by substantial evidence in the SPAS Draft EIR.

SPAS-PC00130-354

Comment:

Question: Appendix matrix J1-1 Aircraft Noise Technical Analysis Table 7 et.al.contain specific tracks assumed. Alts 1, 5, 6, and 7 are predicted to be exactly the same in 2025 but very different from the 2009 Baseline percentages. How is this explained?

Response:

The commentor is inquiring about differences among flight track use percentages recorded in 2009 and those assumed in 2025 under each SPAS alternative. Flight track use percentages were generated in a large database. The tables included in Appendix J1-1 of the SPAS Draft EIR, starting with Table 2 on page 4-12, display percentages of each flight track for each runway of the total number of day, evening, and night operations. For instance, first row of Table 2, 0.01 percent of all daytime operations were assumed to operate on Runway 6L Flight Track ID #LN_CIV1.

As addressed under the discussion of runway utilization under each alternative (starting in Section 3.2.1 in Appendix J1-1 of the SPAS Draft EIR with Alternative 1), the runway use percentages assumed under each SPAS alternative may vary from the 2009 baseline conditions depending upon the SIMMOD simulation results and airfield characteristics of each alternative. As discussed in Section 3.2.1 in Appendix J1-1 of the SPAS Draft EIR, "The function of the SIMMOD model is to assign individual flights to specific runways based largely on minimizing separation requirements between various aircraft types and assign aircraft to runways based on traffic demand to maintain operational efficiency and reduce delay." Therefore, the flight track utilization percentages may differ between the 2009 and 2025 results as runway use percentages vary.

However, an important assumption made in the SPAS Draft EIR aircraft noise analyses was the assumption to maintain the use of each flight track constant (unique to each runway) by time of day and aircraft type in 2009 baseline and 2025 conditions. Accordingly, using the same example as above, for each runway and unique flight track assigned to that runway (for instance, to Runway 6L Flight Track #LN_CIV1), the percentage of operations by time of day and aircraft type (for instance day time and LNB) were assumed to remain constant (in this instance, 30.3 percent). See Section 3.2.2 and 3.2.3 in Appendix J1-1 of the SPAS Draft EIR for further details. Similar discussion is provided for the other alternatives in the subsequent sections of the Appendix J1-1.

SPAS-PC00130-355

Comment:

Question: A chart of the annual number of operations was presented to the LAX-Community Roundtable. 2009 is about 10% less when compared with 2011(with 2009 at a low point). How would this impact the noise and pollution analysis results?

Response:

Aircraft operations at LAX in 2009 were 9.5 percent lower than they were in 2011. When comparing conditions in 2025 with implementation of the SPAS alternatives to a 2009 baseline year, the increase in noise levels and air quality emissions and concentrations is greater than it would be were a 2011 baseline year used. Therefore, use of 2009 baseline year for operational data in the SPAS Draft EIR provides for a conservative analysis.

SPAS-PC00130-356

Comment:

Question: Since LAWA is attempting to move aircraft and facilities closer to communities what biological contamination precautions are being improved?

Response:

It is unclear what is meant by "biological contamination precautions" in the comment. The emissions from the airport sources are not biological contaminants such as molds, fungus, and bacteria. The Section 4.2.5 (pages 4-103 through 4-108) of the SPAS Draft EIR outlines approximately 34 mitigation actions that will be implemented to potentially reduce construction and operational air pollutant emissions from project sources. These include, among other actions, installing diesel particulate filters on construction equipment, fugitive dust controls, administrative controls to limit hours of operation of on-road and off-road vehicles and equipment, provide FlyAway connections in strategic locations and otherwise encourage transit ridership to the airport, improve roadway and highway traffic systems around the airport, encourage use of low-emission vehicles, convert the LAWA fleet to alternative vehicles, conserve energy, and support the conversion of ground support equipment to alternative fuels or battery power.

SPAS-PC00130-357

Comment:

Question: Several 2007 runway safety studies are mentioned in the DEIR/SPAS Report. Several technical improvements such as runway safety lights are available and RSL are installed at some, but not all intersections. None of those studies seems to have assumed that any of the technical improvements were to be implemented. If they are all implemented, what is the impact on runway safety? What is the perceived cost?

Response:

The installation of runway status lights would enhance airfield safety by providing pilots with an additional information source regarding whether to cross a runway. As described on page 4-502 of the SPAS Draft EIR, installation of such a system at LAX is underway. Please refer to Response to Comment SPAS-PC00096-5 for a discussion of the safety improvements analyzed in the SPAS Draft EIR.

SPAS-PC00130-358

Comment:

Question: Regarding DEIR meeting outreach: What list of people or organizations did LAWA notify? At one of the hearings we noted the scarce attendance and asked who had received postcards. We were told that LAWA couldn't find the lists or prior meeting participants to which to send postcards. Many of those initial lists are published in the preliminary SPAS report! We did a quick survey at the last two Westchester Neighbors Assn general meetings and found that only two people had received postcards our of approximately 60 at each meeting (approximately 3/4 in attendance had attended prior LAX meetings).

Response:

LAWA undertook an extensive process to notify public agencies and members of the public of the availability of the SPAS Draft EIR for review and the three open house/public meetings that were held in late August 2012 during the public comment period. As required by CEQA, a Notice of Completion was filed with the State Clearinghouse and the Notice of Availability (NOA) was posted with the County Clerk. In addition to providing information about the availability of the SPAS Draft EIR, the length of the public review period, and the process for providing comments, the NOA listed the three open house/public meeting dates. In addition, a mailer was sent to 7,080 individuals with information regarding the availability of the SPAS Draft EIR and the open house/public meetings. The mailing list included names in the LAX Master Plan Stakeholder Liaison's database, which was originally compiled

during preparation of the LAX Master Plan EIS/EIR. In addition, 1,500 postcards were distributed, along with supplemental Spanish-language materials where appropriate. These postcards were distributed in person at Terminal 1 (baggage claim), the Westwood FlyAway, Union Station FlyAway, and Van Nuys FlyAway. Notices announcing availability of the SPAS Draft EIR and the open house/public meetings were also published in area newspapers, including the Los Angeles Times, Argonaut, Daily Breeze, La Opinion, and Hoy. Meeting information was also published in LA Streets Blog, and onsite advertisements appeared in the Los Angeles Times, Daily Breeze, and Daily News. LAWA posted several press releases announcing the open house/public meetings on its website (www.lawa.org) and distributed press releases to over one dozen travel- and airport-related media outlets. The press releases also notified the public of the virtual meeting platform, which enabled the online audience to access information that was presented at the open house/public meetings and submit comments. Finally, the meetings were announced via LAWA's social media platforms (i.e., Facebook and Twitter).

SPAS-PC00130-359

Comment:

Question: When LAWA did a security analysis, did it take into consideration all of the RAND studies? What perimeter assumptions and accesses did LAWA assume? What controls into the CTA and also what airfield (and through the fence) assumptions were made? Who actually conducted the study and who approved the contractor?

Response:

Security is not an environmental impact and is, therefore, not required to be discussed in the SPAS Draft EIR under CEQA or any other law. However, a security assessment of the SPAS alternatives is included in Appendix I of the Preliminary LAX SPAS Report to comply with the Stipulated Settlement and Section 7.G(2) of the LAX Specific Plan.

The Security Assessment was prepared by TranSecure, who was selected by LAWA in consultation with the petitioners from the LAX Master Plan litigation. The security consultant reviewed and considered previous security studies prepared for LAX, including the RAND studies. The purpose of the Security Assessment was to provide a preliminary review of facilities included in the SPAS alternatives on a conceptual basis. The study looked at all of the facilities included in the SPAS alternatives, including those on current airport property as well as those on land that would have to be acquired. The access assumed for each alternative is as defined for that alternative in Chapter 2 of the SPAS Draft EIR. The study did not make any assumptions regarding security beyond existing physical facilities and security practices.

No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00130-360

Comment:

Question: What kinds of safety studies were conducted? Was it assumed that all structures were sound and in good repair? If not where are cost estimates and identification of the refurbishments that will be needed?

Response:

Structural assessments were not conducted for the SPAS Draft EIR analysis, given that such analysis is more appropriate for, and would be undertaken at, the more detailed project level of planning and review. As discussed on page 4-3 of the SPAS Draft EIR, the Draft EIR is a program-level document prepared pursuant to the State CEQA Guidelines. State CEQA Guidelines Section 15168(a) states that a program EIR "may be prepared on a series of actions that can be characterized as one large project" and applies to projects that are related either geographically or as logical parts in the chain of contemplated actions. A program EIR is prepared at a more general level of planning than a project-

level EIR and allows a lead agency to "consider broad policy alternatives and program-wide mitigation measures at an early time when the agency has greater flexibility to deal with basic problems or cumulative impacts" (State CEQA Guidelines Section 15168(b)(4).) Program EIRs are commonly used in conjunction with the tiering process, which is "the coverage of general matters in broader EIRs (such as general plans or policy statements) with subsequent narrower EIRs or ultimately site-specific EIRs…concentrating solely on the issues specific to the EIR subsequently prepare." (State CEQA Guidelines Section 15385.) Under CEQA's tiering principles, it is proper for a lead agency to focus a first-tier EIR on only the program's general impacts, "leaving project-level details to subsequent EIRs when specific projects are being considered." (State CEQA Guidelines Section 15152(c); In re Bay-Delta (2008) 43 Cal.4th 1143, 1174-1175.)

The CEQA Guidelines establish several additional principles related to the level of detail appropriate for a first-tier program EIR. For example, an EIR project description should be "general" and "not supply extensive detail beyond that needed for an evaluation and review of the environmental impacts." (State CEQA Guidelines Section 15124.) Also, the degree of specificity in an EIR corresponds to the degree of specificity of the underlying activity being evaluated. (State CEQA Guidelines Section 15146(b).) An EIR's sufficiency is reviewed in the light of what is "reasonably feasible." (State CEQA Guidelines Section 15151.)

SPAS-PC00130-361

Comment:

How many vehicle accidents are assumed to occur at LAX and was this accounted for in the traffic analyses?

Response:

The on-airport traffic analyses in Section 4.12.1 of the SPAS Draft EIR were prepared to provide analyses of the peak hour traffic conditions on the upper-level roadways of the CTA and the peak hour conditions on the arrivals-level roadways during an average day of the peak month (PMAD). These conditions represent a busy typical condition for the purposes of assessing existing and future traffic operations related to the SPAS. Please refer to Response to Comment SPAS-PC00130-308 for additional discussion related to the selection of the PMAD and the validity of using PMAD as a basis for conducting the on-airport transportation analyses. The occurrence of traffic accidents, and their effect on operation, is unpredictable and represent an atypical operating condition. Therefore, an assumption of traffic accidents would be very speculative and would not provide meaningful information relative to the various SPAS alternatives. Therefore, such an assumption was not incorporated into the SPAS on-airport traffic analyses.

SPAS-PC00130-362

Comment:

Was taxiway and gate locations considered as part of the safety studies? What about line of sight issues (and non-visibility areas) in all areas of the airside?

Response:

To the extent that taxiway and gate locations are accounted for in SIMMOD airfield modeling, those studies that utilized SIMMOD in evaluating airfield safety, such as in the case of the North Airfield Safety Study (NASS), do take those features into considerations. However, because the SPAS Draft EIR is a program EIR, is it not required to analyze the impacts of specific construction projects included in the program at a project-specific level of detail.

The safety studies do not address line-of-sight issues, as such specific considerations are normally addressed in conjunction with more detailed levels of project planning, engineering, and design for airfield and terminal improvements, which will be subject to project-specific environmental review under CEQA.

SPAS-PC00130-363

Comment:

Are sink holes considered a safety issue? How often and to what extent have sink holes limited regular flow of vehicles and aircraft on the airside?

Response:

Please see Response to Comment SPAS-PC00130-51 regarding sink holes at LAX.

SPAS-PC00130-364

Comment:

What other landside safety evaluations were conducted? What were the results?

Response:

No other landside safety evaluations were conducted, given that such considerations are more appropriately addressed at the project level of planning -- see Response to Comment SPAS-PC00130-360.

SPAS-PC00130-365

Comment:

Question: The DEIR states that the project would, " provide a better balance between north and south airfields." Does the DEIR ever state the current balance and how it intends to improve this balance? Since there are differing numbers of gates on the two complexes does balancing equally make operations less efficient when aircraft are moved to the complex away from their gate location? How does the existence of cargo operations concentration on the south complex impact the definition of "balanced?" Since the Stipulated Settlement called for resolving the issues addressed by the yellow light project, how is this applicable except to be a noble objective to "share the impacts equally?"

Response:

The content of this comment is similar to comments SPAS-PC00130-511 and SPAS-AL00007-57; please refer to Response to Comment SPAS-PC00130-511 and Response to Comment SPAS-AL00007-57.

SPAS-PC00130-366

Comment:

Question: Table 4.7.3-8 compares many runway spacing characteristics. The distance between taxiway and runway is particularly interesting and is LESS than runway spacing between runways for EVERY alternative when a centerline taxiway is installed. There appears to be controversy between FAA and NTSB about the proper spacing between runways, runway-taxiways, and runway-objects. The ACRP Airport Cooperative Research Program studies addressing lateral deviation of aircraft during landing and take offs away from the runway centerline show potential safety problems. Also, there are numerous reports of erroneous landings on a taxiway in error. Does the parallel nature of runway-taxiway create another failure mode that can lead to an air disaster? How is this accounted for? Fifteen years ago the FAA changed its emphasis from right angle taxiway exits from runways to high speed turn offs and is not going back to right angle exits. What does LAWA anticipate will be the next change? The standards changed during the reconstruction of the South Airfield Project so that NLAs like the A380 are now discouraged from the south. Instead these larger aircraft operate on the north where LAWA/FAA management initially told us that these aircraft could not safely land. In view of all of these reversals of standards and opinion of what is the safest method of operation and knowing that the runway-taxiway spacing requirements of AC150/5300-13A was just invoked this month, what IS the best design that we should plan for?

Response:

As described in Section 4.7.2 of the SPAS Draft EIR, numerous studies address safety of the north airfield. A significant number of these studies concluded that the addition of a centerfield runway, together with increased separation between runways, would eliminate existing risks.

The FAA document DOT/FAA/AR-TN07/54 Identification Techniques to Reduce Confusion Between Taxiways and Adjacent Runways provides techniques for airport operators in response to pilots landing on taxiways adjacent to runways. These techniques can also be found in FAA Advisory Circulars (AC) 150/5300-13A Airport Design and 150/5340-1K Standards for Airport Markings. Additionally, the north runways in all alternatives would provide Instrument Landing System (ILS) approach capability, allowing pilots to better align themselves with the runways.

Due to the acceptance of Airport Improvement Program (AIP) funding and Passenger Facility Charge (PFC) funds, LAWA is required to adhere to current FAA guidance for airport design standards incorporated in the FAA Advisory Circulars. LAWA cannot predict what changes to future ACs may be and is only able to design based on current ACs until new revisions are released. However, a reasonable range of alternatives has been presented, and it is up to the LAWA Board of Airport Commissioners to decide on the appropriate course of action. The SPAS Draft EIR was prepared with a sufficient degree of analysis to provide the decision-makers with information which enables them to make a decision which intelligently takes account of environmental consequences. (State CEQA Guidelines Section 15151.)

SPAS-PC00130-367

Comment:

Question: Section 4.5 Cultural Resources (page 4-349) indicates the prior EIR was relied upon. There have been sections of historical roadway identified by local residents that remain within the airfield boundaries. Are any of these roads that date back to the late 1800s into the 1930s a potential source of artifacts or cultural information? Since they were not identified earlier and LAWA now intends to tear up some of these areas shouldn't they be more completely scrutinized? Why not? Has LAWA consulted the Centinela Valley Historical Society to find out about older artifact locations? If not, why not?

Response:

None of the roadways within the SPAS study area are presently considered historically significant roads. The roadways have been altered and repaved over the years and therefore do not retain integrity or possess significance as historic resources either individually or as contributors to a historic property or district. There is little to no potential for the roads within the SPAS study area to contain subsurface artifacts or cultural information. However, Section 4.5 of the SPAS Draft EIR acknowledges the potential for encountering previously unidentified archaeological resources during construction. Mitigation Measure MM-HA (SPAS)-4 is proposed to address this impact. Compliance with this mitigation measure would reduce impacts to previously unidentified archaeological resources that may be discovered during construction of all of the SPAS alternatives to a level that is less than significant. (See Section 4.5.8.2 of the SPAS Draft EIR.)

The Centinela Valley Historical Society was not contacted during the cultural resource study. Per industry standards, the cultural resources records search was conducted through the South Central Coastal Information Center at California State University, Fullerton.

SPAS-PC00130-368

Comment:

Question: The impact of the reconfiguration of Runway 6R/24L eastward to meet FM runway safety requirements seems to have the biggest noise impact, since Alternative 4 would result in the greatest number of newly exposed units and population. However, this impact seems to be overwhelmed in the other alternatives that also have this extension but relocate runways. So relocating runways north tends to obscure the significant impact to our neighbors to the east.

Question: Is this your understanding of the finding? What is the definition of the term "newly exposed" in either the report or Appendices J1-1 or J1-2? Where is, and/or please provide, the data used to calculate the number of units or population exposed by the various alternatives that supports the findings?

Response:

As presented in Table 1-16 on page 1-83 of the SPAS Draft EIR, Alternative 4 would result in the greatest number of population and residential units newly exposed to 65 CNEL or higher noise levels and the greatest number of residential units newly exposed to 75 CNEL. The relocation of Runway 6L/24R northward under Alternatives 1, 5, and 6 does not obscure significant impacts. Significant impacts are clearly presented in Sections 4.9.6 and 4.10.1.6 of the SPAS Draft EIR. Please see Response to Comment SPAS-PC00130-126 regarding how population density changes depending upon the geographic location.

The commentor also asks "[w]hat is the definition of the term 'newly exposed'…" The meaning of this phrase depends upon the context. For example, page 4-831 of the SPAS Draft EIR states "The area depicted by the magenta line indicates areas newly exposed to increases larger than 1.5 decibels and above 65 CNEL dBA." In this context "newly exposed" refers to areas that are above 65 CNEL under Alternative 1 2025 conditions and which experience an increase of 1.5 decibels in comparison to 2009 conditions. This methodology was clearly described in SPAS Draft EIR Section 4.10.1.4 ("Thresholds of Significance for Aircraft Noise") and 4.10.1.2 ("Noise Analysis Methodology"). To the extent the commentor is referencing other portions of the SPAS Draft EIR, the meaning of this phrase can be ascertained in context, or through a review of the SPAS Draft EIR methodology discussion (Section 4.10.1.2) and the significance threshold discussion (Section 4.10.1.4).

Please see Response to Comment SPAS-AL00006-8 regarding an explanation of the data used to calculate the number of units or population that would be exposed to high noise levels under Alternatives 1 through 7 and SPAS-PC00130-209 regarding noise modeling assumptions.

SPAS-PC00130-369

Comment:

Question: Is "newly exposed" the best or only noise impact metric to use in comparing alternatives. Newly exposed would seem to indicate how many people would suffer certain unacceptable levels of noise that wouldn't have that exposure without the change. What factors result in Alt 5 scoring so well with that metric?

Response:

Please see Response to Comment SPAS-PC00130-368 regarding the term "newly exposed." As discussed in Response to Comment SPAS-PC00130-126, additional noise metrics and criteria were used in the aircraft noise analysis, including discussion of single event aircraft noise. See SPAS Draft EIR Section 4.10.1.2 for discussion of the methodology and noise metrics in the aircraft noise analysis and Section 4.10.1.4 for discussion of the thresholds of significance applied in the aircraft noise analysis.

Please see Response to Comment SPAS-AL00007-22 regarding the noise exposure effects of Alternative 5 in comparison with the other SPAS alternatives.

SPAS-PC00130-370

Comment:

Question: What would be the ranking of the alternatives if cost impact of mitigation measures, such as additional soundproofing, were used?

Response:

The costs of mitigation measures, such as soundproofing, depends on such factors as the size of the structure, the number of window and door openings, and the type of ventilation. Please see Response to Comment SPAS-PC00130-730 regarding the treatment of economic conditions in an EIR, which includes costs of project-related improvements such as mitigation.

SPAS-PC00130-371

Comment:

Question: In the section on noise impacts LAWA created some interesting charts on % awakening. What assumptions were made on these comparative alternatives? Was the condition of over ocean operations assumed for all nights? If not, why not? If yes, why are the numbers so imbalanced?

Response:

The fleet mix, flight paths, and aircraft operational assumptions used for the aircraft noise analyses, including both the CNEL analysis and the single event noise analyses, such as for speech interference at schools and nighttime awakenings, for each alternative are presented in Appendix J1-1 of the SPAS Draft EIR. Please see Responses to Comments SPAS-PC00130-130 and SPAS-PC00130-296 regarding ANSI noise modeling assumptions and Over-Ocean Operations.

SPAS-PC00130-372

Comment:

Question: What is the basis for the 15% assumption for midsized jets moved over from the south to the north?

Here's a spreadsheet with assumptions and base numbers presented overall...

	Newly Exposed SFH	MFH	POPULATION	1.5 DB INCREASE SFH	MFH	POPULATION	
Alt 1	4120	9325	13445	9937		13608	
Alt 2	4139	10187	14326	4209	13826	18035	
Alt 3	4394	9049	13443	3819	1120	15099	
Alt 4	4221	10470	14691	4299	12362	16661	
Alt 5	4183	9076	13259	3811	9962	13773	GREATER W-PDR
Alt 6	4031	9861	13892	3404	9301	12705	
Alt 7	4100	10076	14176	4393	15089	19482	

	TOTAL ADDL IMPACT	
Alt 1	412019262	27053
Alt 2	834824013	32361
Alt 3	821310169	28542
Alt 4	852022832	31352
Alt 5	799419038	27032
Alt 6	743519162	26597
Alt 7	849325165	33658

Response:

The tabular data presented in the comment were taken from the results of the aircraft noise analyses presented on page 4-703 in Table 4.9.6 of the SPAS Draft EIR related to newly exposed areas. The data are related to newly exposed residential population (by single family home and multi-family home), with 1.5 dB increase and total additional impacts.

The commentor inquired about "the basis for the 15% assumption of midsized jets moved over from the south to the north," as discussed in Section 4.10.1.6 of the SPAS Draft EIR, beginning on page 4-829 under each alternative. The comment refers to an assumption listed in Section 4.10.1.6 of the SPAS Draft EIR, under each of the Alternatives 1, 2, 5, 6, and 7. As stated, it was assumed that a number of

small wide-body aircraft would use the north runways 15 percent more than the south runways under Alternatives 1, 2, 5, 6, and 7 when compared to the baseline (2009), as facilitated by the north airfield and terminal improvements. It is important to note that several additional assumptions, as discussed in Section 4.10.1.6 of the SPAS Draft EIR, were used to derive the aircraft noise analysis results, and not just the 15 percent assumption.

The runway use percentages used in the SPAS Draft EIR aircraft noise analyses were derived based on the airfield and airspace simulations analyses conducted for the SPAS Draft EIR. It was assumed that the air traffic controllers would assign aircraft to either the north or south runway complex based on which airspace fix an aircraft is assigned to. However, if necessary, it was assumed that the traffic might be reassigned to an alternate runway complex to balance airfield operations. It was also assumed that, as the number of operations increases in the future scenarios, the runway use is balanced by dynamically metering the runway assignments. For more information regarding the airspace simulation, refer to Appendix F-2 of the Preliminary LAX SPAS Report.

SPAS-PC00130-373

Comment:

Question: Turning to the Off-airport Transportation Analysis, the "bottom line" seems to be captured on page 4-1242, where the report concludes that "all of the alternatives would result in significant impacts relative to Future (2025) conditions. This conclusion is supported on page 4-1318, where many of the significant Westchester intersections have "N.F.M." (no feasible physical mitigation) under all the scenarios.
Interestingly Alternatives 5, 6, and 7 weren't studied, since they have no changes to ground transportation. Moreover, although the report claims that Future (2025) conditions were studied with and without alternatives, where is the report of the 2025 impacts without Alternatives.

Response:

The comment incorrectly indicates that off-airport transportation impacts associated with Alternatives 5, 6, and 7 were not studied in the SPAS Draft EIR and asks where the analysis of future conditions without Alternatives is presented.

Although Alternatives 5, 6, and 7 focus on airfield and terminal improvements, they are not "stand alone" alternatives, as explained on page 2-8 in Section 2.3.1 and in the text and footnote 679 on page 4-1183 of the SPAS Draft EIR, and therefore cannot serve as a baseline for traffic impact comparisons. Alternatives 5, 6 and 7 would not, by themselves, result in off-airport transportation impacts. However, because Alternatives 5, 6, and 7 could be paired with the ground transportation system improvements proposed under Alternatives 1, 2, 8, or 9, analysis of off-airport transportation impacts associated with those alternatives addresses impacts of Alternatives 5, 6, and 7.

Analysis of future conditions without any of the SPAS alternatives is analyzed in the SPAS Draft EIR. The methodology for this analysis is discussed in Section 4.12.2 of the SPAS Draft EIR. As discussed on page 4-1208 of the SPAS Draft EIR, the SPAS Draft EIR analyzed future conditions to provide a conservative analysis. The SPAS Final EIR presents a comparison of (1) Future (2025) with Alternative Scenario to (2) Future (2025) without Alternatives scenario that includes the natural growth at LAX (as well as other reasonably foreseeable improvements as described on page 4-1208), but does not include the physical changes proposed under the analyzed SPAS alternatives. With the inclusion of projected natural growth at LAX in the Future (2025) without Alternative scenario, impacts would be reduced in comparison to the impacts disclosed in the SPAS Draft EIR. The analysis supporting this conclusion is provided in Response to Comment SPAS-AL00003-3.

As stated in Response to Comment SPAS AL00003-3, the additional comparison of (1) Future (2025) with Alternative Scenario to (2) Future (2025) without Alternatives scenario requested by Comment SPAS-AL00003-3 does not result in new significant impacts, does not result in an increase in the severity of impacts, and does not trigger recirculation under any of the criteria provided in CEQA. This conclusion is consistent with the recent decision Merced Alliance for Responsible Growth v. City of Merced (2012, 5th App. Dist., Case F062602) [Publication Request Pending]. In Merced, petitioners alleged that "…the city's late-submitted information on traffic impacts triggered the requirement that the

EIR be recirculated." (Slip Opinion at 65.) "[The Lead Agency] prepared a response that explained in detail why the methodologies used in its traffic study were sound.

In addition, to allay [Plaintiff's] concern, [the Lead Agencies consultants] conducted an analysis of the study intersections using the baseline [Plaintiffs] suggested-the existing condition plus project-generated trips. This analysis showed that 'there would be no new findings compared to the DEIR traffic analysis.' The challengers argue that, because the respondents cited [the Lead Agency's] analysis to defend the EIR before the superior court, this must have been significant new information that required recirculation. Once again, their recirculation argument fails. The [lead agency's] response letter and new analysis did not disclose a new significant impact, increase the severity of an impact, identify a feasible project alternative or mitigation measure, or 'deprive the public of a meaningful opportunity to comment upon a substantial adverse environmental effect ….' (Laurel Heights II, supra, 6 Cal.4th at p. 1129.) The letter and analysis were prepared especially to respond to [Plaintiff's] concerns, not to change any aspect of the project, mitigation measures, or findings and conclusions in the EIR." (Slip Opinion at 77-78.)

SPAS-PC00130-374

Comment:

Question: Numerous suggestions were made during the SPAS meetings led by LAWA. Why are none of them referenced or identified and analyzed? For instance, more than 5 yrs ago an off site passenger check in was suggested for location near the 405 Freeway in Howard Hughes Center with a bus or people mover to improve the CTA. This commuter passenger option at Howard Hughes, was suggested so that their single vehicle transportation need not drive all the way from the freeway to LAX. Howard Hughes passengers would be taken by mass transit instead. It's nowhere in the DEIR. Why not?

Response:

As described in Chapters 4 and 5 of the Preliminary LAX SPAS Report, LAWA obtained, reviewed, and considered input from the community and the SPAS Advisory Group in formulating the SPAS alternatives. The development of what would amount to a new LAX FlyAway station at the Howard Hughes Center is unlikely to draw a substantial amount of passengers/riders, given that it is only about two miles from LAX and would primarily serve areas to the north of the airport. Therefore, this suggestion was not evaluated in detail in the SPAS Draft EIR. Please also see Response to Comment SPAS-PC00130-957 for additional discussion regarding FlyAway planning.

SPAS-PC00130-375

Comment:

Question: LAWA acknowledges what we've concluded in the first paragraph (underlined) below that a solution is not known and the direct passenger growth is larger than any of the options' impact. Aren't there changes that can be made? What about mass transit? What flyaway's were assumed in the analysis? What about benefits of regionalization?

Page 1183 4.12.2 Off-Airport Transportation
4.12.2.1 Introduction
The off-airport transportation analysis for the SPAS alternatives addresses traffic-related impacts outside the airport boundaries, including arterial roads, highway segments, and ramps that serve traffic approaching and departing the airport environs. This analysis also considers remote facilities that serve airport-related functions, such as parking and offairport cargo. The impacts of passengers, employees, cargo, ancillary, and collateral development (nonairport activities on airport property) on off-airport roads are also included. Impacts to on-airport transportation associated with operation of the SPAS alternatives are addressed in Section 4.12.1, On-Airport Transportation. The primary focus of the analysis presented in this section is on changes in existing (baseline) traffic conditions that would result from the ground access improvements proposed under each SPAS alternative. Additionally, the off-airport transportation analysis completed for the SPAS alternatives accounts for increases in airport-related traffic that would occur in conjunction with increases in airport passenger activity projected to

occur by 2025, the buildout horizon year for the SPAS alternatives. Such future growth in passenger activity levels at LAX is independent of the SPAS alternatives and would occur even if no improvements were implemented.

Response:

Please see Response to Comment SPAS-PC00130-327 regarding the ground access improvements proposed under certain SPAS alternatives, including improvements that would be integrated with Metro transit systems, that are intended and designed to reduce traffic impacts; also, please see Topical Response TR-SPAS-T-1 regarding transit as it relates to the SPAS alternatives. Please see Response to Comment SPAS-PC00130-231 regarding FlyAway assumptions.

Regarding spreading traffic to other airports in the region, please see Topical Response TR-SPAS-REG-1. Traffic impacts that would occur at these airports are discussed in Section 6.2 of the SPAS Draft EIR.

SPAS-PC00130-376

Comment:

Question: http://navigatela.lacity.org/index.cfm allows for review of the sewers impacted by the movement of Lincoln Boulevard. So does the attached picture so one of the three outfall sewers. Sections 1 and 2 (i.e. page 1-18 and table 2-3)is where nominal, incomplete information is located for the realignment and tunneling of Lincoln is discussed. This is in an area of highly concentrated utilities including major outfall sewers which can't be moved. What depth is anticipated for this realigned roadway? How will it interface with Sepulveda and where?

Response:

Please see Topical Response TR-SPAS-LR-1 for a discussion of the Lincoln Boulevard realignment associated with Alternatives 1, 5, and 6.

SPAS-PC00130-377

Comment:

How much more impact on other roadways and traffic should be expected during construction and afterwards? Creating a new tunnel brings all kinds of new and interesting problems, not just from construction, but also operation.

1. Will the tunnel height restrict certain vehicles from entering?
2. If there are height restrictions where will trucks go to get around the tunnel? (Probably Sepulveda and Manchester)
3. Will there be hazardous materials restrictions for the tunnel?
4. How will the tunnel be ventilated? Who will operate and maintain the ventilation system?
5. Will there be emergency evacuation areas or exits? How many and where? Call boxes?
6. Will there be traffic controls such as stop lights and electronic signage to warn drivers not to enter the tunnel? Will the electronic signage offer alternate routes? What will those alternate routes be?
7. The Sepulveda Tunnel is dirty from automobile pollution and graffiti. What are the plans to clean the proposed Lincoln Boulevard tunnel on a regular basis?

Response:

Please see Topical Response TR-SPAS-LR-1 regarding the realignment of Lincoln Boulevard. Under Alternatives 1, 5, and 6, modifications to Runway 6L/24R would require realignment of a portion of Lincoln Boulevard but there would be no capacity reduction following construction. Section 4.12.2.5 of the SPAS Draft EIR lists the LAX Master Plan commitments and mitigation measures that are applicable to the SPAS alternatives, including those related to minimizing construction-related traffic effects. Section 4.12.2.6.3 of the SPAS Draft EIR discusses temporary traffic impacts to the off-airport transportation system during construction.

As explained in the topical response, details regarding design elements, construction, and operation aspects inquired about in the comment have not yet been determined. If the tunnel were to remain under the jurisdiction of Caltrans, the tunnel would be constructed in a manner consistent with the standards set forth in the current edition of the California Highway Design Manual (Caltrans), including height, ventilation, emergency exits, traffic controls, signage, and lighting. Restrictions may be placed on its use by vehicles carrying hazardous materials, subject to a determination by LAWA and Caltrans. Responsibility for maintenance of the tunnel, should it be constructed, would be determined as part of a maintenance agreement between the City of Los Angeles and Caltrans.

SPAS-PC00130-378

Comment:

Question: Why is the totality of the Master Plan not addressed? Elements such as Terminals 1.5 and 2.5 are referred to in the DEIR, but never explained. The DEIR states that these are outside of SPAS. These elements, however, are not in the approved 2004 Alternative D Master Plan. In which portions of the environmental assessments were these projects included? Which version of gate alignment and size were assumed? How will this be incorporated into the Master Plan?

Response:

Please see Response to Comment SPAS-PC00130-30 for an explanation of why the SPAS Draft EIR does not need to address the totality of the LAX Master Plan as well as a discussion as to how any approved SPAS alternative, if it is other than Alternative 3, would be incorporated into the LAX Specific Plan. It should be noted that past, present, and reasonably foreseeable elements of the LAX Master Plan are identified in Chapter 5 of the SPAS Draft EIR and are considered in the analysis of cumulative impacts. Specifically, the North Terminals Improvements Project (also referred to as Terminals 1.5 and 2.5) is an LAX Master Plan project. The North Terminals Improvements Project is consistent with the new north linear concourse under Alternative D. This project is identified as a cumulative terminal-related project in Section 5.3.2 of the SPAS Draft EIR, and the cumulative impacts of this project, in conjunction with SPAS and other cumulative projects, are analyzed in Chapter 5. Gate layouts developed for SPAS are provided in Appendix F-1 of the Preliminary LAX SPAS Report. As discussed in Appendix F-1, detailed information developed for SPAS Alternatives 1 through 4 enabled the analysis to provide reasonable estimates for Alternatives 5 through 7; gating analysis was not developed for Alternatives 8 or 9 because these alternatives do not include terminal or airfield improvements.

SPAS-PC00130-379

Comment:

Question: Traffic issues are generally noted as significant and not mitigatable and/or not addressed. Adequate alternative plans as well as cumulative impacts are understated because several key major projects are not fully listed such as planned buildout of several Howard Hughes towers. Mass transit into and/or around LAX would significantly impact businesses but are not addressed. None of the mass transit alternatives have capacity for more than a few million annual passengers. How will the rest of the passengers be serviced?

Response:

The traffic impact analyses presented in Sections 4.12.1 and 4.12.2 fully analyzed potential traffic impacts associated with a range of alternatives. Analysis periods included not only normal peak AM and PM commute hours but also the midday peak hour, when airport-related traffic peaks. The impact analysis considered impacts relative to both Existing (2010) Baseline conditions and Future (2025) Without Alternatives conditions. The latter conditions, as stated on pages 4-1208 and 4-1211 of the SPAS Draft EIR, conservatively analyze the projected "natural" passenger growth at LAX from 2010 to 2025 as incremental project traffic. (See Response to Comment SPAS-PC00130-373 for additional discussion of the methodology used to evaluate off-airport transportation impacts.)

The comment asserts that mass transit into and/or around LAX would significantly impact businesses but is not addressed but provides no supporting facts or evidence for this assertion. The SPAS Draft

EIR traffic model for 2025 does assume the completion of the Crenshaw/LAX light rail line connecting the Expo light rail line with the Green Line. The impacts of this project are included in the cumulative impact analysis presented in Chapter 5 of the SPAS Draft EIR. Metro, as the lead agency for the Crenshaw/LAX line, has developed an EIR which describes in detail the anticipated impacts and proposed mitigation measures for this project. It is unclear which other mass transit projects the commentor is referencing.

For a discussion of how background traffic growth was estimated, including traffic associated with the Howard Hughes property, please see Response to Comment SPAS-PC00130-216.

Please see Topical Response TR-SPAS-T-1 regarding transit options into LAX.

SPAS-PC00130-380

Comment:

Question: Not all reasonable traffic routings were assessed. What additional studies will be done to reduce traffic (and attendant congestion, noise and pollution) in residential neighborhoods?

Response:

The comment states that the traffic analysis in the SPAS Draft EIR does not assess all "reasonable traffic routings" and asks what additional studies will be done to reduce traffic in residential neighborhoods. However, the comment does not specifically identify any routes or residential streets that are of concern, or suggest specific studies for traffic reduction in residential neighborhoods. CEQA does not require a lead agency to conduct every recommended test or study recommended by commentors. (State CEQA Guidelines §15204(a).) The SPAS EIR provides sufficient analysis to enable decision-makers to intelligently take account of environmental consequences related to off-airport transportation impacts, as well as other impacts.

Traffic on residential streets is composed of locally-destined traffic and non-local traffic. The location of each street within the surrounding street network, its connectivity and the level of congestion on arterial streets affects traffic in residential neighborhoods.

The off-airport traffic analysis in Section 4.12.2 of the SPAS Draft EIR employed a focused travel demand forecasting model to assist in estimating the routes that airport-generated traffic would use, as well as the routes of other traffic in the vicinity. Primary access routes include both freeways and arterial streets. The location of LAX within the immediately surrounding streets and the lack of connectivity of residential streets in the area, make local residential streets inefficient to access the airport. It is noted that some residential land uses occupy streets that do provide access to the airport, however, the traffic impact analysis in Section 4.12.2 assessed impacts at 200 study intersections during three peak hours for each SPAS alternative and proposed mitigation where feasible.

SPAS-PC00130-381

Comment:

Question: "Section 4.11.2 Law Enforcement talks about staff reduction facilitated by improved scale of efficiency, but as the number of travelers, service vendors, and gate facilities and more terminals increase won't there be an increased need for staff? Will there not be increased crime due to the sheer increase in numbers of people passing through LAX?

Response:

The content of this comment is similar to comment SPAS-PC00130-307; please refer to Response to Comment SPAS-PC00130-307.

SPAS-PC00130-382

Comment:

As traffic increases and the number of entries into the CTA remain large how will staffing be increased to adequately support security as well as traffic control? Doesn't more traffic mean more vehicle accidents as well? How will these needs be met?"

Response:

LAWA is committed to providing and maintaining adequate staffing levels required to promote the safe and efficient operation of the Central Terminal Area (CTA) curbside and roadway system. As such, curbside enforcement staffing levels and assignment locations are routinely adjusted to address daily and hourly fluctuations of CTA traffic activity and to respond to traffic incidents when they arise. LAWA will continue to provide adequate staffing and supplement these services commensurate with the level of traffic activity that is being accommodated within the CTA today and in the future.

The comment does not present any facts or evidence that traffic accidents would increase under the SPAS alternatives. As explained in Response to Comment SPAS-PC00130-361, traffic accidents are not predictable and, therefore, it would be speculative to attempt to estimate the number of future accidents in the SPAS Draft EIR.

SPAS-PC00130-383

Comment:

Question: How does the DEIR address ensuring the law enforcement staffing numbers of LAWAPD will do better than merely keeping up with attrition because growth in numbers are needed to keep up with the anticipated growth of LAX?

Response:

Please see Response to Comment SPAS-PC00130-307 regarding the provision of adequate law enforcement staffing.

SPAS-PC00130-384

Comment:

Question: What is LAWA doing to ensure that staffing of LAPD resources do not again violate in whole or in part either Los City Charter Sections 635 or 636 or any other parts of the FAR pertaining to federal revenue diversion as we have seen in years plan?

Response:

This comment requests information about LAPD staffing, potential violation of Los Angeles City Charter provisions, and potential issues related to federal revenue diversion. All of these issues are beyond the scope of the EIR and no response is required pursuant to CEQA as the comment does not address significant environmental issues or the adequacy of the SPAS Draft EIR. CEQA does not require an EIR to address purely social impacts, such as those with which the comment is concerned, only physical environmental impacts. (State CEQA Guidelines Section 15064(e).)

Nevertheless, LAWA works closely with all of its law enforcement partners including the Los Angeles Police Department. LA officers and detectives provide important expertise to address crime problems and security threats. For example, LAPD's bomb squad responds to reports of suspicious items that may contain explosives and LAPD detectives assist in the investigation of criminal rings that often involve suspects and evidence located outside the confines of LAX. LAWA maintains strict compliance with all federal regulations promulgated by the Federal Aviation Administration and the Transportation Security Administration and will continue to do so in the future.

SPAS-PC00130-385

Comment:

Question: How does proper staffing at LAWA impact the staffing of LAPD resources which are vital and are much needed elsewhere in the City of Los Angeles and are part of the Mayor's promise to have 10,000 LAPD officers on the streets of LA?

Response:

Please note that the SPAS Draft EIR is not required to address law enforcement staffing levels, since they are a purely social impact rather than a physical environmental impact subject to CEQA. (State CEQA Guidelines Section 15064(e).) Nevertheless, LAWA constantly re-evaluates its personnel and security needs and makes adjustments to deployments as needed. Over the past several years, LAWA has hired additional police officers for its Police Division and has reduced the number of LAPD officers assigned to LAX. LAWA will continue to use LAPD resources where necessary in close coordination and partnership with LAWA's Police Division.

SPAS-PC00130-386

Comment:

Section 4.7.1 Health Risk Assessments
...These estimates show that program-related cancer risks for all evaluated receptors (residential adults, residential children, school children, and adult workers) are predicted to be below the threshold of significance of 10 in one million for Alternative 1 and are expected to result in decreases in cancer risks due to anticipated decreases in DPM emissions. Therefore, cancer risk impacts to human health under Alternative 1 would be less than significant and would be beneficial. As noted above, these beneficial impacts are primarily due to ongoing implementation of more stringent motor vehicle emissions standards, cleaner future fleet mixes, and the decrease in stationary source emissions attributable to the replacement CUP, currently under construction. These reductions in future emissions, particularly those associated with future motor vehicle emissions, are anticipated to more than offset the estimated increases in other types of emissions, such as from aircraft, APU, and GSE....

Question: What is the basis for saying that LAWA additional emissions are compensated for by future vehicle reductions per vehicle? Where is this assumption scoped and demonstrated?

Response:

The emission factors associated with automobile, truck, and ground support equipment engines decline over time as the fleets of these mobile sources turn over - meaning that new vehicles (or equipment) are purchased to replace old, worn-out vehicles. The new vehicles comply with the more stringent emission standards.

The emission standards for vehicle and equipment engines have phase in periods. In addition, the equipment fleets are not replaced immediately when a new emission standard becomes effective. Therefore, the fleet average emission factors for a given calendar year for these sources will be slightly lower than factors in the previous calendar year and slightly higher than factors in the next calendar year. The reduction in fleet average emission factors between the SPAS baseline period and the future alternatives horizon year (2025) is substantial. This reduction in emission factors between baseline period and 2025 more than compensates for the increase in vehicle and equipment activity between the same two periods. The decrease is of such magnitude that when combined with the increase from aircraft emissions the overall affect is that emissions of several key pollutants decrease by 2025 under all alternatives. It should be noted that the automobile, truck, and ground support equipment included in the SPAS Draft EIR air quality impact analysis are only those units that are associated with airport operations (vehicles with trips that begin or end at LAX and ground support equipment located at LAX).

The emission factors used in the air quality impact analysis for the SPAS Draft EIR were developed by the California Air Resources Board and approved by the U.S. Environmental Protection Agency. The

emission factors are included in the CARB EMFAC and OFFROAD models, as noted in Section 4.2.2 of the SPAS Draft EIR.

SPAS-PC00130-387

Comment:

1.1.1 Research (Phase 1)
Any conditions completed in Dec. 1995 will not include any impacts established by the terriristic attack on 9/11/01. Therefore should be completely redone including the new model of security and the difficulties with the downturn in economic conditions the number of operations is actually down and the million annual passengers capped at 79 not 98 million annual passengers.

Response:

The section of the SPAS Draft EIR noted in this comment provides background information pertaining to the development of the LAX Master Plan and EIR, specifically, the initial phase of the LAX Master Plan completed in December 1995. The information developed at that time was not used as a basis for analysis of the SPAS alternatives nor was it incorporated into the SPAS Draft EIR. As noted on page 1-9 of the SPAS Draft EIR, the SPAS alternatives are designed to accommodate a practical capacity of 78.9 MAP. The reference to 98 MAP in the noted section of the SPAS Draft EIR merely identified the forecasted activity level in the early stages of the LAX Master Plan formulation. Security is not an environmental impact and is, therefore, not required to be discussed in the SPAS Draft EIR under CEQA or any other law. However, a security assessment of the SPAS alternatives is included in Appendix I of the Preliminary LAX SPAS Report to comply with the Stipulated Settlement and Section 7.G(2) of the LAX Specific Plan. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00130-388

Comment:

Concept development (Phase II)
Any study before the 2004 lawsuit should be rendered mute. There is now a legal settlement in place that supercedes anything before the SPAS agreement. Please explain why?

Response:

Based on the comment heading "Concept development (Phase II)," it is believed that the commentor is referring to the discussion at the bottom of page 1-1 of the SPAS Draft EIR. The subject discussion is part of the project background description that summarizes the three main phases of the LAX Master Plan formulation and includes an overview of the concept development process for the LAX Master Plan. While it provides some background and context related to the LAX Master Plan, it is not related to the technical analyses completed for the SPAS Draft EIR. The commentor's implication that any studies completed prior to execution of the LAX Master Plan Stipulated Settlement are now moot by virtue of the Stipulated Settlement is incorrect. Comments regarding LAWA's compliance with the Stipulated Settlement require legal conclusions that are beyond the scope of what is required by CEQA. However, the Stipulated Settlement identifies the terms and conditions agreed to by all parties for continued implementation of the LAX Master Plan, including the requirement that the Yellow Light Projects be restudied through the SPAS process, but does not invalidate or render moot the studies completed in conjunction with the LAX Master Plan.

SPAS-PC00130-389

Comment:

Environmental Review and Approval (Alt D) (Phase III)
Final Environmental Impact Reports were highly flawed, contradicted itself and nomitigations were ever built. See 2003 lawsuit and the 17,000 page EIR/EIS. Where in the Alt D have you listed migations that have since been installed? What changes were made to community intersections to change traffic flow? How have toxic fugitive dust been mitigated from construction? Since 1995 explain why there hasn't been a train added to the CTA to help lower community traffic?

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)). Nevertheless, the following information is provided in response to the questions raised.

Annual progress reports that provide a status update on implementation of the mitigation measures and plans outlined in the LAX Master Plan Mitigation Monitoring and Reporting Program are available at ourlax.org under "Archived Documents," "Master Plan Mitigation Monitoring & Reporting Program (MMRP)."

With respect to off-airport transportation mitigation improvements, as indicated on page 28 of the 2010 MMRP Annual Progress Report, in accordance with LAX Master Plan MM-ST-10, Modify Signal Phasing, as a traffic mitigation measure for the Bradley West Project, traffic signal timing at the intersection of Imperial Highway and Main Street was modified by LADOT at LAWA's request when construction at the intersection reduced the number of travel lanes. As indicated on page 26 of the 2011 MMRP Annual Progress Report, in accordance with LAX Master Plan MM-ST-6, Add New Traffic Lanes, in 2011, construction was completed at the intersection of Imperial Highway and Main Street to install an additional westbound left-turn lane, and at Imperial Highway and Pershing Drive to install an additional westbound right-turn lane. These improvements were completed as construction traffic mitigation for the Bradley West Project. Other off-airport traffic mitigation measures for the Bradley West Project will be implemented when the number of international passengers at LAX reaches certain levels. For example, Mitigation Measure MM-ST (BWP)-8, Modify the Intersection of La Tijera Boulevard and Sepulveda Boulevard, will be implemented once there are 18.7 million annual international passengers at LAX. (In 2011, there were 16.7 million annual international passengers.) Intersection improvements at Airport Boulevard and Manchester Avenue, Imperial Highway and Sepulveda Boulevard, and Sepulveda Boulevard & 76th/77th Street will be implemented when there are 19.7 million annual international passengers at LAX, in accordance with Mitigation Measures MM-ST (BWP)-4, MM-ST (BWP)-6, and MM-ST (BWP)-9, respectively. Intersection improvements at Arbor Vitae Street and Aviation Boulevard and La Cienega Boulevard and I-405 Ramps north of Century Boulevard will be implemented once there are 20.7 million annual international passengers in accordance with Mitigation Measures MM-ST (BWP)-5 and MM-ST (BWP)-7, respectively. It should be noted that a number of mitigation measures to the off-airport transportation system identified in the LAX Master Plan MMRP are related to development of the Ground Transportation Center (GTC), one of the "Yellow Light Projects" being addressed as part of SPAS. As the GTC has not been constructed, and alternatives to the GTC are being considered as part of SPAS, the associated LAX Master Plan mitigation measures to the off-airport transportation have appropriately not been implemented.

Regarding air pollutant emissions during construction activities, as indicated on page 37 of the 2011 MMRP Annual Progress Report, LAWA completed a Construction-Related Mitigation Plan that set forth specific implementation requirements for the measures outlined in the LAX Master Plan MMRP under Mitigation Measure MM-AQ-2. As described on page 4-104 in Section 4.2 of the SPAS Draft EIR, MM-AQ-2 is complete and was adopted by the Board of Airport Commissioners in December 2005. The mitigation measures specified in MM-AQ-2 were implemented during construction of the South Airfield Improvement Project, Crossfield Taxiway Project, Bradley West project (construction ongoing), and will

be implemented during construction of all future projects at LAX, including implementation of the individual components of the selected SPAS alternative.

SPAS-PC00130-390

Comment:

We would like to see a solid 20 foot block wall along the north and east side perimeters to help contain ground generated particulates within the airport flight field. Where is the study? Why has no action occured for 17 years?

Response:

Installing a solid 20-foot block wall along the north and east sides of the airport would not noticeably reduce the particulate matter concentrations in the surrounding communities. The particulate matter concentrations in these communities come from a variety of mobile and stationary sources, many of which are not associated with the airport or are not located within the confines of the airport property line. Please refer to Response to Comment SPAS-PC00043-2 regarding particulate matter deposition, and Response to Comment SPAS-PC00130-225 regarding ultrafine particles. Construction of such a wall would be subject to CEQA review and could have potentially adverse impacts on aesthetics, traffic circulation, and biological resources, among others.

It is not clear to what study or lack of study the commentor is referring. The LAX Air Quality and Source Apportionment Study (AQSAS) is ongoing, with the final report due out in the spring of 2013. Please refer to Response to Comment SPAS-PC00130-36 for a discussion of the LAX AQSAS status. CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commentors. (State CEQA Guidelines Section 15204.)

It is also not clear to what action or lack of action the commentor is referring. As noted above, the LAX AQSAS final report is due out in the spring of 2013. Since 1995, the airport has instituted or expanded numerous measures and programs to reduce emissions from ongoing airport activity. Examples of several of these actions include, among others:

- Converting LAWA fleet vehicles to alternative fuels. LAWA's fleet is the largest Alternative Fuel Vehicle (AFV) airport fleet in the nation and includes over 590 AFVs. Currently, over 63 percent of LAWA's fleet vehicles and equipment at LAX are AFV's. Additionally, 100 percent of the LAX courtesy shuttle fleet is powered by natural gas. LAWA has designed and built a state-of-the-art, high-technology liquefied natural gas/compressed natural gas (LNG/CNG) fueling station at LAX and acquired over $5 million in grant funding to offset the differential cost of AFVs.

- Promoting electric automobile use. LAWA has partnered with the Department of Water and Power to install 32 public access electric vehicle charging stations at LAX.

- Encouraging use of transit and carpools. LAWA's Rideshare Program saves over 8 million vehicle miles, over 600,000 gallons of gasoline, over 8 billion pounds of air pollutants, thousands of dollars in insurance and vehicle depreciation costs, and countless hours spent driving on Southern California's over-burdened streets and freeways. LAWA's multi-faceted Rideshare Program includes 66 vanpools, 88 carpool program participants, 320 free monthly transit passes, and numerous marketing and advocacy activities to recruit and retain program participants. Currently, about 26 percent of LAWA's employees are participating in the Rideshare Program, saving over 1,000 vehicle trips to LAWA facilities every day.

- Operating direct LAX buses from strategic locations. Throughout 2011, LAWA operated four FlyAway routes between LAX and remote boarding locations at Van Nuys, Union Station, Westwood/UCLA, and Irvine Station. In 2011, the network realized an average daily ridership of 3,790 passengers, reduced vehicle emissions by almost 24 tons per day, and removed 3,221 vehicles trips per day (i.e., approximately 1,175,700 trips over the course of the year), traveling a combined total of 65,505 miles per day on roads approaching LAX.1 The operation of the FlyAway site at the Irvine Transit Center was suspended on August 31, 2012 due to low ridership.

- Installing gate power and preconditioned air at passenger gates. LAWA has recently completed the installation of grid power and preconditioned air at all passenger gates in the Central Terminal Area. This equipment will allow aircraft parked at the gates to use electrical power to run onboard systems and air conditioning without operating the auxiliary power unit engines.

This a short list of the activities that LAWA has undertaken in the last 17 years to minimize air pollutant emissions from airport sources.

SPAS-PC00130-391

Comment:

1.1.2 The stipulated settlement agreement
Westchester, Playa del Rey, was promised a return of street lights the faa removed. Where are the documents that show how this was approched with the faa? Since this was an airport related activity and part of the settlement agreement show where this exsists in the current document?

Response:

The comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR. Notwithstanding, LAWA has already provided the commentor with a copy of the letter from LAWA to the FAA requesting the expenditure of $1 million for the subject street lighting and also provided the commentor with a copy of the letter from the FAA rejecting the request. The commentor's receipt of both of those letters is clearly acknowledged in comment SPAS-PC00130-25.

SPAS-PC00130-392

Comment:

Figure 1-2
Why doesn't the map of the exsisting airport include reference to all of the underground tunnels? Please redo map including tunnels, sewers, hot oil pipes, and explain why they exist and how to mitigate them?

Response:

The purpose of Figure 1-2 in the SPAS Draft EIR is to show the existing LAX facilities and the property surrounding LAX. The SPAS Draft EIR is a programmatic document and specific locations of all the utilities that would be affected by the SPAS alternatives have not been identified at this level of planning. Project-level impacts to utility infrastructure associated with implementation of individual SPAS components would be assessed in future CEQA documents. Please see Response to Comment SPAS-PC00130-235 for a discussion of the appropriateness of the programmatic review conducted for the SPAS project.

SPAS-PC00130-393

Comment:

Figure 1-3
Why aren't the maps made to scale?

Response:

No scale was provided in Figure 1-3 as the map is an illustrative presentation of improvements associated with the approved LAX Master Plan (i.e., Alternative D), rather than an engineered drawing showing the precise dimensions of the improvements. Other maps throughout the SPAS Draft EIR that do show specific improvements include a scale.

SPAS-PC00130-394

Comment:

Explain why green lighted projects okayed during settlement agreements were not built? Projects including the ground transportation center, tunnel, associated structures and equipment was a "yellow lighted" project however the automated people mover was still designated a green lighted project. Why have the Spas committee not seen plans for said project in eight years?

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. The comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR; therefore no further response is required. (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)). Nevertheless, the response below is provided for informational purposes.

LAWA has completed or begun a number of Master Plan projects, including the South Airfield Improvement Project, the Crossfield Taxiway Project, and the Bradley West Project. LAWA has not constructed all of the improvements approved as part of the LAX Master Plan, including a number of projects that were not Yellow Light projects, such as the APM that would connect the approved ITC and CONRAC to the CTA because such projects are integral parts of the overall ground transportation system planned for LAX, which is being reevaluated as part of the SPAS process. The need for the ITC and an APM connecting the ITC and CONRAC to the CTA, as proposed in the LAX Master Plan and is reflected in SPAS Alternative 3, is predicated on the assumption that the CTA is closed to private vehicles, whereas the ground transportation system proposed under the other SPAS alternatives keep the CTA open to private vehicles, which alleviates the need for the ITC and associated APM. As outlined in Chapter 2 of the SPAS Draft EIR, many of the non-Yellow Light projects would be eliminated under the SPAS alternatives. The completion of the SPAS process will help guide LAWA's decisions regarding the nature and timing of various improvements at LAX.

SPAS-PC00130-395

Comment:

We as part of Spas have not seen any practical modernization plans that manage environmental impacts on the surrounding communities. Please list and show drawing of all such plans.

Response:

The LAX Master Plan included a comprehensive set of LAX Master Plan commitments and mitigation measures to reduce or eliminate significant impacts, many of which were directed at managing environmental impacts on surrounding communities. These measures were included in the LAX Master Plan Mitigation Monitoring and Reporting Program (MMRP). LAWA prepares an annual MMRP progress report that provides a status update on applicable mitigation activities, policies, and programs that have been implemented by LAWA to ensure compliance with mitigation measures identified in the MMRP. As discussed in Chapter 1 of the SPAS Draft EIR, the SPAS process is intended to identify amendments that, among other things, minimize environmental impacts on the surrounding communities. Mitigation measures that would address the impacts of the SPAS alternatives are identified throughout the SPAS Draft EIR. All adopted mitigation measures would be incorporated into the SPAS MMRP.

SPAS-PC00130-396

Comment:

Since 2008 lawa has done nothing to encourage airlines to go to other lawa owned facilities, Please list and describe 20 conditions that Lawa intents to enact to each of her other properties that will relieve LAX of at least 25% of flights, cargo. Why have not of the conditions been met? Why are you 8 years out of compliance?

Response:

Please see Topical Response TR-SPAS-REG-1 regarding LAWA's involvement in efforts to promote regionalization of air travel demand in Southern California.

SPAS-PC00130-397

Comment:

Since the flight field at LAX has a capacity of 120 MAP as a currently constructed, Why are you adding more capacity? Who benefits from this?

Response:

The commentor provides no basis or supporting documentation for the claim that the existing "flight field at LAX has a capacity for 120 MAP as a (sic) currently constructed." Page 1-10 in Section 1.2 of the SPAS Draft EIR states that "the SPAS process also includes identification of potential amendments to the LAX Specific Plan that plan for the modernization and improvement of LAX in a manner that is designed for a practical capacity of 78.9 MAP while enhancing safety and security, minimizing environmental impacts on the surrounding communities and creating conditions that encourage airlines to go to other airports in the region, particularly those owned and operated by LAWA." Section 1.2.1 of the SPAS Draft EIR identifies the project objectives for the SPAS project. The Project Objectives section discusses the reasons underlying the SPAS project, as well as the benefits of the SPAS project.

SPAS-PC00130-398

Comment:

What new technology has LAWA implemented in the last 8 years to move Traffic out of LAX ajacent communities? How many vehicles has LAX removed? Why is LAX allowing so many empty buses to circulate in the CTA? Why hasn't LAX made the rental car agencies that use LAX to use only 1 consolidated vehicle every 15 minutes?

Response:

Regarding new technology implemented at LAX, in December 2010, LAWA opened its Airport Response Coordination Center (ARCC) which is a centralized operations center developed to serve the LAX community with round-the-clock operational support, facility management, flight information, and security coordination. It is staffed with personnel from LAX Airport Operations, LAX Airport Police, Facilities Management Group, and the Transportation Security Administration. Together, these agencies are able to obtain situational awareness of security and operational activities at LAX through the use of new technologies that integrate videos, alarms, sensors, and communications. This heightened awareness allows staff to quickly respond to disruptions that negatively impact airport operations at LAX. This includes traffic incidents within and near the Central Terminal Area (CTA) that could, if not dealt with quickly and effectively, result in queuing and delays of traffic on the off-airport street network. Please also see Response to Comment SPAS-PC00130-389 for a discussion of the status of implementation of transportation mitigation improvements identified in the LAX Master Plan Mitigation Monitoring and Reporting Program (MMRP). In addition, widening of World Way across from TBIT will be completed as part of the Central Utility Plant Replacement Project and is scheduled for construction in the first half of 2013.

Regarding removed vehicles, LAWA has no information as to the number of vehicles removed from adjacent communities due to actions taken by the ARCC in responding to traffic incidents.

The commentor is inquiring about empty buses circulating in the CTA, but did not specify which types of buses. Regarding hotel shuttles, in December 2006, the Board of Airport Commissioners approved a program which required all hotels to reduce their LAX shuttle trips by 35 percent from the number of trips that they made during 2004. Financial penalties were imposed for non-compliance ($10 per trip for the first 15 percent over the allowed number of trips and $5 for each trip over 15 percent of the trip allocation). Mostly due to this program, several hotels consolidated their shuttle operations and the

overall number of hotel shuttles in the CTA was significantly reduced. Therefore the suggestion is considered repetitive of existing requirements. Regarding rental car company buses, rental car companies are given an annual number of trips that they are allowed to make into the CTA. The number of trips varies depending on their market share. If they exceed their allotted number of trips, they are subject to financial penalties per excessive trip. To the extent the suggestion is recommending more stringent requirements, the suggestion is considered infeasible. Individual companies may experience differing peaking characteristics or greater demand than other companies, and therefore need more than 1 trip per 15 minutes. Mechanically assigning such values without consideration of market share or actual demand, would result in an inefficient transportation system, and therefore would be inconsistent with the project objective of improving the ground access system."

The table below shows the annual number of outbound shuttle trips at LAX. As a result of the programs discussed above, the number of outbound rental car shuttle trips decreased by 29.8 percent between 2003 and 2010. In addition, the number of outbound hotel shuttle trips decreased by 50.6 percent between 2003 and 2010.

LAX Numbers of Annual Outbound Shuttle Trips by Industry

Year	Rental Cars	Hotels	Off-Airport Parking
2000	1,126,946	682,512	536,309
2001	1,010,994	627,929	650,086
2002	1,014,120	612,561	659,023
2003	985,738	537,976	632,810
2004	909,757	600,332	635,262
2005	897,813	544,697	691,632
2006	803,133	417,335	693,532
2007	779,681	333,185	696,274
2008	764,241	205,203	773,661
2009	639,565	214,099	782,949
2010	691,773	265,784	735,745
2003-2010 Percentage Reduction	29.8%	50.6%	-16.3%

Regarding the consolidation of rental car agency vehicles, since the existing car rental agencies that serve passengers in the CTA are located in separate facilities in the LAX area (Alamo/National and Advantage are located in the City of Inglewood), it is infeasible to establish a consolidated busing operation under the current configuration of the airport that would serve all the various companies.

However, as indicated under the heading of "Ground Access Improvements" on pages 2-21, 2-25, 2-38, and 2-41 in Chapter 2 of the SPAS Draft EIR, SPAS Alternatives 3, 4, 8, and 9 include a Consolidated Rental Car Facility, or CONRAC, that would relocate rental car companies into a single location that would lend itself much more easily to a consolidated bus operation. As discussed on page 4-3 of the SPAS Draft EIR, the current SPAS alternatives are conceptual in nature and the Draft EIR provides a programmatic analysis. These types of operational changes will be considered, depending upon the selection of the alternatives, at a time where specific development proposals are made. It should be noted, however, that one consolidated vehicle every 15 minutes would not provide sufficient seating capacity to serve the rental car customer demand.

SPAS-PC00130-399

Comment:

Why hasn't LAWA completed its settlement of 10 flyaway buses? Why are they asking funds from the flying public when the idea was to cut traffic? How many car trips have been cut since the institution of the exsisting flyaway service? Why haven't similar services been instituted at Ontario, Van Nuys, and Palmdale?

Response:

LAWA currently operates three FlyAway routes between LAX and remote boarding locations at Van Nuys, Union Station, and Westwood/UCLA to serve airport customers and reduce the number of vehicle trips to and from the airport. The operation of a fourth FlyAway site at the Irvine Transit Center was terminated on August 31, 2012 due to low ridership which was resulting in greater emissions from FlyAway buses traveling the 100-mile round trip between LAX and the Irvine Transit Center several times per day with very few, or often no, passengers than would occur if those few passengers drove directly or utilized a shared-ride van/shuttle service.

LAWA is not obligated to operate 10 FlyAway routes, as the commentor indicates. Item C., Air Quality Mitigation, in Exhibit A of the Stipulated Settlement states:

"LAWA shall develop at least eight FlyAway sites with service similar to the service provided by the Van Nuys FlyAway currently operated by LAWA. The intent of these FlyAway sites will be to reduce the number of vehicles going to and from LAX by providing regional locations where LAX employees and passengers can pick up an LAX-dedicated, clean-fueled bus that will transport them from a FlyAway closer to their home or office into LAX and back. Final selection of the FlyAway sites must be completed on a schedule that allows for property acquisition or leasing, terminal design, construction and implementation of all sites by 2015. LAWA shall also implement a public outreach program to inform users of the terminals about their existence and their locations."

The next FlyAway service, connecting LAX with the Metro Exposition light rail line at its Expo/LaBrea station, was approved by the LAWA Board of Airport Commissioners in October 2012 and is expected to begin service in spring 2013. Other potential LAX FlyAway locations which LAWA staff is currently evaluating for service include Santa Monica, Long Beach, Torrance, Hollywood, and Glendale. Regarding public outreach, LAWA provides detailed information on the LAWA website about the FlyAway program and other alternative modes of transportation to and from LAX (lawa.org/welcome_LAX.aspx?id=132) and also provides FlyAway information brochures at transit centers, such as Union Station, and to major employers upon request as part of their transportation demand management/trip reduction programs.

The current FlyAway operations are funded by LAWA's general fund and fares charged to customers to use the service. The funding support provided by LAWA enables the FlyAway costs to passengers to be substantially lower than those of other airport transportation services. Prices currently range from $7 one-way for the Van Nuys and Union Station routes and $10 for the Westwood route. By comparison, the fare from Van Nuys to LAX for shared-van service, with multiple stops (i.e., passenger pick-ups), is typically over $30, from Union Station to LAX is typically over $15, and from Westwood to LAX is typically over $20.

The number of vehicle trips reduced by LAWA's FlyAway shuttles is presented on Page 38 in Table 1, "CY 2007/2008/2009/2010/2011 LAX FlyAway Network Emissions Reduction Summary" of the LAX Master Plan Mitigation Monitoring and Reporting Program (MMRP) 2011 annual progress report dated October 2012.1

Similar FlyAway services at other airports such as LA/Ontario International Airport (Note: Van Nuys Airport is a general aviation airport, which would not have a need for, or a benefit from, FlyAway service, and Palmdale Regional Airport is no longer in operation) have not been developed as LAWA is focused on developing the eight LAX FlyAway sites required by the Stipulated Settlement. Additional FlyAway sites require significant investment with no guaranteed ridership. A primary concern of LAWA

regarding site selection is the investment and/or lease cost for new sites combined with the experimental nature of the service. Revenue generated by the current LAX FlyAway service does not provide sufficient funds to sustain its operations, and is dependent on funding from LAWA's general fund.

1. City of Los Angeles, Los Angeles World Airports, LAX Master Plan Mitigation Monitoring and Reporting Program (MMRP), 2011 Annual Progress Report, October 2012, Available: http://www.lawa.org/uploadedFiles/OurLAX/LAX_MP/MMRP%20Annual%20Report%202011_final_10-11-12.pdf, accessed January 3, 2013.

SPAS-PC00130-400

Comment:

How many van pools for employees exsist from LAWA airports to other airports?

Response:

There are no existing LAWA-sponsored employee vanpools from LAWA airports to other airports. However, the LAWA rideshare and vanpool program is comprehensive, offering financial incentives and discounts to participating employees. There are approximately 68 existing LAWA employee vanpools, 62 eight-passenger vanpools to LAX (496 seats), 5 eight-passenger vanpools to ONT (40 seats) and 1 eight-passenger vanpool to VNY (8 seats). The vanpool program alone saves over 5,500,000 commute miles per year and approximately 390,000 gallons of gasoline annually. For more information about the vanpool program, please see the LAWA Rideshare website at http://www.lawa.org/rideshare.aspx?id=1498.

Should such a program be operated, the implementation of a vanpool program to shuttle employees between airports would not reduce any impacts created by the SPAS Alternatives because there currently is not a need for employees to commute between on a scheduled basis.

SPAS-PC00130-401

Comment:

Project Objectives
1. Provide north Airfield Improvements that Support the Safe and Efficient Movement of Aircraft at LAX. The study completed by Nasa Aims and the 6 university experts deemed the north complex safe. Expansion of the runways would provide a statistically insignificant improvement in safety.

Response:

Please refer to Response to Comment PC00130-168 regarding the North Airfield Safety Study and the opinion of the academic panel involved in that study.

SPAS-PC00130-402

Comment:

By placing a centerline taxiway on the north with an A380 located on it how much closer would the aircraft be? Would moving the runway cause more blind spots from the tower?

Response:

It is understood that the commentor is inquiring about how close aircraft operating on Runways 6L/24R or 6R/24L would be to an Airbus A380 operating on the proposed centerfield taxiway. Many variables would affect the distance in between an aircraft operating on a north airfield runway (Runways 6L/24R or 6R/24L) and one operating on the proposed centerfield taxiway, such as the positions of the aircraft during taxiing on or off the runway and taxiway centerlines; turning onto high-speed exits or taxiway connectors; or the relative position of an aircraft on the centerfield taxiway while the other aircraft is

either taking off or landing on a runway. As discussed and depicted in Section 2.3.1 of the SPAS Draft EIR, the range of runway-taxiway separation in the north runway alternatives is between 400 feet to 550 feet. These separation standards meet the minimum design guidelines put forth by the FAA in Tables 3-6 and 3-7 of FAA Advisory Circular 150/5300-13A Airport Design. Compliance with these minimum design guidelines ensures that there would be sufficient distance between an aircraft operating on Runways 6L/24R or 6R/24L with an A380 operating on the centerfield taxiway.

Please see Response to Comment SPAS-PC00130-998 regarding tower line of sight.

SPAS-PC00130-403

Comment:

How does the airport plan to operate at full levels while both north runways are closed for tunnel repairs? cover huge overcrowding on the south runways? How does LAWA plan to co-ordinate repair of the 2 tunnels, 3 sewers, hot oil pipes, movement of Lincoln Blvd., closure of Sepulveda at Lincoln? How will this be paid for?

Response:

Please see Response to Comment SPAS-PC00130-41 regarding phasing of project improvements. As noted in that response, construction phasing plans have not yet been developed for the SPAS alternatives, therefore, information regarding necessary runway closures has not been determined. Please see Topical Response TR-SPAS-LR-1 regarding impacts associated with the realignment of Lincoln Boulevard, including impacts to sewers, oil pipelines, and Sepulveda Boulevard. Please see Response to Comment SPAS-PC00130-1012 regarding the north airfield abandoned tunnel segment. Please see Response to Comment SPAS-PC00096-2 regarding funding sources for SPAS improvements.

SPAS-PC00130-404

Comment:

Since LAWA has such poor relations with Caltrans, DWP, Dot and local communities, How many studies will LAWA produce to make sure any new runway or any old runway will be safe during the moving of sewers, movement of streets, water issues etc.?

Response:

This comment is noted. Prior to implementation of any individual SPAS project, LAWA will conduct the requisite studies concerning the relocation of infrastructure and utilities. The engineering analysis for each project will also evaluate construction issues, such as soils, contaminated materials, and perched water. These studies will be conducted during the design stage for each individual SPAS project.

SPAS-PC00130-405

Comment:

How does LAWA intend to pay DWP for the redevelopment of 3 new major sewers currently under the northern runways? How long will this take? How long is LAWA expecting full closure of northern complex? With the Saip taking little more than a year we expect DWP to take 3 years to reroute new sewers. 1 year for planning and at least 2 years for building will the close Sepulveda, Lincoln, Manchester, and Weschester Parkway? If so how long? Will it come before or after the other repairs? Who is paying for all this?

Response:

Please see Response to Comment SPAS-PC00130-348 regarding the presence of outfall sewers beneath the north airfield. As indicated in that response, there are only two outfall sewers beneath the north airfield. Due to the depth of these sewers, implementation of north airfield improvements would not require relocation of these outfall sewers. Please see Response to Comment SPAS-PC00130-41

regarding phasing of project improvements. As noted in that response, construction phasing plans have not yet been developed for the SPAS alternatives, therefore, information regarding necessary runway or roadway closures has not been determined. While LAWA will pay for the improvements associated with the selected SPAS alternative, funding and economic questions need not be discussed because economic effects of a project shall not be treated as significant effects on the environment. (State CEQA Guidelines Section 15131(a).) Therefore, because a lead agency need only respond to comments that raise significant environmental issues, no further response is required. (State CEQA Guidelines Section 15204.)

SPAS-PC00130-406

Comment:

FAA people have informed us that by improving the taxi ways next to the northern complex will increase through put 20% or more. Why hasn't LAX built a fully standard group 6 taxiway next to the northern complex? How much cheaper would the taxiway be than the moving of the runway? If ground vehicles are interferring with taxing aircraft on nearby service roads, why not move the service road out of aircraft taxiways?

Response:

The SPAS Draft EIR analyzed a reasonable range of alternatives, including options that move the improved existing taxiways and relocate existing service roads, sufficient to provide the decision-makers with information necessary to make an intelligent decision. Various Aircraft Design Group (ADG) VI taxiway options and various options for the ground vehicle service road are included in a number of alternatives presented in the SPAS Draft EIR. Please see pages 1-18 through 1-26 in Section 1.2.2 of the SPAS Draft EIR for an overview of each alternative, and Section 2.3.1 of the SPAS Draft EIR for a more detailed discussion of the characteristics of each alternative. The performance of the SPAS alternatives is further discussed in Appendix F of the Preliminary LAX SPAS Report.

Regarding the latter part of the comment, there may be a misunderstanding as to the relationship between taxiways and vehicle service roads, in that ground vehicles are not allowed on aircraft taxiways and taxiing aircraft are not allowed on vehicle service roads; hence, that is not a problem that SPAS is attempting to resolve. The problem relates to the required safety clearance distances between taxiways and service roads. Due to limited space between Runway 6R/24L and the ends of the concourses for Terminals 1, 2, and 3 and Tom Bradley International Terminal, placement of a Group VI taxiway adjacent to that runway is not feasible without a negative impact to other taxiways/taxilanes such as Taxilane D or Taxiway E or to the vehicle service road. Alternatives 1, 2, 3, 5, 6, and 7 include moving the vehicle service road (VSR) from its current location between Taxiway E and Taxilane D to a more suitable location (i.e., typically south of Taxilane D). However, also due to the aforementioned limited space between Runway 6R/24L and the north concourses, the new location of the VSR affects the available spacing between the taxilanes, taxiways, and runway. In short, the ability to accommodate an ADG VI taxiway adjacent to Runway 6R/24L and the ability to relocate the existing vehicle service road is subject to the space constraints described above.

Estimated costs for the SPAS alternatives are provided in Section 8.5 of the Preliminary LAX SPAS Report.

SPAS-PC00130-407

Comment:

LAX Master Plan Improvements again have been covered in the Nasa Aims report, proving the north airfield has extremely high safty standards.

Response:

Please refer to Response to Comment SPAS-PC00130-168 regarding the North Airfield Safety Study and the opinion of the academic panel.

SPAS-PC00130-408

Comment:

Please explain how putting more aircraft, closer together, further from the tower will improve safty? How many safty issues world wide have been caused by center line taxiways? Besides the accident landings on centerline taxiways what other types of accidents have occurred? If centerline taxiways prevent incursions why are there still incursions on the south complex?

Response:

Federal Aviation Administration (FAA) runway-runway separation standards are different than runway-taxiway standards. Per FAA Advisory Circular (AC) 150/5300-13A, the runway-runway separation standard is 700 feet. As discussed and depicted in Section 2.3.1 of the SPAS Draft EIR, none of the airfield alternatives provide a separation less than 700 feet. Alternatives 1, 3, 5, 6, and 7 increase the separation between the two runways. Alternatives 2 and 4 keep the separation between the runways at 700 feet. The new centerfield taxiway for the various alternatives would meet FAA runway-taxiway separation guidelines for Group V and/or VI aircraft. For additional information on runway-taxiway separation standards, please see Response to Comment SPAS-PC00130-63.

Please see Responses to Comments SPAS-PC00130-362 and SPAS-PC00130-577 regarding ATCT line-of-sight.

Please see Response to Comment SPAS-PC00130-366 regarding errant landings on taxiways parallel to the intended runway.

Please see Response to Comment SPAS-PC00130-160 regarding runway incursions on the south airfield.

SPAS-PC00130-409

Comment:

Why remove remote gates? If there isn't sufficient space to hold arriving flights?

Response:

As indicated under the heading of "Terminal Facilities" on pages 2-10, 2-17, 2-21, 2-30, 2-33, and 2-37 in Chapter 2 of the SPAS Draft EIR, under Alternatives 1, 2, 3, 5, 6, and 7 the west remote gates would be eliminated upon completion of the airfield and terminal improvements. This assumption was also included in the LAX Master Plan.

The relationship drawn between the commentor's first question (answered above) and second question is unclear: "If there isn't sufficient space to hold arriving flights?" Although it may happen, the sole purpose of the west remote gates is not to be used to "hold arriving flights." Currently, the west remote gates accommodate not only passenger operations (deplaning, boarding, and busing of passengers to terminals) but also remain all day and remain overnight operations for aircraft that cannot be accommodated for long periods of time at terminal gates. In the future, as discussed in Section 2.3.1 of the SPAS Draft EIR, the west remote gates would be removed upon the completion of the airfield and terminal improvements. Passenger activity would no longer be accommodated at the west remote gates. However, LAWA might reserve the west remote gates for remain all day or remain overnight operations.

SPAS-PC00130-410

Comment:

2. Improving Ground Access

How does LAWA intend to stop blocking curb areas with ie. smokers, people waiting for pick up, cabs, shuttles, and how is LAWA going to implement emergency [text indecipherable]? How is LAWA planning on intergating the people mover and the green line train to all nine of the terminals? Will Lawa be paying for the train? If so what percentage and out of what pot of money? How will these 2 items effect pedestrian traffic and how will they change the plan to accommodate handicap people.

Response:

Please see Topical Response TR-SPAS-T-1 regarding transit options into LAX, including extension of the Green Line into the CTA. The topical response also provides a summary of the ground access improvements associated with each of the SPAS alternatives.

Under all of the alternatives, new ground access facilities located outside the CTA would reduce the number of private vehicles and shuttles in the CTA. However, only those alternatives with an APM system (i.e., Alternatives 3 and 9), would reduce passenger accumulation on the curbsides by diverting passengers from the curbside to APM stations within the CTA.

The APM has been developed at a program level of planning for SPAS. The final APM system, including the number and placement of stations within the CTA, has not yet been defined. The SPAS Draft EIR is a programmatic document, and no design or engineering plans, or construction phasing plans or schedules, are available for any of the alternatives. However, there are no plans to include APM stations at every terminal. Similarly, the effect on pedestrian traffic has not yet been determined, but would be analyzed in a project-level environmental document. The APM would be fully compliant with the requirements of the Americans with Disabilities Act and all other applicable laws. Please see Response to Comment SPAS-PC00130-730 regarding the treatment of economic conditions in an EIR, including costs of proposed improvements. A general discussion of the costs associated with each alternative is provided in Section 8 of the Preliminary LAX SPAS Report.

SPAS-PC00130-411

Comment:

What plans in detail does LAwa have to repair the structural nature of the upper roadway? Who will pay for this and how? How long will the upper roadway be closed in order to eliminate issues with the bridge (upper roadway) and the structural damage due to creeping rust? Who insures this part of the airport? Who would be responsible incase of catastrophic failure? Where would the money come from? If it were to fail how long would access to central terminal area be denied?

Response:

The CTA Second Level Roadway Expansion Joint and Deck Repairs project was identified as a cumulative infrastructure improvement project in Section 5.3.3 of the SPAS Draft EIR. LAWA is currently collaborating with Caltrans' Division of Maintenance, Structure Maintenance and Investigations, to ensure that all structures and bridges at LAX are maintained and safe. Ongoing improvements are designed to address maintenance and wear deficiencies identified by Caltrans' Structure Maintenance and Investigations unit and confirmed by LAWA's design engineers. As part of the on-going design process, LAWA's design engineers conducted a structural and seismic analysis of the roadway. The analysis confirmed that the roadway, which in the early 1990s had seismic improvements to its support columns, is structurally sound. However, many of the expansion joints that form a smooth transition between the bridge segments need to be replaced. These joints, which expand and contract in response to changes in temperature, have surpassed their useful life, resulting in uneven road conditions between segments. LAWA is not aware, and the comment does not provide any evidence, of any structural damage to the second level roadway due to creeping rust. The project will include roadway resurfacing, replacement of certain bearing pads, drainage, and other miscellaneous improvements. LAWA anticipates that construction work would start in the summer of 2013 and take approximately 18 months to complete. While the construction will necessitate the closing of traffic lanes during certain hours of the day, there are no plans to close the upper level roadway during construction. Detailed traffic control plans are currently being developed and will be approved by LAWA staff prior to start of construction. The project is funded by LAWA.

The comments and questions related to insurance and financial responsibility in case of structure failure, as well as information on the amount of time the CTA would be closed should structure failure occur, are speculative and beyond the scope of the EIR. No response is required pursuant to CEQA because these comments do not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00130-412

Comment:

Since LAWA is using public streets during peak access times how much money is LAWA reimbursing LADOT and Caltrans? Where is the money coming from? What percent is LAWA currently reimbursing? Is LAWA paying AQMD for the extra idil times associated with waiting cars? Has LAWA implemented any programs to lower the amount of excessive pollution caused by idiling cars waiting to access the CTA? If so what plans are currently in effect? Where have they been implemented? Who at AQMD is encharge of this program? Where does the money come to pay for this? How does LAWA intend to handle these issues as they worsen? Has LAWA started a medical fund for employees, and Local public who have been effected by excessive exposure to pollution? If so who is paying for this? How would some one gain access?

Response:

Please note that no response is required because this comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)). Nevertheless, streets and freeways that passengers, employees, and commercial vehicles use to access LAX are free to all members of the public. Neither LAWA nor vehicle owners are required to pay any fees for airport-related use of public streets. Similarly, there are no fees assessed to LAWA or vehicle owners for emissions associated with vehicle trips. LAWA has instituted a number of programs to reduce vehicle idle times, and associated air emissions, within the CTA. For example, LAWA established a cell phone waiting lot on the northwest corner of 96th Street and Vicksburg Avenue where motorists meeting arriving passengers can wait for free, for up to two hours, until passengers call to say they are ready to be picked up, thereby decreasing the likelihood that these motorists will drive around the CTA multiple times to pick up their passengers.1 In an effort to encourage the use of electric vehicles, free parking is available for electric vehicles at charging stations located in Parking Structure 1 (SPAS Draft EIR page 4-420). Electric vehicles do not emit any pollutants within the CTA.

1. City of Los Angeles, Los Angeles World Airports, LAX Parking -- LAX Cell Phone Waiting Lot, Available: http://lawa.org/welcome_LAX.aspx?id=64, accessed November 10, 2012.

SPAS-PC00130-413

Comment:

Who covers the liability of travelers on public roads trying to access the CTA in case of a terroristic attack? Where does the money come from? Who covers the liability of travelers, on public roads trying to access the CTA in case of earthquake? Who is managing these funds and how were they accumulated?

Response:

Please note that no response is required because this comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)). Nevertheless, LAWA is not liable for injuries to motorists on public roads traveling to LAX, including injuries related to a terrorist attack or natural disasters such as earthquakes and flooding.

SPAS-PC00130-414

Comment:

Who at LAWA covers the liability of travelers on public streets, in and around the airport in case of flooding? If neighbors, northside buildings, cargo, public streets, homes, are effected by poor engineering of surface water, aquifers, the argo ditch and sewer malfesence will LAWA be able to manage the liability and how will this effect the ability of LAWA to sell bonds and not damage its credit rating.

Response:

Please see Response to Comment SPAS-PC00130-413 regarding liability related to flooding. Improvements associated with the SPAS alternatives, including airport buildings, roads, and the conversion of the Argo Drainage Channel to a box culvert, would be designed in accordance with the Uniform Building Code and all required standards.

SPAS-PC00130-415

Comment:

LAWA state curbside demand is unevenly distributed. How will LAWA rearrange Airlines, cargo, and take off and landings so that during peak hours curbside demand is no longer unevenly distributed.

Response:

The distribution of airline passenger and curbside traffic activity along the curbfront is a direct result of the distribution of airline passenger activity among terminals and the airline passenger schedules that determine the hourly patterns of passenger arrivals and departures. These schedules are primarily developed based on the business decisions of the individual airlines. The variation in schedules and passenger activity among airlines and terminals results in an inherent imbalance of activity among terminals. As such, a complete balance of activity among terminals and, consequently, along the curbsides cannot be obtained because the peaking characteristics and passenger activity levels vary widely among airlines. In addition, the unique characteristics of the passenger terminals and the available curbside will affect how the curbside demand is accommodated. Refer to Section 4.12.1.3.9 on page 4-1058 and Section 4.12.1.7.1 on page 4-1099 of the SPAS Draft EIR for discussions of the unique passenger peaking characteristics assumed in the various flight schedules under the 2009 and 2025 conditions, respectively. In terms of passenger activity assignment to terminals among the various SPAS alternatives, see Section 4.12.1.6.1 beginning on page 4-1091 of the SPAS Draft EIR.

The future on-airport traffic operations analyzed for SPAS include the benefits offered by Terminal 0, as well as non-SPAS improvements such as a new Midfield Satellite Concourse (MSC) Passenger Processor, Terminal 1.5 and Terminal 2.5 described on pages 4-1094 through 4-1096 in Section 4.12.1.6.2 of the SPAS Draft EIR. These new facilities will provide additional curbside capacity that will allow for the redistribution of curbside activity.

SPAS-PC00130-416

Comment:

How is LAWA looking to redesign the access roadway to efficiently accommodate security screening? How does lawa expect to pay for these improvements? What does the TSA have to say about how effective current models are? LAWA has been paying an Israeli team for their expertise on terror what have they recommended and why haven't any of these procedures been implemented.

Response:

As indicated on page 21 of Appendix E2-1 of the Preliminary LAX SPAS Report, the relocated upper and lower Sky Way roadways could be designed with security checkpoints prior to traffic reaching World Way North. As a non-SPAS project, LAWA is considering improvements to the security checkpoint on

westbound Century Boulevard that could be also be incorporated into other traffic checkpoints on the approaches to the CTA.

Security is not an environmental impact and is, therefore, not required to be discussed in the SPAS Draft EIR under CEQA or any other law. However, a security assessment of the SPAS alternatives is included in Appendix I of the Preliminary LAX SPAS Report to comply with the Stipulated Settlement and Section 7.G(2) of the LAX Specific Plan. Please see Response to Comment SPAS-PC00130-152 regarding the findings of the Security Assessment relative to the redesigned entry roadway. Please see Response to Comment SPAS-PC00096-2 regarding funding sources for SPAS improvements. Details regarding the security measures considered and implemented by LAWA and/or TSA are considered Sensitive Security Information under federal law and therefore are not subject to disclosure. (49 CFR Part 1520)

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00130-417

Comment:

Since LAWA expects to use both the Crenshaw and Green line trains what percentage of these projects is LAWA paying for? Are they buying and/or providing land? If so which land? How is it being paid for? If issues between passenger cars and metro trains occur which agency will be in charge and whose insurance will cover the liability? Should a traveler be hurt or killed by a metro train on LAWA property who will be responsible? Do both agencies put in excess funds into the LA citys general fund to cover any insurance issues?

Response:

Please see Topical Response TR-SPAS-T-1 regarding transit options into LAX. LAWA does not plan to use Metro trains, as stated by the commentor; however, LAWA passengers and employees may choose to use Metro transit to access the airport. Metro's Crenshaw/LAX Transit Corridor would not be located on airport property. Future plans for the Airport Metro Connector Project are currently under consideration by Metro, which is the lead agency for that project. Some of the alternatives associated with this project would enter the CTA whereas others would not. Therefore, details regarding the location of a possible Metro station on airport property are not currently available. Please see Response to Comment SPAS-PC00130-730 regarding the treatment of economic impacts in an EIR, including costs of proposed improvements. Insurance associated with events at the airport is purely a socio-economic concern, and thus is not required to be analyzed under CEQA. (State CEQA Guidelines Section 15064(e).)

SPAS-PC00130-418

Comment:

3. Where does the study that says LAX is the premier International gateway? How is LAX supporting and/or Advancing economic growth? LAX has not supported vitality of the Los Angeles region There has not been any effort on LAX's part to revitalize freeways, Access roads, terminals, and neighboring communities. Why if the goal is to revitalize the city of Los Angeles hasn't LAX made areas surrounding it appealing to tourists? Open space, walkable districts, off ramps that are used to help support traffic to LAX and public streets used to support access should be maintained by the airport! How are they planning on doing this? Where are the funds coming from?

How does LAX expect to maintain a key role when they have removed thousands of jobs, (Alternative D), thousands of homes, (manchester square, and the area now considered the northside, and the southern homes of Play del Rey). How does LAX expect to renew those areas, replace the schools and open at least long term jobs to the people who lost their positions?

Response:

As described in Section 1.2.3 of the LAX Master Plan Final EIR, LAX is recognized as a key international gateway. Please see page 1-12 of the SPAS Draft EIR for a discussion of the regional economic impact of LAX. LAWA is not aware of any other major transportation facility in Southern California that provides the level of economic and employment benefits associated with international travel as that indicated by the LAEDC for LAX. Given that those benefits are reaped directly and indirectly by businesses throughout the region, particularly as related to tourism and international trade, the continued operation of LAX does support the economic vitality of the region. LAWA does provide improvements to the street system around LAX, as evidenced by the intersection improvements completed in the last couple of years at Imperial Highway and Main Street, at Imperial Highway and Pershing Drive, and the new intersection on Pershing Drive just south of World Way West. Additionally, LAWA funded tree planting programs that occurred in Inglewood and at Westchester Park between October 2010 and June 2012. LAWA has long supported educational and jobs training programs in the local area and has been involved in a number of community benefits programs.

Economic/social impacts, such as employment, are not required to be evaluated under CEQA. (State CEQA Guidelines Section 15064(e)). The commentor provides no basis for the claim that LAX has "removed thousands of jobs." With regard to the acquisition of properties in Manchester Square, that voluntary acquisition program was initiated at the request of homeowners and property owners therein, whereby they preferred that LAWA acquire their properties instead of receiving soundproofing. Where acquisition of properties with homes or businesses has occurred by LAWA, affected property owners and businesses have received relocation assistance from LAWA.

SPAS-PC00130-419

Comment:

LAX is already accommodating newer larger aircraft. The SAIP was said to be done to accomdate the NLA and none of the new EIR options fit the new FAA accommodations so still no group 6 field. This was shown a way to get a full group 6 airfield on the north in the Nasa study please show that option.

Response:

As described on page 4-488 of the SPAS Draft EIR, ADG VI aircraft, also known as new large aircraft, such as the Airbus A380 currently operate at LAX, but are subject to certain restrictions and special operations requirements, especially during poor visibility conditions. As indicated in the project objectives discussion in Section 2.2 of the SPAS Draft EIR, LAWA seeks improvements to the north airfield that meet FAA design standards for ADG V and VI aircraft. The SPAS Draft EIR addresses a broad range of airfield improvement alternatives, each of which has different characteristics relative to the extent that it does, or does not, meet those design standards. Alternative 5 is considered to be the most responsive to meeting ADG VI design standards, followed by Alternative 3. Additional discussion of how each of the alternatives responds to FAA airfield design standards is provided in Section 4.7.2 of the SPAS Draft EIR.

It should be noted that the LAX South Airfield Improvement Project (SAIP) was done primarily to provide a centerfield parallel taxiway in the south airfield, which would benefit all aircraft group sizes. While that new taxiway was designed to meeting FAA ADG VI design standards in effect at that time, there were, and still are, restrictions on existing Taxiways B and C that do not meet ADG VI standards. It was always intended that the north airfield be improved to meet ADG VI standards, as indicated in Section 2.1 of the Final LAX Master Plan and illustrated in Figure 2.1-1 of that document.

SPAS-PC00130-420

Comment:

It is very nice that LAX is supplying alot of jobs. Show how many more jobs would be created if all of LAWA airports were fully developed. Did the LA EDC have any studies showing employment at the other LAWA airports? Where are they and who was responsible for them?

Response:

LAWA owns and operates LAX, LA/Ontario International Airport, and Van Nuys Airport. LAWA no longer holds an operating permit for Palmdale Regional Airport. It is unclear what the commentor means by "how many more jobs would be created if all of LAWA airports were fully developed." Each of LAWA's airports accommodates the existing market demands specific to each airport. The suggestion that further developing each airport would automatically create more jobs at each airport does not reflect the reality that the number of jobs at each airport is tied more to the aviation activity levels at each airport, which are driven by market demand at each airport, and are not a matter of "build it and they will come." LAWA is not aware of any LAEDC studies showing employment at LAWA airports other than LAX.

No further response is required because employment impacts are purely economic impacts, which are not required to be evaluated under CEQA. (State CEQA Guidelines Section 15064(e).)

SPAS-PC00130-421

Comment:

LA city owns LAX and we would like to know how many of the permanent jobs are going to the citizens of Los Angeles? How many are new jobs?

Response:

Please see Response to Comment SPAS-PC00130-730 regarding the treatment of economic impacts in an EIR, including job creation. LAWA is pleased to provide a variety of employment opportunities within the Los Angeles region, including both construction-related jobs and permanent positions. Construction and operation of the SPAS improvements would continue the role of LAX as a major source of jobs in the region. According to a recent report by the Los Angeles County Economic Development Corporation, LAX operations in 2011 supported 294,000 jobs in Los Angeles County, with an additional 19,400 jobs in neighboring counties. Of these, 25,540 jobs are directly on airport property. According to the report, modernization efforts at LAX in the preceding fiscal year created 10,700 new jobs in Los Angeles County and an additional 1,000 jobs in neighboring counties. Future capital improvement projects in the next 10 to 15 years are anticipated to create 98,800 jobs throughout the region, with 90,500 of those jobs in Los Angeles County.1,2

1. Los Angeles County Economic Development Corporation, Economic and Policy Analysis Group, Los Angeles International Airport in 2011: Economic Impact Analysis, August 2012.
2. Los Angeles World Airports, News Release: Economic Study Finds Los Angeles International Airport Generates 294,400 L.A. County Jobs, $39.7 Billion in Economic Output, $2.5 Billion in Local and State Tax Revenues, August 20, 2012.

SPAS-PC00130-422

Comment:

During construction of the cross field taxiway and Bradley West huge piles of toxic earth have been piled on the perimeters of LAX. They have been in exsistence for over a year and been inadequately kept intact creating huge quanties of fugitive toxic dust. What will these tons of toxic earth cost to mitigate? Has LAWA involved the department of toxics? If so will they remain on hand while new work is being done on the remaining toxic soil? What involvement has the AQMD had with the fugitive toxic dust? What are LAWA's plans to mitigate the fugitive toxic dust in the neighboring communities? Is LAWA running air samples in their child care facility next to the piles toxic fugitive dust? What are the liabilities associated with fugitive toxic dust? Who will be responsible? Does LAWA have special insurance to cover this?

Response:

Please see Response to Comment SPAS-PC00130-265 regarding testing of soil associated with past construction activities at LAX. As indicated in that response, LAX Master Plan Commitment HM-2 addresses the handling of contaminated materials encountered during construction. This commitment also applied to the Bradley West Project and the Crossfield Taxiway Project. Excavated soils from these construction projects were handled in accordance with LAWA's Procedure for the Management of Contaminated Materials Encountered During Construction, which was developed pursuant to LAX Master Plan Commitment HM-2, and in accordance with federal, state, and local laws and regulations. As a result, contaminated soils encountered during excavation associated with the Bradley West Project and Crossfield Taxiway Project are not stockpiled on-site and do not pose a risk of generating fugitive toxic dust.

SPAS-PC00130-423

Comment:

4. There are more than 153 passenger gates as present. Remote gates were not included in the passenger gate count. How many passenger gates including the remote gates does LAX have?

Response:

Figure A, entitled "Gate Positions 2009 Baseline Conditions," within Attachment A to Appendix F-1 of the Preliminary LAX SPAS Report indicates a total of 159 passenger gates under the 2009 baseline conditions. It included 19 west remote gates (identified as "West Gates" in Figure A) that allowed passenger to board and deplane aircraft.

As indicated in Section 1.2.1 of the SPAS Draft EIR, one of the objectives of the SPAS is to: "Plan improvements that do not result in more than 153 passenger gates at 78.9 MAP." This objective is consistent with the requirements of the LAX Master Plan Stipulated Settlement, which call for a reduction in the number of passenger gates compared to present conditions (i.e., see Section IV, Passenger Gate Provision, of the Stipulated Settlement, which acknowledges that LAX had 163 total passenger gates in 2005 when the agreement was drafted and identifies the terms and conditions for reducing the total number of passenger gates to 153).

SPAS-PC00130-424

Comment:

5. Eight years into the spas process LAX has not completed any extra security recommended by the Rand company study of 2004. Explain why? Also recommendations of blast glass in the frontage of all terminals was never studied, why not?

Response:

LAWA has implemented many of the recommendations contained in the RAND Corporation's studies of LAX including enhanced screening procedures for LAX badge holders, increased capabilities to detect explosives, perimeter fence upgrades, and other infrastructure improvements. LAWA has reviewed and analyzed recommendations from RAND and other critical infrastructure experts regarding the use of various forms of blast-resistant glass in conjunction with other methods to mitigate the impact of a vehicle-borne improvised explosive device. Details regarding the security measures considered and implemented is considered Sensitive Security Information under federal law and is therefore not subject to disclosure.

The SPAS Security Assessment is provided in Appendix I of the Preliminary LAX SPAS Report. This assessment identifies blast suppression films on exposed glass surfaces as a potential security measure for all alternatives.

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the

adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00130-425

Comment:

6. To minimize environmental impacts on surrounding communities why hasn't LAX removed the toxic fugitive dust?

Response:

Please see Response to Comment SPAS-PC00130-422 regarding toxic fugitive dust at the airport.

SPAS-PC00130-426

Comment:

Why hasn't looked to filter the ambient water coming from the flight field?

Response:

As described on page 4-607 of the SPAS Draft EIR, stormwater from the portion of the airfield that lies within the Pershing sub-basin flows to a water quality retention basin, where dry weather flows and "first flush" storm water flows are filtered before being discharged to Hyperion Treatment Plant. All industrial activities at the airport, including areas outside of the Pershing sub-basin, are subject to the LAX SWPPP, as described on page 4-610 of the SPAS Draft EIR.

SPAS-PC00130-427

Comment:

Why haven't local schools been equiped with indoor air filters? Why hasn't the airport flight field been surrounded with extra high solid fences to keep in particles generated by aircraft on the ground?

Response:

LAWA has committed to providing funding for the installation of air filtration systems at qualifying public schools with air conditioning systems in place (LAX Master Plan Commitment AQ-2, as presented in the LAX Master Plan Mitigation Monitoring and Reporting Program).1 The qualifying schools will be determined based upon review of the conclusions and recommendations of the LAX Air Quality and Source Apportionment Study (AQSAS). LAWA will initiate the process of identifying qualifying schools following completion of the LAX AQSAS, anticipated in the spring of 2013.

Please refer to Response to Comment SPAS-PC00130-390 regarding the suggestion to construct a 20-foot block wall around the airport for particulate matter control.

1. City of Los Angeles, Los Angeles World Airports, Alternative D Mitigation Monitoring and Reporting Program, September 2004, Available: http://ourlax.org/pub_MMRP.aspx, accessed January 8, 2013.

SPAS-PC00130-428

Comment:

Why hasn't LAX installed a berm to lessen noise pollution on the north?

Response:

As described on page 4-29 and shown in Figure 4.1-4 (Photograph U) in Section 4.1.3.21 of the SPAS Draft EIR, LAWA has constructed 20-foot high buffers between LAX Northside and residential

development to the north, consisting of 12-foot-high sound walls on the crest of 8-foot-high landscaped berms on 88th Street and 88th Place between Sepulveda Westway and the Westchester Golf Course. There are also sound walls along portions of La Tijera Boulevard which range in height from 8 to 20 feet. The purpose of these buffers and barriers is to reduce airport-related ground noise in nearby residential areas and to reduce noise impacts from traffic on adjacent roadways.

Furthermore, as described on page 4-654 and shown in Figures 4.9-3, 4.9-4, and 4.9-5 of the SPAS Draft EIR, LAX Northside serves as an airport buffer zone between the airport and the Westchester community to the north. Please also see Response to Comment SPAS-PC00130-737 for an additional description of the LAX Northside buffer area which would serve to reduce noise impacts to the north.

In addition, as discussed in Response to Comment SPAS-PC00130-919, acoustical barriers are only useful for reducing noise impact from aircraft ground activities, and their benefits are greatly affected by surface topography and wind conditions. The effectiveness of a barrier depends on the distance of the noise source from the receiver and the distance of each from the barrier itself, as well as the angle between the ends of the berm and the receiver. While noise berms and noise walls can attenuate noise, they would be largely ineffective for attenuation of aircraft overflight noise. As the noise levels at LAX are dominated by the noise of aircraft in flight, the reduction of ground noise by berms is not considered effective for noise abatement. Therefore, the installation of berms in additional locations is not expected to result in a noticeable decrease in noise at land uses located within Westchester at greater distances from the airport. Section 4.10.1.7 of the SPAS Draft EIR discusses various abatement and mitigation techniques of aircraft noise at LAX to reduce the impacts of the SPAS alternatives.

SPAS-PC00130-429

Comment:

7. Explain how airport improvement grants work. Where does the money originate? Explain where passenger facility charges are applicable. What is the top and bottom limits of the PFC's? Who is responsible for bond sales? If the projected amounts of funds is 10 times higher than estimated how will those funds be raised? Are the bonds insured? If so by what entity? What other expenses associated with the 9 Alternatives will other agencies be responsible for? Is Metro, Dot, DWP, public works, Caltrans, AQMD, suetes, right of ways, closures of neighboring businesses, moving of sewers, groundwater issues, black outs, department of toxics and movement of hot oil pipes. If the airport fails to raise enough funds how will these things be paid for? If blind spots or construction cause devastation who is responsible?

Response:

The questions raised in the comment go beyond the scope of what is required in an EIR prepared pursuant to CEQA, and no further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)). Nevertheless, LAWA provides the following response for informational purposes.

Chapter 8 of the Preliminary LAX SPAS Report presents a thorough and detailed discussion of funding sources for the alternatives and variations analyzed. The Airport Improvement Program (AIP) provides grants to public agencies and, in some cases, to private owners and entities, for the planning and development of public-use airports that are important to public transportation and contribute to the needs of civil aviation, national defense, and the Postal Service. The AIP program is discussed in detail in Federal Aviation Administration Order 5100.38C (available at http://www.faa.gov/airports/resources/publications/orders/media/aip_5100_38c.pdf (accessed on November 20, 2012)). The description of eligible grant activities is described in the authorizing legislation and relates to capital items serving to develop and improve the airport in areas of safety, capacity, and noise compatibility. Eligible projects include those improvements related to enhancing airport safety, capacity, security, and environmental concerns. Projects related to airport operations and revenue-generating improvements are typically not eligible for funding. Operational costs, such as salaries, equipment, and supplies, are also not eligible for AIP grants. Airport sponsors who accept a grant offer are also accepting conditions and obligations associated with the grant assurances. These include obligations to operate and maintain the airport in

a safe and serviceable condition, not grant exclusive rights, mitigate hazards to airspace, and use airport revenue properly. AIP grants are issued by FAA. The Airport and Airway Trust Fund provides the revenues used to fund AIP projects. The Trust Fund was established to provide a stable funding source whereby users pay for the services they receive. Various taxes support the Trust Fund, including but not limited to domestic passenger ticket taxes, frequent flyer taxes, commercial fuel taxes, and general aviation fuel taxes.

The uses of Passenger Facility Charges (PFCs) are slightly more expansive than those of AIP grants. The PFC program is discussed in detail in Federal Aviation Administration Order 5500.1 (available at http://www.faa.gov/documentLibrary/media/Order/PFC_55001.pdf (accessed on November 20, 2012)). Also, Section 8.6.3 of the Preliminary LAX SPAS Report discusses the applicability of the PFC program to LAX. PFCs may be used to pay for projects that enhance airport safety, airport security, or airport capacity and may include terminal improvements, airfield improvements, acquisition of land for aeronautical purposes, noise mitigation, and other uses as approved by the FAA. Collections are approved on a project-by-project basis through a prescribed application process involving the airport, the FAA, and the passenger air carriers serving the airport. Charges for different projects may be approved at different collection rates, ranging between $1 and $4.50 per passenger, at the discretion of the FAA. These charges are collected from passengers by the airlines and remitted to the airport sponsor. Currently PFC collections at LAX are limited to $4.50 per enplaned passenger, the maximum allowable by the FAA.

LAWA is responsible for all bond sales benefitting the airport. Bond sales may be initiated on either a competitive or negotiated basis following the approval by the Board of Airport Commissioners and City Council and are subject to the provisions of the Master Senior and Master Subordinate Trust Indentures. The amount of bonds that LAWA can issue may be limited by an "additional bonds test" defined in the bond indenture that requires LAWA to demonstrate its ability to generate sufficient revenues in the future to support the bonds or by market demand for bonds issued by LAWA. Should additional bonding capacity not be available for either of these reasons, LAWA would need to raise funds through other sources, such as grants, PFCs, customer facility charges, and internal revenue generation. None of LAWA's outstanding bonds have been insured due to the small pool of viable insurance companies issuing bond insurance and the unfavorable economics associated with its purchase. LAWA has no knowledge as to whether bond insurance will be available in the future, what entities might offer such insurance, or if its use will be cost effective at the time future bonds are issued.

LAWA would be responsible for the costs associated with the construction of the SPAS improvements. All construction would be conducted in accordance with applicable laws and regulations, and would include precautions associated with construction activities. All cost estimates for construction projects at LAX include contingency for unforeseen items that may arise during construction.

As described in Section 8.6 of the Preliminary LAX SPAS Report, if the assumed funding sources are not available in the future, certain projects would need to be deferred until funds become available or users or tenants agree to support funding of the projects or other sources. It would require significant speculation to analyze whether the deferral of specific projects could create "blind spots" that could lead to construction and operation problems.

If the commentor is referring to general liability for individual construction projects associated with the alternatives analyzed in the Preliminary LAX SPAS Report and SPAS Draft EIR, that is outside the scope of CEQA. CEQA requires that a lead agency provide an analysis of the project's significant physical impacts on the environment; it does not require a discussion of liability. (State CEQA Guidelines Section 21068.)

SPAS-PC00130-430

Comment:

1.2.2 What waivers of operations are currently in effect at LAX? If LAWA builds a specific alternative and the FAA once again changes it standards and refuses operational waivers what would be the consequences? Who would be responsible for the expense? What is the current separation between the north airfield runways at both the east end and the west end? What base assumptions of taxiways

were these alternatives generated? Does it include taxiways called for in Alt D yet not yet completed or both cross field taxiways although only 1 is complete? Has money already been put aside for missing taxiways?

Response:

The existing Modifications of Standards (MOS) applicable to the north airfield are described in the footnotes at the bottom of Table 4.7.2-8 on pages 4-514 and 4-515 of the SPAS Draft EIR.

Please see Response to Comment SPAS-PC00130-435 regarding changes to airport design standards published by the Federal Aviation Administration (FAA). Because future design standards are not available, LAWA must ensure compliance with the existing standards. It would be highly speculative to attempt to analyze what would happen if new standards were promulgated and no waiver or MOS were granted to LAX. CEQA does not require a lead agency to perform all research, study, and experimentation recommended or demanded by commenters. (CEQA Guidelines Section 15204.) Additionally, as provided on page 2-2 of the SPAS Draft EIR, LAWA is seeking to provide north airfield improvements that support the safe and efficient movement of aircraft and that minimize modifications of standards, waivers, or operational restrictions, all of which reduce airfield efficiency and level of service. LAWA is unable to ascertain to what expense commenter is referring. Nevertheless, expenditures are not an environmental impact that needs analysis under CEQA.

As described in Section 4.7.2.3 on page 4-488 of the SPAS Draft EIR, the existing north airfield runways are 700 feet apart.

LAWA is unable to ascertain what commenter means by "what base assumptions of taxiways were these alternatives generated?" Please see Response to Comment SPAS-PC00130-523 regarding Taxiway E and Taxilane D and financial information related to the development of the SPAS alternatives. Again, expenditures and economic considerations are not environmental impacts that require analysis under CEQA.

SPAS-PC00130-431

Comment:

Wouldn't construction of a center line taxiway place aircraft closer together then on the existing field? Even at the highest separation mentioned in the 9 alternatives with inclusion of a centerline taxiway fail to meet new FAA requirements and therefore still require waivers. How many new blind spots on runway 24 R will be created for each of the alternatives?

Response:

The commentor is correct that construction of a centerfield taxiway under all alternatives would place aircraft closer together than they are under the current configuration. However, FAA Advisory Circular 150/5300-13A (AC 150/5300-13A) provides different standards for runway-to-runway separation and runway-to-taxiway separation. The runway-to-taxiway separation standards are provided in Table 3-6 and 3-7 of AC 150/5300-13A.

700 feet currently separates the existing north airfield runway centerlines. (See page 2 of Appendix H-3 of the Preliminary LAX SPAS Report and Table 4.7.2-8 of the SPAS Draft EIR.) As discussed in Section 2.2 of the SPAS Draft EIR, the current north airfield configuration requires non-standard operating procedures. All of the alternatives that propose a centerfield taxiway also reconfigure the existing runways in a manner that creates a greater runway-to-runway centerline separation distance. (See section 2.3 of the SPAS Draft EIR.) Alternative 1, for example, while it would decrease the separation between aircraft, due to the addition of a centerline, would comply with the runway-to-taxiway separation standards promulgated in AC 150/5300-13A. It would provide a centerline taxiway distance of 500 feet to Runway 6L/24R and 460 feet to Runway 6R/24L. (See Section 2.3.1.1.1 of the SPAS Draft EIR.) Alternative 1 would also increase the separation distance between runways to 960 feet. (See Section 2.3.1.1.1 of the SPAS Draft EIR.) Like Alternative 1, Alternatives 3, 5, 6, and 7 all increase centerline separation distances of the runways and include the addition of a centerfield taxiway. Please see Chapter 2 of the SPAS Draft EIR for a discussion of the specific runway

movements under each alternative and the separation distances between the relocated runways and the centerfield taxiway. (Also see Table 4.7.2-8 of the SPAS Draft EIR).

Please see Table 4.7.2-8 of the SPAS Draft EIR for a summary of north airfield runways and centerfield taxiway compliance with FAA design standards for each SPAS alternative.

Please also see Response to Comment SPAS-PC00130-402 for additional discussion regarding discussion regarding runway to separation distances. Please see Response to Comment SPAS-PC00130-998 regarding tower line of sight.

SPAS-PC00130-432

Comment:

How long would Lincoln Blvd and Sepulveda have to be closed to traffic during modification? Who will do the modifications on Lincoln or/and Sepulveda? Will the airport pay for all of the modifications?

Response:

Please see Topical Response TR-SPAS-LR-1 for a discussion of the Lincoln Boulevard realignment associated with Alternatives 1, 5, and 6.

SPAS-PC00130-433

Comment:

How long would the Argo water channel be closed to incorporate modifications? If the surrounding area begin flooding what entity is responsible for damage? Who is doing the modification of the Argo flood channel? Has the army corp of engineers been consulted on the flood channel alteration? In case of flooding what is being done to prevent flight field toxics from polluting ground water? If flooding is severe what is being done to prevent pollution in the Santa Monica bay? If pollution occurs who will be responsible for the cost of cleanup? If the flight field floods would the runways need to be closed? How much of a cost would it be if one or both runways needed to be closed? If the rains are extensive would the airport be able to survive the financial hit for 1 month? How long could the financial health of the airport survive without use of the north airfield?

Response:

The modifications to Argo Drainage Channel, proposed as a part of Alternatives 1, 5, and 6, have been developed at a program level of planning for SPAS. Final culvert design and construction schedule have not been determined. These details will be addressed at the project level, should one of these alternatives be approved. The modifications would be undertaken by LAWA. Issues regarding liability for damage associated with events at the airport are not germane to environmental issues, are not required to be addressed under CEQA, and are beyond the scope of the SPAS Draft EIR.

The Argo Drainage Channel is not under control of the U.S. Army Corps of Engineers (USACOE), although USACOE has regulatory authority over jurisdictional areas associated with the Argo Drainage Channel and mitigation for impacts. Please see Response to Comment SPAS-PC00130-201 regarding USACOE jurisdiction.

Please see Response to Comment SPAS-PC00130-169 regarding the design capacity of the Argo Drainage Channel improvements proposed under Alternatives 1, 5, and 6. As noted in this response, the design of the facility would provide sufficient capacity to meet the design storm flow for the tributary area. If the capacity of the channel were exceeded, no impacts to the north airfield, the terminals, the Dunes, or offsite areas including Westchester would result. Rather, the area upstream of the culvert inlet would be affected for a short time until water that had temporarily ponded upstream could be drained back into the channel once the peak of a large storm had passed. No impacts to water quality within the north airfield or Santa Monica Bay would occur, nor would the north airfield be subject to closure as a result of Argo Drainage Channel design.

The comments regarding clean-up costs and runway closures are noted, are hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because these comments do not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00130-434

Comment:

If runway 24L is extended 1,250 feet west where will you move the holding lot? Because of the proximity to the 98th Street bridge will new safety requirements be installed? Will the bridge need to be moved?

Response:

Because none of the alternatives propose extending Runway 6R/24L 1,250 feet west, it is assumed that the commentor intended to ask about extension of the runway east (Runway 6R/24L would be extended 1,250 feet east under Alternatives 1, 2, 5, 6 and 7; See Table 2-2 in Chapter 2 of SPAS Draft EIR). As stated on page 2-55 of the SPAS Draft EIR, the commercial vehicle holding lot would be relocated to the easternmost portion of the area currently occupied by the Park One parking facility under Alternatives 1, and 5 through 9. Under Alternative 3, the commercial vehicle holding lot would be relocated within the Ground Transportation Center (GTC). Under Alternative 4, the taxi holding lot would likely be relocated to Park One of Parking Lot C and other commercial vehicle holding lots would remain in their current locations.

As described and depicted in Section 2.3.1 of the SPAS Draft EIR, an elevated/dedicated busway along 98th Street, with a bridge over Sepulveda Boulevard will be developed under Alternatives 1, 2, and 8. The eastward extension of Runway 6R/24L does not necessitate the implementation of additional safety requirements beyond those described in Section 4.7.2 of the SPAS Draft EIR.

SPAS-PC00130-435

Comment:

How often does the FAA change standards associated with runway protection zones?

Response:

The Federal Aviation Administration (FAA) does not publish Advisory Circular (AC) 15/5300-13A, Airport Design, on a regular basis. Additionally, every standard within the AC is not updated every time an update is released. As such, LAWA cannot predict what changes to future ACs may be and is only able to design based on current ACs until new revisions are released.

SPAS-PC00130-436

Comment:

Moving outboard runways west will increase the impact of homes in Playa del Rey. How does the airport plan on mitigating that? It will also damage property values on southern Playa del Rey will the airport pay landowners the difference in values? If not willing to make residents whole will the airport have to pay the city general fund for the tax decreases? Or pay the state?

Response:

Please see Responses to Comments SPAS-PC00130-167 and SPAS-PC00130-758 regarding the westerly extension of Runway 6L/24R. As indicated in those responses, displaced thresholds would preserve existing aircraft landing heights for aircraft arriving from the east. Therefore, changes in noise impacts associated with the SPAS alternatives are not associated with the westerly extension of the runway but, rather, from primarily the increases in aircraft operations that occur under all alternatives and, to a lesser degree, by the northerly relocation of Runway 6L/24R under certain SPAS alternatives.

A discussion of aircraft noise impacts on homes in Playa del Rey under Alternatives 1 through 7 is provided in Sections 4.9.6 and 4.10.1.6 of the SPAS Draft EIR. Please see Sections 4.10.1.5 and 4.9.3.3 of the SPAS Draft EIR for discussion of LAWA's mitigation measure and commitments.

Changes to the RPZ due to the relocation of the runways would not affect homes in Playa del Rey, as analyzed in Section 4.7.2.6 of the SPAS Draft EIR.

Please see Response to Comment SPAS-PC00189-4 regarding property values and Response to Comment SPAS-PC00130-730 regarding other economic issues.

SPAS-PC00130-437

Comment:

What staff person wrote about RSA? It isn't explained what it is and the foot notes muddy the explanation further. Please explain RSA declared distances and displaced thresholds. What is surface criteria? Who is responsible for them?

Response:

As stated in Federal Aviation Administration (FAA) Advisory Circular (AC) 150/5300-13A, Airport Design, the Runway Safety Area (RSA) is a 'defined surface surrounding the runway prepared or suitable for the risk of damage to aircraft in the event of an undershoot, overshoot, or excursion from the runway.' Furthermore, the RSA is required to be clear of all objects, except for those that need to be located within due to their function.

As explained in Footnote 11 on page 1-14 in Section 1.2.2 of the SPAS Draft EIR, declared distances are the distances the airport operator declared available to an aircraft's take-off run (TORA), take-off distance (TODA), accelerate-stop distance (ASDA) and landing distance (LDA) requirement to obtain a standard RSA. The four components of declared distances, TORA, TODA, ASDA and LDA are explained in further detail below.

TORA is the runway length declared available and suitable for the ground run of an aircraft taking off.

TODA is the TORA plus the length of any remaining runway or clearway beyond the far end of the TORA.

ASDA is the runway plus stopway length declared available and suitable for the acceleration and deceleration of an aircraft aborting takeoff.

LDA is the runway length declared available and suitable for landing an aircraft.

The reference to 'surface criteria' in Footnote 12 on page 1-14 in Section 1.2.2 of the SPAS Draft EIR refers to conditions set forth by the FAA in order to meet standards.
The comments regarding authorship of the EIR are noted and are hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d)' CEQA Guidelines Section 15204(a)).

SPAS-PC00130-438

Comment:

Taxiway E, Taxilane D, service road and aircraft gates, parking positions are not included in the illustrations. Where are they located? What assumtions have been made? What limitations are you referring to? Who wrote this section? Why didn't the airport hire a more capable technical writer?

Response:

Section 2.3.1 of the SPAS Draft EIR contains illustrations for Taxiway E and Taxilane D modifications (see Figures 2-1 through 2-7) and textual descriptions of the ground vehicle service road alignments. Assumptions and limitations for each alternative are also included in Section 2.3.1.

Appendices F-1 and F-2 of the Preliminary LAX SPAS Report contain detailed drawings showing the number and location of gates for Alternatives 1 through 4.

LAWA cannot ascertain the nature or intent of the commentor's question about "limitations." The latter comments are noted and are hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d), CEQA Guidelines Section 15204(a)).

SPAS-PC00130-439

Comment:

Why will building limit lines differ between alternatives? Why are taxiways diff for alternatives? The accepted alternative right now is D all taxiways and limit building lines should be based on that.

Response:

The Building Restriction Lines (BRL) and Aircraft Parking Limit Lines (APLL) differ between alternatives due to the various taxiway options proposed. Section 213(a) of FAA Advisory Circular (AC) 150/5300-13A Airport Design describes the BRL in more detail. APLL are the safety clearance setback area along runways and taxiways into which no part of an aircraft parked at a gate can extend. For the SPAS Draft EIR, the APLL was located outside of the Taxilane D Object-Free Area and south of the ground vehicle service road. As described on page 1-14 of the SPAS Draft EIR, the northernmost limit of concourse building area and/or aircraft gate parking positions is defined by the southernmost safety clearance distance for the runways and taxiways in the north airfield.

The taxiways proposed in each alternative differ in order to provide several options of varying operational capability for the north airfield at LAX.

SPAS-PC00130-440

Comment:

Having been a part of the spas process I find it interesting that the number of gates that were to be a part of the mid field terminal were to be included in the new TBIT build out. I see that a new mid-field terminal is now to be included. Why would the airport spend the money on building a mid-field terminal when the number of gates is remaining static at 159? What does LAWA think could be gained? Any extra floor space for international travelers could have been done will an extra floor in the new TBIT building. The airport is giving up space for 50 additional concessions, who is making up for the financial difference?

Response:

The LAX Master Plan (Alternative D) always included gates on the west side of TBIT as well as gates at a new Midfield Satellite Concourse (MSC). The additional gates on the west side of TBIT were approved at a project-level detail as part of the Bradley West Project, and are currently under construction. Similarly, the MSC, which is currently in the project-level planning stages, was always part of Alternative D (referred to as the "West Satellite Concourse" in the LAX Master Plan). The MSC is not a component of SPAS. The MSC is identified as a cumulative project in Section 5.3 of the SPAS Draft EIR, and the cumulative impacts of this project, in conjunction with SPAS and other cumulative projects, are analyzed in Chapter 5. The MSC is a component of the new and reconfigured terminal space and aircraft gates at LAX, whose purpose it is to enhance safety and security, increase the level of passenger service, and accommodate the forecast mix of aircraft.1 With the LAX Master Plan, the

existing remote gates at the west pad facility (referred to the in SPAS Draft EIR as the "West Remote Gates"; see Figure 2-10) will be eliminated. The total number of gates following implementation of the LAX Master Plan, including implementation of any of the SPAS alternatives, will be 153. Passenger processing for the MSC gates will be provided in a new passenger processor within the CTA. Please see Response to Comment SPAS-PC00130-409 for further discussion regarding removal of the west remote gates.

Regarding the comment's opinions on project design and finance-related questions, these comments are noted and are hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because these comments do not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

1. City of Los Angeles, Final Environmental Impact Report for Los Angeles International Airport (LAX) Proposed Master Plan Improvements, April 2004, page 3-75.

SPAS-PC00130-441

Comment:

Again who wrote about the ground access summary? Show what is described as an APM. When alternative D was accepted the technology described did not exist. Has someone at LAWA invented the necessary technology? If so who? Does this process belong to LAWA or some other engineering group? If the patents are in LAWA's name I suggest marketing them to other airports and venues to pay for terminal improvements.

Response:

The evaluation of impacts associated with on- and off-airport transportation in the SPAS Draft EIR was conducted by Ricondo & Associates, Inc. and Fehr & Peers, respectively, in consultation with LAWA. Ricondo & Associates, Inc. is a full-service aviation consulting firm founded in 1989 providing technical consulting services relating to airport facilities planning, airport master planning, environmental planning, ground transportation and parking planning, and other aviation-related services. Ricondo & Associates has been providing consulting services to LAWA since 2004. Fehr & Peers, established in 1985, is a traffic engineering and transportation planning consulting firm that specializes in providing transportation planning and traffic engineering services to public and private sector clients. Fehr & Peers staff include nationally-recognized experts in all aspects of transportation planning and engineering, including land use and transportation planning, traffic engineering, travel demand forecasting, transit planning, and other transportation-related specialties. Fehr & Peers has extensive expertise in traffic consulting and impact analysis in the Los Angeles area. Resumes of key individuals who performed the traffic analyses are available upon request to LAWA (SPAS Contact Person Diego Alvarez as indicated on SPAS public notices and SPAS website).

Regarding the comments concerning the APM, the SPAS Draft EIR includes two alternatives - Alternatives 3 and 9 - that extend an APM system into the CTA. The description of the APM system associated with Alternative 3 is provided in Section 2.3.1.3 of the SPAS Draft EIR. The description of the APM associated with Alternative 9 is provided in Section 2.3.1.9 of the SPAS Draft EIR.

APM technology currently exists and is in operation at many airports in the U.S. and internationally. The technology was in existence when the LAX Master Plan was approved in 2004/2005. LAWA is not involved with the development of APM technologies, not does it currently hold any patents relating to APM technology.

SPAS-PC00130-442

Comment:

What designs are for ITC? Are they included in all options? It was green light 8 years ago why has no progress been made?

Response:

The ITC was approved at a programmatic level as part of the LAX Master Plan. Detailed designs for this project have not yet been developed. This project is only associated with the approved LAX Master Plan, (i.e., SPAS Alternative 3). LAWA has not constructed all of the improvements approved as part of the LAX Master Plan, including the ITC. As discussed in Section 1.2.2 of the SPAS Draft EIR, the non-Yellow Light projects that are integral to the ground access system, including the ITC, are considered in the SPAS. Because these projects are important to the overall ground access system, the SPAS alternatives include proposed modifications to, or proposed deletion of, these non-Yellow Light projects. (Section 1.2.2 of the SPAS Draft EIR.) It should be noted that the ITC would be eliminated under Alternatives 1, 2, 4, 8, and 9.

SPAS-PC00130-443

Comment:

The Consolated rental car has been collecting money from rental car travelers for several years. How much money have they collected? What are the plans for building the conrac? Because Los Angeles is in big need of jobs why hasn't this project gone out to bid? Wouldn't having all the rental cars in one place cut the number of buses in the CTA and optimizing traffic?

Response:

The rental of vehicles near LAX typically includes customer facility charges (CFCs) for the funding of rental car system improvements related to LAX, the amount of which is not pertinent to the environmental analysis of SPAS. While LAWA has considered over the past several years whether to advance conceptual plans for a CONRAC at LAX into detailed design engineering and construction, the formulation of concept options for overall ground transportation system improvements at LAX as part of SPAS provided the basis for further evaluation of the need for, and location of, a CONRAC at LAX. Because the CONRAC is still under review and consideration, LAWA has not yet solicited bids for construction.

The development of a CONRAC under SPAS Alternative 8 would utilize a shuttle bus system to transport customers to and from the CTA via the elevated/dedicated busway and under Alternatives 3 and 9, an APM system would be used to transport rental car company customers. These systems would indeed reduce traffic within the CTA. Please see Section 4.12.1 of the SPAS Draft EIR for a discussion of the traffic and circulation impacts of the SPAS Alternatives. Under Alternative 4, a CONRAC would be developed at Lot C, but would not have a dedicated CTA access system, as in the other alternatives described above; however, the replacement of individual rental car company shuttle buses with a single consolidated shuttle system would still help to reduce traffic in the CTA.

SPAS-PC00130-444

Comment:

What does "fully integrated" mean? Why weren't diagrams of all 9 Alternatives included at this point? Discussion at this point is useless.

Response:

As stated on page 1-17 of the SPAS Draft EIR, "Alternatives 1 through 4 are presented in this EIR as 'fully-integrated' alternatives that include specific improvements in all three categories: airfield improvements, terminal improvements, and ground access improvements." As further explained after

that statement, Alternatives 5 through 7 focus on variations to the airfield improvements, which, in turn, affect the terminal improvements, and Alternatives 8 and 9 focus on variations to the ground access improvements. There is a certain amount of interchangeability between alternatives, as also explained in that discussion within the SPAS Draft EIR. Diagrams of the nine alternatives are included as Figures 1-5 through 1-13 in Chapter 1, Introduction and Executive Summary, and as Figures 2-1 through 2-9 Chapter 2, Project Description, of the SPAS Draft EIR. It is unclear as to what "at this point" is referring to in the comment; hence, no response to that is offered.

SPAS-PC00130-445

Comment:

Alt 1
Again what does "fully integrated" mean? Where is Taxi lane D? Where is Taxiway E where is the service road? Most important where is the plan? Where is terminal D and what modifications to the terminals are you referring to?

What MSC means? How is Sky West being modified? Why was ITF moved from near the 2 closest freeways to next to the closest community? How does LAWA plan to mitigate traffic and pollution due to idoling cars?

Why use a bus when LAWA already owns lots of shuttles? Why wouldn't this dedicated bus help service the hotels?

Looking at the plan for Alt 1 the consolidated car rental is missing why? obviously "not fully integrated". If the consolidated car rental isn't built when will the car rental companies return the money? Who will pay to research who gets their money back? Is LAWA going to pay for the postage? How long do they got to keep the money? Are the car rental people paying back taxes on the money they collected?

Response:

Please see Response to Comment SPAS-PC00130-444 for an explanation of the term "fully integrated." Taxilane D is the southernmost taxilane within the north airfield. It is the taxilane located closest to the terminal concourses and is highlighted entirely in yellow in Figure 1-5 of the SPAS Draft EIR. Taxiway E is located between Runway 6R/24L and Taxilane D within the north airfield. As indicated on page 2-10 of the SPAS Draft EIR, under Alternative 1, the service road, which is currently located between Taxiway E and Taxilane D would be relocated to a location 142 feet south of the Taxilane D centerline to increase the separation between the two taxiways to allow for simultaneous operations with larger aircraft than currently accommodated, improve safety and efficiency, and meet FAA standards. It is unclear what the commentor is referring to when asking "where is the plan?" The improvements associated with Alternative 1 are illustrated in Figure 2-1 and described on pages 2-8 through 2-14 of the SPAS Draft EIR. There is no terminal, existing or proposed, in any of the SPAS alternatives, that is referred to as "terminal D." Modifications to terminals associated with Alternative 1 are described in Section 2.3.1.1.2 of the SPAS Draft EIR. "MSC" stands for the Midfield Satellite Concourse, which is a Master Plan project that is independent of SPAS. This project is considered in the cumulative analysis, and is described on page 5-18 of the SPAS Draft EIR. A description of the proposed modifications to Sky Way under Alternative 1 is provided on page 2-13 of the SPAS Draft EIR. The location of the ITF was selected for its proximity to the CTA and to the proposed ground access facilities in Manchester Square, and its location on a corridor that links both the Manchester Square ground access facilities and the planned Metro Aviation/Century transit station to the CTA. Mitigation of traffic impacts is addressed in Sections 4.12.1.10 and 4.12.2.7 of the SPAS Draft EIR. Mitigation of transportation-related air quality impacts is addressed by LAX Master Plan Mitigation Measure MM-AQ-3, which would apply to the SPAS alternatives. The proposed dedicated busway would transport passengers from the ground access facilities in Manchester Square and the ITF to the CTA. The busway would also provide connectivity with Metro's planned Aviation/Century transit station. Buses would transport more people per trip than would shuttles, which are smaller. Although the dedicated busway would be accessible to hotels that are located near a planned stop, providing transportation for hotel guests to the airport is not a purpose of the dedicated busway. The ground access improvements proposed under each alternative vary from one another. A CONRAC is proposed in Alternatives 8 and 9, but not in Alternatives 1 or 2. Questions pertaining to financing associated with the CONRAC and the CFCs

being collected for the CONRAC are beyond the scope of the SPAS Draft EIR. Please see Response to Comment SPAS-PC00130-730 regarding the treatment of economic considerations in an EIR. Please also see Chapter 2 of this Final EIR regarding the LAWA Staff-Recommended Alternative, which couples the airfield and terminal improvements associated with Alternative 1 with the ground access components associated with Alternative 9, and includes a CONRAC.

SPAS-PC00130-446

Comment:

Alt 2
Its interesting that LAWA is proposing high-speed taxiways on the north when it just paid millions of dollars to remove them on the south air complex. Will the results not be the same? Won't the number of incursions increase the way they did on the south airfield with these addition?

Response:

In regards to the removal of high-speed exit taxiways from the south airfield, please refer to Response to Comment SPAS-PC00130-65.

In regards to the number of incursions on the south airfield, pages 4-510 and 4-511 in Section 4.7.2.3 of the SPAS Draft EIR discuss how even though data indicates that the number of Category C incursions on the south airfield increased following completion of the South Airfield Improvement Project (SAIP) compared to prior years, the comparative change is the result of the definition change by the Federal Aviation Administration (FAA) and is not a reflection of actual events.

SPAS-PC00130-447

Comment:

Habitats & Associations
Because loose soil from the flight field contains huge quantities of toxics before any staging could occur the soil must be cleaned of toxics. How does LAWA plan on cleaning the soil? If the soil isn't cleaned and sensitive habitats are effected how would lawa pay for this? What toxics are currently in the soil? How does LAWA intend to handle run off?

Response:

Impacts associated with contaminated soils are addressed in Section 4.7.3 of the SPAS Draft EIR and sites with known contamination are illustrated in Figure 4.7.3-1. There are no sites with known contamination within the north airfield or in the construction staging areas, although it is possible that contaminated soils could be encountered during excavation associated with improvements to the north airfield. Please see Response to Comment SPAS-PC00130-265 regarding testing of soil associated with past activities at LAX. As indicated in that response, LAX Master Plan Commitment HM-2 addresses the handling of contaminated materials encountered during construction. Contaminated soils would be handled in accordance with LAWA's Procedure for the Management of Contaminated Materials Encountered During Construction, which was developed pursuant to LAX Master Plan Commitment HM-2. With implementation of this commitment, impacts associated with contaminated soils would be less than significant and no impacts to sensitive habitats would occur.

SPAS-PC00130-448

Comment:

How does LAWA plan to keep dust, dirt, and debris off of public streets? Will they be hiring a 24 hour team to clean up dirt, insects etc so that there are no incursions into local communities? Especially in the case of large wind storms.

Response:

LAWA has identified approximately 17 mitigation actions that will be implemented during construction of the selected SPAS alternative. These actions are summarized in Tables 4.2-7 and 4.2-8 (pages 4-104 and 4-105 in Section 4.2.5 of the SPAS Draft EIR. With regard to fugitive construction dust, these mitigation actions include: compliance with South Coast Air Quality Management District Rule 403 (Fugitive Dust rule) by watering active construction areas and preventing mud/dust trackout onto public roads, post visible signs with telephone number and contact person to call with dust complaints, cover or treat all ground surfaces to minimize dust prior to final occupancy, and pave all construction roads at least 100 feet on to the site from public roads. These measures will help limit dust emissions even during high wind events. Additional, project-specific mitigation measures would be developed as necessary as specific projects are implemented and analyzed at the project-level.

SPAS-PC00130-449

Comment:

Since LAWA expects to remove mature trees in order to expand why don't they replace those trees with mature (not as old) trees now? That way there would be less impact to nesting raptors. Had this been done when Alt D was granted trees could be up to 30 years old.

Response:

As discussed in Section 4.3 of the SPAS Draft EIR, implementation of mitigation measures MM-BC-3 from the LAX Master Plan EIS/EIR and MM-BIO (SPAS)-11 would reduce impacts to mature trees and nesting raptors to a level that is less than significant. These mitigation measures would be implemented prior to the initiation of construction that would require the removal of mature trees with either active nests or evidence of past raptor nesting. In accordance with the mitigation measure, LAWA would compensate for the loss of such mature trees at a ratio of 2:1 with specimens that are 15 gallons or larger. This is the standard size for mitigation of this nature. It would not be possible to replace trees now as the number of mature trees with either active nests or evidence of past raptor nesting that would require removal cannot be ascertained at this level of planning. Rather, specific impacts to mature trees would be identified as part of the construction-level analysis that would occur prior to implementation of a specific SPAS component. As discussed in the SPAS Draft EIR on pages 4-195 (and 4-297), although the possibility that raptors would utilize mature trees in the study area is low, the mitigation measures discussed above would reduce impacts to nesting raptors to a less than significant level. The mature trees that occur in the study area are primarily ornamental vegetation, which has limited potential to support nesting raptors. It should be noted that LAX Master Plan Mitigation Measure MM-BC-3 has already been partially implemented for impacts to mature trees associated with the Northwest Construction Staging/Parking Area for the Bradley West Project, which coincides with Staging Area A for the SPAS alternatives. Impacts to trees associated with the Bradley West Project occurred in 2010. It should be further noted that the LAX Master Plan (i.e., Alternative D), which includes LAX Master Plan Mitigation Measure MM-BC-3, received final approval in May 2005, seven years ago.

SPAS-PC00130-450

Comment:

Human Health Risk Assessment
What is meant by incremental cancer risks? If incremental cancer occurs in surrounding communities will LAWa be paying for the expense of treatment? If the cancer is untreatable will LAWA be pay death benefits to family members? If so how much? Where will the funds come from?

Response:

The SPAS HHRA, provided in Section 4.7 of the SPAS Draft EIR, examined the difference between existing (baseline) emissions from LAX and emissions projected for future construction and operations associated with each SPAS alternative. The SPAS HHRA uses the difference between baseline emissions of toxic air contaminants (TAC) and emissions associated with each SPAS alternative to estimate the incremental impact of the alternative to human health due to inhalation of TAC. Incremental impacts are appropriate, since emissions from LAX will be ongoing regardless of whether

SPAS is implemented. Thus, incremental cancer risk represents the anticipated change in possible exposure to TAC in emissions from LAX operations for each of the SPAS alternatives compared to current ongoing emissions as estimated for the baseline year of operations at the airport. Because it represents the difference between existing and anticipated future conditions, incremental risk can be either positive or negative. Positive incremental risk indicates that implementation of one or more SPAS alternatives would result in increased TAC emissions during airport operations; negative incremental risk indicates that implementation of one or more SPAS alternatives would result in decreased TAC emissions, and future risks would be lower with implementation of the SPAS alternative than for current baseline operations. As shown in Table 4.7.1-5 of the SPAS Draft EIR, incremental cancer risks for all SPAS alternatives are negative, indicating that each alternative would have a beneficial impact on human health compared to baseline conditions (i.e., cancer risk associated with each alternative would be less than that associated with baseline conditions).

The SPAS HHRA calculated total construction-related risks rather than incremental risks for impacts due to emissions during construction of SPAS. Specifically, baseline construction emissions were assumed to be zero, so that total and incremental risks are the same. Results from assessment of operations and constructions impacts of the SPAS alternatives are provided in Section 4.7.1.6 of the SPAS Draft EIR and in Section 5.3.2 of Appendix G1. Impacts from operations and construction were combined in Section 4.7.1.6 of the SPAS Draft EIR. However, in Appendix G1, cancer risks and non-cancer hazards for the 11-year construction period were calculated separately from operations as part of the uncertainty analysis.

The commentor appears to assume that incremental cancer risk estimates represent a definitive number of actual cases of disease. Current risk assessment methods cannot, however, achieve this level of sophistication. Instead, risk assessment practice uses information on exposure and toxicity to make a conservative estimate of the odds that someone in the population might be affected. (In this case, "conservative" means that risk estimates err on the side of protecting the public and are higher than actual risks for the bulk of the population of people living near LAX.)

In fact, the incidence of disease attributable to airport-related TAC emissions, as distinct from background concentrations of TAC in the South Coast Air Basin, is not known, but could range from zero to some small fraction of disease attributable to the generally poor air quality in the Los Angeles basin. Incremental cancer impacts from the SPAS alternatives would be less, and are anticipated to be beneficial in many instances. That is, implementation of one or more SPAS alternative could reduce total TAC emissions during airport operations, resulting in a negative incremental risk.

Please also see Response to Comment SPAS-PC00201-4 regarding epidemiological studies that have been performed at other airports in large metropolitan areas to help determine whether individuals living near airports have a greater incidence of disease than populations living in other areas.

Finally, regarding the comment that the SPAS Draft EIR include a funding mechanism to pay for cancer treatment costs and death benefits, there are no reported impacts that require or warrant the proposed mitigation. As described in Section 4.7.1.6.5 of the SPAS Draft EIR, and Table 4.7.1-10, cancer risks, chronic non-cancer health hazards, and health effects for on-airport workers were all less than significant. Acute non-cancer health hazards were found to be significant and unavoidable. However, the impact was due to exposure to the TAC acrolein and was only found at or near the fence-line. Acute exposure to acrolein causes mild irritation of the eyes and mucous membranes. Such exposure and impact does not require the extreme measure and costs proposed by the commentor. Therefore, identification of potential sources of funding for treatments is beyond the scope of the SPAS Draft EIR. The SPAS HHRA was prepared in accordance with California Environmental Protection Agency (CalEPA) and U.S. EPA guidance. Neither of these agencies require the actions requested by the commentor. See also Response to Comment SPAS-PC00130-454.

SPAS-PC00130-451

Comment:

What are incremental chronic non-cancer hazards? Please name all non-cancer hazards. Again if someone in the community surrounding LAX will fall subject to one or more of these hazards will LAWA

be paying for the treatment? If said subject dies will LAWA be pay death benefits to family members? Where would the money come from?

Response:

Please see Response to Comment SPAS-PC00130-450 for an explanation of incremental health risks. Although that response addressed incremental cancer risks, incremental non-cancer hazards are defined in an analogous fashion. In summary, incremental non-cancer hazards represent the difference in possible impacts for baseline (current) conditions and conditions anticipated in the future after implementation of SPAS. Incremental hazards are only calculated for LAX operations. Hazards associated with TAC emissions during construction are assumed to be zero for baseline (current) conditions and, therefore, total, not incremental, risks associated with construction-activities are calculated.

Hazards vary considerably across TAC and across concentrations of TAC in air and are discussed in the SPAS Draft EIR. Section 2.3 of Appendix G1 of the SPAS Draft EIR summarizes the toxicity assessment for TAC of concern. Specifically, non-cancer hazards are summarized in Table 3 on page 10 of Appendix G1 of the SPAS Draft EIR and more detailed information regarding non-cancer hazards are described by TAC in revised toxicity profiles provided in Attachment 1 to Appendix G1 of the SPAS Draft EIR.

The commentor seems to assume that incremental non-cancer risk estimates represent a definitive number of actual cases of disease. As with cancer risks, current risk assessment methods cannot, however, achieve this level of sophistication. Instead, risk assessment practice uses exposure and toxicity information to make a conservative estimate of whether people in the population might be affected. (In this case, "conservative" means that hazard estimates err on the side of protecting the public and are higher than actual hazards for the bulk of the population of people living near LAX.) Please see Response to Comment SPAS-PC00201-4 regarding epidemiological studies that have been performed at other airports in large metropolitan areas to help determine whether individuals living near airports have a greater incidence of disease than populations living in other areas.

An explanation of the meaning of hazard quotients is provided on page 4-468 in Section 4.7.1.6.3 of the SPAS Draft EIR. Although this text refers to a hazard quotient of 1 and hazard quotient of 3, the explanation is still applicable when comparing a hazard quotient of 1 to a hazard quotient of 2. Also note that the general concepts apply equally well to acute and chronic non-cancer hazards.
Estimates of non-cancer hazard, whether for acute (short-term) or chronic (long-term) exposure, are not quantitative expressions of the odds of being affected. Instead, hazard estimates are simple comparisons of exposure with exposure levels that are considered safe. At present, these comparisons cannot be used to examine how likely it is that health effects might occur in a population. Thus, it is not possible to describe quantitatively the difference between a hazard index of 1 and a hazard index of 2. In fact, the odds of adverse health effects could be zero in both cases, because hazard indices are calculated in a manner intended to protect the most sensitive individuals. The only meaningful interpretation of hazard indices is that the level of concern increases as hazard estimates increase above 1. Therefore, the SPAS HHRA identified any incremental chronic or acute hazard index greater than, or equal to, one for any target organ system at any receptor location as significant (see Section 4.7.1.4 of the SPAS Draft EIR).

Please see Response to Comment SPAS-PC00130-450 regarding reimbursement of medical treatment and/or death benefits.

SPAS-PC00130-452

Comment:

What are the thresholds of significance? How acute is a significance of 1? How many thresholds are there? Who is measuring? Are passenger's the only people effected?

Response:

Section 4.7.1.4 of the SPAS Draft EIR provides a discussion of the thresholds of significance that were used to reach the significance determinations for the HHRA. Four thresholds are listed. These thresholds are based on Southern California Air Quality Management District (SCAQMD) guidance.

Acute and chronic reference exposure levels (RELs) developed by the State of California were used to characterize acute and chronic non-cancer hazards associated with exposure to TAC. As stated in Section 2.3 of Appendix G1 of the SPAS Draft EIR, "RELs are based on the most sensitive, relevant, adverse health effect reported in the medical and toxicological literature." As stated by the Office of Environmental Health Hazard Assessment (OEHHA), RELs were developed with the intention of protecting nearly all individuals -- including individuals with high susceptibility for chemical injury and sensitive subpopulations (e.g., children, pregnant women, and elderly persons) -- from adverse health effects.1 Note that this definition does not include "hypersensitive individuals (those exhibiting idiosyncratic responses that cannot be predicted from studying health effects of the substance)."

As stated in Section 2.4.3 on page 13 of Appendix G1 of the SPAS Draft EIR, "Acute non-cancer health hazards were then estimated at each grid point by dividing estimated maximum 1-hour TAC concentrations in air by acute RELs. A hazard index equal to or greater than 1, the threshold of significance for acute non-cancer health impacts, indicates some potential for adverse acute non-cancer health impacts. A hazard index less than 1 suggests that adverse acute non-cancer health impacts are not expected." Possible acute health impacts are therefore based on short-term exposure to the highest modeled TAC concentrations, regardless of location at or near the LAX fence-line. Please also see Responses to Comments SPAS-PC00130-451 and SPAS-PC00130-454 regarding the meaning of acute hazard indices.

No actual measurements of air quality at or near the airport can be conducted to support hazard estimates. The SPAS HHRA is based on air quality modeling for future conditions associated with various SPAS alternatives. This modeling considered multiple factors including varying on-airport meteorological data such as temperature, wind speed, wind direction, atmospheric stability, and mixing height parameters based on several years of meteorological (weather) data collected at LAX. Please refer to Section 4.2 of the SPAS Draft EIR for details on the air quality modeling. By definition, the SPAS Draft EIR estimates potential impacts to human health based on projected TAC emissions. Actual measurements of impacts (e.g., maximum fence-line TAC concentrations) are not conducted prior to project implementation.

The SPAS HHRA addresses impacts to the community surrounding LAX. Passengers are not specifically included in the analysis since the focus of the effort is on these communities. The exposure assessment in Section 4.7.1.2.3 of the SPAS Draft EIR describes receptors selected for quantitative evaluation in the HHRA. The receptors evaluated include: off-airport workers, off-airport adult residents, off-airport child residents, and off-airport school children. Each receptor represents a unique population and set of exposure conditions. As a whole, they cover a range of exposure scenarios for people who may be affected by LAX emissions to the greatest extent. These receptors were evaluated with a focus on locations where maximum TAC concentrations are anticipated. This focus results in risk and hazard estimates that represent the upper end of those possible. In essentially all instances, these upper end risks are anticipated only at or near the LAX fence-line, where no one lives, works continuously, or goes to school. Thus, risk and hazards for people in surrounding communities and removed from the LAX fence-line would be lower than those estimated in the HHRA in essentially all situations.

Passengers who visit the airport infrequently and/or for short periods of time are not likely to receive exposures greater than those estimated in the HHRA. For example, nearby residents are assumed to be present at the LAX fence-line for 24 hours a day and 350 days a year and workers are assumed to be present at the LAX fence-line for 10 hours a day for 5 days a week. See Table 1 on page 8 of Appendix G1 of the SPAS Draft EIR. By providing estimates for the most exposed individuals for determination of significance, the general population is protected.

1. California EPA, Office of Environmental Health Hazard Assessment Air Toxics Hot Spots Program Risk Assessment Guidelines, Part III, Technical Support Document for the Determination of Noncancer Chronic Reference Exposure Levels, February 2000.

SPAS-PC00130-453

Comment:

Why hasn't LAWA implemented some form of Air purification in so called "hot spots"? If taxing time for aircraft on the ground is a major source why aren't aircraft being towed by clean air vehicles? Wouldn't airlines save significant amounts of money on fuel by being towed? How much fuel is required in its entirety by taxing? Would fence line hazards be mitigated? By what agency? Who would be measuring?

Response:

It is assumed that the "hot spots" mentioned in the comment are the locations of peak concentration impacts for airport operations included in Section 4.2.6.4 of the SPAS Draft EIR, Figures 4.2-2 through 4.2-8. The mitigation measures that will be used to potentially reduce air quality impacts from airport operations are discussed in Section 4.2.5 of the SPAS Draft EIR, which include approximately 17 mitigation actions. These actions include the ongoing LAX FlyAway Program, encouraged use of transit ridership through the LAWA Rideshare Program, continued conversion of ground support equipment to alternative fuels, and other methods to reduce traffic and parking emissions. Please refer to Response to Comment SPAS-PC00130-390 for a discussion of the ongoing efforts LAWA is making to reduce impacts to air quality. Note that attempting to clean ambient air with an air purification system is not effective since the sources emitting pollutants will continue to impact air quality. Reducing the concentration impacts is best accomplished by measures that control emissions at the sources.

Methods to reduce aircraft emissions during taxiing are being studied by various airlines and aircraft equipment manufacturers. Towing aircraft was briefly attempted by Virgin Atlantic, however potential damage to the landing gear over time has caused them to stop the practice.1 Other issues, such as increased tow tug emissions and safety hazards due to complex communications between the air traffic control tower, aircraft pilot, and tug operator would need to be worked out. Reduced emissions associated with tow tug operations are occurring at LAX relative to the use of alternative fuel tugs. In the 2006 Ground Service Equipment (GSE) survey at LAX, 14 of the 176 aircraft tractors (tugs) in operation at LAX were electric and another two were CNG/LNG powered. Pursuant to the requirement of the LAX Master Plan Community Benefits Agreement, LAWA is continuing ahead with efforts to encourage and further support the conversion of GSE, including aircraft tractors, at LAX to alternative fuels. Other methods to reduce aircraft taxi emissions are being studied, and in some cases utilized. Reduced engine taxiing (operating own fewer engines when taxiing) is currently practiced by many airlines serving LAX, primarily to save fuel. Airlines and aircraft manufacturers are also looking at installing small electric motors on the front landing gear that run off of the aircraft's auxiliary power unit.2,3 These motors would propel the aircraft along the taxiways without needing the operation of the aircraft's main engines, thus substantially reducing taxi mode emissions. Implementation of these nose gear motors would be by airlines and the aircraft manufacturers, if used. LAWA does not have the authority to mandate modifications to aircraft.

Assuming that the fence line hazards in the comment refer to the peak operational concentrations discussed in Section 4.2.6.4 of the SPAS Draft EIR, it is unlikely that reducing aircraft taxi emissions would reduce the significant impacts of nitrogen dioxide (NO2) and particulate matter (PM10 and PM2.5) at the eastern fence line. These pollutant impacts are dominated by aircraft during takeoff, as noted in Section 4.2.6.4, thus would still likely be significant even if taxi emissions were substantially reduced. Commercial aircraft engine emission standards are set by the International Civil Aviation Organization (ICAO) and are adopted by the U.S. Environmental Protection Agency. Earlier this year, U.S. Environmental Protection Agency adopted Tier 6 and Tier 8 large aircraft engine emission standards for oxides of nitrogen (NOx),4 the major contributor to ambient NO2 concentrations. These standards will reduce NOx emissions by approximately 12 percent from engine manufactured after December 2012, and by an additional 15 percent for engines manufactured after 2014, compared to the previous emission standards. The Federal Aviation Administration is responsible for certifying that aircraft engines meet the emission standards, which they accomplish through engine certification testing.

1. Deonandan, I. and Balakrishnan, H., Evaluation of Strategies for Reducing Taxi-out Emissions at Airports, American Institute of Aeronautics and Astronautics, 2010.
2. EV World, Honeywell, Safran to Develop Electric Taxiing System for Jetliners, June 20, 2011, Available: http://evworld.com/news.cfm?newsid=25973, accessed January 3, 2013.
3. Gubisch, M., L-3 and Lufthansa get moving with e-taxi demonstrator, 2011, Available: http://www.flightglobal.com/news/articles/video-l-3-and-lufthansa-get-moving-with-e-taxidemonstrator-365815/, accessed January 3, 2013.
4. U.S. Environmental Protection Agency, Control of Air Pollution from Aircraft and Aircraft Engines: Emission Standards and Test Procedures - Final Rule, 77 FR 36342, June 18, 2012.

SPAS-PC00130-454

Comment:

How much difference is there between hazard level 1 and hazard level 2? What impacts are expected exactly? How many impact victims does this represent? Why isn't LAWA looking at some form of mitigation that would clean the air going beyond the fence line and providing filtered face masks for all workers exposed?

Response:

Estimates of non-cancer hazard, whether for acute (short-term) or chronic (long-term) exposure, are not quantitative expressions of the odds of being affected. Instead, hazard estimates are simple comparisons of exposure with exposure levels that are considered safe. At present, these comparisons cannot be used to examine how likely it is that health effects might occur in a population. Thus, it is not possible to describe quantitatively the difference between a hazard index of 1 and a hazard index of 2. In fact, the odds of adverse health effects could be zero in both cases, because hazard indices are calculated in a manner intended to protect the most sensitive individuals. The only meaningful interpretation of hazard indices is that the level of concern increases as hazard estimates increase above 1. Therefore, the SPAS HHRA identified any incremental chronic or acute hazard index greater than, or equal to, one for any target organ system at any receptor location as significant (see Section 4.7.1.4 of the SPAS Draft EIR).

An explanation of the meaning of hazard quotients is provided on page 4-468 in Section 4.7.1.6.3 of the SPAS Draft EIR. Although this text refers to a hazard quotient of 1 and hazard quotient of 3, the explanation is still applicable when comparing a hazard quotient of 1 to a hazard quotient of 2. Also note that the general concepts apply equally well to acute and chronic non-cancer hazards. As stated on page 4-468, "The acute REL for acrolein has an uncertainty factor of 60.1 This factor indicates a moderate uncertainty in the REL based on specific sources of variability not addressed in the toxicological studies, such as individual variation and interspecies differences. Although maximum acute hazard quotients for acrolein after build-out of Alternative 1 are greater than 1, it should be noted that the acute REL is set at or below a level at which no adverse health impacts are expected for the majority of the population. Hence, it represents the tail-end of a distribution and not a specific "bright line" beyond which adverse effects are certain; instead any adverse acute non-cancer health effects (mucous membrane irritation) would be part of a complex probabilistic process. Although the maximum acute hazard quotient estimated as 3.0 is above the threshold of significance of 1, the value is still close to the threshold for acute effects, given the uncertainty in the toxicity factor, and may represent minimal actual acute non-cancer health hazards. Thus, an acute hazard quotient of 3.0 does not mean that adverse effects would definitely occur in the receptor population; rather, it indicates that such effects cannot be ruled out on the basis of current knowledge."

Regarding the impacts that would be expected to occur, non-cancer impacts are described in Section 2.3 of Appendix G1 of the SPAS Draft EIR. This section summarizes the toxicity assessment for TAC of concern. Specifically, the non-cancer hazards are summarized in Table 3 on page 10 of Appendix G1 of the SPAS Draft EIR. More detailed information regarding non-cancer hazards are described by TAC in toxicity profiles provided in Attachment 1 of the SPAS Draft EIR.

The primary TAC of concern associated with emissions from LAX with respect to chronic and acute non-cancer hazards are acrolein and formaldehyde. As noted in Section 4.7.1.6.3 of the SPAS Draft EIR, acute exposures to acrolein may result in mild irritation of eyes and mucous membranes. Acute

exposures to formaldehyde typically include irritation to the eye and respiratory system and possibly adverse effects to the immune system. The HHRA makes no predictions concerning whether adverse effects will occur. It is possible that incremental impacts to the population living in communities surrounding LAX will be zero, or that people in some areas will see an improvement in air quality (lower concentrations of TAC from LAX). Risk and hazard estimates in the HHRA should not be used to suggest that adverse effects from exposure to TAC from LAX would occur.

The commentor seems to indicate that hazard estimates indicate a definitive number of actual cases of impact rather than the relative likelihood that an adverse health effect may occur. In fact, impacts attributable to airport TAC emissions, as distinct from background concentrations of TAC in the South Coast Air Basin, are not known, but could range from zero to some small fraction of risks that are attributable to poor air quality in the basin in general. As indicated in Section 4.7.1.6.1 of the SPAS Draft EIR, incremental impacts from the SPAS alternatives would be less, and could even be beneficial (i.e., implementation of one or more SPAS alternatives could reduce total TAC emissions during airport operations, see).

With respect to linking health effects in the surrounding communities to emissions from LAX, the SPAS HHRA cannot be used to attribute health issues for individuals to TAC emissions from LAX. Please see Response to Comment SPAS-PC00201-4 regarding epidemiological studies that have been performed at other airports in large metropolitan areas to help determine whether individuals living near airports have a greater incidence of disease than populations living in other areas.

Regarding mitigation of TAC, many of the mitigation measures that LAWA has committed to as part of the LAX Master Plan with respect to air quality impacts, and that would be applicable to the SPAS alternatives, aim to reduce exhaust emissions from construction equipment (MM-AQ-2) and mobile sources such as aircraft and ground support equipment (MM-AQ-4), and reduce traffic congestion near the airport (MM-AQ-3). These mitigation measures focus on reducing emissions from the source before they even go beyond the fence-line rather than trying to capture and treat the air containing TAC as it passes the fence-line. Treating the source is more effective and efficient in that such a single measure would ultimately benefit a larger number of potential receptors and reduce the amount of TAC that are emitted from LAX.

In assessing any health and safety issue, the hierarchy for instituting protective measures is: elimination, substitution, engineering controls, administrative controls, and lastly personal protective equipment (PPE). Usually the higher the control in the hierarchy, the more effective it is as a control that offers protection. However, worker health and safety is regulated under the Office of Safety and Health Administration (OSHA) and workers at LAX, including contractors hired by LAWA for construction or other tasks, fall under these regulations. If exposures might exceed protective workplace levels (i.e., permissible exposure limits (PELs)) and cannot be controlled in any other way, personal protective equipment (PPE), including respiratory protection, is provided. The type of respiratory protection is dictated by TAC of concern and airborne concentrations of these TAC. Compliance with OSHA safety and health standards is necessary for airport construction and operations.

1. California Environmental Protection Agency, Office of Environmental Health Hazard Assessment, Air Toxics Hot Spots Program Technical Support Document for the Derivation of Noncancer Reference Exposure Levels, December 2008.

SPAS-PC00130-455

Comment:

Your plan states there are no defined cumulative health risk impacts available. What has happened to the 12 year study that was supposed to define the dangers? Why has this plan not been completed? Why haven't measures recommended so far been instituted? Who at LAX is responsible of the study? What individual thresholds of cancer risk does LAWA consider significant? If LAWA doesn't consider any of this significant then we suggest that all upper level LAWA employees be housed in offices near the fence line. They could use their individual health markers as to whether they are of significance.

Buildings is this area would help block the neighborhoods from lower emissions and tell how high real thresholds are. What difference is there to the community between thresholds of less than 1 to over 3

Response:

Please refer to Section 5.5.7.1 of the SPAS Draft EIR for a detailed discussion of cumulative health risk impacts associated with the SPAS alternatives. Section 5.5.7.1 does not state that "there are no defined cumulative health risk impacts available." It accurately states, "no standards exist that establish acceptable levels of human health risks or that identify a threshold of significance for cumulative health risk impacts." The discussion in this section provides a semi-quantitative analysis of the cumulative health risk impacts of the SPAS project based on the Multiple Air Toxics Exposure Study for the South Coast Air Basin (MATES-III)1 and USEPA predictions2 for annual average acrolein concentrations.

Regarding the 12-year study referred to in this comment, it is assumed that the commentor is referring to the Air Quality and Source Apportionment Study (AQSAS). As part of the AQSAS, LAWA is evaluating the contribution of on-airport aircraft emissions to off-airport air pollutant concentrations, addressing several criteria and toxic air pollutants. Please see Response to Comment SPAS-AR00002-45 for additional discussion regarding the AQSAS.

Regarding the thresholds of significance for cancer risk, Section 4.7.1.4 of the SPAS Draft EIR provides a discussion of the thresholds of significance that were used to reach the significance determinations. As indicated in that section, a significant incremental impact to human health relative to cancer risk would occur if changes in airport operations following implementation of a SPAS alternative would result in an increased incremental cancer risk greater than, or equal to, 10 in one million (10 x 10E-06) for potentially exposed off-site workers, residents, or school children. In this context, the term "significant" is used as defined in CEQA regulations and does not imply an independent judgment of the acceptability of the risk. This threshold is based on Southern California Air Quality Management District (SCAQMD) guidance.

Please refer to Section 4.1.1 of Appendix G of the SPAS Draft EIR for a discussion of health effects for on-airport workers. Health and safety of on-airport workers is regulated under CalOSHA and no risk or hazards were estimated for these workers; instead TAC emission estimates were used to provide additional perspective on possible impacts of operational emissions. Fence-line concentrations of TAC represent the highest or near-highest concentrations that could be considered "off-airport" and were used to evaluate exposure for off-airport receptors. The presence of buildings at the fence-line would have little to no impact on the air dispersion modeling, and construction of new buildings on the fence-line would have additional environmental impacts. Please refer to Section 4.2.2 of the SPAS Draft EIR for a discussion of the emission sources and the dispersion modeling assumptions.

Please see Response to Comment SPAS-PC00130-454 regarding the difference between non-cancer hazard indices of 1 to over 3.

1. South Coast Air Quality Management District, Final Report, Multiple Air Toxics Exposure Study in the South Coast Air Basin (MATES-III), September 2008, Available: http://www.aqmd.gov/prdas/matesIII/matesIII.html, accessed June 21, 2012.
2. U.S. Environmental Protection Agency, 2005 National-Scale Air Toxics Assessment, 2011, Available: www.epa.gov/ttn/atw/nata2005/tables.html.

SPAS-PC00130-456

Comment:

Safety
Your document states there is no solid waste facility within 10,000 ft of LAX. What facilities do exist in 5' under LAX that could cause contamination and leaching of toxics into the water table?

Response:

Please see Response to Comment SPAS-PC00130-113 regarding the identification of contaminated sites within the hazardous materials study area, which consists of the airport property and SPAS alternatives acquisition areas. Appendix G3 contains additional information regarding known soil and/or groundwater contamination sites located within the hazardous materials study area. As shown in Table 4.7.3 1 of Section 4.7.3 of the SPAS Draft EIR, there are 32 sites at LAX where hazardous materials releases have resulted, or may have resulted, in groundwater and/or soil contamination. Of these 32 sites, seven have significant soil and/or groundwater contamination and are undergoing remediation activities under LAFD or RWQCB supervision. In addition to the sites listed in Table 4.7.3 1, there is the potential for unidentified contamination within the hazardous materials study area from past activities involving hazardous materials or substances. With implementation of existing LAX Master Plan commitments and LAWA procedures, including the Procedure for the Management of Contaminated Materials Encountered During Construction, prepared in accordance with LAX Master Plan Commitment HM-2, impacts associated with soil and groundwater contamination from hazardous materials would be less than significant.

SPAS-PC00130-457

Comment:

How does covering the Argo flood channel add to ponding in & near the airfield?

Response:

Converting the Argo Drainage Channel from an unlined earthen channel to a concrete box culvert would not add to ponding in or near the airfield. Please see Response to Comment SPAS-PC00130-433.

SPAS-PC00130-458

Comment:

How would the LAX northside development cause Part 77 when there is no development now? Just plan whatever development not to interfer with FAR part 77.

Response:

The LAX Northside Plan Update has taken into account the existing Part 77 airspace surface and potential Part 77 airspace surfaces related to all north airfield alternatives to ensure that development does not penetrate those surfaces. As part of the LAX Northside Update, which is a separate and independent project subject to its own environmental review process, building heights will be limited to 45 and 60 feet and will not penetrate the existing Part 77 surfaces and potential Part 77 surfaces related to any SPAS alternatives.

SPAS-PC00130-459

Comment:

Hazardous Materials
Your document says that LAX would require excation in areas of known contamination. Where are area's of known contamination? How many are there? Is any of the soil piled up west of the Westchester business those know sites been mitigated? Do any of those sites effect the water table? Do any of the known contamination show up in current run off? Have you found any contamination in the Argo flood channel? If so what contaminates? Are any of the contaminates contagious with the neighboring communities? What are the known health hazards associated with those contaminants? Does the department of health or any other department have records showing clusters of people suffering from those health hazards? If so, has the airport approached those people, the city or county in which they live and offered to pay for treatment or death benefits?

Response:

Sites with known contamination within the study area are identified in Section 4.7.3.3 of the SPAS Draft EIR. These sites are listed in Table 4.7.3-1 and illustrated in Figure 4.7.3-1. As indicated on the table, there are 32 sites on airport property and 4 sites within the acquisition areas. The sites with impacts to groundwater are identified in the table. Many of these sites are closed cases, indicating that remediation has been completed or that investigations found that no remediation was required. Groundwater investigation is underway or anticipated at four sites, and is in progress at eight sites. Monitoring is conducted at sites undergoing remediation, as necessary, to ensure that contamination does not migrate off-site. As indicated on page 4-597 of Section 4.7.3, implementation of LAX Master Plan Commitment HM-1, and compliance with the Procedure for the Management of Contaminated Materials Encountered During Construction, developed in accordance with LAX Master Plan Commitment HM-2, would ensure that impacts related to sites with known contamination associated with Alternatives 1 through 9 would be less than significant. Water quality impacts associated with runoff from the airport are addressed in Section 4.8 of the SPAS Draft EIR. Section 4.8.3 discusses the type and nature of surface runoff contaminants, and Table 4.8-4 quantifies estimated stormwater pollutant loads (i.e., contaminants) delivered to receiving water bodies from the hydrology and water quality study area (HWQSA).

Please see Responses to Comments SPAS-PC00130-265 and SPAS-PC00130-190 regarding soils stockpiled at LAX. No contamination has been found in the Argo Drainage Channel.

Health hazards associated with hazardous substances vary widely depending upon the contaminant. LAWA does not have any information pertaining to and is not aware of any evidence of cancer clusters in the airport area. Regarding LAWA's liability for medical expenses of individuals living in the community, this issue is outside the scope of CEQA. CEQA requires that a lead agency provide an analysis of the project's significant physical impacts on the environment; it does not require a discussion of liability. (State CEQA Guidelines Section 21068.) Health hazards associated with the SPAS alternatives are addressed in Section 4.7.1 of the SPAS Draft EIR. As noted in that section, incremental cancer risks and incremental chronic non-cancer health hazards within the study area under all the alternatives would be less than significant for all receptor types (i.e., child resident, school child, adult resident, adult worker). Additionally, under all the alternatives, health effects to on-airport workers would be less than significant. Incremental acute non-cancer health hazards at small areas at or near the LAX fence-line under all the alternatives would be slightly above the threshold of significance and are considered to be significant and unavoidable for all analyzed receptor types (i.e., residents, recreational users, school child, off-site adult workers). The primary toxic air contaminant of concern contributing to this impact is associated with emissions of acrolein from aircraft operations, which would occur in 2025 even in the absence of SPAS. It should be noted that, with the exception of Alternative 3, acute non-cancer health hazard impacts in 2025 would be lower under the SPAS alternatives than if no airfield improvements were implemented. Moreover, these significant impacts would occur at or near the fence-line; it is expected that actual impacts in the community would be less than significant.

SPAS-PC00130-460

Comment:

Hydrology
What mitigations for hydrology are you implementing? Flooding seems to be a major issue in all but Alt 3, why? Are you having major issues with flooding now? If so is the Santa Monica Bay effected? If so how is it effected? Why hasn't LAWA moved forward to mitigate pollution to local watersheds? How does the Manchester tunnel figure into airport flooding? Where is the water source currently in the Manchester tunnel currently coming from? Is the water in the tunnel polluted? What pollutants have been identified in the tunnel? What health risks are associated? Does airport flooding impact the runways with sink holes? If so since the last flight field improvements (north runway) how many sink holes have occurred? How much money has been spent repairing sink holes? How many aircrafts have been damaged because of sink holes and flooding? How much money has this cost?

Response:

Mitigation for impacts relating to hydrology and water quality is identified in Section 4.8.7 of the SPAS Draft EIR. As indicated in that section, for every alternative except for Alternative 3, MM-HWQ (SPAS)-1 is recommended, which would require LAWA to revise and update the CDP to account for changes in the planned improvements as a result of the selected SPAS alternative. Flooding is not a "major issue" associated with these alternatives. Rather, the SPAS Draft EIR acknowledges that the existing CDP was developed with a certain set of improvements in mind (i.e., Alternative D, referred to in SPAS as Alternative 3), and these plans would need to be revised to apply to a different set of improvements. As indicated on page 4-607 of the SPAS Draft EIR, localized flooding can occur on the airport in low elevation areas or in areas where debris accumulates, thus blocking flow. As indicated in Section 4.8.6 of the SPAS Draft EIR, with implementation of MM-HWQ (SPAS)-1, revisions to the CDP would be made to reflect the specific characteristics the alternative, and the hydrology and flooding impact would be less than significant.

As noted on pages 4-604 and 4-605 of the SPAS Draft EIR, stormwater from the western portion of LAX (west of Sepulveda Boulevard) discharges to the Santa Monica Bay, whereas stormwater from the eastern portion of the airport discharged to San Pedro Bay. The exception is dry weather flows and "first flush" stormwater flows within the Imperial drainage sub-basin, which are captured by a water quality retention basin and treated at the Hyperion Treatment Plant. Regulatory programs that address water quality are identified on pages 4-606 through 4-612 of the SPAS Draft EIR. As indicated in that discussion, LAWA has a number of programs that reduce impacts to water quality, including a Stormwater Pollution Prevention Program.

Please see Response to Comment SPAS-PC00130-1012 regarding the north airfield abandoned tunnel segment (referred to as Manchester tunnel by the commentor). As indicated in that response, the tunnel segment is sealed and, therefore, does not contribute to flooding. Please see Response to Comment SPAS-PC00130-51 regarding sink holes at LAX.

SPAS-PC00130-461

Comment:

Why are the new designs being made from all impervious materials? Please list all reasons impervious materials are being used? Please list all unimpervious materials considered acceptable for runways and taxiways? Under LA's green building code what percentage of land must be left as open space to use impervous materials? Exactly how many square feet will be covered by impervious materials in each alternative?

Response:

It is unclear why the commentor believes that "new designs [are] being made from all impervious materials." As indicated in Section 2.3.1 of the SPAS Draft EIR, the improvements associated with the SPAS alternatives have been developed at a program level of planning. Specific design features of these facilities, such as drainage facilities, Best Management Practices, and materials that would be used in construction, have not been determined. Details regarding drainage design and the use of pervious versus impervious materials would be determined during the planning and engineering design of individual project components. Runways and taxiways would be designed to comply with FAA design standards for these facilities, including the use of required materials. The facilities would also comply with SUSMP requirements and the City's LID Ordinance.

Section 4.8.2 of the SPAS Draft EIR estimated the amount of land area within the Hydrology and Water Quality Study Area (HWQSA) that would be impervious under each alternative as compared with baseline conditions. Resulting impacts associated with these impervious areas are included in Section 4.8.6 of the SPAS Draft EIR. This analysis was conducted at a program-level of detail. In the analysis, all areas that would be paved were assumed to be impervious. However, as stated above, the actual materials that would be used in construction have not been determined. During engineering design, it may be determined that pervious materials may be feasible for some SPAS improvements. Please see Responses to Comments SPAS-PC00130-235 and SPAS-PC00130-142 for a discussion of the appropriateness of the programmatic review conducted for the SPAS project.

SPAS-PC00130-462

Comment:

Should storm water capacity be exceeded where would the excess water move to? Would all excess water remain on the flight field? If not would LAWA pay for flooding damage to adjacent areas? Cover closing of businesses? If flooding proceded into terminal areas would LAWA's insurance plan be sufficient to cover all the damages? Where does the LAWA escrow account for insurance exsist? Who runs it? How much money is in the account?

Response:

Please see Response to Comment SPAS-PC00130-433 regarding storm water flows and flooding associated with conversion of the Argo Drainage Channel to a concrete box culvert.

The comments regarding the economic costs of flooding damage and LAWA's insurance plan are noted, are hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because these comments do not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00130-463

Comment:

Who designed the LAX Conceptual Drainage plan? Has the Army corp of engineers been consulted? How about the engineers of caltrans and LA city DOT? Has LAWA approached the Los Angeles Department of Water and Power about storage of excess storm water? If so what plans have been put forward?

Describe in detail the MM-HWQ Conceptual Drainage Plan Division and updates. Does the plan include pollution controls?

Response:

The Conceptual Drainage Plan (CDP) was prepared by LAWA in 2005 in accordance with LAX Master Plan Commitment HWQ-1. The CDP provides the basis by which detailed drainage improvement plans will be designed in conjunction with site engineering specific to each LAX Master Plan improvement project. No consultation with the U.S. Army Corps of Engineers, Caltrans, or the City of Los Angeles Department of Transportation was required in conjunction with this plan. However, the CDP was developed in accordance with FAA guidelines and LADPW methods and design criteria. As indicated in Table 4.8-5 of the SPAS Draft EIR, implementation of the SPAS alternatives would result in very minor changes in the amount of impervious area at LAX, ranging from 0.5 percent under Alternative 4 to 3.4 percent under Alternative 3. As explained in Section 4.8.6 of the SPAS Draft EIR, previous studies indicate that the SPAS alternatives would result in a very small net increase in peak flow within the Argo and Imperial sub-basins, which could cause one or more existing on-site or off-site storm drains to reach or exceed their design capacity. Similarly, increases within the Dominguez Channel sub-basin, which is currently over capacity off-site and downstream from LAX, would add to the capacity deficiency, which would be a significant impact. As described in Section 4.8.7 of the SPAS Draft EIR, a new mitigation measure, MM-HWQ (SPAS)-1 is proposed to tailor the CDP recommendations to the specific characteristics of the selected SPAS alternative, if an alternative other than Alternative 3 is selected. The CDP update, if required, would address both drainage and water quality and would reduce flooding impacts associated with the SPAS alternatives to a level that is less than significant. With implementation of this mitigation measure, the SPAS alternatives would not generate excess stormwater that would require storage.

SPAS-PC00130-464

Comment:

What mitigations for each of the alternative for errosion has LAX planned for? What are those mitigations?

Response:

Please see Response to Comment SPAS-PC00130-463 regarding the new mitigation measure, MM-HWQ (SPAS)-1, that is proposed to tailor the CDP to the specific characteristics of the selected alternative. As indicated in the text of proposed Mitigation Measure MM-HWQ (SPAS)-1 on page 4-638 of the SPAS Draft EIR, the CDP revision and update would provide the basis and specifications by which detailed drainage improvement plans would be designed in conjunction with site engineering specific to each improvement associated with any selected SPAS alternative, including, if necessary, improvements to address increased erosion and sedimentation.

SPAS-PC00130-465

Comment:

How would flooding effect the sensitive land areas next to LAX? Which plants and endangered species would be effected should the changes to Argo flood channel fail?

Response:

Please see Response to Comment SPAS-PC00130-433 regarding stormwater flows and flooding associated with conversion of the Argo Drainage Channel to a concrete box culvert. As indicated in Response to Comment PC00130-350, if the capacity of the channel were exceeded, the area upstream of the culvert inlet would be affected for a short time until water that had temporarily ponded upstream could be drained back into the channel once the peak of a large storm had passed. No plants or endangered species would be affected if peak flows could not be accommodated by the channel following conversion to a concrete box culvert, as there are no plants or endangered species located in the area immediately upstream of the inlet to the Argo Drainage Channel.

SPAS-PC00130-466

Comment:

What is the LAX storm water pollution prevention plan?

Response:

A Stormwater Pollution Prevention Plan (SWPPP) is a comprehensive, facility-specific document prepared by any facility covered under the State Water Resources Control Board General Industrial Stormwater Permit to address and control pollutants in stormwater runoff. A SWPPP describes the facility and drainage pathways and systems, identifies potential pollutant sources, prescribes a set of Best Management Practices to prevent generation and/or minimize discharges of pollutants to receiving waters, and identifies a monitoring and reporting program. Information about the LAX SWPPP is provided on page 4-610 of the SPAS Draft EIR. As indicated in the SPAS Draft EIR, more detailed information about the LAX SWPPP is provided in Technical Report 6 of the LAX Master Plan Final EIR (pages 31 and 32). The LAX SWPPP covers all industrial activities at LAX, including those of LAWA and its tenants.

SPAS-PC00130-467

Comment:

Table 1-14 is less than useless. How can massive expansion plans absolutely no impacts? How did LAX come to these conclusions?

Response:

Table 1-14 of the SPAS Draft EIR presents a summary of land use and planning impacts. A complete and thorough analysis of land use and planning impacts associated with the SPAS alternatives, and which are summarized in Table 1-14, is provided in Section 4.9.6 of the SPAS Draft EIR. As described in Section 4.9.6 of the SPAS Draft EIR, a consistency analysis for the SPAS alternatives was presented for the following on-airport land use plans: the LAX Plan, LAX Specific Plan, Los Angeles Airport/El Segundo Dunes Specific Plan, LAX Street Frontage and Landscape Development Plan Update, and acquisition identified within the LAX Master Plan Draft Relocation Plan. A consistency analysis was also presented for the following off-airport land use plans: SCAG 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), SCAG 2012-2035 RTP/SCS Aviation and Airport Ground Access Appendix, SCAG 2004 Compass Blueprint Growth Vision, Los Angeles County Airport Land Use Plan, 2011 Caltrans California Airport Land Use Planning Handbook, Los Angeles Citywide General Plan Framework, City of Los Angeles Transportation Element, City of Los Angeles Bicycle Plan, City of Los Angeles Noise Element, Westchester-Playa del Rey Community Plan, South Los Angeles Community Plan, and West Adams-Baldwin Hills-Leimert Community Plan. As stated on page 4-684 in Section 4.9.4 of the SPAS Draft EIR, the determination of consistency was based on the potential for the SPAS alternatives to "conflict with any applicable land use plan, policy, or regulation . . . adopted for the purpose of avoiding or mitigating an environmental effect." Furthermore, as stated on page 4-689 in Section 4.9.6 of the SPAS Draft EIR, "a project is consistent with a general plan and related planning documents, if considering all its aspects, it will further the objectives and policies of the general plan or not obstruct their attainment. Nevertheless, in certain instances, amendments to the various plans are proposed to ensure precise consistency."

As described on page 4-775 in Section 4.9.6 of the SPAS Draft EIR, with implementation of applicable LAX Master Plan commitments, LAX Master Plan mitigation measures and SPAS mitigation measures, and amendments to some plans to ensure precise consistency, impacts would be less than significant.

The statement that massive expansion plans are proposed is inaccurate. As stated on page 1-13 of the SPAS Draft EIR, the project would not change the potential for passenger growth at LAX; rather, future passenger activity is forecast to reach 78.9 MAP at LAX with or without the SPAS alternatives. In addition, the proposed improvements under the SPAS alternatives, including acquisition areas, are within the boundaries of the LAX Plan and LAX Specific Plan and therefore are generally consistent with these plans. Furthermore, as no SPAS improvements are proposed outside of the City of Los Angeles, no associated inconsistencies with plans in other jurisdictions would occur.

SPAS-PC00130-468

Comment:

Table 1-15 has no details. Explain how cnel was calculated? Explain the relationship CNEL Has with Topography? Where are the noise monitors for Playa del Rey, westchester and north Inglewood located? How does CNEL modeling account for spacing issues and course corrections?

Response:

Table 1-15 in Section 1.2.3 of the SPAS Draft EIR, which is specifically designated as the "Introduction and Executive Summary" section of the EIR, is intended to provide only the summary of land use and noise impacts. Sections 4.9 and 4.10.1 further describe the methodology, impacts, and mitigation measures associated with the aircraft noise analyses for the SPAS alternatives, including discussion of CNEL methodology.

The commentor also asks about the relationship between CNEL and topography. The commentor is referred to responses to the same comments/questions posed by ARSAC in Responses to Comments SPAS-PC00130-209 and SPAS-PC00130-937. As discussed therein, the noise analysis incorporated digital topographic data from the U.S. Geological Survey. Thus, the results of the noise modeling reflected the effects of topographic variations in the study area.

Regarding the question of where are the noise monitors for Playa del Rey, Westchester, and north Inglewood located, the locations of all the LAWA noise monitors around LAX are delineated on the LAX noise contour maps on LAWA's website -- see http://lawa.org/welcome_lax.aspx?id=1090.

It is assumed that the commentor referred to aircraft spacing and flight paths when inquiring about "how does CNEL modeling account for spacing issues and course corrections." Together, air traffic controllers and pilots ensure and maintain proper spacing between aircraft, based on appropriate vectors provided for arriving and departing aircraft. LAX radar data used in the SPAS Draft EIR analyses reflected a multitude of flight paths followed by aircraft traversing through the airspace. Radar data for the arrival and departure flights at LAX was used as the basis for creating the flight tracks for aircraft noise modeling purposes in the INM model. For additional information on this issue, please see Appendix J1-1 of the SPAS Draft EIR and Response to Comment SPAS-PC00130-354.

SPAS-PC00130-469

Comment:

1-84 states that implementation of the Spas alternatives would have a considerable contribution to future aircraft noise impacts on existing & potential future noise-sensitive uses within the 65 CNeL noise contour. How will each of the Spas Alternatives effect surrounding areas to the 65 CNEL area? Will there be special attention to schools, old age homes, hospitals, or open air recreation areas? Please list all of the schools, old age homes, hospitals or open air recreational areas that will be either impacted (65 CNEL) or effected (near CNEL) within 10 miles and explain for each alternative how they would be impacted.

Response:

The language referenced by the commentor is included in the "Introduction and Executive Summary" of the SPAS Draft EIR. The commentor is directed to the detailed noise impact analysis for the SPAS alternatives which is included in Sections 4.9 and 4.10.1 of the SPAS Draft EIR. For discussion of impacts to schools (i.e., "Classroom Disruption") the commentor is directed to SPAS Draft EIR Section 4.10.1.4.3 (for discussion of the impact analysis methodology) and Section 4.10.1.6 (for the impact analysis). As also discussed in Section 4.10.1.2.2. of the SPAS Draft EIR, the analysis "provides a comprehensive list of grid points, including a set of regularly spaced points throughout the aircraft noise study area, and the locations of identified non-residential noise-sensitive facilities, such as schools, places of worship, hospitals, nursing homes 'hospital convalescent,' parks, and libraries. Table 1 in Appendix J1-2, Grid Point Noise Levels, lists the grid point types and locations. The locations, by type, are also illustrated in Figure 4.10.1-6 through Figure 4.10.1-9." Impacts to noise-sensitive land uses are discussed in Section 4.10.1.6 of the SPAS Draft EIR, which also summarizes impacts by land use (e.g., Table 4.10.1-9). The level of detail provided in the SPAS Draft EIR is consistent with Section 15151 of the State CEQA Guidelines.

A more detailed listing of noise-sensitive uses (including schools, convalescent hospitals, and hospitals) for Alternatives 1 through 7 is provided in Appendix I-2. For example, Table 10 in SPAS Draft EIR Appendix I-2 of the SPAS Draft EIR provides a detailed listing of noise-sensitive uses under Alternative 1 in comparison to existing conditions.

The comment also suggests using a geographic scope of "10 miles." The geographic scope for the CNEL aircraft noise analysis in Section 4.10.1 is shown in Figure 4.10.1-6. The geographic scope was selected to include all areas that could potentially be affected by the SPAS alternatives, consistent with State CEQA Guidelines Sections 15125(a), 15126.2(a), 15204(a). As stated on pages 4-641 through 4-645 in Section 4.9.2.2 of the SPAS Draft EIR, significant noise impacts are primarily associated with exposure to noise levels of 65 CNEL or higher, which does not extend to areas as remote as 10 miles from LAX. As shown in Figure 4.10.1-14, the Alternative 1 65 CNEL contour to the north is approximately .47 mile north at its farthest point from the northernmost runway. The level of detail provided in the aircraft noise analysis permits "decision-makers with information which enables them to make a decision which intelligently takes account of environmental consequences." (State CEQA Guidelines Section 15151.)

SPAS-PC00130-470

Comment:

Please explain why Alternative 6 page 1-83 would have the least impacts? Then on page 1-84 you state Alt 5 would result in the least change followed by Alt 1, Alt 6, Alt 7, Alt 3, Alt 2 & Alt 4. Why do these studies disagree with each other? How can moving runways compare to not moving runways in new impacts? Explain in detail how these results were reached? Who did the studies?

Response:

As shown in Tables 1-16 and 1-18 of the SPAS Draft EIR, Alternative 6 would have the least impacts for the number of residential units, population, and non-residential noise-sensitive facilities that would experience a noise increase of 1.5 CNEL or higher within the 65 CNEL or higher noise contours.

As shown in Table 1-17 and described on page 1-84 of the SPAS Draft EIR, Alternative 5 would result in the least change in number of dwelling units exposed to 65 CNEL compared to baseline 2009 conditions. Thus, Tables 1-16 and 1-18 are referring to noise increases while Table 1-17 is referring to the change in contour area. However, the text describing Table 1-17 incorrectly refers to Table 1-18; in response, page 1-84 of the SPAS Draft EIR has been revised. Please see Chapter 5, Corrections and Additions Related to the SPAS Draft EIR.

Please see Response to Comment SPAS-PC00130-126 regarding moving the runways and noise impacts on surrounding communities under Alternatives 1 through 7.

Please see Response to Comment SPAS-PC00130-209 regarding the noise model and assumptions that were used and Response to Comment SPAS-AL00006-8 regarding the calculation of population and dwelling units used for GIS. The studies were prepared by Ricondo & Associates and PCR Services Corporation based on input from LAWA.

SPAS-PC00130-471

Comment:

Lawa says page 1-96 that there will be no cumulative transit noise or vibrations from either the Spas Alternatives or the Crenshaw Metro LAX line. Since LAWA has no idea which Alternative they will use or what the Metro LAX line will look like how can they say that it won't be noisy and/or have vibrations? Who is responsible for this data?

Response:

The discussion of cumulative transit noise and vibration impacts cited by the commentor is only a brief summary of the more complete analysis provided in Section 5.5.10.4 for the SPAS Draft EIR. As described therein, the cumulative impacts analysis for the combination of SPAS alternatives that have a busway or APM transit system and the Metro Crenshaw/LAX Transit Corridor and Station is based on the respective alignments of each system and basic system design assumptions that are recognized in the FHWA Transit Noise and Vibration Impact Assessment Manual that is referenced in the analysis.

SPAS-PC00130-472

Comment:

Fire
LAX SPAS states "Airfield improvements under alternatives 1-7 would enhance the safety & efficiency of the airfield compared to base line conditions." How would Alt 1-7 enhance potential need for emergency fire response? Please explain each alternative separately. What improvements to fire stations is LAX planning? What are the LAPD Design recommendations? What does PS2 have to do with fire safety response? How does Fire and Police Facility space and sitting requirements increase response time? What is FAR? How does FAR ensure maintenance of adequate staffing?

Response:

Enhancements in the safety and efficiency of the airfield under Alternatives 1 through 7 would have a beneficial effect on emergency fire response as the enhancements would address current limitations in airfield design that place aircraft at an increased risk of hazards. Such hazards include, but are not limited to, potential collisions with other aircraft and insufficient side-by-side passing clearances between certain types of aircraft arriving/departing on runways and aircraft on nearby taxiways. By reducing the potential for such hazards, demand for fire services and emergency response in the event of such hazards would also be reduced. Regarding enhancements to the safety and efficiency of the airfield under each alternative, please see Table 4.7.2-16 on pages 4-569 and 4-570 in Section 4.7.2 of the SPAS Draft EIR.

As discussed in Section 4.11.1 of the of the SPAS Draft EIR, improvements to existing LAFD stations are not planned under SPAS Alternatives 1 through 9. However, as stated on page 4-1001 in Section 4.11.1, Fire Station 80 located at LAX was recently expanded to better serve future airport operations and Fire Station 5 was substantially increased in size when it was relocated in 2006.

LAFD Design Recommendations are described in LAX Master Plan Commitment FP-1, LAFD Design Recommendations, on pages 4-1003 and 4-1004 in Section 4.11.1 of the SPAS Draft EIR. As further described therein, prior to initiating construction of an LAX Master Plan component, LAWA would work with the LAFD to prepare plans that contain appropriate design features to ensure adequate emergency access, adequate fire flow, adequate street dimensions, building heights, and construction access.

LAX Master Plan Commitment PS-2, Fire and Police Facility Space and Siting Requirements, would ensure that, early in the design phase for implementation of LAX Master Plan elements affecting on-airport fire facilities, LAWA and/or its contractors would consult with LAFD and other agencies as appropriate, to evaluate and refine as necessary, program requirements for fire facilities. This coordination would ensure that final plans adequately support future facility needs, including space requirements, siting, and design. Consideration of siting and design is important to ensure that fire facilities are located optimally to facilitate emergency response and maintenance of adequate response times.

As indicated on page 4-994 of the SPAS Draft EIR, FAR refers to Federal Aviation Regulations that mandate many aspects of fire protection and emergency response services at LAX, including equipment types, personnel training, vehicle response times, and readiness. Regarding how FAR ensures maintenance of adequate staffing, as further discussed on page 4-994 in Section 4.11.1 of the SPAS Draft EIR, LAFD Station 80, located at LAX, is an Aircraft Rescue and Fire Fighting (ARFF) facility regulated under FAR. Fire Station 80 is mandated to meet three-minute response times to airfield emergencies in accordance with ARFF requirements. In addition, FAR 139.315-319 requires the provision of sufficient rescue and fire fighting personnel capable of meeting response times, minimum fire suppressant agent discharge rates, and maintenance of emergency access roads.

SPAS-PC00130-473

Comment:

LAX Spas states "Construction of ground access improvements under Alt 1, 2, 3, 4, 8 & 9, would reduce traffic congestion & curb front demands", How? In reading of the alternatives I have seen no improvements to widening streets, removing buses, moving cabs or even improving side walk space for pedestrians, Why? Without measures to access from behind, between, & in front I don't see an improved traffic flow, why didn't LAWA put in an emergency vehicle only access?

Response:

The SPAS Draft EIR defines a series of alternatives that have been analyzed to assess anticipated operations at the 78.9 million annual passenger (MAP) traffic activity levels, identify potential impacts, and define appropriate mitigation measures to address impacts within the Central Terminal Area (CTA). As described in Section 4.12.1.9.5 of the SPAS Draft EIR, the SPAS alternatives would not have significant impacts on curbside operations compared to baseline (2009) conditions. As described in

Section 4.12.1.10.2 of the SPAS Draft EIR, the SPAS alternatives would have cumulatively considerable impacts on curbside operations compared to 2025 future conditions, but these impacts can be mitigated to less than cumulatively considerable levels by Mitigation Measures MM-ST(OA) (SPAS)-1 and MM-ST(OA) (SPAS)-2, neither of which would require expanding the amount of curbside space. MM-ST(OA) (SPAS)-1 would provide additional curbside frontage for private vehicles to pick up passengers by relocating the existing taxi loading zone at TBIT to the curved portion of the curbside between TBIT and Terminal 4. MM-ST(OA) (SPAS)-2 would reduce the total number of shuttles accessing both the arrivals and departures level curbsides by implementing single level busing operations as described in Section 4.12.1.10.2 of the SPAS Draft EIR. For example, by converting rental car shuttles to a single level operation on the departures curbside, these shuttles would no longer operate on the arrivals level curbside, thereby reducing the number of vehicle trips on the arrivals level curbside. Similarly, converting the current dual level hotel shuttle bus operation to single level operation on the arrivals level would reduce the number of trips on the departures level as hotel shuttles would no longer use the Departures level roadways.

As described in Section 4.12.1.6 of the SPAS Draft EIR, all of the SPAS alternatives seek to reduce the CTA traffic by redistributing traffic to various off-site facilities such as the Intermodal Transportation Facility and the Consolidated Rental Car Facility (CONRAC). Section 4.12.1.6.1 discusses the key elements of each SPAS alternative related to on-airport transportation. Please also see Responses to Comments SPAS-PC00130-150 and SPAS-PFA00001-4.

SPAS-PC00130-474

Comment:

Law Enforcement
LAX-Spas states page 1-97 "Airfield improvements under Alt 1-7 would enhance safety and efficiency of the airfield compared to base line conditions, thereby decreasing demand on law enforcement services & personel associated with airfield accidents." I thought that the entire purpose of making airfield improvements was to handle more planes, passengers, and cargo thereby increasing demand on law enforcement. If airfield improvements bring no further business and the nasa-aims study shows the airfield safe why pay billions of dollars to save the cost of a police officer's salary?

Response:

As detailed in Section 2.2 of the SPAS Draft EIR, the purpose of the airfield improvements associated with the SPAS alternatives is to support the safe and efficient movement of aircraft at LAX. The commentor is correct that the summary of law enforcement impacts on page 1-97 of the SPAS Draft EIR concludes that increased airfield safety would decrease demands on law enforcement service and personnel associated with airfield accidents. Although this is a benefit of the airfield improvements, it is not the purpose of these improvements. The statement by the commentor that greater numbers of passengers would increase demands on law enforcement is consistent with the findings of the SPAS Draft EIR. Section 4.11.2.6 of the SPAS Draft EIR concludes that development of new terminal areas and ground access facilities, and the increase in passenger activity over time, could increase demand for law enforcement services and police functions compared to baseline conditions. (Note that the increase in passenger activity over time would occur with or without the SPAS alternatives, as stated on page 1-13 of the SPAS Draft EIR.) Please also see Response to Comment SPAS-PC00130-307 regarding law enforcement services. Please refer to Response to Comment SPAS-PC00130-168 regarding the North Airfield Safety Study and the opinion of the academic panel.

SPAS-PC00130-475

Comment:

How do you explain the reduction in curb-front demands? Are all collisions, automobile/pedestrian conflicts due to curb-front demands? Where did the study information come from? How did you reach these conclusions?

Response:

Reductions in curbside demands would result from the implementation of certain physical and operational improvements that would reduce the overall traffic activity accessing the Central Terminal Area (CTA) and redistribute these demands within the CTA curbside. Please refer to Response to Comment SPAS-PC00130-326 for additional information on the SPAS Draft EIR methodology used to analyze curbside operations impacts.

Automobile collisions can be the result of many factors, including driver inattention and carelessness; therefore, all automobile collisions and automobile/pedestrian conflicts are not due to curb-front demands. Please refer to Response to Comment SPAS-PC00130-361 for additional information pertaining to automobile collisions and considerations related to the on-airport traffic analysis for SPAS.

SPAS-PC00130-476

Comment:

Where would LAX be placing the new LAX public safety building? Has that added traffic been added to the LAX traffic plan?

Response:

As discussed in Section 1.4 on page 1-98 of the SPAS Draft EIR, under the heading of "Law Enforcement," at the time the SPAS Draft EIR was prepared, the location, timing and characteristics of the replacement LAX Public Safety Building and Supporting Facilities have yet to be determined.

Therefore, traffic associated with the replacement LAX Public Safety Building and Supporting Facilities was not specifically included in the SPAS Draft EIR ground access analyses; however, given that the proposed facilities would replace existing facilities already located at and near the airport (i.e., associated trips are already in the baseline conditions), and travel to and from both the existing facilities and the proposed facilities would largely be internal or local to the airport, it is not expected that inclusion or exclusion of the LAX Public Safety Building and Supporting Facilities would have a material effect on the SPAS traffic analysis.

SPAS-PC00130-477

Comment:

Curbside Operations
It appears that only curbside operations at the TIBIT have been analyzed, why? Does LAWA not expect any other increases at the other 10 terminals? Why not? It appears that the concerns are only at the arrival levels not at departures?

Response:

Both arrival and departures level curbside operations at each terminal have been analyzed under all alternatives in Section 4.12.1 of the SPAS Draft EIR. The SPAS Draft EIR addresses the curbside operations analysis in Section 4.12.1.8.1. As described in Section 4.12.1.9.5 of the SPAS Draft EIR, the SPAS alternatives would not have significant impacts on curbside operations compared to baseline (2009) conditions. As described in Section 4.12.1.10.2 of the SPAS Draft EIR, the SPAS alternatives would have cumulatively considerable impacts on curbside operations compared to 2025 future conditions, but these impacts can be mitigated to less than cumulatively considerable levels by Mitigation Measures MM-ST(OA) (SPAS)-1 and MM-ST(OA) (SPAS)-2, neither of which would require expanding the amount of curbside space.

As described in Section 4.12.1.6 of the SPAS Draft EIR, all of the SPAS alternatives seek to reduce the CTA traffic by redistributing traffic to various off-site facilities such as the Intermodal Transportation Facility and the Consolidated Rental Car Facility (CONRAC). Section 4.12.1.6.1 discusses the key elements of each SPAS alternative related to on-airport transportation. Please also see Responses to Comments SPAS-PC00130-150 and SPAS-PFA00001-4.

SPAS-PC00130-478

Comment:

Intersections p 1-96
Says only intersections impacted is World Way South & Center Way and yet in many of the SPAS alternatives they speak of realigning Lincoln Blvd and bigrating of Sepulveda why weren't these intersections studied?

Response:

The comment appears to refer to a statement on page 1-98 summarizing the finding of the SPAS Draft EIR on-airport transportation analysis that only one on-airport intersection would be significantly impacted under the SPAS alternatives. (Page 1-96 is cited in the comment; however, the statement appears on page 1-98 of the SPAS Draft EIR.) The comment asks why changes to Lincoln Boulevard and Sepulveda Boulevard were not studied. The intersection of Lincoln Boulevard and Sepulveda Boulevard (study intersection 108) was among the 200 intersections analyzed in the SPAS Draft EIR in Section 4.1.2.2 (Off-Airport Transportation). The intersections studied in the off-airport transportation analysis are listed in Table 4.12-2-1. Under Alternatives 1, 5, and 6, runway modifications would require the realignment of a portion of Lincoln Boulevard but, following construction, there would be no capacity reduction on Lincoln Boulevard and no impact to the intersection of Lincoln and Sepulveda Boulevards from any alternative under any scenario.

SPAS-PC00130-479

Comment:

Off Airport Transportation (1-99)
Table 1-24 chart makes no sense. New studies should be run and someone who speaks english should write a more comprehensive set up. Please explain what CMP stands for? Why aren't numbers that represent vehicle shown? Why aren't more mass transit answers added in? Why hasn't LAX complied with the rest of the flyaways required by their settlement agreement? Free or extremely cheap mass transportation could cut traffic and free up parking places. Construction workers could be picked up at remote locations and bussed to work. They could be safety cleared at other than LAX.

Response:

Table 1-24 in the SPAS Draft EIR provides a summary comparison of the results of the off-airport transportation impact analysis for each SPAS alternative. It is similar in format to many other summary tables presented in Chapter 1, which delineate whether specific types of impacts associated with each alternative are Significant and Unavoidable (SU) or Less Than Significant (LS). In the case of Table 1-24, the number of intersections/facilities with impacts that are Significant and Unavoidable is also indicated in parentheses beside each SU designation. "CMP" stands for Congestion Management Program, and as indicated on page 4-1196 and in Chapter 10, Acronyms, of the SPAS Draft EIR, is also commonly referred to as "Congestion Management Plan." Vehicle trip generation estimates for the Existing (2010) Baseline and Future (2025) Alternatives are presented in Table 4.12.2-10, with additional detail provided in Appendix K2-8. Estimates of potential increases in public transit use are related to the total estimated vehicle trips under each scenario and are presented in Table 4.12.2-6 on page 4-1201 of the SPAS Draft EIR.

Regarding additional FlyAway service required under the LAX Master Plan Stipulated Settlement, please see Response to Comment SPAS-PC00130-399.

The comment speculates that free or reduced price public transit could reduce traffic generated by LAX. The fare structure of public transit service is a policy matter determined by each transit operator. It should be noted that transit fares seldom cover the full costs of providing service and that reducing fares would require additional outside funding. The location of construction worker parking is addressed in LAX Master Plan Commitment ST-21, which is also applicable to the SPAS alternatives, described on

page 4-1229 of the SPAS Draft EIR, and seven potential locations for construction staging are described on pages 2-57 and 2-71 and depicted in Figure 2-15 of the SPAS Draft EIR.

SPAS-PC00130-480

Comment:

Energy
Because more passengers use more power, water, and natural gas, why hasn't LAX put in solar & wind power the flat roofs should make enough to cover not only the needs of the airport but some of the surrounding areas? Why haven't they switched from natural gas to electric and use solar & wind turbine power?

Response:

As described in Section 4.13.1.3 of the SPAS Draft EIR, LAWA has an ongoing commitment to increasing energy efficiency and implementing energy conservation measures at its airports. Measures implemented to promote energy efficiency and conservation are outlined in Section 4.13.1.3. As discussed therein, "energy conservation initiatives have resulted in a 7 percent decrease in per passenger energy consumption at LAX between 2008 and 2009." Furthermore, as discussed on page 4-1331 of the SPAS Draft EIR, LAWA purchases its power from the LADWP, which generated 20 percent of its power from renewable resources in 2010, and is planning to increase this value to 33 percent by 2020. LADWP's renewable energy sources include solar, wind power, and other renewable sources described in the SPAS Draft EIR. Please see Response to Comment SPAS-AR00002-8 regarding on-site solar power.

LAWA does not currently have any plans to install wind turbines at LAX. As with solar power generation, wind power requires a large amount of land, as well as appropriate wind conditions. In addition, installation of low profile wind turbines near the runways would need to be consistent with FAA requirements pertaining to Runway Safety Areas, Object Free Areas, and Obstacle Free Zones. Specifically, a 1.5 megawatt (MW) wind turbine of a type frequently seen in the United States has a tower 80 meters (260 feet) high.1 A 1.5 MW wind turbine, which is on the smaller side of the range of commercial wind turbines currently in operation around the world, which range from approximately 0.6 MW to 8.0 MW (based on a list of the different models of wind turbines from the top 10 wind turbine manufacturers),2 would typically have a rotor diameter (i.e., the area swept by the turbine blades) of approximately 70 meters (230 feet), as in the case of a 1.5 MW GE Model 1.5i wind turbine.3 As such, the total height of a 1.5 MW wind turbine would be approximately 375 feet. The base elevation of LAX is approximately 125.5 feet above mean sea level (MSL), which means that the installation of a 1.5 MW wind turbine at LAX would reach of height of approximately 500 MSL (125.5 feet MSL base elevation plus 375 feet). Figure 4.7.2-1 of the SPAS Draft EIR illustrates the Federal Aviation Regulation (FAR) Part 77 Imaginary Surfaces associated with any commercial runway, indicating the various imaginary surfaces within which any penetration of those surfaces represents a potential concern relative to the safe operation of aircraft at and around the runway. For LAX, the transitional surfaces at the ends of the runways extend up to approximately 276 feet MSL (125.5 MSL base elevation plus 150 feet), which means that placement of such a wind turbine near the ends of the runways would penetrate that imaginary surface by more than 224 feet. Similarly, the Horizontal Surface illustrated in Figure 4.7.2-1, which extends well around the sides of LAX is also set at the 276 feet MSL elevation, which means placement of the wind turbine anywhere to the side of the runways would also penetrate that imaginary surface by 224 feet. In moving farther away from the airport and into the Conical Surface illustrated in Figure 4.7.2-1, per the Airport Master Plan Airport Layout Plan, a 500-foot tall object would have to be more than approximately 14,000 feet (2.65 miles) from the runways in order to not penetrate that surface.4 Such a wind turbine placement would be well beyond the limits of the airport property.

As indicated in Section 4.13.1 6 of the SPAS Draft EIR, a sufficient supply of electricity and natural gas is expected to be available to serve the SPAS improvements.

1. http://en.wikipedia.org/wiki/Wind_turbine, accessed December 27, 2012.
2. http://en.wikipedia.org/wiki/Wind_turbine, accessed December 27, 2012.
3. http://en.wikipedia.org/wiki/Wind_turbine, accessed December 27, 2012.

4. City of Los Angeles, Los Angeles World Airports, Airport Master Plan Airport Layout Plan, Sheet 13, FAR Part 77 Approach Surfaces, prepared by Landrum & Brown, Draft April 28, 2004.

SPAS-PC00130-481

Comment:

I know LAX uses gray water for their land scaping but they sit on top of one of the largest springs in southern California why aren't they tapping that water, cleaning it and using it to support their own water supply?

Response:

As discussed on page 4-1380 in Section 4.13.4 of the SPAS Draft EIR, Los Angeles Department of Water and Power (LADWP) provides water service to the LAX area. LADWP obtains its water supplies from (1) the Owens Valley and Mono Basin via the Los Angeles Aqueduct; (2) northern California and Colorado River imports purchased from the Metropolitan Water District of Southern California; and (3) local groundwater basins. In order to determine whether the increase in water use associated with the SPAS alternatives would be significant, projected water demands were compared with LADWP's projections regarding future water supply. As described in the SPAS Draft EIR, LADWP projects that there will be adequate water supply to meet City demands through 2035, including demands associated with LAX. There are no municipal water wells at LAX.

SPAS-PC00130-482

Comment:

Transportation-Related Fuel
LAX states that on page 1-101 that a substantial portion of the increase in fuels is associated with an increase in flight operations. Why hasn't LAWA required the use of more fuel efficient planes? Why hasn't solar power been substituted for other fuels? More efficient forms of organization also can save fuel like grouping all of the LAX office people together and using car pool type shuttles. Electric vehicles to shuttle employees in the airport and passengers in the terminal areas supported by solar energy and or wind makes greater fuel unnecessary. Why hasn't LAWA investigated more environmental means of expansion?

Response:

LAWA does not have the legal or practical authority to set aircraft design standards such as aircraft fuel efficiency, which are controlled by the federal government, the FAA, and aircraft manufacturers. Furthermore, as discussed on page 4-1330 of the SPAS Draft EIR, airplanes are becoming more fuel efficient: "New aircraft are 70% more fuel efficient than 40 years ago and 20% better than 10 years ago. Airlines are aiming for a further 25% fuel efficiency improvement by 2020. Modern aircraft achieve fuel efficiencies of 3.5 liters per 100 passenger kilometers. The [Airbus] A380 and [Boeing] B787 are aiming for 3 liters per 100 passenger kilometer [approximately 78 miles per gallon]."

The commentor also asks why solar has not been substituted for other fuels. To the extent the commentor is referring to electricity generation for use at on-site facilities, please see Responses to Comments SPAS-PC00130-480 and SPAS-AR00002-8. To the extent the commentor is referring to incorporation of solar power into airplanes, such a suggestion is infeasible to fully power multi-passenger commercial aircraft. As described in the previous paragraph, LAWA does not have the legal authority to mandate plane design, nor would solar power on passenger planes provide sufficient energy to noticeably offset fuel consumption since the weight of such panels would offset any energy they produce.

LAWA has an ongoing commitment to increasing energy efficiency and implementing energy conservation measures at its airports. Please see Response to Comment SPAS-PC00130-390 regarding programs undertaken at LAX to reduce emissions from ongoing airport activity, including converting LAWA fleet vehicles to alternative fuels, promoting electric automobile use, and encouraging

use of transit and carpools/vanpools. Please see page 4-417 of the SPAS Draft EIR and Response to Comment SPAS-AR00002-19 for discussion of LAWA's existing employee carpool/vanppol program.

SPAS-PC00130-483

Comment:

Do they have programs for mulching of paper products and recycling of plastic? If so why aren't such programs detailed? Do you have some program from the concessions? If so please describe? What are the largest sorces of solid waste from LAX?

Response:

Please see Response to Comment SPAS-PC00130-210 regarding recycling programs at LAX. According to a waste characterization study conducted in 2000, the largest solid waste sources at LAX were construction and demolition generators (27 percent) and terminal areas (26 percent).1 Paper and organics were the largest components of the solid waste stream, accounting for 42.8 percent and 32.7 percent of the overall waste stream by weight, respectively. Cardboard, metals, and wood pallets are the largest constituents of the recycled waste stream.

1. City of Los Angeles, Los Angeles World Airports, LAX Waste Characterization and Quantification Study - Final Report, prepared by Cascadia Consulting Group, Inc., Mary Loquvan Consulting, Sky Valley Associates, and TerraStat Consulting, January 2002.

SPAS-PC00130-484

Comment:

Wastewater Generation
LAX states that on page 1-102 "The projected wastewater generation for each alternative could be accommodated by existing wastewater treatment facilities at the Hyperion Treatment Plants" Is LAX increasing their payments to hyperion? Is LAWA giving extra land to Hyperion to expand their facilities?

Response:

As discussed on page 4-1368 in Section 4.13.3 of the SPAS Draft EIR, Hyperion Treatment Plant (HTP) has a design capacity of 450 million gallons per day (mgd). Currently, there are no plans to expand the design capacity of HTP before 2025. Also, as discussed in Section 4.13.3 of the SPAS Draft EIR, the projected wastewater generation for each alternative could be accommodated by existing wastewater treatment facilities at HTP. LAWA and/or LAX tenants pay fees for wastewater disposal just like any other user.

SPAS-PC00130-485

Comment:

Water Supply
LAX states demand for water would be increased, why hasn't LAWA developed their own water source? By removing LAX water needs the city of Los Angeles would have less need to conserve and/or ration.

We appreciate the maximum use of reclaimed water, However we believe that LAX should supply their own water sorce.

Response:

Please see Response to Comment SPAS-PC00130-481 regarding water supply to LAX. As indicated in that response, LADWP projects that there will be adequate water supply to meet City demands through 2035, including water demands associated with LAX. Please also see Table 4.13.4-1 on page 4-1383 of the SPAS Draft EIR, which sets forth the percentage of LADWP water demand represented by LAX, both under baseline (2010) and projected (2025) water use for all of the SPAS alternatives. Therefore,

City of Los Angeles will not need to ration its water supply. LAWA will continue to implement and enhance water conservation measures at LAX, in fulfillment of LAX Master Plan Commitments W-1, Maximize Use of Reclaimed Water, and W-2, Enhance Existing Water Conservation Program, which would serve to reduce water use under the SPAS alternatives. In addition, development at the airport will be consistent with the LAX Street Frontage and Landscape Plan Update and Sustainable Airport Planning, Design and Construction Guidelines, which include a number of objectives and guidelines pertaining to water use at LAX.

SPAS-PC00130-486

Comment:

Evaluation of Amendments to the Specific Plan
What kind of administrative amendments to the specific Plan is LAX planning? Please describe each amendment for each alternative.

Response:

A description of potential Administrative amendments to the LAX Specific Plan are described in Section 6.1.2 of the SPAS Draft EIR and Section 7.2 of the Preliminary LAX SPAS Report. Such amendments include updating Municipal Code references to make sure they are consistent with the current Code, updating the Definitions section of the LAX Specific Plan to delete references to the Ground Transportation Center (GTC), Intermodal Transportation Center (ITC), and the like if a SPAS alternative other than Alternative 3 is selected, clarifying the LAX Plan Compliance Review process requirements, and other such changes as described in the sections cited above.

SPAS-PC00130-487

Comment:

Page 32

1.5 Environmentally Superior Alternative
North Airfield Improvements
1 The south complex was expanded to cover newer larger aircraft, then the FAA changed these qualifications. Although the north is currently handling the newer larger aircraft none of the alternatives as stated would accomplish the new FAA qualifications. Please explain the new FAA qualifications for the newer larger aircraft?

Response:

Alternative 5, as proposed in the SPAS Draft EIR, meets the minimum design requirements for a full Aircraft Design Group (ADG) VI airfield, including an ADG VI Category II/III outboard runway and an ADG VI Category I inboard runway. Taxiway E and Taxilane D dimensions would meet ADG VI standards. Section 2.3.1 of the SPAS Draft EIR provides the airfield characteristics for each of the north airfield reconfiguration options (Alternatives 1 through 7).

Additionally, please see FAA Advisory Circular (AC) 150/5300-13A Airport Design for more information on airport design standards for ADG VI aircraft.

SPAS-PC00130-488

Comment:

Why wasn't a one runway alternative considered? Explain why the only way to handle the newer larger aircraft would have been 1 runway with unmoved taxi ways.

Response:

The concept of having only one runway in the north airfield, leaving LAX with a three-runway system is described and evaluated in Section 2.3.2.3, Three-Runway Airfield, of the SPAS Draft EIR. This section

presents several operational problems associated with this alternative and indicates that it would likely result in environmental impacts comparable or greater to the alternatives evaluated in detail in the SPAS Draft EIR. Please also see Response to Comment SPAS-PC00130-1033 for additional discussion regarding operational problems and infeasibility of this airfield concept. The comment does not indicate any environmental advantages of a three-runway system relative to the alternatives evaluated in the SPAS Draft EIR. Therefore, this alternative was not evaluated in detail in the Draft EIR.

SPAS-PC00130-489

Comment:

Please describe FAA Engineering Brief No 75

Response:

Federal Aviation Administration (FAA) Engineering Brief (EB) No. 75, Incorporation of Runway Incursion Prevention into Taxiway and Apron Design, provides strategies for taxiway and apron design in order to help prevent runway incursions. The guidance provided within the EB was only a recommendation. However, since the publication of the EB, the guidance has been incorporated into FAA Advisory Circular (AC) 150/5300-13A, Airport Design. Paragraph 203 of the AC states that "the airport designer must keep basic concepts in mind to reduce the probability of runway incursions through proper airport geometry."

SPAS-PC00130-490

Comment:

What are ADG V and VI aircraft?

Response:

The acronym "ADG" stands for Aircraft Design Group and is used to group and characterize the various sizes of airplanes, ranging from ADG I, the smallest size including airplanes such as a Cessna 150, up to ADG VI, the largest size including airplanes such as the Airbus A380. As described on page 2-2 of the SPAS Draft EIR, the largest aircraft types currently in service in the U.S. are ADG V aircraft, such as the Boeing 747-400, and ADG VI aircraft, such as the Airbus A380.Table 1-2 of FAA Advisory Circular (AC) 150/5300-13A Airport Design outlines the tail height and wingspan requirements for Airplane Design Group (ADG) I through VI aircraft. Additionally, a table of aircraft and their representative ADG group can be found in Table A1-1 of Appendix 1 of FAA AC 150/5300-13A Airport Design. The AC also details airport design standards for ADG-V and ADG-VI aircraft.

SPAS-PC00130-491

Comment:

Why are you looking to accommodate a larger percentage of departing aircrafts? Before the South Air field project the airfields together could accommodate 100 MAP, now they can accommodate 120 MAP with out improvement, why spend billions of dollars when the airport is capped at 78.9 map?

Response:

The content of this comment is similar to comment SPAS-PC00130-397; please refer to Response to Comment SPAS-PC00130-397.

SPAS-PC00130-492

Comment:

Ground Access System

So far documents haven't stated how the roadway would be improved. Please explain the improvements? How do you plan on reducing "bottlenecks" and congestion? How are you planning to reduce the volume of private vehicles? What other alternative drop off and pick up areas are you developing? How much is LAWA counting on the metro Crenshaw station to reduce traffic?

Response:

Page 4-1094 through and 4-1096 in Section 4.12.1.6.2 of the SPAS Draft EIR describes the non-SPAS roadway improvements associated with the implementation of the Midfield Satellite Concourse (MSC) Passenger Process, Terminal 1.5, and Terminal 2.5. Page 4-1178 in Section 4.12.1.10 of the SPAS Draft EIR describes Mitigation Measures MM-ST(OA) (SPAS)-1 and MM-ST(OA) (SPAS)-2 that would address SPAS-related impacts within the Central Terminal Area (CTA). In addition, Section 4.12.1.6 describes the improvements that would be in place under each of the SPAS alternatives. As described Section 4.12.1.11.2, the implementation of these improvements and operational changes would address the existing "bottlenecks" and anticipated congestion such that traffic-related impacts on the CTA departures-level and arrivals-level curbsides would be less than significant after mitigation.

Table 4.12.1-15 on Page 4-1103 of the SPAS Draft EIR shows the mode split assumptions for the on-airport traffic analyses. As shown in the table, it is anticipated that the volume of private vehicle volumes accessing the CTA would be reduced by 5% (calculated as 2.55% of 51.96% of total private vehicle traffic using the curbside in the arrivals peak hour) for certain SPAS alternatives due to the provision of "kiss-and-ride" facilities at the Intermodal Transportation Facility (ITF) and at the Ground Transportation Center (GTC) or Consolidated Rental Car Facility (CONRAC) near Manchester Square. Airline passengers would be dropped off or picked up at these locations remote from the CTA and then transported between the remote location and the CTA via a dedicated bus or Automated People Mover (APM).

The on-airport traffic analysis for the SPAS Draft EIR was prepared using a conservative assumption that transit (which includes rail associated with the Metro Crenshaw line) mode split would increase by 1.91% as compared with baseline conditions (i.e., from 0.59% to 2.50%). The assumption regarding the future use of rail was intentionally held to a low value for traffic analysis purposes in order to provide a conservative estimate of future roadway traffic volumes and potential impacts associated with CTA roadway traffic. As such, any increase in transit mode share above the nominal rate assumed in the analysis will provide additional CTA roadway benefits beyond those analyzed in the SPAS Draft EIR; however, the additional benefit of using this conservative approach is that LAWA is not "counting on" the Metro Crenshaw line to reduce traffic activity and associated impacts.

SPAS-PC00130-493

Comment:

Maintaining LAX's position
How has it been determined that LAX serves a key role in the region's economy? Since LAWA is providing jobs in the region, why hasn't LAWA completed the rest of the green lighted improvement projects?

Response:

Please see Response to Comment SPAS-PC00130-725 regarding the impact of LAX on the region's economy and Response to Comment SPAS-PC00130-394 regarding LAWA's progress towards implementation of non-Yellow Light LAX Master Plan projects.

SPAS-PC00130-494

Comment:

On improvements 153 passenger gates 2-4
This section makes no sense at all. How is LAWA making terminals 123 consistent? Are they all to be the same size? Are they to look the same?

Response:

It appears that the commentor is referring to the following statement under Section 2.2 "Project Objectives," Object 4 "Plan Improvements That Do Not Result in More than 153 Gates:" "In identifying and evaluating alternatives to the demolition of Terminals 1, 2, and 3, LAWA is seeking to maintain consistency with the LAX Master Plan design for a total of 153 passenger gates, which was based on a future passenger activity level of 78.9 million annual passengers (MAP) at LAX in 2015."

This statement does not indicate that Terminals 1, 2, and 3 would be the same size or designed to look the same, as suggested by the commentor, but rather the objectives associated with completion of the SPAS project to fulfill Section 7.H of the LAX Specific Plan in accordance with the Stipulated Settlement. As indicated in Section 2.2 of the SPAS Draft EIR, the demolition of portions of Terminals 1, 2, and 3 is a Yellow Light Project being addressed as part of SPAS. As indicated in Section 2.3.1.3.2 and depicted in Figure 2-3 of the Draft EIR, under Alternative 3, which represents implementation of the LAX Master Plan as originally envisioned, portions of Terminals 1, 2, and 3 would be demolished and replaced by a linear concourse. As indicated in Table 2-2, Summary of SPAS Alternatives, and depicted in Figures 2-1, 2-2, 2-5, 2-6, and 2-7, Alternatives 1, 2, 5, 6, and 7 all include demolition of a portion of the Terminal 1 concourse and demolition and reconstruction of the Terminal 3 concourse and associated gates.

SPAS-PC00130-495

Comment:

Enhance Safety
When is LAWA planning on putting into effect the rand projects to 2004 solutions to safety? Why hasn't LAWA put in blast glass? Why hasn't LAWA installed a license plate reader at all egresses of the airport? Why aren't there more camera's in the CTA?

Response:

Please see Response to Comment SPAS-PC00130-424 regarding blast-resistant glass. LAWA's Police Division utilizes automated license plate reader (ALPR) technology throughout the airport and has made numerous arrests as a result of ALPR notifications. In addition, LAWA has expanded the number of close circuit television cameras throughout the airport, including within the CTA, to enhance security measures, manage traffic congestion, and increase situational awareness. Please see the SPAS Security Assessment provided in Appendix I of the Preliminary LAX SPAS Report for additional information on the security features of the SPAS alternatives.

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00130-496

Comment:

Minimize Environment Impacts
Easy way to minimize local environmental impacts is develop the other airports!

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Topical Response TR-SPAS-REG-1 regarding regionalization of air travel demand in Southern California.

SPAS-PC00130-497

Comment:

Why hasn't LAWA instituted any form of renewable energy (ie. solar, wind)?

Response:

The content of this comment is similar to comment SPAS PC00130-480; please refer to Response to Comment SPAS-PC00130-480.

SPAS-PC00130-498

Comment:

Knowing that rental cars are a huge problem why hasn't LAWA built a consolidated car rental?

Response:

Please see Responses to Comments SPAS-PC00130-185 SPAS-PC00130-443 for discussions of how certain SPAS alternatives include the development of a CONRAC.

SPAS-PC00130-499

Comment:

Why hasn't LAWA offered discounts to airlines who lessen their peak times take offs and/or landings?

Response:

In general, the Federal Aviation Administration (FAA) requires that airport operators make assurances that their facilities are available to airlines "on reasonable conditions without unjust discrimination." 49 U.S.C. 47107(a)(1). This policy restricts the ability of airport sponsors to lower fees for airlines that restrict their operations during peak times. While the FAA does allow an exception to this policy for certain congested airports, LAX does not meet the criteria for such an exception as set forth in 49 U.S.C. 47107(q).

SPAS-PC00130-500

Comment:

7. Producing an Improvement Program pg 2-4
The document says improvements are a major undertaking, our experts are saying that LAWA is majorly underestimating costs, construction time, and starting with the most dangerous of the projects. If the experts are correct and the amount to fund the projects is over 100% more than predicted how does LAWA plan on paying for the projects? If severe damage is done because of the manchester tunnel, or the Argo flood channel how does LAWA plan on paying for that? How much money exsists in the current insurance policy? Could the current insurance cover 35 billion? How long would it take LAWA to sell bonds to cover 35 billion? How sustainable would LAX be? How does this situation keep LAX fiscally responsible? How long is LAWA guessing that the north airfield will be closed? Can the south airfield handle all of the traffic currently on the north airfield? If so for how long? If terminals 1,2 and 3 aren't approachable from the north or south airfield what is LAWA's plan for those airlines currently using those terminals?

Response:

The questions raised in the comment go beyond the scope of what is required in an EIR prepared pursuant to CEQA, and no further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the

SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)). Nevertheless, LAWA provides the following response for informational purposes.

Please note that the comment presents personal opinions about the costs, construction time, and phasing of the SPAS alternatives that are not supported by facts or evidence. A detailed discussion of the estimated costs and funding sources for the alternatives is provided in Section 8 of the Preliminary LAX SPAS Report. As described therein, if assumed funding sources are not available in the future, certain projects would be deferred until funds become available. If the commentor is referring to general liability for individual construction projects associated with the alternatives analyzed in the Preliminary LAX SPAS Report and SPAS Draft EIR, that is outside the scope of CEQA. CEQA requires that a lead agency provide an analysis of the project's significant physical impacts on the environment; it does not require a discussion of liability. (State CEQA Guidelines Section 21068.)

Please see Response to Comment SPAS-PC00130-41 regarding phasing. As discussed in that response, the SPAS Draft EIR is a programmatic document. Therefore, because there are no specific improvement or modification designs, the nature or length of restrictions on the north airfield are unknown. A project-level environmental review would be conducted for individual projects prior to construction, including impacts associated with restricting operations on the north airfield during construction, should an alternative that proposes north airfield construction be chosen. North airfield construction would be phased to minimize disruption to the north airfield and north airfield terminals.

SPAS-PC00130-501

Comment:

2.3.1 Alternatives Addressed in Draft EIR
Other than a quick mention of Alt D I haven't seen any plans for development of the ground transportation Center. Where are the plans for the GTC? What plans are being made for the baggage tunnel? In the original Alt D most of the GTC safety was based on non-esxistent technology what is LAWA planning on instead? What are the associated structures and equipment you are referring to?

Response:

As described in Section 2.3.2 of the SPAS Draft EIR, the primary focus of the SPAS is on potential alternatives to the LAX Master Plan improvements defined in the Stipulated Settlement as the Yellow Light Projects. One of the Yellow Light Projects is the development of the Ground Transportation Center (GTC), including the baggage tunnel, associated structures and equipment. As such, all of the SPAS alternatives, with the exception of Alternative 3 which represents the implementation of the LAX Master Plan (Alternative D), propose alternatives or "options" to the GTC. Such options to the GTC are described under the heading of "Ground Access Facilities, in the descriptions of Alternatives 1, 2, 4, 7, and 8 in Section 2.3.1 of the SPAS Draft EIR. (Alternatives 5, 6, and 7 focus on airfield and related terminal improvements which can be paired with the ground access improvements under Alternative 1, 2, 8, or 9) The GTC is discussed in Section 2.3.2.2 of the 2004 LAX Master Plan. The LAX Master Plan was a programmatic document, and the improvements contemplated do not have project-specific details, and would require further environmental review.

As described on page 2-6 of the SPAS Draft EIR, under the LAX Master Plan, the function of the GTC is to replace CTA curb front for drop off and pick up of passengers and to replace a portion of the private vehicle parking area and all of the commercial vehicle (e.g., taxis, shuttle vans, and limousines) staging area. The GTC was designed to allow closure of the CTA to private vehicle access and provide the curb front function at a location well-removed from the main terminal area to enhance security within the CTA. The GTC, in conjunction with the Intermodal Transit Center (ITC) and other parking facilities proposed as part of the LAX Master Plan, also provided replacement parking for the existing parking that would be eliminated under the LAX Master Plan, such as in the CTA and Parking Lots C and D.

As discussed on page 2-8 of the SPAS Draft EIR, "The nine SPAS alternatives addressed within this Draft EIR were formulated at a programmatic level of conceptual planning, and no design or engineering plans, or construction phasing plans or schedules, are available for any of the alternatives." The specific design, for the GTC, baggage tunnel and associated facilities are all considerations that will be determined and addressed at the project level, should Alternative 3 be approved. It is appropriate

for a first-tier, program level EIR to defer detailed descriptions and impact analysis of individual projects in the program to future project-level CEQA documents. (State CEQA Guidelines Section 15383; Koster v. County of San Joaquin (1996) 47 Cal.App.4th 29, 37.). Please see Response to Comment SPAS-PC00130-235 for a discussion of the appropriateness of the programmatic review conducted for the SPAS project.

The commentor provides no indication of what is meant by "In the original Alt D most of the GTC safety was based on non-existent (sic) technology…", consequently it is not possible to respond to that comment.

SPAS-PC00130-502

Comment:

The automated people mover is currently in Alt 9 as well as Alt 3 what are the differences? Where are the stations and related facilities & equipment going to be? How will the check in center for the new mid-field project effect the people mover?

Response:

The most notable difference between the APM system in Alternative 9 and the APM system in Alternative 3 is in the basic function of the APM, which translates into different designs for the APM system in the two alternatives. Under Alternative 3, the CTA would be closed to private vehicles and only FlyAway buses would have direct access to and from the CTA. As such, an extensive APM system is proposed under Alternative 3 to link the CTA with several new major transportation facilities where the vast majority of LAX passengers would be dropped-off, picked-up, or park. Under Alternative 9, the CTA remains open to private vehicles and a less extensive APM system, compared to Alternative 3, would be used to link the CTA with new transportation facilities designed to offer alternative access into the airport, reducing traffic within the CTA and encouraging use of public transit. The differences in the basic design of the APM system of the two alternatives are summarized below.

The APM system in Alternative 3, shown in Figure 2-3 on page 2-20 of the SPAS Draft EIR, consists of two separate APMs, one connecting the CTA to a CONRAC in the current Lot C area and to the ITC in Continental City, and the other connecting the CTA to the GTC in Manchester Square. The APM proposed for Alternative 9, as shown in Figure 2-9 on page 2-43 of the SPAS Draft EIR, is a single system connecting the parking and CONRAC at Manchester Square to the CTA, with a stop at the ITC and connectivity with the planned Metro Aviation/Century light rail station. The APM systems for both Alternative 3 and Alternative 9 extend into the CTA and will include multiple stations within the CTA for passengers to access the APM from different terminals. At the current program level of planning and evaluation, the exact number and locations of APM stations within the CTA have not yet been determined, but would be determined in conjunction with more detailed project planning in the future should Alternative 3 or 9 be selected for approval. This also applies to where and how passenger access would occur between the APM and the future Midfield Satellite Concourse passenger processor within the CTA, which has not yet been designed. Such is also the case relative to determining the specific alignment of the APM within the CTA, the system capacities during peak hours, and the APM system technologies to be utilized.

It is appropriate for a first-tier program level EIR to defer detailed descriptions and impact analysis of individual projects in the program, such as the APM and MSC Passenger Processor, to future project-level CEQA documents. (State CEQA Guidelines Section 15383; Koster v. County of San Joaquin (1996) 47 Cal.App.4th 29, 37.)

SPAS-PC00130-503

Comment:

Why is terminal 3 being demolished in all of the alternatives? What is the plan to deal with the black mold currently in terminal 3? Where will LAWA put the airlines currently using terminal while the terminal is out of commission? How long does LAX expect terminal 3 to be unusable? Will it take longer than the eight years that the TBIT is taking? What assumsions have been made regarding

terminal 3? Has the black mold progressed to the underground tunnel between terminal 3 and the Bradley?

Response:

As discussed in Section 2.3.1 under the section heading of "Terminal Improvements" on page 2-7 of the SPAS Draft EIR, under all of the alternatives except Alternative 4, a westerly realignment of the Terminal 3 concourse is proposed to provide a wider alleyway between the concourses at Terminals 2 and 3 for aircraft to taxi and operate. Please refer to the discussion of the assumed improvements to the Terminal 3 concourse in Section 2.3.1.1.2 on page 2-10 of the SPAS Draft EIR, and under the respective sections for the other alternatives within the section titled "Terminal Facilities."

As a program-level document, the SPAS Draft EIR does not include project-specific detailed information related to improvements of the Terminal 3 concourse, including airline assignment during construction, project duration, and other assumptions regarding Terminal 3. Such details would be evaluated in a project-level EIR for Terminal 3. Please see Response to Comment SPAS-PC00130-235 for a discussion of the appropriateness of the programmatic review conducted for the SPAS project.

Please refer to Response to Comment SPAS-PC00130-514 regarding allegations of "black mold" at Terminal 3.

It should be noted that the Bradley West Project has not been underway for 8 years. The NOP for the Bradley West EIR was published in December 2008 and the Final EIR was completed in September 2009. Construction began later that year, or approximately 3 years ago. Construction of the new concourses in the Bradley West Project is expected to be complete in 2013 and associated taxiway improvements, demolition of the old (existing) concourses, and relocation of existing gates to the east side of the new concourses are anticipated to occur by the end of 2015.

SPAS-PC00130-504

Comment:

What road improvements are associated with the development of the GTC and the APM? I haven't seen any list or chart detailing any of the improvements, why?

Response:

SPAS is designed to focus on potential alternatives to the Yellow Light Projects, which include on-site road improvements associated with development and construction of the GTC and APM. (See Section 2.3.1 of the SPAS Draft EIR.) Therefore, each alternative proposes different methods of fulfilling the goals of the Yellow Light Projects. Alternative 3 is the "no project" alternative and represents what would reasonably be expected to happen under the LAX Master Plan. Alternative 3 is the only alternative that includes both a GTC and APM, and the on-airport improvements associated with these faculties are discussed in Section 2.3.1.3 of the SPAS Draft EIR. The other alternatives provide for improvements that would serve as a replacement to the on-site road improvements associated with the development and construction of the GTC and APM. A discussion of the improvements associated with each alternative is provided in Section 2.3.1 of the SPAS Draft EIR.

As indicated in in Table 2-2, beginning on page 2-45, of the SPAS Draft EIR, only Alternative 3 includes a GTC and only Alternatives 3 and 9 include an APM. That table provides a summary of the SPAS alternatives and shows in matrix-format which elements are present in each alternative.

As stated on page 2-22 of the SPAS Draft EIR, two APMs would be constructed under Alternative 3, one "between the ITC and the GTC, along Aviation Boulevard and 96th Street, with a stop at the CONRAC" and another "between the GTC and the CTA, along Century Boulevard." Under Alternative 3, a new roadway system would be developed at the eastern end of the airport, and the existing access to the CTA via Sky Way and 96th Street would be removed. The new roadway system at the eastern end of the airport associated with the GTC, ITC, and parking facilities under Alternative 3 are depicted by purple lines in Figure 2-3 of the SPAS Draft EIR.

As stated on page 2-41 of the SPAS Draft EIR, the APM under Alternative 9 would be elevated and would operate "between Manchester Square and the CTA, primarily using the 98th Street corridor, including a bridge over Sepulveda Boulevard and stops at the future Metro LAX/Crenshaw Light Rail Transit Station at/near Century and Aviation Boulevards and the new Intermodal Transportation Facility (ITF). Within the CTA, the APM would be located on an elevated guideway above the upper level roadway, existing parking structures, or Center Way." Improvements would be made to Sky Way under Alternative 9, as described on page 2-38.

As discussed on page 2-8 of the SPAS Draft EIR, "The nine SPAS alternatives addressed within this Draft EIR were formulated at a programmatic level of conceptual planning, and no design or engineering plans, or construction phasing plans or schedules, are available for any of the alternatives." Please see Response to Comment SPAS-PC00130-235 for a discussion of the appropriateness of the programmatic review conducted for the SPAS project.

SPAS-PC00130-505

Comment:

Problems North Airfield assumptions
What parts of LAX meet FAA standards for ADG V and VI Aircraft without waivers? How does a centerline taxiway help with weather restrictions? If no centerline taxiway results in less incursions than why does the south airfield with a centerline have more incursions and larger rated than the north airfield?

Response:

LAX does not have an airfield, in either the north complex or the south complex, that is fully designed for the largest aircraft types currently in service (i.e., Aircraft Design Group (ADG) V and VI). Some taxiways or taxilanes, or a portion of a taxiway or taxilane, meet Federal Aviation Administration (FAA) standards for ADG V or VI aircraft. However, none of the runways at LAX are fully compliant with FAA standards, and Modifications of Standards (MOS) or waivers are in place.

The existing MOS or waivers applicable to the north airfield are described in the footnotes at the bottom of Table 4.7.2-8 of the SPAS Draft EIR.

There are numerous safety benefits of a centerline taxiway. For a detailed discussion of the safety and operational benefits of a centerline taxiway, please see Responses to Comments SPAS-PC00130-63, SPAS-PC00130-260, and SPAS-PC00135-2. While the addition of a centerline taxiway does promote safety, it does not necessarily help with weather restrictions. Instead, runway-to-taxiway and runway-to-runway separation requirements govern the types of aircraft that may operate on runways in good and poor weather. (See Table 4.7.2-8 of the SPAS Draft EIR.)

Please see Response to Comment SPAS-PC00130-160 regarding the reduction in incursions on the south airfield following the completion of the South Airfield Improvement Project. The commentor does not provide any evidence in support of the conclusion that the south airfield has more incursions. Moreover, as described in the EIR, the addition of taxiways to the north airfield would improve its ability to accommodate large aircraft and reduce risk levels. (See Section 4.7.2 of the SPAS Draft EIR.) Please also see Response to Comment SPAS-PC00130-260 for a discussion of the decrease in runway incursions on the south complex due to the addition of a centerfield taxiway.

SPAS-PC00130-506

Comment:

The Nasa-Aims safety report says that the runways as operational now are safe and the operation restrictions would be satistically insignificant. So why would LAWA want to risk 50 billion for little benefit? We've been told by experts that repairing of taxiways would improve operations as much as 20% and still be under 1 billion in expenses why is there no chart showing those improvements?

Response:

Please refer to Response to Comment SPAS-PC00130-168 regarding the North Airfield Safety Study and the opinion of the academic panel. The comment does not raise any environmental issue or address the adequacy of the environmental analysis included in the SPAS Draft EIR. Rather, it raises funding and economic questions, which need not be discussed because economic effects of a project shall not be treated as significant effects on the environment. (State CEQA Guidelines Section 15131(a).) Because a lead agency need only respond to comments that raise significant environmental issues, no further response is required. (State CEQA Guidelines Section 15204.) In any event, the commentor provides no substantial evidence in support of its assertions regarding cost, in particular the reference to risking $50 billion. Chapter 8 of the Preliminary LAX SPAS Report provides a financial analysis of the SPAS alternatives including cost estimates for each alternative. As summarized in Table 8-2 of that report, the cost estimates for the SPAS alternatives range from $1.66 billion for Alternative 4 up to $16.8 billion for Alternative 3. The commentor provides no identification of, or supporting analysis and facts from, the "experts" that indicated repairing of taxiways would improve operations by as much as 20 percent and be under one billion dollars.

SPAS-PC00130-507

Comment:

If the GTC is not being built replacement parking is an unnecessary expense, who pays to rebuild parking?

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Response to Comment SPAS-PC00130-325 regarding parking demand. LAWA would pay for parking facilities associated with the SPAS alternatives.

SPAS-PC00130-508

Comment:

Where is the SPAS document written by Cindy Missokski? Please repeat this document.

Response:

It is unclear what document is being referenced in this comment. Former Councilwoman Cindy Miscikowski was involved in the approvals for the LAX Master Plan and, in coordination with Mayor Hahn and others, developed the "Consensus Plan," which essentially constituted revisions to the LAX Specific Plan and LAX Plan to add a greater emphasis on regionalism; greater monitoring and oversight in regards to project implementation and traffic and passenger activity; provisions concerning stakeholder participation and annual reporting; and requirements pertaining to SPAS. The "Consensus Plan" was not a set of physical improvements; rather, it was a set of policies and requirements that were incorporated into the LAX Plan and LAX Specific Plan, both of which were adopted by the City Council in December 2004. The LAX Plan and the LAX Specific Plan are available at www.ourlax.org.

SPAS-PC00130-509

Comment:

To what extent would Lincoln blvd. need to be moved, changed, and/or closed? What else would need to change? Who would do the work on Lincoln Blvd? Would the sewer be moved while the street was closed? Would Sepulveda Blvd have to be closed while the sewer is being moved?

Response:

Please see Topical Response TR-SPAS-LR-1 for a discussion of the Lincoln Boulevard realignment associated with Alternatives 1, 5, and 6.

SPAS-PC00130-510

Comment:

You mention covering part of the Argo flood channel, how much of the channel are you covering? If it floods who is responsible for damages?

Response:

As noted on pages 2-10 and 2-29 of the SPAS Draft EIR, under Alternatives 1 and 5, the entire length (9,857 linear feet) of the Argo Drainage Channel would be covered. As noted on page 2-33 of the SPAS Draft EIR, under Alternative 6, 1,400 linear feet of the channel would be covered.

Issues regarding liability for damage associated with events at the airport, including flooding, are not germane to environmental issues and are beyond the scope of the SPAS Draft EIR. The comments are noted, are hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because these comments do not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00130-511

Comment:

By extending 1,200 eastward 6R/24L how would this balance large aircraft to the south airfield? Heavier aircraft are usually loaded with cargo and the cargo is located on the south would it increase taxi time and be an air pollution problem?

Response:

As discussed on page 5-80 in Section 5.5 of the Preliminary LAX SPAS Report, some long-haul passenger airline departures at Maximum Gross Take-off Weight (MGTOW) must bypass the north airfield in order to use the longer runway length available on the south airfield. The objective of balancing north and south airfield departures is related to eliminating instances in which aircraft defer to the south airfield, not displacing operations, which under normal operating conditions, would typically depart from the south airfield. As such, balancing of the airfield would likely result in a decrease in taxiing emissions due to smaller taxi distances to the departure runway. These factors were considered in the air quality impact analysis presented in Section 4.2 of the SPAS Draft EIR.

SPAS-PC00130-512

Comment:

RSA's 2-7
Any runway movement north will distrub the Westchester business district. How does LAX plan on compensating the business community? How does the airport plan on compensating the community for the jobs and the ability to have another business community? Will LAX give away land and new buildings to those businesses that will be displaced? Will they pay for moving

Response:

Regarding analysis of property acquisition impacts on the Westchester Business District associated with the RPZ, please see Responses to Comments SPAS-AL00007-26 and SPAS-PC00130-931. No acquisition is proposed within the Westchester Business District, as shown in Figure 2-11 and listed in Table 2-4 in Section 2.3.1.11 of the SPAS Draft EIR.

Regarding disruption of the Westchester Business District, it is not proposed or certain that such business would be displaced due to changes in RPZs. As discussed in Section 4.7.2.6.1 of the SPAS Draft EIR, there are various potential options for dealing with incompatible structures or land uses within

an RPZ including: (1) doing nothing (i.e., for low-risk objects); (2) placing high-visibility markings and lighting on the object to make it highly visible to pilots and indicating such objects on avigation maps; (3) lowering, reducing, or removing the object, and; (4) modifying an approach or departure procedure to allow aircraft to safely navigate around or above an object that penetrates a Part 77 surface. The most appropriate option(s) would be determined in conjunction with detailed airfield improvement engineering and would be subject to FAA review and concurrence prior to FAA approval of an ALP amendment for such an airfield modification. Such information would be developed during project-specific CEQA review should an alternative calling for shifting Runway 6L/24R northward be selected. It is appropriate for a first-tier program level EIR to defer detailed descriptions and impact analysis of individual projects in the program to future project-level CEQA documents. (State CEQA Guidelines Section 15383; Koster v. County of San Joaquin (1996) 47 Cal.App.4th 29, 37.)

CEQA does not require job losses and other purely social or economic impacts to be analyzed in an EIR (State CEQA Guidelines Sections 15064(e) and 15131(a)). Nevertheless, in the event it is determined in the future that relocation of an existing business is necessary, impacts associated with acquisition of the property and relocation of the business would be addressed in future project-specific CEQA documents, and by LAX Master Plan Commitment RBR-1 and LAX Master Plan Mitigation Measure MM-RBR-1.

SPAS-PC00130-513

Comment:

Separation of Taxiway and runway 2-7
Why doesn't LAX extend the taxiway into park 1 so that the taxiway so it could handle the NLA's? Your document states an intent to fix the taxiway in all alternatives and therefore there is no need to move the runway. Why does LAX insist on both?

Response:

As described and depicted in Section 2.3.1 of the SPAS Draft EIR, Alternatives 1, 2, 5, 6, and 7 include extensions for Taxiways D and E to the east to accompany the extension to Runway 24L. Among other things, these taxiways provide sufficient areas at the ends of the runways for holding arriving flights and sequencing departing aircraft. Alternative 5 will be designed to full Aircraft Design Group VI standards to handle New Large Aircraft (NLA). It should be noted that Alternatives 1, 2, 5, 6, and 7 do include extending the airfield operations area eastward into the existing Park One parking lot, through the proposed development of Terminal/Concourse 0. The alignments of Taxiways D and E lie north of Park One; hence, the eastward extension of those taxiways would not include Park One. Moreover, the lengthening of those taxiways is not what is needed for accommodating NLA, but rather it is the lateral separation between those taxiways and Runway 6R/24L that is the primary consideration relative to NLA.

Page 2-2 of the SPAS Draft EIR provides that the outdated airfield design creates a situation where aircraft are at increased risk of hazards. Those hazards include potential collisions with other aircraft and insufficient side-by-side passing clearances between certain types of aircraft arriving/departing on runways. As evidenced by Alternative 2, which proposes taxiway improvements but not runway relocation, the future, unrestricted operation of ADG V and VI aircraft is dependent upon runway relocation. (See Section 2.3.1.2 of the SPAS Draft EIR.)

Since the existing separation between the two northern runways is only 700', either runway must be shifted at least 100' to provide sufficient space for the installation of a centerline taxiway. Separation beyond the 100' would provide further standardization of operations for certain aircraft. Please see Responses to Comments SPAS-PC00130-63, SPAS-PC00130-260, and SPAS-PC00135-2 regarding the safety and operational benefits of a centerfield taxiway.

SPAS-PC00130-514

Comment:

Terminal improvements 2-7

Moving terminal 3 would result in LAX dealing with the black mold issue, How does LAX plan on dealing with the mold? Wouldn't moving T-3 cause building over the passenger underpass between T-BIT and T3? What improvements would be made to ensure the safety of pedestrians?

Response:

LAWA is not aware of "black mold issue" at Terminal 3, and the comment does not provide any evidence to support the implication that such an issue exists. In the event that mold or other contaminants are encountered during demolition of Terminal 3, or any other facility at LAX, and are determined to pose a potential health risk to those nearby, including workers and the general public, appropriate protective and materials management measures would be implemented in accordance with applicable federal, state, and local health and safety requirements.

The commentor inquires about the passenger underpass between TBIT and Terminal 3 as it relates to "moving" Terminal 3 and the safety of pedestrians. Please refer to a discussion of the improvements to Terminal 3 concourse discussed under Alternative 1 in Section 2.3.1.1.2 on page 2-10 of the SPAS Draft EIR, and under the other SPAS alternatives in their respective sections under the section heading of "Terminal Facilities." The team of architects and engineers assigned to the Terminal 3 improvements would ensure that improvements to Terminal 3 would not challenge the structural integrity of the underpass between Terminal 3 and TBIT, or any facilities located in the proximity of Terminal 3, and therefore would not create a risk to pedestrians. Any SPAS-related construction project that affects the normal operation of ground transportation would be subject to LAX Master Plan Commitment ST-18, which requires preparation of a Construction Traffic Management Plan (CTMP). Under the CTMP, project construction may be limited to certain times; message signs, arrow boards, temporary striping and other pedestrian construction advisory signs would be deployed; and pedestrian activity could be rerouted. (See page 4-1165 of the SPAS Draft EIR.) During construction, all standards of safety to pedestrians using facilities around Terminal 3 would be upheld.

SPAS-PC00130-515

Comment:

Where does LAX plan on eliminating gates so that terminal O and the mid field terminal don't excede the gate limit?

Response:

Please refer to Response to Comment SPAS-PC00130-188 regarding a discussion of the assumed passenger gate position layouts and gate counts in 2025.

SPAS-PC00130-516

Comment:

We were told during Spas meetings that underground access to a mid field terminal would not be possible because of underground issues or above ground because of the inability to predict the size of future planes. How does LAX plan on accessing the mid field? Are they going to do buses? If so why not just keep the remote gates? How much would a mid field terminal cost? What changes to an airport road are you planning? What specific transportation facilities are you planning? What changes to parking locations?

Response:

The Midfield Satellite Concourse is not a component of SPAS; rather, this project was approved as part of the LAX Master Plan and is currently undergoing preliminary engineering design and analysis. The MSC, including the concourse and gates, associated taxiways, and passenger processing facilities, will be subject to a project-level EIR when the project is proposed for implementation. As part of the design process, the means of accessing the MSC from the CTA will be determined. In the LAX Master Plan, an underground APM was assumed. In characterizing the conveyance as part of the analysis of cumulative impacts for SPAS, it was assumed that passengers would access the MSC via buses.

Please see Response to Comment SPAS-PC00130-409 regarding removal of remote gates with implementation of the SPAS alternatives. Changes to on-airport roadways within the CTA associated with implementation of the MSC passenger processor are described in Section 4.12.1.6.2 of the SPAS Draft EIR. As indicated in that discussion, these improvements are independent of SPAS, but were assumed to be in place and operational relative to the EIR analyses of future conditions in 2025. The costs associated with the MSC will be determined in the detailed planning being undertaken for that project. The costs of this facility are not germane to the analysis of environmental impacts associated with SPAS. Transportation facilities, including any changes in parking and airport roads, planned under the SPAS alternatives are described in Chapter 2 of the SPAS Draft EIR.

SPAS-PC00130-517

Comment:

How much money does the airport have put aside for the CONRAC? Where is the escrow account? Who is in charge of it? Why are they waiting to build it?

Response:

Questions pertaining to financing associated with the CONRAC and the CFCs being collected for the CONRAC are beyond the scope of the SPAS Draft EIR. Please see Response to Comment SPAS-PC00130-730 regarding the treatment of economic considerations in an EIR. Please see Response to Comment SPAS-PC00130-443 regarding the independent planning and consideration of a CONRAC at LAX by LAWA, and the relationship of that planning effort to SPAS.

SPAS-PC00130-518

Comment:

Overview 2-8
Alternatives 1-4 are "fully integrated" according to LAX plan, what does that mean? Does it mean we could build Alt 3 with Alt 4 and alt 9? Does that mean that all the studies done so far aren't completely accurate? Why would you build more than one alternative? What about 'non-Spas" projects? Doesn't building more than one project impact the environment impacts? How does it change air quality, solid waste, and traffic? Will you build an APM and a bus way?

Response:

Please see Response to Comment SPAS-PC00130-444 for an explanation of the term "fully integrated." As described on page 1-17 of the SPAS Draft EIR, Alternatives 3 and 4 are unique fully-integrated alternatives and are not considered to have elements that are "interchangeable" with the other SPAS alternatives. Therefore, Alternatives 3 and 4 would not be combined with Alternative 9. The fact that there is interchangeability between the components of Alternatives 1, 2, and 5 through 9 does not mean that the studies completed as part of the SPAS Draft EIR are not accurate. LAWA would not build more than one alternative although, as indicated on pages 1-17 and 1-18 of the SPAS Draft EIR, among Alternatives 1, 2, and 5 through 9, the airfield and terminal components of one alternative could be combined with the ground access components of another alternative. Therefore, LAWA would not build both a dedicated busway and a separate APM. The SPAS Draft EIR discloses the environmental impacts that would result from combining the airfield and terminal components of one alternative with the ground access components of another alternative. Non-SPAS projects are considered in the cumulative impacts analysis; see Section 5.3 of the SPAS Draft EIR.

SPAS-PC00130-519

Comment:

Alternative 1 2.3.1.1
What do you mean by fully integrated? All alternatives have airfield, terminal and ground access components. Are you adding more than one alternative at a time? There is no order in which improvements is listed why?

How long are you expecting the north airfield to be closed while these components are being built? Why aren't those disruptions included in the LAX costing?

Response:

Please see Response to Comment SPAS-PC00130-444 for an explanation of the term "fully integrated." As explained in that response, only Alternatives 1 through 4 have airfield, terminal, and ground access components. LAWA would implement only one set of improvements as part of SPAS. As indicated in Response to Comment SPAS-PC00130-444, there is interchangeability among Alternatives 1, 2, 5, 6, 7, 8, and 9, in which the airfield/terminal components from one alternative could be paired with the ground access components of another alternative. The improvements are generally listed in order of airfield components, terminal components, and ground access components. The SPAS Draft EIR is a programmatic document. Details regarding construction phasing would be determined during project-level planning for the north airfield.

SPAS-PC00130-520

Comment:

We've been told in many meetings that no land acquisitions will be necessary in order to build this alternative explain how this is possible? Why this plan hasn't included a consolidated car rental?

Response:

Please see Response to Comment SPAS-PC00130-287 regarding property acquisition associated with the SPAS alternatives and Response to Comment SPAS-AL00007-26 regarding the potential for acquisition of land uses within the RPZ. Alternative 1 does not include a CONRAC. A CONRAC is included in Alternatives 3, 4, 8, and 9.

As provided in Section 1.2.2 of the SPAS Draft EIR, ground access improvements consist of changes to on-airport and off-airport roads, the addition of specific transportation facilities, development of dedicated access, and changes in parking. While SPAS focused on alternatives to the Yellow Light Projects, the ground access improvements also considered non-Yellow Light Projects, such as the CONRAC. The SPAS alternatives propose ground access improvements that represent different combinations of options to the Yellow Light Projects. Because of the integral nature of these non-Yellow Light Projects, the SPAS alternatives include proposed modifications to, or proposed deletion of, these non-Yellow Light Projects. (See Section 1.2.2. of the SPAS Draft EIR.)

SPAS-PC00130-521

Comment:

How potential gates on the northside of tBIT won't interfer with the gates on the western side of terminal 3?

Response:

The commentor is inquiring about potential interferences between gates on the northside of Tom Bradley International Terminal (TBIT) and the western side of Terminal 3 Concourse. The comment was made following comments on Section 2.3.1.1 of the SPAS Draft EIR, which discusses Alternative 1.

Please see Figure B in Appendix F-1 of the Preliminary LAX SPAS Report which depicts the gate layout assumed under Alternative 1. Although the aircraft depicted in Figure B are shown for illustrative purposes only, these aircraft have been arranged with the appropriate safety areas around each of them and provide a good illustration of the area available within the alleys in between concourses. The depicted aircraft represent the largest aircraft that could be accommodated at each gate. Similarly to the alley between the Terminals 2 and 3 Concourses, operations in the alley between TBIT and Terminal 3 Concourse would be coordinated among LAWA and the operators, holding operations while aircraft taxi in or out of gates on the other side of the alley.

SPAS-PC00130-522

Comment:

Who will be responsible for the relocation of Lincoln blvd. What plans had the airport made for the utilities under Lincoln blvd? Why weren't those cost included in the project?

What portion of Lincoln Blvd would be below ground? Why hasn't there been any mention of sewers in that area?

Response:

Please see Topical Response TR-SPAS-LR-1 for a discussion of the Lincoln Boulevard realignment associated with Alternatives 1, 5, and 6.

SPAS-PC00130-523

Comment:

What improvements to Taxilane D are being proposed? Why is that an improvement? How much will that cost?

Response:

The taxiway improvements generated for the SPAS alternatives provide a range of operational capability and impacts to the airfield. The specifics regarding the taxiway improvements included in each alternative are also included in Sections 2.3.1.1 through 2.3.1.7 of the SPAS Draft EIR. Each section contains a subtopic titled 'Taxiway Modifications' which describes the specific details of the taxiway improvements. Table 4.7.2-8 of the SPAS Draft EIR provides a comparison of the benefits of Taxiway E and Taxilane D improvements in tabular format.

Cost or other financial considerations are not topics requiring analysis in an EIR. (State CEQA Guidelines Section 15131.) Nevertheless, please see Chapter 8 of the Preliminary LAX SPAS Report regarding financial information related to the development of the SPAS alternatives.

SPAS-PC00130-524

Comment:

What improvements to Taxiway E are being proposed? Why is that an improvement? How much will that cost?

Response:

The content of the comment is similar to comment SPAS-PC00130-523; please refer to Response to Comment SPAS-PC00130-523.

SPAS-PC00130-525

Comment:

What is the difference between a Taxilane and a Taxiway? Where is the current service road? Why do you want to relocate it?

Response:

Per Federal Aviation Administration (FAA) Advisory Circular (AC) 150/5300-13A, Airport Design, a taxiway is 'a defined path for the taxiing of aircraft from one part of an airport to another.' A taxilane is 'designed for low speed and precise taxiing. Taxilanes are usually, but not always, located outside the

movement area, providing access from taxiways to aircraft parking positions and other terminal areas.' Taxiways and taxilanes have different dimensional criteria as well.

The service road for the existing airport is located between Taxiway E and Taxilane D. Relocation of the service road from its existing location would reduce the amount of vehicular traffic that is required to enter the movement area. It would also reduce the separation required between Taxiway E and Taxilane D, minimizing the impact to the gates/concourses at Terminals 1, 2, and 3.

SPAS-PC00130-526

Comment:

Why are you calling the proposed new terminal zero? It sounds as if you are anticipating failure.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project.

LAX terminals are named in numerical order around the Central Terminal Area (CTA) starting with Terminal 1 through Terminal 8. For planning purposes, and because Terminal 0 (zero) would be located east of the existing Terminal 1, the new terminal was named Terminal "Zero." No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00130-527

Comment:

What modifications of Sky Way are you proposing? Why have you connected Alt 8 & 9 with this proposal? If Manchester Square is future parking where are you planning on the CONRAC? Why would bus/shuttle require and ITF? Why not have stops at CONRAC, Crenshaw station, lot 3, and each of the terminals?

Response:

As indicated in Section 2.3 of the SPAS Draft EIR, Sky Way would be relocated easterly for all alternatives that propose the addition of Terminal 0. Specifically, Sky Way (upper and lower level roadways) would be shifted eastward between the future Terminal 0 and Sepulveda Boulevard to provide additional roadway and curbfront in the CTA, while allowing the development of Terminal 0. (See Section 2.3.1.1.3 of the SPAS Draft EIR.) Alternatives that propose the addition of Terminal 0 include Alternatives 1, 2, 5, 6, and 7. The relocation of Sky Way is included with Alternatives 8 and 9 because, as described on page 2-8 in Section 2.3, the ground transportation systems under Alternatives 8 and 9 would be paired with the airfield and terminal improvements of either Alternative 1, 2, 5, 6, or 7.

As indicated in Section 2.3 of the SPAS Draft EIR, a CONRAC is proposed at Lot C under Alternatives 3 and 4, and at Manchester Square under Alternatives 8 and 9. Alternative 1 does not include the construction of a CONRAC.

As indicated in Section 2.3 of the SPAS Draft EIR, the ITF proposed under Alternatives 1, 2, 8, and 9 would provide public parking and remote passenger pick up/drop off, and arriving passengers could travel to the ITF to board door-to-door shuttles or scheduled buses. The elevated busway proposed under Alternatives 1, 2, and 8 and the APM proposed under Alternative 9 would provide a dedicated access corridor connecting the ITF to the CTA. The elevated busway would include connections to the future Metro Crenshaw/LAX Transit Station and to the CONRAC proposed under Alternative 8, and that would also be the case for the APM proposed under Alternative 9. As provided above, Alternative 1 does not include a CONRAC. LAWA does not know what "lot 3" the commentor is referring to. The shuttle buses operating via the elevated busway between the CTA and the ITF under Alternatives 1, 2, and 8 would be able to make stops at each terminal once in mixed-flow traffic within the CTA. The APM

under Alternative 9 has been developed at a program level of planning for SPAS. The final APM system, including the number and placement of stations within the CTA, has not yet been defined. The SPAS Draft EIR is a programmatic document, and no design or engineering plans, or construction phasing plans or schedules, are available for any of the alternatives. However, there are no plans to include APM stations at every terminal.

SPAS-PC00130-528

Comment:

2.3.1.1.1 Airfield
This airfield design could put airplanes closer together by having a plane on the centerline taxiway, Why do you consider this safer than the current set up?

Response:

This comment raises questions similar to those brought up in comment SPAS-PC00130-402 and comment SPAS-PC00130-431; please see Response to Comment SPAS-PC00130-402 and Response to Comment SPAS-PC00130-431.

SPAS-PC00130-529

Comment:

Runway Modifications
What order would these modifications be done? How long would the north airfield be closed for the manchester tunnel? How long for the removal of the 100 year old hot oil pipe? How long will it take to remove the fuel station? Where will you park VIP (ie. the president) planes with the new set up?

Response:

Please see Response to Comment SPAS-PC00130-41 regarding construction plans and phasing of project improvements. As noted in that response, construction plans have not yet been developed for the SPAS alternatives, therefore, information regarding necessary runway closures has not been determined. Please see Topical Response TR-SPAS-LR-1 regarding oil pipelines in the vicinity of LAX and Response to Comment SPAS-PC00130-551 regarding VIP planes.

SPAS-PC00130-530

Comment:

What is the difference between this alternative and the 300 alternative in the notice of preparation? by widening the runway to 200 feet you're moving 310' north? Or are you clipping off the extra 50' from the centerline taxiway? Will this impact the covered well?

Response:

The major difference between the 300-foot-north alternative included in the 2010 Notice of Preparation and SPAS Alternative 1 is a 40-foot reduction in the northerly relocation of Runway 6L/24R under Alternative 1 (i.e., Alternative 1 would shift the runway only 260 feet northward), along with different runway-taxiway separations between Runways 6L/24R, 6R/24L, and the centerfield taxiway. Section 5.7.2 of the Preliminary LAX SPAS Report notes that the 300-foot-north alternative included in the 2010 SPAS Notice of Preparation was refined to become the 260-foot-north alternative (i.e., SPAS Alternative 1) in the SPAS Draft EIR. For more information on SPAS Alternative 1, please see Section 2.3.1.1 of the SPAS Draft EIR.

Please refer to Response to Comment SPAS-PC00130-536 regarding the relocation of Runway 6L/24R and the fact that the SPAS Draft EIR calculates movement of runways in terms of the distance the centerline changes from its existing position. Although it is unclear what the commentor means by "clipping off the extra 50 feet from the centerline taxiway", the commentor may have been referring to the fact that, in addition to its northerly relocation, Runway 6L/24R would also be widened by 50 feet

under SPAS Alternative 1 (for a total width of 200 feet compared to its existing width of 150 feet). This would result in 25 feet of additional pavement to the north of the centerline and 25 feet of additional pavement to the south of the centerline. With this widening, under Alternative 1, the proposed centerline of Runway 6L/24R would be relocated 260 feet northward, with 100 feet of pavement of each side of the centerline, for a total width of 200 feet.

The commentor has not provided enough information for LAWA to adequately respond to the commentor's question regarding the "covered well."

SPAS-PC00130-531

Comment:

What is the source of water in the Manchester tunnel?

Response:

Please see Response to Comment SPAS-PC00130-1012 regarding the north airfield abandoned tunnel segment (referred to by the commentor as Manchester Tunnel).

SPAS-PC00130-532

Comment:

Runway 6R/24L
Your people keep saying that this alternative wouldn't require land purchase, however by extending eastward haven't you've placed some of the hotels into the RPZ? If so which ones? Do you own any of these adjacent Hotels already?

Response:

Section 4.7.2 of the SPAS Draft EIR addresses changes in the RPZ area associated with each SPAS alternative and includes for each alternative a figure showing the limits RPZ area. As indicated therein, the easterly extension of Runway 6R/24L by 1,250 feet under Alternatives 1, 2, 5, 6, and 7 would shift the existing RPZ eastward; however, the only parcels affected would be the northern edge or two (surface) parking lots located on the south side of West 96th Street east of Sepulveda Boulevard. Surface parking is generally considered to be a compatible uses within an RPZ. Under Alternative 3, Runway 6R/24L would be extended eastward by 1,280 feet and shifted southward by 340 feet. The relocated RPZ would extend over the aforementioned surface parking and would also extend over several single story structures that include a trade school and vehicle maintenance garages. As described in Section 4.7.2, should a SPAS alternative be selected for implementation, potential options for addressing any incompatible structures or uses within an RPZ would be assessed and determined in consultation with the FAA at more detailed levels of planning.

No hotels would be located within the RPZs for the north airfield under any alternative.

SPAS-PC00130-533

Comment:

What does RSA stand for? Explain what the difference is between runway length and displaced threshold?

Response:

As indicated throughout the SPAS Draft EIR, including Chapter 10, Acronyms, RSA stands for Runway Safety Area. As indicated on page 1-14 of the SPAS Draft EIR, a displaced threshold is a threshold that is located on a point on the runway other that the designated beginning of the runway to satisfy approach surface criteria and/or RSA length requirements. In other words, a displaced threshold shifts the beginning of that portion of the runway available for landing to a point on the runway beyond the beginning of the runway. "Threshold" always refers to landing, not the start of takeoff.

SPAS-PC00130-534

Comment:

What is grade compliance? Do you have topigrafical maps showing grades on the airport? Which way would excess flood water go?

Response:

FAA Advisory Circular (AC) 150/5300-13A, Airport Design, delineates longitudinal gradient standards for the centerline of runways, which must be met by airports to achieve grade compliance. These standards include the maximum longitudinal grade, vertical curve length, and minimum allowable distance between changes in grade. In conjunction with the easterly extension of Runway 6R/24L associated with Alternatives 1, 2, 5, and 6, the eastern 2,000 feet of the runway would require reconstruction in order to meet these standards. For further information on longitudinal grade limitations, as well as a graphical depiction, please refer to Figure 3-22 of AC 150/5300-13A.1 LAWA has topographical maps that depict gradients on the airport. Topographical gradients are depicted on the current Airport Layout Plan, which are available for review by contacting LAWA's Department of Community Relations. An illustration of regional drainage flows is provided in Figure 1 of Appendix H of the SPAS Draft EIR.

1. U.S. Department of Transportation, Federal Aviation Administration, Advisory Circular 150/5300-13A, Airport Design, September 29, 1989, as amended, September 28, 2012.

SPAS-PC00130-535

Comment:

Taxiway Modifications 2-9
Centerfield
These numbers are different than the ones in the previous explanation which numbers are correct?

Response:

The separations and width provided in Section 2.3.1.1.1 on page 2-9 in the SPAS Draft EIR are correct. The comment does not cite any specific previous descriptions alleged to be inconsistent. After careful review of the SPAS Draft EIR, no inconsistencies with previous descriptions of the Alternative 1 centerfield taxiway were found.

SPAS-PC00130-536

Comment:

According to these numbers you would be moving north 292' not 260' and that doesn't include the extra 50' width of the new runway. Explain why?

Response:

Section 2.3.1.1 of the SPAS Draft EIR discusses, in detail, the modifications and improvements proposed under Alternative 1, including the relocation and widening of Runway 6L/24R. The environmental impacts of these improvements are analyzed throughout the SPAS Draft EIR. All distances listed within the SPAS Draft EIR specifying the relocation of runways or taxiways refer to the distance between the centerlines. Taxiway or runway width does not have an effect on these measurements.

The commentor incorrectly asserts that Runway 6L/24R would be moved 292 feet northward. As discussed in the SPAS Draft EIR, Alternative 1 would entail a northbound shift of the centerline of Runway 6L/24R. (See page 1-89 of the SPAS Draft EIR.) FAA Advisory Circular 150/5300-13 and revised FAA Advisory Circular 150/5300-13A measures runway-to-runway and runway-to-taxiway

separation by centerline distance. The SPAS Draft EIR calculates movement of runways in terms of the distance the centerline changes from its existing position. Therefore, as described in Section 2.3.1.1 of the SPAS Draft EIR, the relocation of Runway 6L/24R under Alternative 1 would relocate the centerline of Runway 6L/24R 260 feet north.

SPAS-PC00130-537

Comment:

What do these inconsistent plans do to the studies for water, traffic, pollution etc? Does it completely nullify everything? How does this change noise contures? What does this do to the realignment of Lincoln Blvd? Does it increase the amount of sewer replacement? If so how much?

Response:

As stated in Responses to Comments SPAS-PC00130-535 and SPAS-PC00130-536, the description of Alternative 1 provided in the SPAS Draft EIR is correct and no inconsistencies with previous descriptions have been found. As a result, the environmental impact analyses provided in the SPAS Draft EIR, including studies related to water, traffic, and air quality, are accurate, as is the description of the Lincoln Boulevard realignment. Noise contours associated with Alternative 1 are provided in Figures 4.10.1-14 through 4.10.1-16 in Section 4.10.1 of the SPAS Draft EIR. Please see Topical Response TR-SPAS-LR-1 regarding the location of outfall sewers beneath the Lincoln Boulevard realignment area. As indicated in that discussion, no outfall sewers would be affected by the realignment.

SPAS-PC00130-538

Comment:

Taxiway E
Where is Taxiway E? How does extending this taxiway allow for planes to leave the terminals with greater speed? By holding more aircraft aren't you increasing the amount of pollution? More idling time?

Response:

As discussed on page 2-2 in Section 2.2 of the SPAS Draft EIR, the north airfield does not provide sufficient areas at the end of the runways to accommodate or move both aircraft that have just arrived and aircraft that are ready to depart. As such, there are times when aircraft queuing to depart Runway 24L on Taxiway E interfere with arriving aircraft taxiing to, as well as departing aircraft exiting from, parking positions at Terminals 1, 2, and 3. Extension of Taxiway E would relocate the departure queue for Runway 24L departures further to the east and allow arriving and departing aircraft easier access to the north terminals. Additionally, the extension of Taxiway E allows for better sequencing of departing flights, reducing the amount of holding time that some departures incur. This thereby would reduce idling time for some arriving and departing aircraft and consequently would result in a decrease in emissions for these aircraft. These factors were considered in the air quality impact analysis presented in Section 4.2 of the SPAS Draft EIR.

SPAS-PC00130-539

Comment:

Covering of the Argo flood Channel 2-10
What kind of covering are you planning on using to cover the flood channel? By covering the unlined flood channel to a concrete box culvert where will you be directing the flood water? What is the topigrapical layout of the north airfield? If water over runs the flood channel where would the excess go? Would it flood towards the other runway? Would it flood towards the business center? Would it flood the dunes? How is this process insured?

Response:

If Alternatives 1, 5, or 6 were selected, the existing, open Argo Drainage Channel would be replaced by a below grade, rectangular concrete box culvert with concrete floor, walls, and roof. This is a common flood control conveyance structure for large watersheds in urban areas. After construction of the box culvert, Argo Drainage Channel would continue to function as it does currently. Specifically, the culvert would connect to a similar existing box culvert near the west end of the airport property that is below Pershing Drive and discharges offshore into Santa Monica Bay through the Argo outfall. The drain would be designed to carry at least a 10-year storm event without overrunning the channel or causing flooding on the airport or offsite. Please see Response to Comment SPAS-PC00130-169 for additional detail regarding the design capacity of the Argo Drainage Channel with implementation of Alternatives 1, 5, and 6. If the capacity of the channel were exceeded, no impacts to the north terminals or to Westchester would result. Rather, the area upstream of the culvert inlet would be affected for a short time until water that had temporarily ponded upstream could be drained back into the channel once the peak of a large storm had passed.

Insurance associated with events at the airport is not germane to environmental issues and is beyond the scope of the SPAS Draft EIR. The comments are noted, are hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because these comments do not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00130-540

Comment:

Relocated Lincoln Blvd 2-10
Exactly how far north would lincoln Blvd be relocated? How far west would this run? What utilities, drainage pipes, electrical wires, and sewers are located currently beneath Lincoln Blvd? Where will they be relocated? How does LAWA planning on dealing with the capped wells in that area?

What agency will be responsible for the tunneling? What agency will be moving the sewer? How much time would moving of the sewer take? How long will Sepulveda and Lincoln be closed?

Response:

Please see Topical Response TR-SPAS-LR-1 for a discussion of the Lincoln Boulevard realignment associated with Alternatives 1, 5, and 6.

SPAS-PC00130-541

Comment:

Does object free refer to the perimeter fence? If it doesn't how will LAWA secure the flight field?

Response:

As indicated in on page 4-491 in Section 4.7.2 of the Draft EIR, the Runway Object Free Area (OFA) is a two-dimensional ground clearance area surrounding the runway and extending beyond the runway end. Within the OFA, parked aircraft and natural or man-made objects are prohibited, except aviation/navigation objects that are fixed by their function. For airports serving the sizes and types of aircraft operating at LAX, the OFA extends 1,000 feet out from each end of the useable runway area and 400 feet out from the runway centerline (800 foot total width along the length of the runway).

Per Federal Aviation Administration (FAA) regulations, LAWA must provide safeguards to prevent inadvertent entry to the movement area by unauthorized persons or vehicles. This is accomplished through the use of a perimeter fence.

SPAS-PC00130-542

Comment:

Taxi Lane E and Taxi Lane D 2-10
By improving to full Taxi Lane size how much more operational efficiency are you expecting? How long will the runway 24L be out of commission during the building of the new taxilanes? Will both 24L & 24R both need to be closed? Are you looking at building the centerline at the same time?

Response:

The extension of Taxilanes D and E would provide additional holding area for departing aircraft. As discussed on page 4-513 of the SPAS Draft EIR, extension of the taxilanes under Alternative 1 in conjunction with the other north airfield improvements, including northward relocation of the runways and construction of a centerfield taxiway, would improve the ability of the north airfield to accommodate large aircraft and would meet FAA Airport Design Standards. (Also see page 4-521 of the SPAS Draft EIR.) Section 3 of Appendix F-2 of the Preliminary LAX SPAS Report provides a detailed discussion of the future operations of each alternative, including Alternative 1.

Due to the numerous SPAS alternatives, detailed construction phasing for Taxilane D, Taxiway E, Runway 24L extension, and the shift of Runway 24R has not been determined at this time. Once an alternative has been selected, detailed construction phasing for the selected alternative will be done in a way to minimize overall impacts to current airfield operations.

SPAS-PC00130-543

Comment:

Please explain ADG V standards and illustrate them.

Response:

The content of this comment is essentially the same as comment SPAS-PC00130-490; please refer to Response to Comment SPAS-PC00130-490.

SPAS-PC00130-544

Comment:

What does APLL stand for? Why does the APLL need to move?

Response:

APLL stands for Aircraft Parking Limit Lines. Please refer to Section 1.2.2 of the SPAS Draft EIR for details on Aircraft Parking Limit Lines (APLL).

SPAS-PC00130-545

Comment:

2.3.1.1.2 Terminal Facilities 2-10
Please rename terminal 0 with the name terminal 1 annex or something updating the remaining part of terminal 1? If so what other modernizations of terminal 1 planned? Who pays for that?

Response:

Regarding the suggestion to rename Terminal 0, the comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Response to Comment SPAS-PC00130-526 regarding the Terminal 0 designation used for planning purposes.

Regarding Terminal 1 improvements assumed under the SPAS Draft EIR, please refer to Table 2-2 on page 2-45 in the SPAS Draft EIR for a comparison of the footprint of the Terminal 1 Concourse under each SPAS alternative. A discussion of improvements to the footprint of the Terminal 1 Concourse is provided for each alternative, starting with Alternative 1 in Section 2.3.1.1.2 on page 2-10 of the SPAS Draft EIR, and in the corresponding sections under the headings of "Terminal Facilities" for the remaining alternatives.

SPAS-PC00130-546

Comment:

Terminal 3 has a bad case of black mold. In demolishing of Terminal 3 how is LAWA planning on dealing with this issue? What can we expect for containment?

Response:

LAWA is not aware of "a bad case of black mold" at Terminal 3, and the comment does not present any facts or evidence that black mold exists at Terminal 3. In the event that mold or other contaminants are encountered during demolition of Terminal 3, or any other facility at LAX, and are determined to pose a potential health risk to those nearby, including workers and the general public appropriate protective and materials management measures would be implemented in accordance with applicable federal, state, and local health and safety requirements. See pages 4-596 and 4-597 of the SPAS Draft EIR.

SPAS-PC00130-547

Comment:

How is LAWA handling the issue of Terminal 3 being one of the major supports of the upper roadway? Will LAWA first do a complete rebuild of the upper roadway to make it a stand alone roadway? Is LAWA planning on leaving the roadway as a canalevered bridge? If so please explain why? Who will be paying for the tear down of terminal 3? What is the plan to accommodate the airlines currently using those gates? Will the demolishment of terminal 3 effect the new taxilane? Would the demolishment be done at the same time as the Tom Bradley north pavilion?

Response:

Please see Response to Comment SPAS-PC00130-411 regarding maintenance of the LAX second level roadway structures and bridges.

Contrary to the statement in the comment, the second level roadway is already a "stand-alone" roadway (to use the commentor's words) and Terminal 3 is not "one of the major supports of the upper roadway" and, in fact, does not structurally support the roadway at all. The second level roadway is not a cantilevered bridge, as stated by the commentor. It should be noted that the SPAS alternatives do not include a redesign of the second level roadway.

As discussed in Section 2.3.1 of the SPAS Draft EIR, under Alternatives 1, 2, 5, 6, and 7, the Terminal 3 concourse would be realigned to provide a wider alleyway between the concourses at Terminals 2 and 3 for aircraft taxiing. As a program-level document, the SPAS Draft EIR need not and does not include detailed information related to project-specific improvements, including engineering design and phasing plans. Such details would be evaluated in a project-level EIR for Terminal 3. A discussion of whether the demolition of Terminal 3 would affect the new taxiline or be done at the same time as the Tom Bradley North Pavilion is unwarranted at this time. An EIR's project description should not provide extensive detail beyond that needed for evaluation and review of a project's environmental impacts. (State CEQA Guidelines Section 15124.) Moreover, an EIR is required to provide only a "general description of the project's technical, economic, and environmental characteristics." (State CEQA Guidelines Section 15124.)

Please see Response to Comment SPAS-PC00096-2 regarding funding for improvements associated with the various alternatives.

SPAS-PC00130-548

Comment:

What are the exact FAA standards LAWA is trying to meet? How is LAWA dealing with the standards currently? Will the new area of the gates and/or taxilane be blind to the tower?

Response:

As discussed in Section 2.3.1.1.2 on page 2-10 of SPAS Draft EIR, Alternative 1 proposes to demolish and reconstruct the Terminal 3 concourse and associated gates while shifting the building centerline 40 feet to the west to increase the width of the alleyway between Terminals 2 and 3. This will bring the alleyway between Terminals 2 and 3 into compliance with FAA standards for taxilane to fixed or movable object (aircraft parking limit line) distances. LAX currently operates in this area with a distance less than specified by FAA standards.

Please see Response to Comment SPAS-PC00130-754 regarding tower line-of-sight.

SPAS-PC00130-549

Comment:

What does MSC stand for? What are the FAA ADG V standards? How is LAWA dealing with those standards currently? What commuter facility is currently in use east of Sepulveda Blvd?

Response:

As discussed on page 5-18 of the SPAS Draft EIR, MSC stands for Midfield Satellite Concourse. The MSC Program includes development, in separate and independent phases, of a new concourse west of the Bradley West Project, along with construction of a connection system for moving passengers, baggage, and materials between the Midfield Satellite Concourse (MSC), TBIT, and the Central Terminal Area (CTA). Completion of the MSC Program would also include development of a new passenger processor within the CTA, to include ticketing, baggage handling, security screening, etc., which would be constructed within the CTA east of Parking Structures 3 and 4. The existing two-directional arrival roadway of West Way is planned to be replaced with two southbound streets, one on each side of the processor, with one for public curbside use and the other for private vehicles (i.e., taxis, limousines, shuttles) only. The first phase of the MSC Program, the MSC North Concourse Facility, is estimated to be completed by 2019, and schedule for future phases, including new passenger processor, to be determined.

As discussed in Response to Comment SPAS-PC00130-490 above, the Federal Aviation Administration (FAA) created a classification of aircraft based on wingspan and tail height. Each aircraft is assigned a particular Aircraft Design Group (ADG). In addition, airfield standards such as separation between a runway and an adjacent taxiway, or between two taxiways, are also based on the types of aircraft that operate on an airfield and are therefore based on ADGs. The current airfield at LAX (runway and taxiway system) meets various ADG standards depending on various areas of the airfield. As discussed on page 2-2 in Chapter 2 of the SPAS Draft EIR, LAX does not have an airfield, in either the north complex or the south complex, that is fully designed for the largest aircraft types currently in service (ADG V and ADG VI). As such the current north airfield configuration requires non-standard operating procedures, which are not optimal for safety and increase traffic delay.

As described in Section 2.3.1.1.2 of the SPAS Draft EIR, the commuter facilities (both terminal and apron facilities) located east of Sepulveda Boulevard are currently maintained and operated by American Eagle (as of November 2012).

SPAS-PC00130-550

Comment:

Why isn't the commuter facility currently being maintained? What is it's use? Who uses it?

Response:

Section 2.3.1.1.2 of the SPAS Draft EIR refers to the commuter facilities (both terminal and apron facilities) located east of Sepulveda Boulevard that are currently maintained and operated by American Eagle (as of November 2012). Regional commuter flights operated by American Eagle, such as LAX to San Diego (SAN) or LAX to San Jose (SJC) are operated at these facilities. The SPAS Draft EIR assumes that these facilities would continue to be operated by commuter carriers in 2025.

SPAS-PC00130-551

Comment:

When the West remote gates are removed where will LAX park Vip planes? Where will LAX park the Air force 1? How will it be possible to maintain remote gates during construction of the new north airfield? Won't they be in the way?

Response:

Currently, VIP aircraft, such as Air Force One, are accommodated on remote parking aprons and are not serviced directly by the west remote gates.

As a program-level document, the SPAS Draft EIR does not specifically discuss VIP parking options. It is anticipated, however, that under all alternatives adequate space to accommodate future VIP aircraft would be available in the existing remote pad area and at other locations around the airport.

Please see Responses to Comments SPAS-PC00130-170 and SPAS-PC00130-409 regarding elimination of the west remote gates under the SPAS alternatives. As discussed therein, the west remote gates would be eliminated upon completion of the airfield and terminal improvements. The continued operation of the west remote gates during construction activities is therefore alternative dependent. Construction phasing will be developed after selection of an alternative by the Board of Airport Commissioners (BOAC).

SPAS-PC00130-552

Comment:

2.3.1.1.3 Ground Access Facilities 2-13
What CTA roadways would be improved in order to maintain private vehicle access to the CTA?

Response:

Please refer to Response to Comments SPAS-PC00130-492 for a description of the anticipated roadway improvements and mitigation measures that would be provided to maintain private vehicle access to the Central Terminal Area (CTA) such that traffic-related impacts on the CTA departures-level and arrivals-level curbsides would be less than significant following mitigation.

SPAS-PC00130-553

Comment:

Exactly where is LAWA planning on relocating Sky Way roadways? How much more curb space will exsist in front of terminal zero?

Response:

Figure 4.12.1-11 on page 4-1119 of the SPAS Draft EIR shows the proposed relocation of Sky Way (depicted as Link UW in the figure). The current location of Sky Way is depicted in Figure 4.12.1-6 on page 4-1069 of the SPAS Draft EIR. There will be approximately 500 feet of curb front along Terminal 0. However, Terminal 0 is functionally an extension of Terminal 1 that does not have external landside access to the CTA roadway system. As such, passenger ticketing and baggage claim functions for Terminal 0 passengers will be accommodated at the existing Terminal 1.

SPAS-PC00130-554

Comment:

Exactly where is the new commercial holding lot being relocated to? What is currently in that location?

Response:

As described on pages 2-55 and 4-1091 of the SPAS Draft EIR, and clarified in Chapter 5, Corrections and Additions Related to the SPAS Draft EIR, the existing taxi holding lot and the commercial vehicle holding lots for the shared-ride vans and charter buses/limousines would be relocated to the surface parking lot between Sepulveda Boulevard, relocated Sky Way, and Little Century Boulevard under Alternatives 1, 2, 8, and 9. This parking lot is currently within the eastern portion of the Park One public parking facility. Under Alternative 3, the commercial vehicle holding lot would be relocated to the Ground Transportation Center (GTC), while under Alternative 4, the taxi holding lot would likely move to Park One or Lot C and other commercial vehicle holding lots would remain in their current locations.

Please refer to Response to Comment SPAS-PC00130-802 for additional discussion related to the relocation of the taxi and commercial vehicle holding lots.

SPAS-PC00130-555

Comment:

What are the current FAA RSA and RPZ Standards? How is LAWA currently dealing with them?

Response:

Please see Paragraph 307 of Federal Aviation Administration (FAA) Advisory Circular (AC) 150/5300-13A, Airport Design, regarding FAA standards for the Runway Safety Area (RSA).

Please see Paragraph 310 of FAA AC 150/5300-13A, Airport Design, regarding FAA standards for the Runway Protection Zone (RPZ).

As discussed on Page 4-492 of Section 4.7.2 of the SPAS Draft EIR, a Runway Safety Area Study was completed for LAX by the FAA in 2006. RSA improvements for Runways 6L/24R and 6R/24L are being addressed as part of SPAS, as further discussed in Section 4.7.2 of the SPAS Draft EIR.. The improvements for Runway 7L/25R are scheduled to take place in 2013. Improvements for the north airfield runways were integrated into all of the SPAS build alternatives. The FAA has acknowledged that that implementation of solutions to RSA compliance may not be practicable by December 31, 2015 and is therefore coordinating with LAWA on the identification of potential interim solutions.

In regards to compliance with FAA standards related to the current RPZ, please see Page 4-497 and Figure 4.7.2-4 in Section 4.7.2 of the SPAS Draft EIR. That section of the SPAS Draft EIR also describes changes in the RPZ associated with each alternative.

SPAS-PC00130-556

Comment:

Please include a detailed map on the new ITF. Explain what is currently located in this area? How does LAWA expect this area to function? Why was this moved from Contintel City between 2 freeways and 2 trainlines to the community! [comentor's text cut off]

What roads would be involved?

Response:

The ITF proposed as a part of Alternatives 1, 2, 8, and 9 is depicted and described in Chapter 2 of the SPAS Draft EIR, and has been developed at a program level of planning and design. The design of the ITF will be determined and addressed at the project level, should one of those alternatives be approved, and will include detailed maps of the facility. The properties currently located in the area proposed for the ITF are illustrated in Figures 2-11 and 2-12 and listed in Table 2-4 (page 58) of the SPAS Draft EIR. The properties consist mostly of airport-related transportation uses, including parking and rental car facilities. A description of how the ITF would function is provided in Section 1.2 of Appendix E2-2 of the Preliminary LAX SPAS Report. The ITF was sited in the proposed location due to its proximity to the CTA and its location between the proposed ground access facilities in Manchester Square and the CTA. Land uses surrounding the proposed location of the ITF consist of commercial and industrial uses. There are no residences or community-serving uses located in proximity to the ITF.

It is unclear what commentor means by "what roads would be involved?" However, while there are no detailed plans for the ITF, Figures 2-1, 2-2, 2-8, and 2-9 provide a general description of the location of the proposed ITF. The specifics of the project would be determined if an alternative that includes the ITF is ultimately selected.

SPAS-PC00130-557

Comment:

Why is LAWA putting more parking in Manchester square? Won't building a consolidated Rent a car facility require most of the space?

Response:

As discussed in Section 2.3.1.1.3 of the SPAS Draft EIR, under Alternative 1, parking spaces would be added to Manchester Square. The additional parking spaces were proposed in conjunction with the dedicated busway between Manchester Square and the CTA, also proposed under Alternative 1. These improvements are designed to improve the ground access system at LAX. (See Section 2.2 of the SPAS Draft EIR.) Alternative 1 does not include a CONRAC.

In Alternatives 8 and 9, a CONRAC facility and a parking structure would be constructed at Manchester Square. (See Section 2.3.1.8 and 2.3.1.9 of the SPAS Draft EIR.) Alternative 8 also includes the development of a dedicated busway between Manchester Square and the CTA, while Alternative 9 proposes the construction of an automated people mover from Manchester Square to the CTA. Like the other alternatives, all the ground access improvements are designed to better accommodate airport-related traffic.

The SPAS Draft EIR is a programmatic document. There are currently no project-level design or engineering plans, nor are there plans for phasing construction. Thus, there are no plans delineating how much of the Manchester Square facility would be allocated for parking versus the CONRAC under Alternatives 8 or 9. If an alternative is selected, project-level environmental review would be conducted before implementation of any modifications and improvements.

SPAS-PC00130-558

Comment:

How many people are currently being serviced by the shuttle bus at the green line? Will LAWA pay transfer fees from green line to Crenshaw line? Why another bus? Why not have the train come all the way into the airport and skip bus way or apm?

Response:

In 2011, there was an average of approximately 3,900 riders per day on LAWA's shuttle from the Green Line station at Aviation Boulevard and Imperial Highway to the CTA.1 For purposes of the SPAS Draft EIR, the on-airport transportation analysis used a calibrated Trip Generation Model as discussed in Section 4.12.1.3.11 of the SPAS Draft EIR, to estimate the number of airport-related vehicles by classification based on airline passengers at the curbsides. The number of passengers assigned to any mode listed in Table 4.12.1-15 can be calculated by multiplying the passenger mode split percentage for either the departures or arrivals level curbside by the number of peak hour passengers at either the departures or arrivals level curbside provided in Table 4.12.1-14. Green Line shuttles are included within the LAX shuttle mode split percentage listed in Table 4.12.1-15. Based on the data from the 2006 LAX Air Passenger Survey, which was the most recent passenger survey available at the time of the analysis, passengers using the Green Line shuttle during the peak hours accounted for .07 percent of all peak hour passengers at the curbside. Therefore, it was estimated that approximately four (4,918 peak hour passengers x .0007) airline passengers departed the airport via the Green Line shuttle during the arrivals level peak hour, and during the departures level peak hour; approximately four (4,878 x .0007) airline passengers arrived at the airport via the Green Line shuttle. This does not include the transit passengers who use the transit station at Lot C along 98th Street, which are provided separately in Table 4.12.1-15. Additionally, the analysis recognizes that the majority of passengers using transit service to access the airport are airport employees. Since the peak passenger activity times do not typically coincide with employee shift changes, the numbers of employees using the Green Line shuttles during the departures or arrivals level peak hours were assumed to be minor.

The configuration of the future Green Line Aviation/Century station has not yet been defined. It is anticipated that passengers transferring between Metro's Green Line and LAX/Crenshaw lines to an airport conveyance system would be able to do so for free with a transfer. LAWA has no plans to pay for airport passengers to transfer from a LAWA bus (SPAS Alternatives 1, 2, 4, and 8) or Automated People Mover (SPAS Alternatives 3 and 9) to transfer to Metro service (bus or light rail).

As part of the SPAS process, and as described and depicted in Chapter 2 of the SPAS Draft EIR, LAWA is considering a variety of ground transportation alternatives to meet future ground transportation needs. These alternatives include bus options as well as APM options. Regarding the suggestion that the train should extend directly into the airport, please see Topical Response TR-SPAS-T-1 for a discussion of the Airport Metro Connector Project, which is examining ways to connect the regional rail system directly to LAX.

1. City of Los Angeles, Los Angeles World Airports, Daily Passenger Volumes from August 2009 Green Line - Aviation Station, August 27, 2011.

SPAS-PC00130-559

Comment:

Exactly where will the new metro station be built?

Response:

Please see Topical Response TR-SPAS-T-1 regarding transit options into LAX, including Metro's plans for a new transit station at Aviation and Century Boulevards.

SPAS-PC00130-560

Comment:

Parking 2-13
Explain how the exsisting structures in the CTA won't change? How is LAWA dealing with the water damage? Will LAWA be reconstructing the damaged passenger bridges?

Response:

Regarding the parking structures assumed in the SPAS Draft EIR, please refer to Response to Comment SPAS-PC00130-140.

The commentor inquires about "dealing with water damage" without providing specific details or evidence of the alleged existence or location of any water damage problem at LAX. In the event that water damage is encountered at LAX and is determined to pose a potential safety risk to those nearby, including workers and the general public, appropriate protective and construction management measures would be implemented in accordance with applicable federal, state, and local safety requirements.

The commentor also inquires about "reconstructing the damaged passenger bridges" without providing specific details or evidence of the existence or location of such damages. Please refer to Response to Comment SPAS-PC00130-411 regarding maintenance of the LAX roadway structures and bridges.

SPAS-PC00130-561

Comment:

What is meant by future pricing structures? How are you planning on which places would be long term or short term parking? Why isn't LAWA removing the employee parking in the CTA? Shouldn't parking be in the ITF?

Response:

"Future pricing structures" refers to the hourly and daily parking rates to be charged for the use of LAWA-owned public parking lots or structures. The rates typically vary by parking product and have a direct effect on where people chose to park.

Airline passengers will choose their parking location based on the price of the various options relative to their judgment of the value offered by that facility. For example, the Central Terminal Area (CTA) facilities are priced at a higher rate than the remote Economy Lot C. Most passengers staying for short-durations will park in the CTA. Passengers staying for longer durations and who are less concerned with cost (e.g., business travelers) may choose to park in the CTA, while others will park in the remote lots. For purposes of the SPAS Draft EIR, it is assumed that the distribution of short-duration and long-duration parking by location will continue to be similar to existing conditions (with the exception of SPAS Alternative 3). In general, short-term parking is expected to be provided in all the parking structures within the CTA and long-term parking is expected to be provided in the offsite facilities.

Table 2-2 on pages 2-45 through 2-48 of the SPAS Draft EIR includes a summary of the public and employee parking allocations under each SPAS alternative. As indicated in the table, 4,900 public parking spaces are planned within the ITF under Alternatives 1, 2, 8, and 9. Additional details regarding parking assumptions for each alternative are provided beginning on page 4-1091 in Section 4.12.1.6.1 of the SPAS Draft EIR.

SPAS-PC00130-562

Comment:

What does lawa mean by mixed-flow buses? How does that term differ from mixed-flow traffic?

Response:

The SPAS Draft EIR does not refer to "mixed-flow buses." Section 2.3.1.1.3 on page 2-13 of the SPAS Draft EIR describes a dedicated busway for exclusive use of the buses connecting the Central Terminal Area (CTA) to the offsite facilities. However, once these buses exit this dedicated busway and merge onto the CTA roadways or the off-airport city streets they will be "mixed" with other vehicles using the public roadways. The combination of the buses interacting with the traffic using the public roadway system is termed as "mixed-flow traffic."

SPAS-PC00130-563

Comment:

What are the future plans for parking lot E? Are traffic studies being done so accual counts of car trips are included? Where is parking lot D? Where is the Jenny lot?

Why aren't they included in the alternative map? How many trips will 3, 944 parking spots result in? Since the location is unknown what is LAWA planning on doing to help clear the air pollution associated with the parking? We recommend that the lot be ringed with smog helpful trees and at a minimum of 7,888 car trips we think at least 1,000 new trees.

Response:

Please see Response to Comment SPAS-PC00130-592 regarding LAWA's plans for their Lot E property. Parking Lot D is located north of LAX Lot C between Jenny Avenue to the east, Westchester Parkway to the south, and Will Rogers Street to the west. The Jenny Lot is located on the southwest corner of Jenny Avenue and Westchester Parkway. These lots are not included in the alternatives map because they are not new facilities proposed under SPAS. Commuter peak hour volumes accessing these lots under the various alternatives are shown in Table 4.12.2-10 on page 4-1212 of the SPAS Draft EIR.

Transportation-related mitigation measures that would apply to the SPAS alternatives are provided in LAX Master Plan Mitigation Measure MM-AQ-3 and listed in Table 4.2-9 of the SPAS Draft EIR. MM-AQ-3 focuses on expansion of the FlyAway system, and includes measures to encourage transit ridership and ridesharing, reduce traffic and parking congestion, and encourage the use of ultra low emission vehicles/super low emission vehicles/zero emission vehicles by passengers, commercial vehicles, car rental agencies, and shuttle operators.

The commentor's suggestion to plant 1,000 new trees around a specific parking lot is considered infeasible for legal, environmental, and policy reasons. LAWA has a number of mitigation measures, which involve planting of trees, including LAX Master Plan Mitigation Measure MM-BC-3 which provides for 2:1 tree replacement ratio for 300 mature trees. Similarly, trees would be planted in compliance with the LAX Street Frontage and Landscape Development Plan Update, which includes the planting of street trees in some locations (see pages 4-11 through 4-13 of the SPAS Draft EIR). However, it is not appropriate to mechanically assign a number of trees to a specific parking lot. Size limitations would preclude planting this number of trees at the subject location. The perimeter of the Parking Lot D and the Jenny Lot is approximately 5,800 linear feet. The planting of at least 1,000 trees to "ring" the site, as requested by the commentor, would place each tree less than six feet from each other, which would not be sufficient room for the root system and branches of most trees. Additionally, the continuous lining of the perimeter of the site with trees would pose the potential for damage to adjacent sidewalk, street, and infrastructure due to root growth. Also, the subject parking lot is located east of, and in proximity to, the north runways and the placement of over 1,000 trees directly beneath the runway flight path could pose an aircraft safety concern relative to being a bird attractant. (See page 4-176 of the SPAS Draft EIR and FAA Advisory Circular 150/5200-33B.)

SPAS-PC00130-564

Comment:

An extra 4,900 short term parking spaces and a drop off area would increase car trips by how much? Again to help pollution standards that another 1,000 smog helpful full canopy trees be added.

Response:

Table 4.12.2-10 on page 4-1212 of the SPAS Draft EIR shows the volume of peak hour private vehicles trips under various SPAS alternatives. The trips in the airport parking row of the table include the vehicle trips that are accessing the 4,900 public parking spaces at the ITF.

Please see Response to Comment SPAS-PC00130-563 regarding mitigation of air quality impacts associated with transportation.

SPAS-PC00130-565

Comment:

So Lawa is adding 16,000 parking spaces most of which will be impacting Westchester. So what plans does LAWA have to mitigate local traffic? What plans does LAWA have to mitigate air quality? Why are LAWA shuttles being discontinued?

Response:

As shown in Table 4.12.1-40 on page 4-1167 of the SPAS Draft EIR, LAWA's current parking supply is approximately 18,605 spaces. In the Future (2025) condition, Alternatives, 1, 2, 8, and 9 LAWA would have a parking supply of 23,441 spaces for a net increase in spaces of 4,836 spaces. The traffic analyses for the off-airport roadway system in the vicinity of Westchester was analyzed and documented in Section 4.12.2 of the SPAS Draft EIR.

Please see Response to Comment SPAS-PC00201-1 regarding mitigation measures to address the air quality impacts associated with the SPAS alternatives.

Future SPAS facilities such as the Intermodal Transportation Facility (ITF), Ground Transportation Center (GTC) and Consolidated Rental Car Facility (CONRAC), provide alternative locations where passengers would be consolidated into groups and boarded onto high-capacity LAWA-operated buses that would be used to transport passengers into the CTA. This would allow for the reduction of shuttle buses and other LAWA parking lot shuttle vehicles that are currently used to transport passengers from off-site locations to the CTA. The consolidation of these busing operations would result in a net decrease in the number of commercial vehicles accessing the CTA.

Please refer to Response to Comments SPAS-PC00130-139 for additional information related to the consolidation of shuttle bus activity and the anticipated benefits related to traffic reduction and improved roadway operations.

It is unclear as to what the commentor is referring to in the question of "Why are LAWA shuttles being discontinued?" and the commentor provides no basis or supporting evidence for that claim. No shuttle services are being discontinued; shuttle services continue to be provided at all LAWA parking lots.

SPAS-PC00130-566

Comment:

How many parking spaces in park one being eliminated? What parking currently exists north of 111th street?

Response:

As indicated on page 2-47 of Table 2-2 of the SPAS Draft EIR, the exiting capacity of Park One is 2,728 spaces. All of these spaces will be eliminated in all of the SPAS alternatives except Alternative 4 as a result of the realignment of Sky Way.

The parking lot north of the 111th street is Lot E which is currently used for airport employee parking. This employee parking will be relocated to the Jenny Lot, located north of Westchester Parkway between Jenny Avenue and Airport Boulevard, once that lot has been constructed in early 2013. The Jenny Lot will provide 1,940 parking spaces for Alternatives 1 and 2, as noted on page 4-1092 of the SPAS Draft EIR. As noted on pages 2-38 and 2-41 of the SPAS Draft EIR, parking on the Jenny Lot under Alternatives 8 and 9 would be the same as Alternative 1. Under Alternatives 3 and 4, the Jenny lot would be part of the proposed Consolidated Rental Car Facility (CONRAC) and associated parking as noted on Page 1-94 of the SPAS Draft EIR.

SPAS-PC00130-567

Comment:

Where do you plan to put the conrac? It isn't shown in the alternative 1 plan?

Response:

Please see Response to Comment SPAS-PC00130-185 for how certain SPAS alternatives include the development of a CONRAC and the proposed location of the CONRAC under those alternatives.

SPAS-PC00130-568

Comment:

2.3.1.2 Alternative 2 2-14
What is meant by fully integrated? How much cheaper would alternative 2 be to institute? How much money would it cost to rebuild the Argo flood channel? How much would it cost to redesign the manchester tunnel? How much will it cost to relocate Lincoln Blvd? How much will it cost to move the 3 sewers? How much will it cost to move the hot oil pipes?

Response:

Please see Response to Comment SPAS-PC00130-444 for an explanation of the term "fully integrated." CEQA does not require an analysis of cost or project funding. (State CEQA Guidelines Section 15131; Pub. Resources Code Section 21068.) Nevertheless, LAWA provided a detailed account of the financial requirements of each of the alternatives in the Preliminary LAX SPAS Report. Table 8-1 in Chapter 8 of the Preliminary LAX SPAS Report provides a comparison of the preliminary rough-order-of-magnitude (ROM) costs associated with each alternative, and provides a comparison of the costs of Alternative 2 and the other alternatives. Details regarding the preliminary ROM cost estimates for the SPAS alternatives are provided in Appendix G of the Preliminary LAX SPAS Report. As indicated in Table AF-1 of Appendix G, the preliminary ROM cost of improvements to the Argo Drainage Channel would be $5,000,000 under Alternatives 2, 3, 4, and 7; $116,562,044 under Alternatives 1 and 5, and $66,839,416 under Alternative 6. The cost to fill the north airfield abandoned tunnel segment is estimated to be approximately $21,873,600. As indicated in Table AF-3 of Appendix G of the Preliminary LAX SPAS Report, the preliminary ROM cost estimate for the realignment of Lincoln Boulevard is $61,210,000 under Alternative 1, $89,960,000 under Alternative 5, and $45,290,000 under Alternative 6. Please see Topical Response TR-SPAS-LR-1 regarding the need to relocate utilities as part of the realignment of Lincoln Boulevard under Alternatives 1, 5, and 6. As indicated in the topical response, realignment of Lincoln Boulevard is not anticipated to interfere with the major outfall sewers that run beneath LAX. Moreover, LAWA has not identified other major utilities, including oil pipelines, in the vicinity of Lincoln Boulevard. Nevertheless, the ROM cost estimates for the Lincoln Boulevard realignment include allowances related to utilities, including sewer lines and other utilities.

SPAS-PC00130-569

Comment:

2.3.1.2.1 Airfield Facilities 2-14
What are the current FAA standards for ADG V with a category 11/111 outbound runway? What are the current FAA standards for ADG V with a category 1 runway? What are the restrictions in place today to hold larger ADG V and ADG VI aircraft?

Response:

FAA Aircraft Design Group (ADG) V standards for runway-taxiway separation can be found in Tables 3-6 and 3-7 of FAA Advisory Circular 150/5300-13A Airport Design, which can be accessed at the following address: http://www.faa.gov/airports/resources/advisory_circulars/index.cfm/go/document.current/documentNumber/150_5300-13/.

As discussed in Section 1.2.1 of the SPAS Draft EIR, the current north airfield configuration at LAX requires non-standard operating procedures. Restrictions in place today generally do not allow ADG V or ADG VI aircraft to hold between Runways 6L/24R and 6R/24L. This reduces operational efficiency as Air Traffic Control must hold arrivals and departures until ADG V and ADG VI aircraft proceed safely across Runway 6R/24L.

SPAS-PC00130-570

Comment:

Runway Modifications 2-17
How much better will the north airfield operate by percentage with the improvements to the taxiways?

Response:

Appendix F-2, North Runway Alternatives Simulation Analysis, of the Preliminary LAX SPAS Report provides a detailed discussion of the future operations of the SPAS alternatives. Please refer to Response to Comment SPAS-PC00130-156 regarding the SPAS Draft EIR airspace simulation analysis.

SPAS-PC00130-571

Comment:

2.3.1.3 Alternative 3
Your first sentence (ie paragraph) says alt 3 is actually alt D and concurrently no action plan, please explain how this can be?

Response:

Please see Responses to Comments SPAS-AL00007-3, SPAS-AL00007-7, SPAS-PC00130-749, and SPAS-PC00130-873 regarding the CEQA "No Project" Alternative.

SPAS-PC00130-572

Comment:

Please explain the 17,000 previous eiR for alt D and how much completion of this project will cost?

Response:

The previous EIR to which commentor refers is the LAX Master Plan EIR. The LAX Master Plan EIR evaluated the potential environmental effects associated with the four LAX Master Plan alternatives. It is available at www.ourlax.org. Cost estimates to complete the remaining components of the LAX

Master Plan are provided in Chapter 8 of the Preliminary LAX SPAS Report, with details included in Appendix G.

SPAS-PC00130-573

Comment:

2.3.1.4 Alternative 4 2-22
Please explain what is meant by this first paragraph? What does MSC stand for? What is a related new passenger processor and connector? What terminal improvements are being considered? Does this alternative deal with the black mold currently in terminal 3?

Response:

The first paragraph of Section 2.3.1.4 on page 2-22 of the SPAS Draft EIR defines Alternative 4. Alternative 4 is defined in relationship with projects and improvements included in the LAX Master Plan.

Accordingly, Alternative 4 would:
- Include ongoing and reasonably foreseeable "non-Yellow Light improvements" identified in the LAX Master Plan which are: ongoing improvements to Tom Bradley International Terminal (Bradley West Project); the extension of Runway 6R/24L; the Midfield Satellite Concourse (MSC) and its associated connector and passenger processor; and various terminal improvements.
- Not include "Yellow Light Projects" identified in the LAX Master Plan. See Section 2.3.1.4.4. of the SPAS Draft EIR for a list of these projects that would not be included in Alternative 4.

A new passenger processor and connector are assumed under Alternative 4 associated with the construction of the planned Midfield Satellite Concourse (MSC). Please see Response to Comment SPAS-PC00130-549 above for further discussion of the MSC. A passenger processor is an airport facility in which departing passengers check in at the airline counters, drop their bags to be scanned by the Transportation Security Administration (TSA) and go through passenger security checkpoints. It also hosts arriving passenger functions such as baggage claim. The connector is a conveyance that will provide access to passengers from the passenger processor to the MSC.

Terminal improvements, aside from those listed above, are ongoing and reasonably foreseeable improvements that LAWA and airlines would make to terminal facilities, some of them unknown, but would be undertaken in the future.

LAWA is not aware of "a bad case of black mold" at Terminal 3, and the comment does not present any facts or evidence that black mold exists at Terminal 3. In the event that mold or other contaminants are encountered during demolition of Terminal 3, or any other facility at LAX, and are determined to pose a potential health risk to those nearby, including workers and the general public appropriate protective and materials management measures would be implemented in accordance with applicable federal, state, and local health and safety requirements. See pages 4-596 and 4-597 of the SPAS Draft EIR.

SPAS-PC00130-574

Comment:

As a Spas member we were told that the Conrac would need to be built underground in order to meet FAA safety standards. Is this still true? Does Lot C in its current condition meet current FAA Safety Standards?

Response:

Please see Response to Comment SPAS-PC00130-346 regarding FAA safety standards applicable to Lot C. Because Alternative 4 proposes the CONRAC at Parking Lot C, the CONRAC would be subject to the FAA Standards promulgated in AC 150/5300-13A. The SPAS Draft EIR is a programmatic document, and therefore it does not, and should not, evaluate the specific components of individual projects. (State CEQA Guidelines Section 15146; Napa Citizens for Honest Government v. Napa County Bd. of Supervisors (2001) 91 Cal.App.4th 342, 369.) A project-specific document that analyzes

construction and design would be prepared for all projects, including the CONRAC, should an alternative that includes the CONRAC be approved.

SPAS-PC00130-575

Comment:

What portion of the Argo drainage channel would be covered? What are the RSA improvements? Why isn't the Argo flood channel included in the illustration?

Runway modifications 2-25.
If there is no change to runway Why is it necessary to change the Argo flood channel?

Response:

As described on page 4-492 of the SPAS Draft EIR, FAA prepared an RSA evaluation in 2006 and concluded that the existing RSA for Runway 6L/24R does not meet current airport design standards and improvements to the RSA were needed.1 Under Alternatives 2, 3, 4, and 7, the easternmost portion of the Argo Drainage Channel, which currently lies within the Runway 6L/24R RSA, would be covered to comply with RSA requirements. Please see Section 4.7.2.6.5 of the SPAS Draft EIR for a discussion of Alternative 4's RSAs. Moreover, as described in Section 4.7.2.6.4 of the SPAS Draft EIR, Alternative 4 would not result in any change to the existing runway safety areas that extend off-airport. The easternmost portion of the Argo Drainage Channel is required to be structurally covered to comply with the requirements governing RSAs. (Table 2-3 of the SPAS Draft EIR.) The proposed improvements to Argo Drainage Channel associated with the northerly relocation of Runway 6L/24R under Alternatives 1, 5, and 6 would also comply with RSA requirements.

The Argo Drainage Channel is not included in the illustration because the SPAS Draft EIR contains sufficient information about the effects of the alternatives on the Argo Drainage Channel to provide decision-makers with sufficient information to make an informed determination.

1. U.S. Department of Transportation, Federal Aviation Administration, Runway Safety Area Evaluation and Analysis for Los Angeles International Airport, June 14, 2006.

SPAS-PC00130-576

Comment:

Alternative 5 2-26
Overview
How much of Lincoln Blvd would need to be underground? Who would pay for this? Would it be like the Sepulveda tunnel and flood every time it rains? How would covering the argo flood channel interfer? What is the plan for moving the fuel station? What is the plan to relocate the 100 year old hot oil line from the Baldwin Hills oil field? Where are you planning on moving the sewers to? How much money would this alternative cost? Does the cost include redevelopment of the manchester tunnel? Has LAWA determined the sorce of water flowing into the tunnel?

Response:

Please see Topical Response TR-SPAS-LR-1 for a discussion of the Lincoln Boulevard realignment associated with Alternatives 1, 5, and 6, including the presence of utilities such as oil pipelines within the relocation area. Please see Response to Comment SPAS-PC00130-539 regarding ability of the Argo Drainage Channel to convey stormwater if a box culvert is constructed. As indicated in that response, covering the Argo Drainage Channel would not have any adverse effects relative to stormwater conveyance, including stormwater associated with the Lincoln Boulevard realignment. It is unclear what fuel station the commentor is referring to. As indicated in Section 2.3.1.10 of the SPAS Draft EIR, an on-airfield fuel truck filling station would require reconfiguration and/or relocation under Alternatives 1, 2, 3, 5, 6, and 7. As indicated on page 2-56 of the SPAS Draft EIR, the fueling station would be relocated to another site within the AOA, if required. Please see Response to Comment

SPAS-PC00130-1012 regarding the north airfield tunnel segment (referred to in the comment as the Manchester Tunnel). Rough-order-of-magnitude cost estimates to remove and fill the north airfield tunnel segment are summarized in Table AF-1 and detailed in Table AF-8 of Appendix G of the Preliminary LAX SPAS Report.

SPAS-PC00130-577

Comment:

Does this alternative include a new tower that can see all of the airfield and taxiways? Where is LAWA planning on locating the new tower?

Response:

There is currently no reason to believe, nor does the commentor provide any supporting information to suggest, that relocation of the existing Air Traffic Control Tower (ATCT) or construction of a supplemental ATCT is warranted for any of the SPAS alternatives. The SPAS alternatives provide development concepts for consideration at the program level. Potential ATCT line-of-sight issues are determined in conjunction with detailed planning and design. The selection and approval of a particular alternative, if any, would be followed by the preparation of more detailed plans, which would address any potential tower line-of-sight issues in consultation with FAA and ATCT staff.

SPAS-PC00130-578

Comment:

2.3.1.6
Same comments on the covering and converting of the Argo flood channel. What other things on the northern airfield would need to be removed? Where would those things be moved to?

Response:

As described on page 2-33 of the SPAS Draft EIR, with the relocation of Runway 6L/24R 100 feet to the north under Alternative 6, 1,400 linear feet of the Argo Drainage Channel would fall within the RSA. As a result, this portion of the channel would need to be covered such that the weight of an aircraft could be supported within the RSA. This would be accomplished by converting the existing open unlined channel to an enclosed concrete box culvert. Other features that would be affected by the northerly relocation of Runway 6L/24R under Alternative 6 are illustrated in Figure 2-10 and described in Section 2.3.1.10. As described on page 2-52 of the SPAS Draft EIR, under Alternative 6, the maintenance road located at the northern edge of the north airfield would be moved north, outside of the RSA for the relocated runway, and operational restrictions would be imposed on the eastern end of the road, restricting its use during certain aircraft operations. Also under Alternative 6, the north airfield abandoned tunnel segment would be filled and navigational aids located at both ends of both of the north airfield runways would be relocated.

SPAS-PC00130-579

Comment:

This alternative also requires changes to the manchester tunnel why aren't those changes included?

How many sewers would LAWA need to move to implement this plan?

Response:

The need to remove and fill the North Airfield tunnel segment (referred to in this comment as the Manchester tunnel) is identified in Section 2.3.1.10 of the SPAS Draft EIR, including Table 2-3 and Figure 2-10. This component is also included in the ROM cost estimates prepared for Alternative 6 (see Table AF-1 of Appendix G of the Preliminary LAX SPAS Report). As the tunnel segment is not operational, it was not considered to be a facility that warranted mention in Section 2.3.1.6 of the SPAS

Draft EIR, which describes changes to airfield, terminal, and ground access facilities associated with implementation of Alternative 6.

Please see Response to Comment SPAS-PC00130-348 regarding outfall sewers that lie beneath LAX.

SPAS-PC00130-580

Comment:

Why isn't the widening of the runway included in the amount of feet the outer edge of the runway is moving?

Response:

The distance a runway is moved refers to the relative location of the new centerline to the location of the old centerline. Thus, if the runway is moved 260 feet north, the centerline of the runway is moved 260 north from the old centerline location.

The content of this comment is essentially the same as comment SPAS-PC00130-536; please refer to Response to Comment SPAS-PC00130-536.

SPAS-PC00130-581

Comment:

Why aren't ground Access things included with alternatives? Is the plan just to leave them off? How can full impacts be determined in pieces?

Response:

As indicated on page 1-17 of the SPAS Draft EIR, components of Alternatives 1, 2, 5, 6, 7, 8, and 9 are interchangeable such that airfield and terminal improvements from one alternative could be implemented in association with the ground access improvements proposed under another alternative. However, as stated on page 1-17, Alternatives 5 through 7 would only be approved in conjunction with the ground access improvements associated with Alternatives 1, 2, 8, or 9. Therefore, any SPAS alternative that is approved would include ground access components.

SPAS-PC00130-582

Comment:

2.3.1.7 Alternatives 7 2-34
How do these taxiway improvements compare to alternative 1? How much cheaper would this alternative be than alternative 1? How much cheaper would this alternative be than Alternative 4?

Response:

Please see Section 2.3.1 and Table 2.2 of the SPAS Draft EIR for a discussion of the various alternatives proposed under SPAS. Under Alternative 1, the separation distance between the centerline taxiway and Runway 6L/24R would be 500 feet and would meet FAA standards for ADG VI runway-to-taxiway separation for approach visibility at or above one-half mile (Category 1 approaches). The separation distance between the centerfield taxiway and Runway 6R/24L would be 460 feet, providing sufficient space for ADG V aircraft to hold prior to crossing the runway with a pilot line-of-sight to the end of Runway 24L. Under Alternative 7, the separation distance between the centerfield taxiway and both runways would be 400 feet, providing for ADG V separation distances. Under Alternative 1, Taxiway E and Taxilane D would meet ADG V standards. Under Alternative 7, Taxiway E would meet ADG VI standards and Taxilane D dimensions would meet ADG V standards.

Cost estimates for the SPAS alternatives are provided in Chapter 8 of the Preliminary LAX SPAS Report, with details included in Appendix G. The difference in costs associated with the alternatives would depend on which ground access alternatives are assumed. If the Alternative 1 ground access

components are assumed for both Alternative 1 and Alternative 7, the total cost of each alternative in escalated dollars is estimated to be $3,294,381,000 and $2,820,562,000, respectively. Alternative 4 would be the least costly of all the alternatives, with costs estimated to be $1,660,190,000.

SPAS-PC00130-583

Comment:

This alternative is showing improvements in all terminals on the northern airfield except terminal 2, Is that correct?

Response:

The commentor is correct in the sense that no modifications to the Terminal 2 building footprint (area) are planned under Alternative 7. However, as depicted in Figure 2-7 by the pink dashed line, Alternative 7 would relocate the Aircraft Parking Limit Line (APLL) south to meet ADG VI standards, and as a result, gates at the north end of Terminal 2 would be downsized (i.e., would accommodate smaller aircraft types). Given that the existing building footprint/area for Terminal 1 extends farther north than that of Terminal 2, the southward relocation of the APLL under Alternative 7 would affect both the northerly gates and the northern tip of the Terminal 1 building area (see red cross-hatch pattern in Figure 2-7). Regarding Terminal 3, the existing concourse is proposed to be relocated westward, which is why it is shown as a terminal improvement in Figure 2-7.

To provide clarification and to be consistent with similar statements made under the heading of Terminal Facilities for Alternatives 1, 5, and 6 in the SPAS Draft EIR regarding potential terminal facility improvements as a result of moving the APLL south, page 2-37 in Section 2.3.1.7.2 of the SPAS Draft EIR has been revised to note that as a result of moving the APLL south to meet ADG VI standards, several gates would be eliminated or the gates would be downsized (i.e., would accommodate smaller aircraft types).

Please see Chapter 5, Corrections and Additions Related to the SPAS Draft EIR.

SPAS-PC00130-584

Comment:

The illustration figure 2-7 shows a centerline taxiway, this change will require complete rebuilding of the manchester tunnel. How long would the north airfield need to be closed in order to do this?

Response:

Please see Response to Comment SPAS-PC00130-41 regarding construction plans and phasing of project improvements. As noted in that response, construction plans have not yet been developed for the SPAS alternatives, therefore, information regarding necessary runway closures has not been determined. Please see Response to Comment SPAS-PC00130-1012 regarding the north airfield abandoned tunnel segment (referred to as the Manchester tunnel in this comment).

SPAS-PC00130-585

Comment:

2.3.1.7.2 Terminal Facilities
What commuter facility currently exsists east of Sepulveda Blvd.

Response:

This content of this comment is similar to comment SPAS-PC00130-550; please see Response to Comment SPAS-PC00130-550 regarding the commuter facilities located east of Sepulveda Boulevard.

SPAS-PC00130-586

Comment:

Alternative 8 2.3.1.8
What are the differences between the ground access improvements in Alt 8 compared with Alternatives 1-4? Why have Alt 5, Alt 6, and Alt 7 imcompatable with Alt 8?

Response:

The ground access components of Alternative 8 are similar to the components associated with Alternatives 1 and 2. All of these alternatives include private vehicle access to the CTA; a redesigned entry roadway with new curbside space at Terminal 0; an Intermodal Transportation Facility between 96th and 98th Streets west of Airport Boulevard; a dedicated busway with connectivity to public transit; and relocation of the commercial vehicle holding lot. However, Alternative 8 includes a CONRAC and parking in Manchester Square, whereas Alternatives 1 and 2 only provide parking in that location. Alternative 3 provides a ground access system that is very different from Alternative 8. Under Alternative 3, the CTA would be closed to private vehicles. The ground access system would consist of a Ground Transportation Center at Manchester Square; Intermodal Transit Center in Continental City; CONRAC in Parking Lot C; development of two Automated People Mover Systems to link the ITC, CONRAC, and CTA and link the GTA and CTA; construction of new on-airport roads east of and parallel to Aviation Boulevard; reconfiguration and expansion of Parking Lot E; and construction of a West Employee Parking facility. Similar to Alternative 8, Alternative 4 would maintain private vehicle access to the CTA. The only ground access improvements that would be constructed under Alternative 4 is a CONRAC in Parking Lot C and a parking structure in Continental City.

Please see Response to Comment SPAS-PC00130-581 concerning the interchangeability of the components of SPAS Alternatives 1, 2, 5, 6, 7, 8, and 9. As indicated on pages 2-37 and 2-38 in Section 2.3.1.8 of the SPAS Draft EIR, Alternative 8 is compatible with the airfield and terminal improvements associated with Alternatives 1, 2, 5, 6, and 7.

SPAS-PC00130-587

Comment:

In your illustration Fig 2-8 you show a consolidated car rental. Unfortunately your illustration shows no access to the public or exit by public, Why? There doesn't seem to be any new roads to access the freeway or Century Blvd, Why?

Response:

Figures 2-1 through 2-9 in the SPAS Draft EIR depict the development concepts proposed under each of the nine SPAS alternatives. They are intended to show the key elements of each alternative, as addressed at a programmatic level of planning and analysis within the SPAS Draft EIR. The delineation of specific vehicle access points and "curb cuts" at individual parcels, such as in Manchester Square where the CONRAC would be developed under Alternatives 8 and 9, would be determined at more detailed levels of planning and design, should one of those alternatives be selected for approval. As indicated in Section 3.1 in Appendix E2-2 of the Preliminary LAX SPAS Report, the overall concept for the CONRAC in Manchester Square would include access from multiple locations. To accommodate traffic between the southbound I-405 and the CONRAC, a westbound leg of the signalized intersection at La Cienega Boulevard and the I-405 southbound ramps north of Century Boulevard would be constructed. A new northbound leg of the signalized intersection at Century Boulevard and Concourse Way would also be constructed to accommodate CONRAC access. A third signalized entry/exit on Aviation Boulevard between Century Boulevard and Arbor Vitae Street is also likely, but its exact location would depend on the alignment of the CONRAC.

SPAS-PC00130-588

Comment:

The same observations with the parking currently located in the Hertz lot. How are the cars to access or exit and have street studies been done? If so where are they?

Response:

Hertz car rental company has an operations facility at the northeast corner of West Arbor Vitae Street and Airport Boulevard, and a vehicle storage lot at the southwest corner of West Arbor Vitae Street and Aviation Boulevard. Under Alternatives 3 and 4, the operations facility parcel would be replaced by a CONRAC, in which case the parking and access specific to Hertz would be replaced by that of the overall new facility. None of the other SPAS alternatives propose improvements to the existing Hertz operations facility site. None of the SPAS alternatives propose improvements at the existing Hertz vehicle storage lot; however, under Alternative 3, the subject property would be acquired under easement only, as indicated in Section 2.3.1.11 of the SPAS Draft EIR. Impacts to parking and access at the vehicle storage lot would be determined in conjunction with more detailed planning of Alternative 3, should that alternative be selected at the end of the SPAS process.

SPAS-PC00130-589

Comment:

Why is LAWA removing parking from continental City? What are LAWA's plans for this area?

Response:

Continental City is a vacant lot at the northeast corner of Imperial Highway and Aviation Boulevard; there is no parking there that would be removed. Regarding plans for this area, an Intermodal Transportation Center (ITC) would be developed at this location under Alternative 3 and a parking structure would be developed there under Alternative 4. There are no development plans proposed for this area under any of the other SPAS alternatives. Please also see Response to Comment SPAS-PC00130-177 which addresses the same question posed by the commentor in greater detail.

SPAS-PC00130-590

Comment:

2.3.1.9 Alternative 9 2-41
This document shows no illustration of the type of APM being considered?

The APM in Alt D EIR wasn't technically available yet is the APM in this DEIR techinally available? How does this APM differ from the APM in Alt D?

The best part of using an APM over an elevated Busway would be that it wouldn't be subject traffic vagrities in the CTA. How would an elevated Bus overcome the traffic in the CTA?

Response:

Please see Response to Comment SPAS-PC00130-502 regarding the APM systems associated with Alternatives 3 (which is the existing LAX Master Plan or Alternative D) and 9, and the differences between the two concepts. At the level of current planning, details regarding the type of APM trains that would be used have not yet been implemented. Please see Response to Comment SPAS-PC00130-816 regarding the level of analysis of the APM in the SPAS Draft EIR.

Section 4.12.1 of the SPAS Draft EIR evaluated the on-airport transportation impacts of Alternatives 1, 2, and 8, which all include a dedicated (elevated) busway. It should be noted that the busway would not be elevated within the CTA; rather, within the CTA, buses would travel in mixed-flow traffic. The analysis in the SPAS Draft EIR considered all traffic in the CTA, including traffic associated with buses.

As indicated in that analysis, on-airport traffic impacts related to curbsides and to departures and arrivals level roadways would be less than significant for Alternatives 1, 2, and 8. All of these alternatives would, however, result in a significant and unavoidable impact related to the volume to capacity level at one intersection within the CTA. Please see Response to Comment SPAS-PC00130-139 regarding consolidated busing and the proposed elevated busway.

SPAS-PC00130-591

Comment:

Your overview should be rewritten! The second to the last sentence could use some verbs. Why are only Alt 1 and Alt 2 comparable? All of the Alternatives have flight field improvements, Why does lawa consider that Alt 3, 4, 5, 6 and 7 don't contain flight field improvements?

Response:

The overview of Alternative 9 summarizes the fact that the subject alternative focuses on ground access improvements. Although Alternative 9 does not, in itself, propose any airfield or terminal improvements, it is compatible with, and could be paired with, the airfield and terminal improvements proposed in Alternatives 1, 2, 5, 6, and 7. The overview's reference to Alternatives 1 and 2 simply notes the fact that the ground access improvements proposed in Alternative 9, other than the APM and the CONRAC, are similar to those of Alternatives 1 and 2, those similarities being the development of an ITF, the connection to the future Metro station, and the redesigned entry roadways (i.e., Sky Way).

Please see the discussion of alternatives on page 2-8 of the SPAS Draft EIR for more information about the compatibility and interchangeability of SPAS alternatives. Alternatives 3 and 4 are considered unique "fully-integrated" alternatives, and are not considered to have elements that are interchangeable with other SPAS alternatives.

SPAS-PC00130-592

Comment:

Where are your arguments over the elimation parking Lot E? What are LAWA's future plans for this area and continental city site?

Response:

As noted in Section 2.3.1.1.3, page 2-13 of the SPAS Draft EIR "Parking Lot E would no longer be used for employee parking, although this property could be used for other airport purposes, in the future. Changes to the use of this parking lot would occur independently from SPAS." While LAWA is unsure of the future use for Lot E, the primary reason they will no longer operate the lot as an employee lot is to improve the efficiency of the operation of shuttling airport employees between parking lots and the Central Terminal Area.

Please see Response to Comment SPAS-PC00130-177 regarding LAWA's plans for the Continental City property.

SPAS-PC00130-593

Comment:

I haven't seen in any of your illustrations a cell phone lot, why? Who decided to remove the cell phone lot? Is the extra trips associated with no cell phone lot included in your traffic studies? If so where? How many extra trips have you determined no cell phone lot to cause?

Response:

The existing cell phone lot is located on the northwest corner of 96th Street and Vicksburg Avenue. In SPAS Alternatives 1, 2, 4, 8, and 9, the cell phone lot would remain in its existing location. In Alternative 3, private vehicle traffic would not be permitted within the CTA; therefore, the existing cell

phone lot could be closed and the site allocated to the proposed CONRAC. Instead of a cell phone lot, the Ground Transportation Center (GTC) could be designed with short-term parking.

Because the cell phone lot is located outside of the CTA, vehicles entering the CTA from the cell phone lot are treated like other private vehicles in the on-airport transportation section of the SPAS Draft EIR (Section 4.12.1). The growth in future cell phone lot trips is included in SPAS Draft EIR projections of future private vehicle trips entering the CTA (discussed on page 4-1062 in Section 4.12.1.3.11 of the SPAS Draft EIR). While a cell phone lot does not reduce the number of trips entering the CTA, vehicles dwelling in the cell phone lot are less likely to recirculate within the CTA since the driver knows when their party is waiting at the curb.

SPAS-PC00130-594

Comment:

Table 2-2 2-45
The distances referred to seem to be added incorrectly, Why? The width of the new centerline in Alt 1, plus the distances between the runways and the new width of the runway indicate Alt 1 is accually 340 north, Alt 5 would be 400' north, Alt 3 400' south. Why aren't LAWA's numbers correct? This is a huge concern that a different group do the lay out so that there isn't any confusion as to where things are supposed to be?

Response:

The content of this comment is essentially the same as comment SPAS-PC00130-536; please refer to Response to Comment SPAS-PC00130-536.

SPAS-PC00130-595

Comment:

2.3.1.10 Exsisting Facilities 2-49
Table 2-3 Navigational Aids Talks about moving radar north of Westchester Parkway. Is this project in the northside EIR? How does LAWA propose to protect the radar from vandalism?

Response:

The California Environmental Quality Act (CEQA) Initial Study and Checklist for the LAX Northside Plan Update (available at http://www.lawa.org/GDZ/projectDocuments.aspx) designates areas for airport support uses, which could include radar surveillance facilities, among others.

Paragraph 606 of Federal Aviation Administration (FAA) Advisory Circular (AC) 150/5300-13A states that "navigational and Air Traffic Control Facilities (ATC-F) located off an airport and in a location that is accessible to animals or the public will have a security perimeter fence installed at the time of construction." LAWA must comply with AC 150/5300-13A. Thus, any radar relocation would include a security perimeter fence.

SPAS-PC00130-596

Comment:

North Maintance Road Why aren't the specific lengths included? What operational restrictions would exsist on the eastern end? Why isn't this information included?

Response:

Specific lengths for the North Maintenance Road have not been included as the distance is variable depending on each SPAS alternative. Additionally, portions of this road are being relocated independent of SPAS as part of runway safety area (RSA) studies. (See page 2-52 of the SPAS Draft EIR.)

Depending on the SPAS alternative selected, future operational restrictions may prohibit vehicle operations on portions of the road which are within the RSAs of north airfield runways while the runways are in use.

SPAS-PC00130-597

Comment:

Argo drainage channel This channel isn't properly denoted. The name is Argo flood channel. How will water reach the flood channel if it is covered? Where does LAWA expect the water to go? Why doesn't LAWA cover the 50 year storm and the 100 year storm? How does LAWA intend to pay if covering the flood channel result in flooding? How long can LAWA run without the north airfield? Is Lawa planning on sending the water through Lincoln Blvd and Sepulveda interchange?

Response:

The comment pertaining to the name of the Argo Drainage Channel is noted. Water would reach the Argo Drainage Channel through upstream storm drains and inlets that are tributary to the eastern end of the culvert and through inlet drains along the length of the channel. Please see Responses to Comments SPAS-PC00130-169 and SPAS-PC00130-539 regarding the design of the Argo Drainage Channel improvements. Please see Responses to Comments SPAS-PC00130-85 and SPAS-PC00130-273 for a discussion of the flood standards applicable to the analysis of hydrology and water quality at LAX. Please see Response to Comment SPAS-PC00130-730 regarding the treatment of economic conditions in an EIR. CEQA does not require an EIR to determine and evaluate costs associated with recovery from natural and unavoidable catastrophes at the airport. Implementation of the Argo Drainage Channel improvements would not result in additional stormwater flows at the Lincoln Boulevard/Sepulveda Boulevard interchange.

The SPAS Draft EIR is a programmatic document. There are no existing designs or engineering plans, nor are there construction phasing plans or schedules for any of the alternatives. If an alternative is selected, project-level environmental review, including specific design and construction timelines, would be conducted.

SPAS-PC00130-598

Comment:

North Airfield Manchester Tunnel The tunnel will need attention in any alternative containing a centerline taxiway. Table 2-2 2-45. The tunnel is 740' not 720'. What would the tunnel be filled with? Have you found the sorce of water in the tunnel? Will you be using the well dug to keep the tunnel dry during it's construction? I don't see any referrance to the air shafts dug for tunnel use, How does lawa plan on dealing with them?

Response:

Please see Response to Comment SPAS-PC00130-1012 regarding the north airfield abandoned tunnel segment (referred to by the commentor as Manchester Tunnel).

SPAS-PC00130-599

Comment:

Airport Operation Area The table doesn't say where this area is, where is it located? What is it currently guarding?

Response:

The commentor's reference to "The table…" appears to be in regard to Table 2-3 on page 2-49 of the Draft EIR, which delineates the existing facilities affected by SPAS improvements including Aircraft Operations Area (AOA) Guard Post #3. Page 2-52 of the SPAS Draft EIR discusses the location of the AOA Access Guard Post #3. Guard Post #3 is located northwest of 96th Street/Sky Way, just east of

the eastern terminus of Taxiway E. Figure 2-10 also depicts the location of AOA Access Guard Post #3. The Guard Post provides an access point to the north airfield. The AOA includes the portion of the airport intended for the landing, takeoff, or surface maneuvering of aircraft. These areas include such paved or unpaved areas that are used or intended to be used for the unobstructed movement of aircraft in addition to its associated runway, taxiway, taxilane, or apron. Access to the AOA is restricted to authorized personnel only and there are several guard posts, including Guard Post #3, located around the perimeter of the AOA to control access to and from the AOA. If Runway 6R/24L is extended, the access point guarded by Guard Post #3 will be removed. There are no plans to establish a replacement access point in this area of the airport.

SPAS-PC00130-600

Comment:

Lincoln Blvd How long would it take to tunnel Lincoln Blvd 540'? How long would it take to tunnel Lincoln Blvd 765'? How long will it take to tunnel Lincoln Blvd 252'? Who would be responsible for the blvd? Who would be moving the utlieties beneath Lincoln? What does LAWA plan to do about sewers in the area? What about the hot oil pipe? Who will pay for these jobs?

Response:

Please see Topical Response TR-SPAS-LR-1 for a discussion of the Lincoln Boulevard realignment associated with Alternatives 1, 5, and 6.

SPAS-PC00130-601

Comment:

96th Street 2-50 removal of this roadway should be done! It is indanger of pulling the upper roadway in the CTA down and it obsures gates in terminal 1.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. The commentor provides no evidence or substantiation of the claim that the 96th Street Bridge is in danger of "pulling down" the upper level roadway or that the upper roadway is at risk of collapsing. The bridge has no adverse effect on the structural integrity of the upper level roadway. Please see Response to Comment SPAS-PC00130-809 regarding the reconfiguration of Sky Way under the SPAS alternatives and the relationship of the reconfiguration to the 96th Street Bridge. The reconfiguration of the 96th Street Bridge under the Alternatives 1, 2, and 5 through 9 would be compatible with the airfield and terminal improvements associated with these alternatives. The commentor's reference that the bridge obscures gates in Terminal 1 is unclear. The bridge is currently located a sufficient distance from the Terminal 1 gates such that there is no obstruction to the movement or operation of aircraft these gates. Also, after reconfiguration of Sky Way in Alternatives 1, 2, and 5 through 9, the bridge would be located a sufficient distance from the terminal to allow for safe movement and operation of aircraft. (See Table 2-3 of the SPAS Draft EIR.)

SPAS-PC00130-602

Comment:

Taxi Holding lot we agree taxis should not be that close to the flight field.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00130-603

Comment:

Urgent Care This facility is the only medical care available to the traveling public in an emergency! If this facility is to be removed a newer version should be built before the old ones removal. Who owns this building? Is Lawa operating this building?

Response:

Please see Responses to Comments SPAS-PC00130-944 and SPAS-PC00130-623 regarding the relocation of the urgent care facility and the provision of emergency service. As stated on page 4-694 in Section 4.9.6.1 of the SPAS Draft EIR, the urgent care facility is leased from LAWA. The urgent care facility is operated by Reliant Urgent Care.

SPAS-PC00130-604

Comment:

LAWA Police Where is the new facility being planned? How big would the new facility be? Did you include an area for canines? Are you including a kennel area?

Response:

As discussed on page 2-55 in Chapter 2 of the SPAS Draft EIR, under all alternatives except Alternative 4, the existing LAWAPD station and associated facilities would be removed due to the realignment or, in the case of Alternative 3, removal of the 96th Street Bridge/Sky Way. As indicated in Section 4.11.2.6.10 of the SPAS Draft EIR, the existing LAWAPD station could be relocated to the future LAX Public Safety Complex, which is currently being planning independent of SPAS. A specific site and detailed building components such as space for a canine or kennel area has not yet been determined, and knowledge of its precise location and specific design components is not necessary to understand the environmental impacts of the alternatives. As explained on page 4-3 of the EIR, the SPAS Draft EIR is a programmatic document. Project-level impacts associated with implementation of individual components would be assessed in future CEQA documents. Please see Response to Comment SPAS-PC00130-235 for a discussion of the appropriateness of the programmatic review conducted for the SPAS project.

Furthermore, as discussed in Section 4.11.2.6.10, any impacts to law enforcement associated with ground improvements would be mitigated by implementation of Mitigation Measure MM-LE (SPAS)-1. LAX Master Plan Commitments PS-1 and PS-2 would also guide demolition of existing law enforcement structures and the construction of new facilities (see Section 4.11.2.5 of the SPAS Draft EIR).

As discussed in Section 4.11.2.6.1 of the SPAS Draft EIR, the LAX Public Safety Building and Supporting Facilities would consolidate existing facilities and personnel under one roof, creating a larger, more modern and efficient facility that would result in an improvement and expansion of law enforcement facilities. The Public Safety Building and Supporting Facilities project is independent of SPAS, and the site for the facility is currently unknown and under consideration.

SPAS-PC00130-605

Comment:

Park One Does the no relocation of parking not include the 16,000 new parking spots? How many parking spots are currently in park one?!

Response:

As provided in Table 4.12.1-1 on page 4-1054 of the SPAS Draft EIR, Park One currently has 2,728 public parking spaces.

The comment refers to the "no relocation of parking" relative to Park One which is consistent with SPAS Alternative 4 as described and depicted in Section 2.3.1.4 of the SPAS Draft EIR. As shown in Table 4.12.1-40 on page 4-1167 of the SPAS Draft EIR, Alternative 4 would have 18,896 total public parking spaces, only 291 more than the baseline supply. The existing CTA public parking structures 2B and 5, as well as Lot C public parking supply would be replaced by 9,127 spaces in the Intermodal Transportation Center (ITC). This would represent the only set of additional spaces in Alternative 4.

After reviewing Table 4.12.1-40 on page 4-1167 of the SPAS Draft EIR, this page has been revised due to a formatting error. Please see Chapter 5, Corrections and Additions Related to the SPAS Draft EIR. Accordingly, the numbers of parking spaces under Alternatives 8 and 9 under the "Airport Remote" section of Table 4.12.1-40 have been shifted down one row. Accordingly, the numbers of Airport Remote parking spaces assumed under Alternatives 8 and 9 are identical to those assumed under the column "Alts. 1-2." These minor revisions do not change the impact significance conclusions provided in the Draft EIR and are consistent with the data provided on page 2-47 in Table 2-2 of the SPAS Draft EIR.

SPAS-PC00130-606

Comment:

West remote gates If these gates are to be removed where is LAWA planning on parking VIP aircraft? (ie the president) Will celebrities have a special gate facility? What is the LAX gate build out plan? It is not described in the DEIR.

Response:

Regarding west remote gates, please see Responses to Comments SPAS-PC00130-170 and SPAS-PC00130-409. Refer to Figures B through D in Appendix F-1 of the Preliminary LAX SPAS Report for illustrations of the assumed gate layout plans under each alternative.

Regarding VIP aircraft parking, please see Response to Comment SPAS-PC00130-551.

SPAS-PC00130-607

Comment:

LAWA Construction & Maintanance Since construction and storage is to be shifted to continental city, will LAWA be putting in sound walls will landscaping in front of them to maintain the area? Will the toxic dirt removed from the airfield and placed next to the business center be moved there as well?

Response:

The use of the Continental City site by LAWA's Construction and Maintenance (C&M) Division is one of three possibilities for the relocation of the existing C&M facility, as would be necessary under Alternatives 1 through 3 and 5 through 7. As described on page 2-50 of the SPAS Draft EIR, relocation of existing C&M Division facilities affected under these alternatives may occur through on-site consolidation of facilities, relocation of affected facilities to another location with the Airfield Operations Area, or relocation to Continental City. As stated on page 2-49 of the SPAS Draft EIR, the planning and analysis for the SPAS alternatives are at a programmatic level, therefore specific improvements associated with the affected facilities, which would include those requiring relocation, have yet to be designed and would not be implemented until project-level review of specific improvements is complete. As such, both the likelihood of relocating C&M Division facilities to Continental City and the site design for the relocated facilities have not yet been determined. Additionally, the basic operational characteristics of the C&M Division facilities and the land use setting of Continental City suggest that significant noise impacts are very unlikely and, therefore, the use of sound walls to mitigate noise impacts is unwarranted. Specifically, as described on page 2-50 of the SPAS Draft EIR, the northern portion of the C&M Division facilities site potentially affected by the SPAS alternatives is used for materials recycling (i.e., sorting and bundling of recyclable materials), and equipment (storage) yard, and other materials storage. Such uses are not considered to be notable noise generators. The commentor is incorrect in suggesting that there are existing construction activities within C&M Division

facilities that would be shifted to Continental City, notwithstanding that it is currently unknown whether any of the existing facility would be relocated to Continental City. Even if one were to assume that construction activities, or other activities with noise levels comparable to those of construction, were to move to Continental City, Section 4.10.3 of the SPAS Draft EIR already addresses construction noise impacts at Continental City. As indicated therein, the only noise-sensitive use in the general vicinity of Continental City is residential development in Del Aire to the south. As indicated on page 4-951 of the SPAS Draft EIR, the northern edge of Del Air (i.e., point closest to Continental City) is approximately 800 feet south of Continental City and is lined by an existing 8-foot cinderblock wall, which already provides noise attenuation to the community. In summary, no significant noise impacts are anticipated from the potential relocation of C&M Division facilities to Continental City and the need for a sound wall at Continental City is unwarranted.

Please see Response to Comment SPAS-PC00130-265 regarding the handling of contaminated materials encountered during construction.

SPAS-PC00130-608

Comment:

Fedex 2-51
How would the facilities be reconfigured? How could they be consolidated? What does AOA mean?

Response:

In regards to the reconfiguration and/or consolidation of the FedEx Aircraft Maintenance Facility, please refer to Response to Comment SPAS-PC00130-627.

In regards to the Airport Operations Area (AOA), please refer to Response to Comment SPAS-PC00130-599.

SPAS-PC00130-609

Comment:

On Airfield Fuel Truck how would the fueling station be reconfigured?

Response:

As indicated on pages 2-51 and 2-56 of the SPAS Draft EIR, with the extension of Taxilane D under Alternatives 1, 2, and 6, the fueling station would need to be reconfigured or relocated within the airfield operations area (AOA), and under Alternatives 3, 5, and 7, the entire facility would be removed and relocated within the AOA. As stated on page 2-49, because the planning and analysis for the SPAS alternatives are at a programmatic level, specific improvements to the existing facilities potentially affected by SPAS improvements have yet to be designed and would not be implemented for several years.

SPAS-PC00130-610

Comment:

Southwest Airlines 2-51
Where would you move the facilities?

Response:

As stated on Page 2-56 in Section 2.3.1.10 of the SPAS Draft EIR, the Southwest Airlines Ground Support Equipment (GSE) facility would be removed and relocated elsewhere within, or adjacent to, the Airport Operations Area (AOA). A specific site has not yet been designated, and knowledge of its precise location is not necessary to understand the environmental impacts of the alternatives. As explained on page 4-3 of the EIR, the SPAS Draft EIR is a programmatic document. Please see Response to Comment SPAS-PC00130-235 for a discussion of the appropriateness of the

programmatic review conducted for the SPAS project. Project-level impacts associated with implementation of individual components would be assessed in future CEQA documents.

SPAS-PC00130-611

Comment:

Airfield Bus Parking Area 2-51
Where on the AOA would you relocated the Bus parking area?

Response:

As stated in Section 2.3.1.10 on page 2-56 of the Draft SPAS EIR, the Airfield Bus Parking Area would be removed and relocated elsewhere within the Airport Operations Area (AOA) or in the area referred to as Continental City. A specific site has not yet been designated.

SPAS-PC00130-612

Comment:

LAX Fuel Why only on Alternatives 3,5, and 7 would the facilities be consolidated on the exsisting site? What will occur with the other Alternatives?

Response:

As described in Section 2.3 of the SPAS Draft EIR, the proposed airfield improvements proposed under Alternatives 3, 5, and 7 include the southward relocation of existing Taxiway E and Taxilane D. The combination of the two southward relocations would push the aircraft operations area farther south than exists today and would extend into the northern portion of the existing fuel farm area. As such, existing facilities in the northern portion of that site would need to be relocated and consolidated into the remaining undisturbed portion of the fuel farm area.

SPAS-PC00130-613

Comment:

US Airways Maintence Where would this facility be moved? How much square footage would the new building be?

Response:

As discussed on page 2-56 in Section 2.3.1.10 of the SPAS Draft EIR, the LAX Master Plan includes the construction of a new aircraft maintenance building on the west side of the airport (i.e., west of the former Continental Airlines (now United Airlines) maintenance hangar. Knowledge of its precise square footage is not necessary to understand the environmental impacts of the alternatives. As explained on page 4-3 of the EIR, the SPAS Draft EIR is a programmatic document. Please see Response to Comment SPAS-PC00130-235 for a discussion of the appropriateness of the programmatic review conducted for the SPAS project. Project-level impacts associated with implementation of individual components would be assessed in future CEQA documents.

SPAS-PC00130-614

Comment:

Avis Car Rental I thought Alternatives 8 & 9 were to be used in conjuction with another Alternative could these alternatives be used a stand alone measure? What property on 111th St does LAWA own? What other properties does LAWA own?

Response:

As indicated on page 2-8 in Section 2.3.1 of the SPAS Draft EIR, the ground access improvements associated with Alternatives 8 and 9 are compatible with, and could be paired with, the airfield and terminal improvements proposed under Alternatives 1, 2, 5, 6 and 7. Implementation of only the ground access improvements proposed under Alternatives 8 and 9 is not proposed and such a scenario would not respond most of the project objectives presented in Section 2.2. Specifically, such a scenario would not provide north airfield improvements that support the safe and efficient movement of aircraft at LAX, would not maintain LAX's position as the premier international gateway in supporting and advancing the economic growth and vitality of the Los Angeles region, would not plan improvements that do not result in more than 153 passenger gates at 78.9 MAP, and would not produce an improvement program that is efficient, sustainable, feasible, and fiscally responsible.

The airport boundary shown in Figures 2-12, 2-13, and 2-14 generally reflects the property owned by LAWA, and also shows properties proposed to be acquired by LAWA under the various SPAS alternatives.

SPAS-PC00130-615

Comment:

Travelodge & Dennys Restaurant2-52
What does LAWA plan to put in the Travelodge/Dennys location? Will LAWA give them other land that they own and pay to build a new facility? How many jobs would be effected?

Response:

The Travelodge Hotel is located in the southwest corner of Manchester Square. Under Alternatives 1, 2, 3, 8, and 9, this parcel would be used for ground access facilities. Because these facilities are located on LAWA property, they are not subject to the relocation provisions under the LAX Master Plan Draft Relocation Plan. (See page 4-668 of the SPAS Draft EIR.) No relocation of these facilities is planned by LAWA; rather, relocation would be a business decision. (See page 2-57 of the SPAS Draft EIR.) Whether or not jobs would be affected would depend on whether or not the businesses chose to relocate to another site in the area. Note that economic/social impacts, such as employment, are not required to be evaluated under CEQA. (State CEQA Guidelines Section 15064(e).)

SPAS-PC00130-616

Comment:

Navigational Aids What are you referring to as navigational aids? Is it just radar? Are you including runway status lights? What does ASR refer to?

Response:

Per Federal Aviation Administration (FAA) Advisory Circular (AC) 150/5300-13A, Airport Design, Navigational Aids (NAVAID) are 'electronic and visual air navigation aids, lights, signs and associated supporting equipment.' By definition, Runway Status Lights (RWSL) would be a NAVAID.

Per Federal Aviation Administration (FAA) Advisory Circular (AC) 150/5300-13A, Airport Design, Airport Surveillance Radar (ASR) is "a radar facility used to detect and display azimuth, range, and elevation of aircraft operating within terminal airspace." For additional information, please refer to Paragraph 618 of AC 150/5300-13A.

SPAS-PC00130-617

Comment:

North Maintence Road Wouldn't movement 500' north place the maintence road on top of the Argo flood Channel? Is the plan to put the maintence road in the flood Channel?

Response:

As discussed on Page 2-52 in Section 2.3.1.10 of the SPAS Draft EIR, the north maintenance road would require relocation outside of the Runway Safety Area (RSA). The distance of the relocation is dependent on the runway shift occurring in each alternative. In instances where the Argo Drainage Channel and the service road fall within the RSA, the Argo Drainage Channel would be structurally covered to support the weight of a truck on the overhead service road once it is relocated outside of the RSA.

SPAS-PC00130-618

Comment:

Argo Drainage Channel This is improperly named it is called the Argo flood channel. If the channel is to be converted what plans has LAWA made to clean the water before returning it to the Santa Monica Bay? What kind of surface are you looking at to cover the channel? Where else do you know of has a covered flood channel with a perible surface that can support an aircraft? Have they had an difficulty with flooding, colasp, or contamination? If this situation does not exsist anywhere else where is the technology coming from and does it come with a garuntee?

Response:

Impacts from storm water pollutant loads are described generally on page 1-80 of the SPAS Draft EIR, and specifically in Section 4.8 of the SPAS Draft EIR. As described on page 4-637 of the SPAS Draft EIR, the annual stormwater pollutant loads would be either less than significant or less than significant with mitigation for all SPAS alternatives.

The comment pertaining to the name of the Argo Drainage Channel is noted. Conversion of the Argo Drainage Channel to a concrete box culvert would be subject to Standard Urban Stormwater Mitigation Plan (SUSMP) and Low Impact Development (LID) requirements pertaining to water quality. Under Alternatives 1, 5, and 6, the channel would be covered with concrete of sufficient strength to handle the weight of an aircraft. Use of permeable materials would not meet FAA RSA requirements and would therefore not be used to cover the Argo Drainage Channel. The technology exists to design a concrete box culvert to withstand the weight of an aircraft without resulting in flooding, collapse, or contamination. For example, at LAX, the Sepulveda Tunnel provides for the presence of Sepulveda Boulevard beneath the south runway complex.

SPAS-PC00130-619

Comment:

Manchester tunnel the tunnel is 740' long not 720'. The tunnel has never been open to public use but has been open in the past. Have you found the sorce of water in the tunnel? What do you plan to do about the airvents? Any use of a centerline taxiway would contribute to co lapse of the tunnel because it is only reinforced at the current north runway.

Response:

Please see Response to Comment SPAS-PC00130-1012 regarding the north airfield abandoned tunnel segment (referred to by the commentor as the Manchester Tunnel).

SPAS-PC00130-620

Comment:

figure 2-10
#4 is located incorrectly please get a survaior to find the actual location and length. Where are the current access vents?

Response:

The approximate location of the north airfield abandoned tunnel segment is accurately depicted in Figure 2-10 of the SPAS Draft EIR. There is no need for a surveyor to identify the precise location and length of the tunnel segment in order to evaluate the impacts of the SPAS alternatives on this facility, or to identify the current access points. As discussed in Table 2-3 of the SPAS Draft EIR, under Alternatives 1, 5, and 6, the tunnel would be filled.

If an alternative is selected, future project-level environmental review would be conducted. This level of review would analyze all impacts of the proposed project, including those to the abandoned north airfield tunnel.

SPAS-PC00130-621

Comment:

96th Street Bridge/Sky Way under all the alternatives (except 3) this bridge should be removed and reconfigured. This bridge blocks the interior gates to terminal one and is straining the connection to the upper roadway increasing the chance of collaspe of the upper roadway at the canalever junction of terminal one.

Response:

The content of this comment is similar to comment SPAS-PC00130-601; please refer to Response to Comment SPAS-PC00130-601.

SPAS-PC00130-622

Comment:

Commercial Holding Lots Has LAWA looked at putting the taxi holding lot in the parking lot within the central terminal? It would allow cabs and vans to pull to whatever side of horseshoe (CTA roadway) to get to waiting passengers more quickly. What other commercial Holding Lots does LAWA have? Where are they located?

Response:

As described below in further detail, relocating the taxi holding lot inside the CTA parking lot area is infeasible because there is insufficient space to construct a commercial vehicle holding lot within the CTA. Also, there is no evidence that relocating the commercial vehicle holding lot to the CTA would improve efficiency.

As can be seen SPAS Draft EIR Figures 1-5, 1-6, 1-12, and 1-13, which delineate the location and size of the commercial vehicle holding lot proposed under SPAS Alternatives 1, 2, 8, and 9, and also depict the CTA relative to building areas (gray shading) and open areas between buildings, there is insufficient space available within the CTA to efficiently accommodate the area needed for commercial vehicles such as taxis and shuttle vans. Moreover, there is no evidence that placing the commercial vehicle holding lot within the CTA would improve the efficiency by which taxis and shuttles could get to passengers awaiting pick up, given the one-way direction of most roads within the CTA. For example, if the holding lot were to be placed in the middle of the CTA, a taxi or shuttle dispatched to pick up passengers at Terminal 1 would be required to travel west on World Way North and/or south on West Way, then east on World Way South to the airport return road at the east end of the CTA, and then circle around to stop at Terminal 1. The dispatch of a taxi or shuttle to Terminal 1 from the currently proposed commercial vehicle holding lot would simply require the vehicle to travel south on Sky Way and stop at the first terminal. Although the physical straight-line distance between Terminal 1 and a holding lot within the CTA might be comparable or even less than the straight-line distance between Terminal 1 and the holding lot associated with the SPAS alternatives, the travel distance of the former would be substantially greater (i.e., approximately 2 to 5 times greater) than the latter, due to the one-way nature of roads within the CTA.

Regarding the location of existing commercial vehicle holding lots at LAX, as indicated on page 2-55 of the SPAS Draft EIR, the taxi holding lot is located northeast of the CTA, near 96th Street and Sepulveda Boulevard, as shown in Figure 2-10 of the SPAS Draft EIR. The existing shared ride van holding lot is located on Avion Drive south of Century Boulevard and the charter bus/limousine holding lot is located in the southwest corner of Jenny Street and Westchester Parkway.

SPAS-PC00130-623

Comment:

Urgent (Medical) Care Facility - Please have this facility relocated within the northside development. This facility is of major concern to the traveling public! It should be as close as possible to the airport yet not in the airport. Have you checked with Maxine Waters office about removing this facility? She negociated its' presence when Daniel Freeman Hospital was being sold. If there is an accident anywhere on airport grounds because of distance and traffic people could die.

Response:

As shown in Figure 2-10 and discussed on page 2-55 in Chapter 2 of the SPAS Draft EIR, the urgent care medical facility (i.e., Reliant Urgent Care) would be removed under all alternatives except Alternative 4. This facility could potentially be relocated elsewhere in the airport area, including LAX Northside, which allows for commercial and office uses such as an outpatient medical facility. Any decision to relocate within LAX Northside or the local area would be at the discretion of Reliant Urgent Care. It should be noted that, although located on LAWA property, the outpatient medical care facility has no relationship to LAX other than offering routine and urgent care medical services to residents and employees in the local area or others who may see it while driving along Sepulveda Boulevard. There are also other urgent care facilities in the area with convenient access from LAX, including Urgent Care at 8320 Lincoln Boulevard (approximately 0.75 mile north of LAX) and Los Angeles Airport Urgent Care at 1117 West Manchester Boulevard, Inglewood (approximately 1.25 miles northeast of LAX).

As described in Section 4.11.1 of the SPAS Draft EIR, medical emergencies are responded to by the City of Los Angeles Fire Department from their four fire stations located on airport property. Those patients in need of further attention are transported by ambulance to the nearest area hospitals with the necessary emergency medical treatment facilities. As shown in Figure 4.10.1-9 in Section 4.10.1 and listed in Table 1 of Appendix J1-2, the nearest hospitals within the SPAS land use study area are Centinela Hospital Medical Center (approximately 2 miles east of LAX) and Freeman Regional Medical Center (approximately 2.5 miles northeast of LAX). Furthermore, as described on pages 4-994 through 4-997 in Section 4.11.1 of the SPAS Draft EIR, LAX and surrounding communities are subject to various emergency response and disaster response plans and regulations in the event of a major emergency including the County of Los Angeles Mutual Aid Operations Plan, LAX Airport Emergency Plan, and LAX/Sea Disaster Preparedness Plan to ensure the safety of the public. Therefore, relocation of Reliant Urgent Care would have no effect on emergency response to accidents at LAX.

SPAS-PC00130-624

Comment:

LAWA Police Station/Facilities What is the LAX public safety building? What are the supporting facilities? Are you including kennel space? Will you have a walking area for the dogs?

Response:

The content of this comment is similar to comment SPAS-PC00130-604; please refer to Response to Comment SPAS-PC00130-604.

SPAS-PC00130-625

Comment:

Park One Parking and Billboards Always happy to hear of the removal of billboards.

West Remote Aircraft gates 2-55 What does MSC stand for?

Response:

The comment regarding the removal of billboards is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project.

MSC stands for Midfield Satellite Concourse. The MSC was a component of Alternative D and was addressed in the program-level LAX Master Plan; it is not a component of the SPAS alternatives but is considered in the analysis of cumulative impacts in the SPAS Draft EIR. The MSC is described on page 5-18 in Chapter 5 of the SPAS Draft EIR.

SPAS-PC00130-626

Comment:

LAWA Construction and Maintenance We recommend that these areas be consolidated and put in continential city

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. As indicated on page 2-56 of the SPAS Draft EIR, LAWA is considering relocating these facilities to the area referred to as Continental City.

SPAS-PC00130-627

Comment:

Fed Ex Maintenance - Where else could these facilities be located? Employee parking could be consolidated with a parking structure.

Response:

As stated on page 2-56 in Section 2.3.1.10 of the SPAS Draft EIR, the FedEx Aircraft Maintenance Facility, including the various aspects of the facility that are within the existing leasehold, such as the maintenance hangars and apron areas, workshops and equipment storage buildings, employee parking, etc., would be consolidated and relocated on the existing site or relocated elsewhere on the Airport Operations Area (AOA). A specific site within the AOA has not yet been designated.

SPAS-PC00130-628

Comment:

On-Airfield Fuel Truck Filling station - Having this fueling station so close would seem somewhat dangerous where else could it be relocated?

Response:

As stated on page 2-49 of the SPAS Draft EIR, because the planning and analysis for the SPAS alternatives are at a programmatic level, specific improvements to the existing facilities potentially affected by SPAS improvements have yet to be designed and would not be implemented for several years. That includes the on-airfield fuel truck filling station.

If one of the alternatives that reconfigures or relocates the fuel truck filling station is approved, further project-level environmental review would be conducted. That review would assess, among other things, the safety of the location and configuration of the filling station.

SPAS-PC00130-629

Comment:

Southwest Airlines GSE Facility Exactly where are you considering relocating this facility?

Response:

The content of this comment is essentially the same as comment SPAS-PC00130-610; please refer to Response to Comment SPAS-PC00130-610.

SPAS-PC00130-630

Comment:

Airfield Bus Parking Area - We recommend that these 44 parking spaces be relocated near the employees on World Way West. The building exsists, there are bathrooms and food nearby. Buses could be used to shift employee parking to lot C or continental city.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please refer to Response to Comment SPAS-PC00130-611 regarding relocation of the Airfield Bus Parking Area.

SPAS-PC00130-631

Comment:

LAX Fuel Farm Same comments as Fuel Truck.

Response:

Please see Response to Comment SPAS-PC00130-628. The explanation provided therein is applicable to both the on-airfield fuel truck filling station and the LAX fuel farm. Also, please see Response to Comment SPAS-PC00130-612.

SPAS-PC00130-632

Comment:

US Airways Maintence Building This building could be retained if LAWA would shorten the length of the runways!

Response:

As stated on page 2-56 in Section 2.3.1.10 of the SPAS Draft EIR, the US Airways Maintenance Building would be removed under Alternatives 3, 5, and 7. Removal of this building would be required due to the lateral movement of Runway 6R/24L and/or the Taxilane D and Taxiway E improvements associated with those alternatives, and is not related to runway length. As can be seen by review of Figure 2-10 in the SPAS Draft EIR, to avoid removal of that structure (Facility #20 on the figure) by reducing the existing length of the runway and still accommodate the lateral runway move and taxilane/taxiway improvements associated with those alternatives, it would be necessary to reduce the length of the runway by about 50 percent. Such a reduction would be contrary to the basic design and function of the runway, and therefore would be infeasible.

SPAS-PC00130-633

Comment:

Avis Rental Car - Anything to finally get a Conrac

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00130-634

Comment:

Burger King - How much does buying this business cost? Does LAWA currently own this property? What other property does LAWA currently own?

Response:

As noted on page 2-56 of the SPAS Draft EIR, LAWA owns the property currently occupied by a Burger King restaurant. LAWA does not own the restaurant; it operates under a lease. LAWA would not be required to purchase this business as the property is already owned by LAWA. Property owned by LAWA is illustrated by the property boundaries identified in Figure 1-2 of the SPAS Draft EIR.

SPAS-PC00130-635

Comment:

Travelodge Hotel 2-57 What airport facilities would replace the businesses? Would LAWA allow these businesses to open on the other property owned by LAWA?

Response:

The Travelodge Hotel is located in the southwest corner of Manchester Square. Under Alternatives 1, 2, 3, 8, and 9, this parcel would be used for ground access facilities. There are no plans to relocate the Travelodge to another airport-owned parcel. Please also see Response to Comment SPAS PC00130-615 for further discussion of the Travelodge Hotel.

SPAS-PC00130-636

Comment:

2.3.11 Acquistion 2-57
We have been told over and over again in public meetings that no Acquistions would be necessary. Who is responsible for saying this? What is LAWA's plan to accommodate the 493 employees who will have lost their jobs

Response:

Regarding analysis of property acquisition impacts on the Westchester community associated with the RPZ, please see Responses to Comments SPAS-AL00007-26 and SPAS-PC00130-931. No acquisition is proposed within the Westchester community, as shown in Figure 2-11 and listed in Table 2-4 in Section 2.3.1.11 of the SPAS Draft EIR.

During the course of the public meetings held on August 25, 28, and 29, 2012, LAWA received several inquiries as to whether acquisition of homes and businesses in the Westchester community is proposed

under any of the SPAS alternatives. LAWA staff answered that question by correctly indicating that no acquisition is proposed within the Westchester community.

Section 2.3.1.11 of the SPAS Draft EIR delineates and describes the properties proposed to be acquired under each SPAS alternative, none of which include properties in Westchester. Section 4.7.2 of the SPAS Draft EIR addresses potential impacts associated with the relocation of runway safety zones (RPZs) and other safety areas under each alternative, and delineates the specific parcels that would fall within the RPZ under each alternative, including parcels within Westchester. The SPAS Draft EIR impacts analysis indicates that should incompatible structures or uses within the RPZ be determined to pose a safety risk, as assessed at more detailed levels of planning in consultation with the FAA, there are several options for addressing such risks, one of which is the removal of the structure or use. The acquisition of properties within RPZ areas is not proposed, nor is it a certainty, under any of the SPAS alternatives. The majority of the parcels, and uses therein, located within the RPZ areas under the SPAS alternatives have been within the existing runway RPZ area for decades. Information on specific options to address safety risks would be developed during project-specific CEQA review should an alternative calling for shifting Runway 6L/24R northward be selected. It is appropriate for a first-tier program level EIR to defer detailed descriptions and impact analysis of individual projects in the program to future project-level CEQA documents. (State CEQA Guidelines Section 15383; Koster v. County of San Joaquin (1996) 47 Cal.App.4th 29, 37.)

In the event that it is determined in the future that relocation of an existing business is necessary, impacts associated with acquisition of the property and relocation of the business would be addressed in future project-specific CEQA documents, by LAX Master Plan Commitment RBR-1 and LAX Master Plan Mitigation Measure MM-RBR-1.

Regarding the potential for job loss due to acquisition, CEQA does not require job losses and other purely social or economic impacts to be analyzed in an EIR (State CEQA Guidelines Section 15064(e). Nevertheless, as described in Section 4.9.6 of the SPAS Draft EIR, businesses proposed for acquisition under Alternatives 1, 2, 3, 4, 8, and 9, would be eligible for relocation assistance as described in LAX Master Plan Commitment RBR-1, and LAX Master Plan Mitigation Measures MM-RBR-1 and MM-RBR-2, thereby minimizing adverse economic impacts. The number of employees (493) referenced by the commentor was derived from the total number of employees listed in Table 2-4 in Section 2.3.1.11 of the SPAS Draft EIR; however, as shown in Table 2-5 in Section 2.3.1.11 of the SPAS Draft EIR, the acquisition of all of these areas would only occur under Alternative 3. Under Alternatives 1, 2, 4, 8, and 9, fewer parcels would be acquired and therefore fewer employees would be affected. Acquisition under any of the alternatives would be addressed by the LAX Master Plan commitment and mitigation measures noted above, which would provide both compensation and relocation assistance for business owners, and efforts may be taken to move businesses into airport-owned property or developments if feasible.

SPAS-PC00130-637

Comment:

Comments and Questions concerning Lincoln Boulevard Re-Alignment in Alternatives 1, 5, and 6.

In addition to these questions, there are further detail and more questions in the attached Letter from Bureau of Sanitation and the ARSAC White Paper: PROGRAM LEVEL VS PROJECT LEVEL EIR ANALYSIS RE: THE LINCOLN BLVD. TUNNEL PROJECT

1. Based upon the attached Bureau of Sanitation letter dated September 14, 2012, will LAWA be impacting any sewer lines? Which sewer lines will be impacted? How will LAWA mitigate these sewer lines? Considering that the three outfall lines running under LAX to the Hyperion Treatment Plant provide almost all of the sewage treatment capacity for the City of Los Angeles and some adjoining cities, is the risk of realigning Lincoln Blvd by LAWA too great as to prevent Angelenos from flushing their toilets?
2. Is the proposed Lincoln Blvd realignment in Alternatives 1, 5 and 6 a Program Level EIR or a Project Level EIR? Please see the White Paper for a detailed analysis. Please explain your answer with relevant citations from CEQA.

3. Which agencies has LAWA consulted with regarding the proposed Lincoln Blvd realignment?
a. Was CalTrans consulted? What was their response? Who at CalTrans was contacted and who from CalTrans replied?
b. Was the Los Angeles Department of Water & Power consulted? Who was contacted and who from LADWP replied?
c. Was the Bureau of Sanitation contacted? Who was contacted and who from LADWP replied?
d. Were oil pipeline operators contacted? Who was contacted and who from the oil pipelines replied?
e. Were fiber operators contacted? Who was contacted and who from the oil fiber operators replied?
f. Were other underground utilities or right of way users contacted? Who was contacted and who from the oil fiber operators replied?
4. Does LAWA face any challenges with regards to outfall sewers or abandoned sewer lines in relation to a proposed realignment of Lincoln Blvd? How will LAWA mitigate those challenges?
5. Does LAWA face any challenges with regards to water lines in relation to a proposed realignment of Lincoln Blvd? How will LAWA mitigate those challenges?
6. Does LAWA face any challenges with regards to storm drains in relation to a proposed realignment of Lincoln Blvd? How will LAWA mitigate those challenges?
7. Does LAWA face any challenges with regards to electrical lines in relation to a proposed realignment of Lincoln Blvd? How will LAWA mitigate those challenges?
8. Does LAWA face any challenges with regards to fiber lines in relation to a proposed realignment of Lincoln Blvd? How will LAWA mitigate those challenges?
9. Does LAWA face any challenges with regards to other subsurface users of the road or right-of-way in relation to a proposed realignment of Lincoln Blvd? How will LAWA mitigate those challenges?
10. Is the proposed Lincoln Blvd realignment considered to be a minor street modification, an improvement or something else? Please explain your answer.
11. In the Light and Glare section, why does LAWA discount the significance of possible light and glare problems by proposing to move Lincoln Blvd 350 feet closer to homes, schools, churches and businesses.
12. In the Air Quality Section 4.2 (beginning page 4-88), why is the proposed Lincoln Blvd realignment not listed as a construction area?
13. In the Cultural Resources Section 4.5 (beginning page 4-337), the memorial marker for LAWA Police Office Tommy Scott on Lincoln Blvd is not listed. On April 29, 2005, Officer Scott was the first LAWA officer killed in the line of duty. Since LAWA has not listed the memorial marker on the maps, it is not clear if the proposed Lincoln Blvd realignment would affect access to this location. What mitigation measures does LAWA propose to preserve access to the Tommy Scott memorial marker?
14. In the Green House Gases Section 4.6, why did not LAWA study old petroleum lines? Why did not LAWA study old sewer lines that in some cases date back to the 1920's?
15. In the Hydrology Section 4.8, the intersection of Lincoln and Sepulveda was not studied as a hazard? Why in Section 2.3.1.1, Acquisition, did not LAWA list Lincoln and Sepulveda as a potential acquisition?
16. On page 4-988, why is there no impact measured for transit vibration? Lincoln Boulevard is a major highway and carries significant transit, public and private.
17. In the Utilities Section 4.13, why are the utilities underneath Lincoln and Sepulveda discussed and examined?
18. Creating a new tunnel brings all kinds of new and interesting problems, not just from construction, but also operation. This series of questions relates to the proposed tunneling of Lincoln Blvd.
a. Will the tunnel height restrict certain vehicles from entering?
b. If there are height restrictions where will trucks go to get around the tunnel? (Probably Sepulveda and Manchester)
c. Will there be hazardous materials restrictions for the tunnel?
d. How will the tunnel be ventilated? Who will operate and maintain the ventilation system?
e. Will there be emergency evacuation areas or exits? How many and where? Will there be call boxes?
f. Which agency or agencies will respond to accidents and emergencies in the tunnel?
g. Will there be traffic controls such as stoplights and electronic signage to warn drivers not to enter the tunnel? Will the electronic signage offer alternate routes? What will those alternate routes be?
h. Will LAWA consult with LAWA Police Department, LAPD, LAFD, CHP, the FAA, TSA and other relevant agencies for preventing the tunnel from becoming a terrorist target?
i. The Sepulveda Tunnel is dirty from automobile pollution and graffiti. What are the plans to clean the proposed Lincoln Boulevard tunnel on a regular basis?

ARSAC WHITE PAPER-
PROGRAM LEVEL VS PROJECT LEVEL EIR ANALYSIS
RE: THE LINCOLN BLVD. TUNNEL PROJECT

INTRODUCTION AND SUMMARY

The SPAS Report and DEIR recently released by LAWA purports to be a Program Level EIR, not a Project Level EIR, despite the fact that numerous specific projects are identified including an automated people mover, consolidated rental car facility, movement of taxiways and runways on the airfield and modernization of terminals.

This white paper is written to examine one of the projects specifically identified in the documents in the context of the Program versus Project Level EIR debate.

The specific project considered herein is the realignment of Lincoln Boulevard to accommodate the move northward of the outboard runway of LAX. This project will in effect swing Lincoln Boulevard, California State Route 1, on a wider arc around the airfield, bringing it much closer to homes, businesses, churches, schools and other sensitive uses in the Westchester community. It will also require that Lincoln be depressed below grade into a tunnel of a length that will depend on the extent of the runway move. A cost estimate in the SPAS Report puts the cost of this project in excess of $1billion with many elements admittedly not included. A cost figure three or four times larger would be more realistic.

This white paper does not undertake to study all aspects of the runway move. A similar white paper could be written about the implications of converting the Argo Trench to a box culvert or the elimination of the old tunnel that still exists under the north airfield.

Three of the alternatives proposed by LAWA would involve extending the perimeter fence of LAX hundreds of feet into the community and realigning and tunneling Lincoln Boulevard, California State Route 1. All would involve realigning and tunneling Lincoln Blvd.

Alternative 1 relocates runway 6L/24R, the outboard runway of the north airfield, 260 feet to the north; Alternative 5 relocates this runway 350 feet to the north; and Alternative 6 relocates this runway 100 feet to the north. Each of these alternatives requires that 6080 feet of Lincoln Blvd. be realigned and each would require that it be depressed into a tunnel. In the case Alternative 1, the tunnel would be 252 linear feet; Alternative 5 would require a 765-foot tunnel; and Alternative 6 would require a 540-foot tunnel.

In contrast to Alternatives 1, 5 and 6, Alternative 2 would not require moving the LAX perimeter fence or realigning and tunneling Lincoln Blvd.

The subject of Program Level versus Project Level EIR's is dealt with the California's CEQA Guidelines. Under the regulations stated therein, a Program Level EIR may be used to adopt a general plan for the conceptual planning of a district or area. It is designed to provide some level of analysis of "future and unspecified development" (CEQA Guideline 15146(b).

In summary, this white paper demonstrates that the realignment and tunneling of Lincoln Blvd. is a specific, tangible, identified project, not a "future and unspecified" project. A high level of technical analysis has been performed on the project, far more than the "conceptual planning" sanctioned by the Guidelines for a Program Level EIR.

The DEIR and SPAS Report analyze the Lincoln Blvd. project in significant detail including its alignment, length of tunneling and sloping, and cost. Doing so reveals that a "project", not a "program" is being proposed. Having opened the door of technical analysis, LAWA is obligated to perform the analysis completely and accurately. LAWA cannot escape the effects of faulty, incomplete, misleading and inaccurate analysis by claiming only a "program level" analysis is required.

The opinion expressed herein is that LAWA cannot have its cake and eat it too. It cannot disclose innocuous or general details and conceal specific details that reveal serious flaws. It cannot calculate

and state the costs of a project without including all of the costs. And it cannot identify some of the impacts of the project without revealing all of the impacts.

One does not need to be a civil engineer to discern that if LAWA is able to calculate the exact length of the tunnel required for the realigned Lincoln Blvd., then it must know Lincoln's proposed path including how much closer it will be to residences, businesses, schools, churches and other sensitive uses. It must also know how deep below surface level the tunnel must be placed including the extensive web of oil and gas pipelines, outfall sewers, water, electrical, fiber optic and other subsurface facilities which will have to be identified, located, and relocated as a result of the project. None of these factors are addressed in the DEIR or SPAS Report.

Having clearly revealed that it has taken the Lincoln Boulevard realignment project past conceptual planning and into preliminary engineering, LAWA must be forced by either community outcry or by court decree to treat the outward expansion of the LAX perimeter fence and the realignment and tunneling of Lincoln Boulevard as a project which can only be entitled by means of a project level EIR.

During the scoping phase of the SPAS process, numerous comments were offered asking that the subsurface structures below Lincoln and Sepulveda boulevards be studied. The failure to do so, or the failure to disclose the result of doing so, constitutes a fatal flaw in the DEIR.

A word about the real-world context of this program versus project level debate: Gina Marie Lindsey and other advocates for moving the north runway 24 Right to the north are openly and repeatedly refusing to defer the issue of the movement of the runway to a later time when more is known about LAX's passenger levels and the success or failure of the New Large Aircraft which the runway move is designed to accommodate. They are declaring that no other projects at LAX can be planned or implemented until the location of the runway is established. Clearly, this statement reveals that a program level EIR is simply not what LAWA needs at this time. At this time LAWA needs and should produce a Project Level EIR to move the runways. If LAWA has determined that the runway move and the attendant realignment and tunneling of Lincoln Blvd. is the lynchpin for all other LAWA projects, then it should withdraw the Program Level EIR, isolate the runway/Lincoln Blvd. project, study it thoroughly and circulate a project level DEIR which discloses and adequately studies all elements of the project.

WHITE PAPER METHODOLOGY

At page 4-3 of the DEIR LAWA quotes CEQA Guideline 15146(b) to the effect that a program level EIR should "provide an effective means of delineating and comparing and contrasting the overall characteristics, performance levels and environmental impacts of each alternative."

With respect to the runway relocation proposed for the LAX north airfield, this means that sufficient information must be given to compare and contrast Alternatives 1, 5 and 6 which would move the runway to Alternative 2 that would not.

This whitepaper will review both the SPAS Report and the DEIR on this issue. It will identify both what LAWA has disclosed and what it has not disclosed about the Lincoln Blvd. realignment and tunnel project.

The SPAS Report will be considered first. The SPAS Report states the study requirements agreed to by LAWA in the settlement agreement and gives background information and data which are a useful as a starting point for the consideration of the legally mandated and court enforced Environmental Impact Report.

The DEIR is organized, as required by the Guidelines, in terms of thirteen categories of environmental impact such as Aesthetics, Air Quality, etc. Within each such category the DEIR gives general background followed by a specific discussion of each of the nine alternatives. Within the discussion of each alternative there is a heading "Northern Boundary" within which the Lincoln Blvd. realignment is discussed. Within the "Northern Boundary" discussion is a section dealing with impact during operation and impact during construction. Hence each of the thirteen areas of environmental impact is outlined as follows:

- Environmental Impact category
  - General background
  - Specific alternative
    - Northern Boundary issues
      - Operational impacts
      - Construction impacts

The balance of this white paper will review and discuss LAWA's treatment of the Lincoln Blvd. realignment and tunnel project.

REVIEW OF THE "PRELIMINARY LAX SPECIFIC PLAN AMENDMENT STUDY REPORT"

At pages 1-4 through 1-16 SPAS Report basic descriptions of the nine alternatives are given together with diagrams of each. For Alternatives 1, 5 and 6, the "distinguishing airfield improvement feature" is said to be the northward movement of runway 6L/24R 260 feet, 350 feet and 100 feet respectively.

The narrative description of these three alternatives gives no indication that a necessary element of the runway move is the expansion of the airfield and the realignment and tunneling of Lincoln Blvd. Only in a small note on the diagrams is this revealed. A member of the public trying to understand LAWA's intentions would reasonably believe that the narrative would accurately describe the project and would not omit such a significant component as the complete realignment of Lincoln Boulevard, California State Highway 1.

After an extended review of the history of the LAX Master Plan and the SPAS process, Section 5.5 of the Report begins the discussion of the current, on-the-ground situation as LAX. This section, which begins at page 5-79, is entitled Refinement Of Second Iteration of SPAS Concepts.

At page 5-105 the following passage concerning Lincoln Boulevard appears:

Lincoln Boulevard
Similar to the Argo Drainage Channel, relocation of Runway 6L/24R to the north would place portions of Lincoln Boulevard within the RSA and/or OFA. Consequently, new alignments of Lincoln Boulevard were developed (including covered and below grade sections) in order to comply with FAA standards. Concepts with greater runway separation would require portions of the alignment to be covered and below grade.

The conceptual alignments are provided in Section 5.6 beginning at page 5-110. Major elements of each of the nine alternatives are placed into one of three categories: "airfield improvements," "terminal improvements" or "ground access improvements." The Lincoln Blvd. realignment is placed in the "airfield improvements" category and the issue is framed thus:

The extent to which the Lincoln Boulevard and the Argo Drainage Channel would have to be modified in order to accommodate a northerly shift in the alignment of Runway 6L/24R;

A strong argument can be made that it is highly misleading to characterize tunneling and realigning more than a mile of Lincoln Blvd. thereby taking it hundreds of feet closer to sensitive uses as a "modification."

Section 5.7 of the Report sets forth numerous alternatives that were "rejected" and not carried forward in SPAS. The fact that many of those alternatives had great potential for achieving the purposes of SPAS with less community impact than expanding the LAX fence line and realigning Lincoln is not the subject of this whitepaper, but should be noted.

Section 6, SPAS ALTERNATIVE PROJECTS, constitutes the real substance of the Report.

The three goals of SPAS are recited at page 6-1, one of which is to achieve 78.9 million annual passengers. At page 6-3 passenger counts for the years 2007 through 2011 are given.

Discussion of Alternative 1 begins at page 6-12. At page 6-13 the following appears:

Relocate Lincoln Boulevard northward between Sepulveda Boulevard and Westchester Parkway, and depress the eastern portion of the road segment to be compatible with the object free area requirements for the east end of Runway 6L/24R, which would require approximately 540 linear feet of the road segment to be tunneled.

Discussion of Alternative 5 begins at page 6-51, and the following appears at page 6-52:

Relocate Lincoln Boulevard northward between Sepulveda Boulevard and Westchester Parkway and depress the eastern and western portions of the road segment to be compatible with the object free area requirements for Runway 6L/24R, which would require approximately 765 linear feet of the eastern portion of the road segment to be tunneled.

The following appears at page 6-52:

With the combination of the runway improvements (including the easterly extension of Runway 6R/24L and improvements to 6L/24R), associated improvements to Lincoln Boulevard and the Argo Drainage Channel, and establishment of displaced thresholds, the Alternative 5 north airfield configuration would be fully compliant with FAA RSA standards for Runways 6L/24R and 6R/24L, addressing hazards relating to the potential for aircraft to overshoot, undershoot, or experience excursions from the runways.

Just as it is a misrepresentation for LAWA to characterize realigning Lincoln Blvd. for more than a mile and tunneling it for more than 750' as a "modification," so too is characterizing this very large project as a mere "improvement."

A serious question will be whether Caltrans will consider the conversion to a tunnel and the realignment of California State Route 1 by more than a mile to be a minor street "modification" or "improvement." Apparently LAWA considers the permitting of the "Lincoln Boulevard Realignment and Tunnel Project" to be a mere detail to be handled by staff at a later date.

Discussion of Alternative 6 begins at page 6-57, and the following appears at page 6-58:

Relocate Lincoln Boulevard northward between Sepulveda Boulevard and Westchester Parkway and depress the eastern and western portions of the road segment to be compatible with the object free area requirements for Runway 6L/24R, which would require approximately 252 linear feet of the eastern portion of the road segment to be tunneled

As was the case in its discussion of Alternative 1 and 5, the realignment and tunneling of Lincoln Blvd. is labeled "an improvement."

In stark and simple contrast to the expand-the-airfield, tunnel-and-realign-Lincoln approach of Alternatives 1, 5 and 6, the following is stated about Alternative 2 at page 6-34:

Improvements associated with Runway 6L/24R under this alternative, including connecting taxiways, are different than Alternative 1. Because there would be no northerly relocation of Runway 6L/24R under Alternative 2, it does not require the modifications to the Argo Drainage Channel (other than those required under existing conditions to meet federal RSA requirements) and Lincoln Boulevard described above for Alternative 1.

For purposes of this whitepaper this ends the relevant narrative discussion of the SPAS alternatives (although Report Chapter 8 on dollar costs awaits), and the question can be posed, has LAWA fairly described the alternatives and allowed a member of the public who simply wants to understand this important infrastructure project to compare and contrast the alternatives? Asked in another fashion, does characterizing the realignment of Lincoln Boulevard by hundreds of feet and its depression into a tunnel for as much as 765 linear feet as a "modification" or an "improvement" accurately portray what LAWA intends to do? The question answers itself.

The financial underpinnings of LAWA's much desired expansion is strategically placed where LAWA obviously wants it, at the very end before which most members of the public will long since have given up. In fact, Chapter 8, Financial Analysis, is exceptionally informative and, not surprisingly, misleading.

Sections 8.1 through 8.3 provide discussion of LAWA's governance structure, accounting and cost center structure, governing bond documents, and key business agreements. Section 8.4 sets forth key assumptions. All make for interesting reading.

However it is Section 8.5, Estimated Alternative Costs, Section 8.6, Approximation of Funding Sources", and their associated Table 8-1 that are of interest herein.

Section 8.5 incorporates an earlier discussion about the dollar cost of other, non-SPAS planned projects at LAX. A total of $6.5 billion is planned to be spent at LAX on non-SPAS projects. Of this amount $2.1 billion is currently in construction with $4.4 billion in the planning phase. Examples of projects in planning are the Midfield Satellite Concourse, renovations to existing terminals and the ongoing soundproofing program.

Now, on to the cost of SPAS and the Lincoln Blvd. Realignment and Tunnel Project:

To review the Report's analysis of the cost of SPAS one must turn his or her laptop a quarter turn clockwise and rest it on its right side because Table 8-1 is in landscape, not portrait, format and LAWA has made precious few hard copies available. For one reviewing the report on a desktop computer, you will need to rest your left ear on your desk and just do the best you can. The fact the font is nearly invisible and the size is in the 2 to 3 range does not help.

Table 8.1 is a summary of costs associated with each of the SPAS alternatives. Directing attention to the table for Alternative 5, one learns the following. The cost of the airfield component of Alternative 5, which is the component that includes expanding the airfield and realigning and tunneling Lincoln is said to be $808,660,000 in 2010 dollars or $1,099,792,000 in escalated dollars. Rounded that is $800 million if the projects had been built two years ago and $1.1 billion if the projects broke ground this year. Of course it is impossible to predict what it will cost if the work commences in 2025, the earliest year it is predicted LAX will actually reach 78.9 MAP, so we will work with $1.1 billion.

Table 8.1 states that the total escalated cost of Alternative 5 including terminal and ground access improvements to be $9,091,629,000 and the total identified funds available to be $3,601,629. The wisdom of undertaking a program that is underfunded by two-thirds is beyond the scope of this whitepaper, but is alarming.

In clear contrast to the cost estimates for Alternative 5, airfield improvements for Alternative 2 are estimated to be $205,200,000 in 2010 dollars and $279,760,000 in escalated dollars. Thus, the cost of Alternative 2 is approximately three percent (3%) of Alternative 5.

What follows in Chapter 8 is a number of charts and graphs that provide visual representations of the costs of various alternatives with and without various other alternatives concluded. Each is based on the specific dollar figures previously stated.

Where did these specific dollar figures come from? The answer to that question is buried even deeper in the Report in Appendix G, Preliminary Rough Order of Magnitude Cost Estimates. (On your way to Appendix G be sure and stop off at Appendix F that shows that LAWA achieves NO significant operational efficiencies by any of its proposed airfield modifications.)

Table AF-1 of Appendix G purports to summarize cost of the airfield improvements of the various alternatives. The cost of realigning and tunneling Lincoln is explicitly not included but the cost of removing the abandoned tunnel under the north runway and the cost of converting the unlined Argo Trench to a concrete box culvert are included. The cost of airfield improvements for Alternative 5 is placed at $716,700,000. The cost of airfield improvements for Alternative 2 is stated to be $205,200,000.

Parenthetically it can be noted that in addition to the cost of realigning and tunneling Lincoln, the following costs are identified in a footnote as not included in these estimates: site clearing, roadway work and facility demolition in support of Taxiway D and E work; security fence and guard post costs; right-of-way and land acquisition costs; costs of the Community Benefit Agreement or costs for the Mitigation Monitoring Plan; project phasing costs; tenant relocation costs; off-airport property acquisition and relocation costs; or mitigation costs of for the Lincoln (Park West) Apartments or 8939 S. Sepulveda office building. Cost of these items is left to the public's imagination.

Following summary Table AF-1 is seven pages of tightly constructed and very detailed estimates of the cost of moving runway 6L/24R. Examples of the level of detail achieved in the underlying cost estimate are "Removal of runway concrete pavement 19" thick", "Removal of shoulder asphalt 4" thick" and "Removal of Econocrete 12" thick."

Following the detailed seven page estimates to move the runway is our target prize: The estimated costs to realign and tunnel Lincoln Blvd.

Table AF-3 summarizes the cost to realign and tunnel Lincoln Blvd. as follows:
- Alternative 1 - $61,210,000
- Alternative 5 - $89,960,000
- Alternative 6 - $45,290,000

The cost to realign and tunnel Lincoln Blvd. for Alternative 2 is zero of course.

Following summary Table AF-3 are five pages of detailed estimates for the specific cost items of realigning Lincoln Blvd. including such items as "water for compaction" ($15,000), "base course 8" thick" ($208,000), and "subbase course 12" thick" ($216,000).

At this point the question posed at the very top of this whitepaper can be restated: Can it be fairly said that LAWA is only engaged in "conceptual planning" when it has obtained an estimate for 8" thick course base at $208,000 and for 12" thick subbase at $216,000. It is a remarkable "program level" EIR which includes an estimate for the precise amount of subbase required.

Table AF-4 is similarly illuminating of the level or project work completed by LAWA to date. This table states quite precisely the exact number of feet that will be flat, sloped, depressed and in a tunnel for all of the potential runway moves. For example, Table AF-4 indicates that if runway 6L/24R is moved 300 feet, then 6080 feet (more than a mile) of Lincoln Blvd. will be rerouted of which 350' will be in a tunnel, 600' will be "sloped" and 280' will be depressed and 4,850' will be flat. (It might be noted that the tunnel lengths listed in Exhibit G, Table AF-4 seems to be far off from the tunnel lengths listed in the body of the Report).

Is LAWA simply engaged in "conceptual planning?" Hardly.

Exhibit G in total is 56 pages of tightly constructed estimates for very specific projects pertaining to airfield modifications, terminal improvements, and ground access improvements including the Automated People Mover (APM) and the Consolidated Rental Car Facility (CONRAC).

"Conceptual planning" for a master plan involves favoring bike paths and housing near transit stations. It does not include a calculation the cost of concrete subbase 12" thick.

CONCLUSIONS TO BE DRAWN FROM CONSIDERATION OF THE PRELIMINARY LAX SPECIFIC PLAN AMENDMENT STUDY REPORT

Simply stated, LAWA has placed itself uncomfortably on the horns of a dilemma. Otherwise stated, it has hoisted itself on its own petard.

It has claimed that what it seeks is a "Program Level" EIR such as would occur in a community's broad general or zoning plan at the "conceptual planning" stage. And yet it is quite clear that it has gone far, far past "conceptual planning" and is deeply into preliminary engineering on a specific, project-by-project basis.

In recent conversations with Westchester and Playa del Rey community members, LAWA Executive Director Gina Marie Lindsey has been asked whether she would be willing to move forward with the terminal modernization projects and the ground access projects before LAWA proceeds with the airfield projects. Considering the limited acceptance and safety problems faced by the New Large Aircraft (NLA), the sluggish world economy and the "restrained" at best growth in traffic at LAX, such a question is justified.

Ms. Lindsey's response has been clear, unambiguous and simple: No, we can't move forward without knowing what is going to happen with the north airfield.

The community's response to Ms. Lindsey should be equally clear, unambiguous and simple. We believe it is the same answer she will receive in Court: If you want a specific project such as moving the runway and realigning and tunneling Lincoln Boulevard, then do a Project Level EIR. If the world of LAX revolves around one project, that being moving the runway, then all other projects should be put aside and the runway project should be resolved. Don't try to obtain a backdoor approval or confuse the public by throwing in community-serving projects which you have no intention of delivering. Withdraw the "program level" DEIR and prepare a "project level" EIR forthrightly stating that you seek to move the runway and realign and tunnel Lincoln.

Perhaps the expression that should be used in characterizing the Report should not refer to dilemmas or petards. What it is, is "neither fish nor fowl." It is far too detailed and advanced to be considered as a program level EIR and yet it falls far short of what would be necessary to be approved as a project level EIR.

POSTSCRIPT TO CONCLUSIONS TO BE DRAWN FROM CONSIDERATION OF THE PRELIMINARY LAX SPECIFIC PLAN AMENDMENT STUDY REPORT

Back to Exhibit G, Table AF-3, the cost breakdown to reroute Lincoln.

The Sepulveda Boulevard right of way is an old and historic one in Los Angeles. It was not always as urbanized as it is now. For many years it was the main route for subsurface pipelines to transport oil from the oilfields in the Baldwin Hills to the refineries in the South Bay including the Chevron refinery in El Segundo and the Mobil refinery in Torrance. It is still in use today for that purpose.

In more recent years one of the City of Los Angeles most important facilities was constructed and recently modernized, that being the Hyperion waste treatment plant in Playa del Rey immediately south and west of LAX. Fed by outfall sewers as much as 20' in diameter, Hyperion treats and disposes of tons of raw and treated sewage daily. The path of the outfall sewers: through Culver City and Westchester intersecting Sepulveda and Lincoln boulevards around LAX.

The major underground pipelines are all in addition to the innumerable public utility and private entity cables and pipes under the Sepulveda corridor at its intersection with Lincoln.

The spider web of pipes under Sepulveda Boulevard has been well known to the community for many years. Longtime Sepulveda property owner and civic activist Howard Drollinger knew it well and spoke of it often.

LAWA steps onto a very slippery slope when it undertakes to expand its campus and depress Lincoln Blvd. into a tunnel in this area, particularly considering that when it moved the southernmost runway it discovered a runway ON ITS OWN CAMPUS that it had no record of. This runway was a north-south runway that had existed behind the west side of the Tom Bradley International Terminal. Westchester Golf Course was the Runway Protection Zone (RPZ) for this former runway.

Not one word in the SPAS Report concerning the realignment and tunneling of Lincoln indicates that the underground situation around the Lincoln/Sepulveda intersection has been carefully studied. And the estimates to reroute Lincoln set forth in Exhibit G, Table AF-3 give no comfort, it appearing that the estimate contains no allowance for the discovery or relocation of such facilities. Third-party agreements

are a major cost item for such projects and yet Table AF-1 specifically indicates that costs for right of way and land acquisition are NOT included in the cost estimates.

The fundamental purpose of the Scoping process is to advise the project sponsor of items which must be carefully studied. If by some stretch of the imagination LAWA didn't know that it needed to study facilities under Lincoln and Sepulveda boulevards, it was certainly advised to do so in many comments and written correspondence during the Scoping process.

During the scoping phase of the CEQA effort numerous individuals and entities, including ARSAC requested that the subsurface conditions and structures in the Lincoln/Sepulveda intersection area should be carefully studied. The SPAS Report fails to show that this has been done. Nevertheless, Appendix G purports to give a cost estimate to realign and tunnel Lincoln Blvd. Having opened the door to a consideration of cost, LAWA cannot omit from consideration an element so important and costly and utility identification and relocation. To fail to study and/or disclose this cost item is to mislead and indeed deceive the public and public policy officials. While the question of whether this misrepresentation is intentional or inadvertent may be open to debate, the FACT that it IS a misrepresentation is not.

LAWA has either not studied a significant environmental issue or it has intentionally withheld the results of the study from the public. In either case, the DEIR should be withdrawn, re-scoped, properly prepared and re-circulated.

REVIEW OF THE DRAFT ENVIRONMENTAL IMPACT REPORT

The preceding sections of this white paper, with a few digressions, dealt with two questions:

First, can the mistakes and omissions in the two documents LAWA is currently circulating be overlooked because it is only a "program level" efforts. As demonstrated, LAWA is pursuing a very specific project, namely the movement of the northernmost runway 350' north and the realignment and tunneling of Lincoln Boulevard. For this project precise dimensions and costs have been calculated. A project level EIR should and must be done for this project.

Second, has LAWA met its obligations to study all relevant and significant issues raised in the Scoping sessions for the project? Using as a test case the issue of subsurface structures under Lincoln and Sepulveda boulevards where LAX would be tunneling, this obligation has not been met and LAWA's effort is flawed at least based on a review of the Preliminary LAX SPAS Report. Having failed to consider the cost of identifying and relocating major subsurface facilities and structures, LAWA's cost estimates, already gruesomely underfunded, become laughably worthless.

The question now presented is simple: Having failed in the Report to show that this significant topic was studied, does the DEIR go further or otherwise indicate that the issue has been considered by LAWA? The answer is no, and as a result the DEIR itself is fatally flawed.

WHITE PAPER METHODOLOGY RE DRAFT EIR

If the challenge in this section of the white paper is to determine whether LAWA has studied the subject of subsurface structures and facilities below Sepulveda and Lincoln boulevards, then perhaps the most direct approach would be to do a word search for such terms as "oil and gas," "petroleum pipelines," "outfall sewer," "Hyperion," "fiber optic cable," and "Dig Alert (811 service or Underground Service to locate underline pipelines and cables before digging into the ground)." This was not possible because LAWA did not enable the public to word searches on the online or disk versions of the Draft EIR and SPAS Report.

CEQA requires the EIR sponsor to specifically consider each of thirteen designated topics for each project alternative presented. Chapter 4 of the DEIR is LAWA's effort to meet this requirement. For each of the thirteen areas LAWA gives an Introduction, discussions of Methodology, Existing Conditions, Thresholds of Significance, and Master Plan Commitments and Mitigations followed by a review of each of the nine alternatives. The DEIR further divides each topic into a discussion of construction impacts and operational impacts once the project is completed.

If LAWA studied and reported on the impact of subsurface structures under the Lincoln/Sepulveda intersection then one would certainly think that it would be revealed in its comments about Alternative 5 which would relocate runway 6L/24R 350' north. Hence, the methodology used herein is to review LAWA's discussion of each of the thirteen study areas focusing on the Alternative 5 portion of the discussion. Particular attention is given to the Transportation (4.12) and Utilities (4.13) sections that would seem to be the logical locations for consideration rerouting and tunneling Lincoln Blvd.

REVIEW OF ALTERNATIVE 5 DISCUSSION IN DEIR

AESTHETICS, Section 4.1 of the DEIR

The discussion of the impact of the nine alternatives on area Aesthetics commences on page 4-6 and limits itself to consideration of "aesthetic qualities, views and lighting conditions at LAX and surrounding areas." Certainly one would assume that Caltrans would require Lincoln Blvd., California State Route 1, to have very bright overhead lighting at all times. Further, impacts of a major construction site including staging and laydown areas could be expected to be significant. Hence, one would assume moving Lincoln Blvd. 350' closer to the residential community would have significant implications for light and glare.

Discussion of the impacts of Alternative 5 begins at page 4-63 with the light and glare impacts beginning at page 4-65. At page 4-66 the following appears:

Therefore, these improvements would not result in a change in lighting or lighting intensity such that light would spill off and affect light-sensitive areas, and would not result in a substantial new source of glare which would adversely affect nighttime views in adjacent areas sensitive to glare, and thus associated light and glare impacts along the northern boundary would be less than significant.

Increases in light and glare from rerouting more than a mile of Lincoln Blvd. and constructing a tunnel are similarly brushed off with:

Construction Fencing, impacts associated with light and glare during construction would not result in a change in lighting or lighting intensity such that light would spill off and affect light-sensitive areas, and would not result in a substantial new source of glare which would adversely affect nighttime views in adjacent areas sensitive to glare. Therefore, construction light and glare impacts would be less than significant.

Thus, the Aesthetic impact, including light and glare impacts of rerouting more than a mile of Lincoln Blvd. including relocating oil and gas pipelines, utilities and a major sewer structure are viewed as less than significant.

AIR QUALITY, Section 4.2 of the DEIR.

The discussion of Air Quality impacts begins at page 4-83 of the DEIR. Two Air Quality impacts seem obvious for study, those being (1) the impact of routing Lincoln Blvd. 350' or more closer to homes, business, schools and churches, and (2) the impact of using very heavy construction equipment to unearth and expose oil and gas pipelines, utilities and sewer facilities.

The complete failure of the DEIR to study and report on the implications of realigning Lincoln for more than a mile and tunneling for 765' can be seen at page 4-88 where the following elements of the program are identified as studied:

Construction activities were assumed to be located on the north airfield and at the north terminals, in the Central Terminal Area (CTA), at Manchester Square, in the current Parking Lot C, at the proposed Intermodal Transportation Facility (ITF) site just south of Lot C, on the east side of Aviation Boulevard south of Century Boulevard, on the Automated People Mover (APM) routes along Century Boulevard and 98th Street, and on the west side where batch plant operations permitted by the SCAQMD and USEPA and project support activities could occur. The analysis was conducted using normalized emissions rates (1 gram per second) for each construction source area to determine the concentration-

to-emission ratio (X/Q) at each receptor for each source or source group. This X/Q ratio for a given source or source group were multiplied by the estimated emissions for a specific pollutant to obtain that pollutant's concentration at each receptor for the given source or group. The results for all sources in a given alternative were summed for each pollutant to obtain the project's construction activity contribution to ambient concentrations.

Quite apparently the large, high risk rerouting of Lincoln and extensive subsurface work in an area known to include high volume sewer lines and oil and gas transport lines in addition to large amount of standard subsurface utilities in a street in use for decades has not been studied in terms of Air Quality.

The discussions of Air Quality implications of Alternative 5, the most significant in terms of displacement of Lincoln and subsurface work appears at age 4-112 for post-construction air pollution and at page 4-118 for construction air pollution. In neither are the Air Quality implications of rerouting Lincoln for more than a mile even mentioned in passing.

BIOLOGICAL RESOURCES, Section 4.3 of the DEIR.

Discussion of the impact of the nine alternatives on Biological Resources begins on page 4-163, and the discussion of Alternative 5 on page 4-250.

While the DEIR discussion of the impacts of Alternative 5 at the west end of the airfield adjacent to Pershing Drive, no significant discussion appears about the impacts at the east end of the airfield near the Lincoln/Sepulveda intersection.

COASTAL RESOURCES, Section 4.4 of the DEIR.

Discussion of the impact of the nine alternatives on Coastal Resources begins at page 4-299, and the discussion of Alternative 5 on page 4-325.

While there could be storm water runoff impacts or other impacts on Coastal Resources from major construction at Lincoln and Sepulveda, other impacts are certainly far greater.

CULTURAL RESOURCES, Section 4.5 of the DEIR.

Discussion of the impact of the nine alternatives on Cultural Resources begins at page 4-337. Impacts of Alternative 5 with Historic implications appear on page 4-370. Impacts with Archeological implications appear on page 4-376.

As is the case in so many other sections of the DEIR, the Cultural Resource issue is dealt with as if the rerouting of Lincoln Blvd. swinging it further north towards many sensitive uses is ignored. It is as if LAWA failed to advise its CEQA consultants it was part of the project. Buildings older than 45 years must at minimum be inventoried. While the report makes mention of the Union Savings and Loan Building at 9800 Sepulveda, it makes no mention of numerous buildings along Sepulveda that are older than 45 years. If such nearby buildings are outside the technical boundaries of the study area such could be noted. Simply failing to even make mention of such buildings adds to the implication that LAWA is seeking to conceal the impacts of its massive, billion dollar-plus Lincoln/Sepulveda realignment and tunneling project.

GREENHOUSE GAS EMISSIONS, Section 4.6 of the DEIR.

Discussion of Greenhouse Gas impacts begins on page 4-385, and the discussion of impacts of Alternative 5 appears on page 4-407.

Because the methodology used to calculate Greenhouse Gas Emissions in the DEIR combines the impact of operations with the impact of construction and further combines airfield modifications with terminal and ground access impacts, isolating the effects of the Lincoln Blvd. realignment and tunneling project is virtually impossible.

Still, it would seem unearthing, opening and relocation of decades old petroleum lines would release significant greenhouse gas, both by the heavy equipment used in the process and by the pipeline and surrounding contaminated soil. Though not as old of construction, the same can be said for the major sewer lines in the area running to the Hyperion treatment plant.

This is a subject which LAWA should have studied, was asked to study, but apparently didn't study.

HAZARDS AND HAZARDOUS MATERIALS, section 4.7 of the DEIR.

Discussion of Hazards and Hazardous Materials begins on page 4-423, and the discussion of impacts of Alternative 5 appear on page 4-452.

The discussion in this section of the DEIR focuses primarily on the production of Toxic Air Contaminants (TAC) and the rate of cancer that results. This section of the DEIR uses two tricks used throughout to conceal and explain away the impact of locating, opening and relocating major petroleum, sewer and other underground facilities despite the apparent risk of release of toxic substances including explosive gases.

The first trick used is to hide behind the screen that "this is only a program level EIR."

Construction of any SPAS alternative is projected to take about 11 years. A detailed evaluation of TAC emissions during the construction phase cannot be accomplished until project-level information on construction staging is available. For purposes of the program-level evaluation in this EIR, possible construction emissions are estimated generically based on projected costs for the various alternatives. This approach provides sufficient information on the relative impact of construction emissions to analyze how important these emissions might be to incremental impacts of the SPAS alternatives. Detailed evaluation of construction impacts at the project level will be completed to help judge how construction impacts might vary from year-to-year as construction starts and moves through different phases across the airport.

If then LAWA is contending it can predict risk of exposure to cancer based on the "projected costs for the various alternatives", then those cost projections must be accurate. Refer to the sections of this white paper on the cost of the Lincoln Blvd. realignment and tunnel project in which numerous cost factors were declared to have been omitted intentionally and with other apparently simply "missed."

The second trick used is to combine cancel out the deleterious effects of air pollution caused by projects which LAWA intends to construct at any cost with the beneficial effects of ground transportation projects which LAWA has little if any intention or funds to construct.

In the discussion of health risks caused by Alternative 5, at page 4-452 it is claimed that the health risks constructing and operating State Route 1, Lincoln Blvd., 350 feet or more closer to residences, business, churches and schools is overcome by purported efficiencies in airfield operation, vehicle mix and transit facilities that are unfunded and probably will not be constructed.

And the public certainly should not ask for more information or detail. Recall, this is a program level, not a project level EIR.

Section 4.7.3 beginning at page 4-574 deals with Hazardous Materials, especially those that pose a risk to the personal safety of workers or the public or which risk groundwater contamination. At page 4-575 the following appears:

There are 32 sites at LAX where hazardous materials releases have resulted, or may have resulted, in groundwater and/or soil contamination. Of these 32 sites, seven have significant soil and/or groundwater contamination and are undergoing remediation activities under LAFD or RWQCB supervision.

This passage represents further proof, that while LAWA may have studied environmental issues on its own airfield in support of SPAS, it has not put forth a similar level of effort to study environmental issues, including hazardous materials, on the property that will be used for the realignment and

tunneling of Lincoln. For this DEIR to be credible LAWA must have as much knowledge about subsurface problems under Lincoln Blvd. and Sepulveda Blvd. as it knows about subsurface problems under the Central Terminal Area. LAWA has either not studied such subsurface conditions or it has studied them but is withholding the information. In either event, this DEIR is fatally flawed as a result.

Proof positive for this proposition appears at pages 4-592 and 4-593 where Hazardous Materials is discussed in the context of Alternative 5. While there is discussion of the construction in and around Terminals 1 and 2 and Taxilanes O and D, there is not one word about Lincoln and Sepulveda Blvds. and yet the construction in that area is the lynchpin of Alternative 5 and has a far higher cost factor than the taxilane work.

HYDROLOGY AND WATER, section 4.8 of the DEIR.

Discussion of Hydrology and Water begins on page 4-599. This introduction to the Hydrology section states its purpose as follows:

The hydrology analysis below addresses the potential for flooding to occur as a result of actions under any of the SPAS alternatives. The water quality analysis below addresses impacts to the quality of storm water runoff and dry weather flows as a result of actions under any of the SPAS alternatives.

Surely this is an excellent topic to study. What areas are then studied to learn this important information?

To compare baseline conditions with conditions under the SPAS alternatives, a single HWQSA was used. The HWQSA for this analysis includes the existing LAX property, the Manchester Square area, which is part of a voluntary property acquisition under LAWA's Aircraft Noise Mitigation Program, 413 and areas adjacent to LAX that would be acquired under certain of the SPAS alternatives (see Section 2.3.1.11 for description of acquisition areas).

By LAWA's own admission then the areas studied on the important subject of worker safety and groundwater contamination are the existing airport property, Manchester Square and properties identified in 2.3.1.11 which reads in full:

2.3.1.11 Acquisition
The alternatives would require the acquisition of properties located east of the airport. The parcels to be acquired vary with the different alternatives. Table 2-4 lists the properties that may be affected and provides information pertaining to each parcel. A composite map of all of the acquisition properties is provided in Figure 2-11. The parcels that would be acquired under each alternative are identified in Table 2-5 and illustrated in Figures 2-12 through 2-14. Following acquisition, the uses would be demolished and replaced with SPAS-related improvements.

The intersection of Lincoln and Sepulveda Blvds. is not in Figure 2-11 , is not to be acquired by LAWA, and hence was not studied on the subject of Hazards. In fact it was pushed under the rug and ignored in preparation of the DEIR.

LAND USE/ PLANNING, section 4.9 of the DEIR.

Discussion of Discussion of Land Use/Planning begins on page 4-641.

Discussion of Alternative 5 begins at page 4-738. An extended discussion of the numerous land use and planning maps in the LAX area is beyond the scope of this white paper. One sentence on page 4-739 is worth noting. It simply states:

Alternative 5 only includes airfield and terminal improvements.

A multi-billion dollar project to reroute and tunnel Lincoln Blvd. is dismissed as "only an airfield improvement."

NOISE, section 4.10 of the DEIR.

Discussion of the Noise component of CEQA begins at page 4-779.

Discussion of Road Traffic Noise impacts begins on page 4-935. Much technical data is presented. Alternative 5 is not even commented upon. Whatever technical processes and evaluations were performed, they apparently did not include the impact of having Lincoln Blvd. 350' or more closer to ones home, business, school or church.

Construction Noise is discussed beginning at page 4-945. The impact of construction noise under Alternative 5 is discussed at page 4-963. Here is it acknowledged that at various sound receptors in West Westchester, the impact of Alternative 5 would be significant including at St. Bernard's High School, along the 91st St. community border and at Park West Apartments.

It is telling that in the sole area where the impact of the Lincoln Blvd. project is considered, a finding of significant impact has been made. The question that needs to be asked and answered by LAWA is what other impacts would be revealed if the Lincoln Blvd. project had been thoroughly studied in all CEQA areas?

Truer to form, the DEIR did not measure the impact of Alternative 5 for Transit Vibration at page 4-988.

PUBLIC SERVICES, section 4.11 of the DEIR.

Discussion of the impact of the SPAS projects on Public Services begins on page 4-993. Impact on Fire Services and Law Enforcement Services.

As can be clearly seen throughout the SPAS Report and the DEIR, the magnitude of the billion dollar-plus Lincoln Blvd. project simply is not appreciated or understood by LAWA. It is California State Route 1 that is being moved. Massive disruption around one of the busiest intersections in Los Angeles will occur. The Lincoln/Sepulveda intersection is the pivot point between the South Bay and the Westside of Los Angeles. At page 4-1013 it is admitted that construction of the project has "the potential to hamper or delay emergency response". This delay in emergency response is shrugged off however by saying a "coordination office" will be established. This is a serious risk to the public and deserves more study than saying an office will be created in the future.

The impact of SPAS on Law Enforcement is discussed beginning at page 4-1019. At page 4-1035 the DEIR states:

As with Alternative 1, traffic congestion from construction activities would have the potential to hamper or delay response times and increase traffic patrol and other law enforcement activities.

This serious negative impact of Alternative 5 construction is similarly dismissed by the recitation of certain numbered "LAX Master Plan Commitments."

TRANSPORTATION, section 4.12 of the DEIR.

Perhaps nowhere in the DEIR is the failure to study the realignment of Lincoln Blvd. for more than a mile, more than 2000' feet of which would be depressed below surface grade and 765' of which would be in a tunnel more glaring than in the treatment of "Off Airport Transportation at page 4-1281 of the DEIR.

Treating it as if it were a curb and gutter project, the DEIR state shrugs of the realignment of California State Route 1 at page 4-1282 with the following:

In addition to potential disruption of local traffic conditions due to the addition of construction-related vehicle trips, there is the potential for additional disruption in the event a project-related improvement requires temporary closure of at least one lane adjacent to its site. Closures of key roadways and intersections could cause delays, except if done for short durations during periods of very low vehicular volumes.

One marvels at the naiveté of LAWA to think it can accomplish the realignment of Lincoln Blvd. by single-lane closures on off-peak hours.

The treatment of Off-Airport Transportation reveals LAWA's strategy for gaming the CEQA process and obtaining the backdoor approval of rerouting Lincoln. At page 4-1281 the DEIR states:

The nine alternatives currently being considered for the SPAS project are only at a conceptual level of planning. No construction plans, programs, or schedules have been formulated for any of the alternatives. As such, it would be speculative to estimate construction-related vehicle trip generation and distribution onto the local roadway network in order to evaluate traffic impacts on specific streets and intersections during peak and non-peak traffic periods.

As appears throughout the DEIR and SPAS Report, it is clear LAWA is currently hiding behind the skirts of the "Program Level DEIR" to prevent a full and complete disclosure to the public and to the elected officials who will be voting on the DEIR by saying that only "conceptual planning" need be done.

UTILITIES, section 4.13 of the DEIR.

Discussion of the impact on Utilities begins at page 4-1327. Despite what could be significant disruption from relocating utilities currently under Lincoln and Sepulveda Blvd. this section deals with energy use at the airport. The impact of the Lincoln Blvd. realignment and tunneling project is not discussed.

CONCLUSIONS TO BE DRAWN FROM CONSIDERATION OF THE DRAFT ENVIRONMENTAL IMPACT REPORT

Simply stated, the Lincoln Boulevard realignment and tunnel project is not adequately studied in the Draft Environmental Impact Report. In view of the fact that moving runway 6L/24R northward by up to 350' is LAWA's most important project and realigning Lincoln Blvd. is non-negotiable and critical to moving the runway, this failure must be viewed as fatal.

The DEIR must be withdrawn from circulation, the Lincoln Blvd. realignment project must be adequately studied and the DEIR circulated, preferably as a project level EIR that can receive full, detailed public scrutiny.

Response:

Please see Topical Response TR-SPAS-LR-1 for a discussion of the Lincoln Boulevard realignment associated with Alternatives 1, 5, and 6. While the topical response addresses a majority of the issues raised in this comment, other issues are addressed herein.

This comment discusses the organization of the SPAS Draft EIR. It should be noted that the State CEQA Guidelines do not mandate a specific organization for an EIR, nor do the Guidelines specify 13 categories of environmental impacts. Appendix G of the State CEQA Guidelines provides an Environmental Checklist Form that may be used in the preparation of an Initial Study for a proposed project which identifies 17 environmental factors that could potentially be affected by a project. The SPAS Draft EIR is organized into 13 environmental topics. The comment misstates the organization of the discussion within each environmental topic. Only the discussion of Aesthetics includes headings for geographic areas, such as "Northern Boundary."

Section 5.7 of the Preliminary LAX SPAS Report, the content of which is also provided in Section 2.3.2 of the SPAS Draft EIR, not only identifies alternatives considered but rejected during the concept development process, as noted by the commentor, the section also details reasons why the rejected alternatives were not considered to be feasible, would not meet the project objectives, and/or would not reduce the environmental impacts of the alternatives analyzed in the SPAS Draft EIR. Regarding enhancements to the safety and efficiency of the airfield under each alternative, please see Table 4.7.2-16 on pages 4-569 and 4-570 in Section 4.7.2 of the SPAS Draft EIR. As indicated in that table, the SPAS alternatives achieve substantial enhancements to safety and efficiency; the degree to which safety and efficiency is enhanced varies between the alternatives. Please see Response to Comment SPAS-PC00130-904 regarding the abandoned runway that was excavated during construction of the

South Airfield Improvement Project. Please see Response to Comment SPAS-PC00130-853 regarding the ability to perform word searches of the electronic versions of the SPAS Draft EIR.

A number of comments concern the financial analysis provided in Chapter 8 of the Preliminary LAX SPAS Report and the rough-order-of-magnitude (ROM) cost estimates provided in the accompanying Appendix G. There are a number of misstatements in this comment concerning the costs of various alternatives. It is important to correct these misstatements prior to addressing the underlying issues raised in this comment. The commentor states that the cost of the airfield component of Alternative 5 in 2010 dollars is $808,660,000. The actual cost estimate, as indicated in Table 8-1 of the Preliminary LAX SPAS Report is $806,660,000. The commentor states that the total escalated cost of Alternative 5 is $9,091,629,000. This number is incorrect in two regards. The number $9,091,629,000 is the number associated with Alternative 2, not Alternative 5. Moreover, this number represents the escalated costs of Alternative 2 as well as the costs of LAX Base Development Projects. As explained on pages 8-1 and 8-8 of the Preliminary LAX SPAS Report, LAX Base Development Projects are projects that are not associated with the SPAS alternatives. LAX Base Development Projects include projects currently underway and projects expected to be completed at LAX between fiscal year 2012 and fiscal year 2025. The correct escalated costs of Alternative 2, as indicated in Table 8-1, are $2,601,629,000. The escalated costs of Alternative 5 are estimated at $3,282,424,000. The commentor also states that total identified funds available for Alternative 5 are $3,601,629. This number does not represent the approximation of available funding for Alternative 5; rather, it appears to by a typographical error of the available funding for Alternative 2, which is $2,601,629 (with dollars represented in $1000s), or $2,601,629,000. It is misleading for the commentor to state the costs of the improvements as a whole number and the available funding as represented in $1000s. It should be noted that the approximation of available funding for Alternative 5 is $3,282,424,000. (More discussion of the relationship between estimated escalated costs and available funding is provided below.) The commentor correctly represents the estimated costs (in 2010 dollars) of airfield improvements for Alternative 2 (i.e., $205,200,000), but misstates the escalated costs of these improvements, which are estimated to be $279,768,000, not $279,760,000. The commentor states that the costs of airfield improvements for Alternative 5 are $716,700,000. This number actually represents the estimated costs (in 2010 dollars) of airfield improvements for Alternative 5 excluding costs associated with realignment of Lincoln Boulevard (Table AF-1 of Appendix G of the Preliminary LAX SPAS Report). The costs of the Lincoln Boulevard realignment are not intentionally missing from Table AF-1. Rather, ROM cost estimates for the Lincoln Boulevard realignment were calculated separately, and are presented in Tables AF-3 through AF-5. When the Lincoln Boulevard realignment costs are added (Table AF-3 of Appendix G of the Preliminary LAX SPAS Report), the total estimated costs (in 2010 dollars) of airfield improvements for Alternative 5 are $806,660,000, which is the cost shown in Table 8-1.

The commentor states that the cost of the airfield improvements for Alternative 5 would cost roughly $800 million (assuming the commentor is rounding down from $806,660,000) if the projects had been built two years ago, and $1.1 billion if the projects broke ground this year, and then says it is impossible to predict what it would cost if the work commences in 2025. The commentor is incorrect in stating that the cost of the airfield improvements for Alternative 5 would be $1.1 billion if the projects broke ground this year. As stated clearly on page 8-8 in Section 8.5 ("Estimated Alternative Costs"), "Estimated alternative costs are reflected both in 2010 dollars and based on escalation to the assumed mid-point of construction for alternative improvements (FY 2020)." The roughly $1.1 billion estimate of escalated costs for the airfield improvements for Alternative 5 is based on the assumption that the mid-point of construction is FY 2020.

Another issue raised in this comment relates to the approximation of available funding for the SPAS improvements. The commentor is incorrect in stating that the approximate available funding for SPAS Alternative 5 (or Alternative 2) improvements is less than escalated costs. The commentor incorrectly compares the total estimated costs of all planned and proposed capital improvements at LAX, including both SPAS improvements and the LAX Base Development Projects, to the estimated funding for the SPAS alternative improvements alone. A close review of Table 8-1 will show that the total escalated costs associated with each SPAS alternative match the approximate amount of funding from various sources that is anticipated to be available for the alternatives. For example, for Alternative 2 the amount of the "Total Estimated SPAS Alternative Funding Sources" in Table 8-1 is $2,601,629,000 which is equal to the amount of the escalated costs for Alternative 2 SPAS improvements (see row titled "Total SPAS Alternative Improvements"). For Alternative 5, the Total Estimated SPAS Alternative

Funding Sources is $3,282,424,000 which is equal to the amount of the escalated costs for Alternative 5 SPAS improvements. Funding sources associated with the LAX Base Development Projects are not reflected in Table 8-1, as the focus of this chapter is on comparing the order of magnitude costs and funding of the SPAS alternative improvements. Chapter 8 of the Preliminary LAX SPAS Report provides a discussion of each of the funding sources that is included in the approximations of estimated available funding.

Another issue raised in this comment is the comparison of costs between Alternative 2 and Alternative 5. When comparing costs between alternatives, it is important to compare equivalent estimates to make an accurate evaluation of any differences. The commentor states that the cost of Alternative 2 is approximately 3 percent of Alternative 5. It is unclear what numbers the commentor used to derive this percentage, but the commentor's estimate of approximately 3 percent is incorrect by a significant amount. If one were to compare the costs of the Alternative 2 airfield improvements to the costs of the Alternative 5 airfield improvements, one can use either estimated costs in 2010 dollars or escalated costs, as both will yield the same ratio. If using estimated costs in 2010 dollars, the comparison would be Alternative 2 airfield improvement costs of $205,200,000 to Airfield 5 airfield improvement costs of $806,660,000 and the result would show that the cost of airfield improvements associated with Alternative 2 are approximately 25 percent of the cost of airfield improvements associated with Alternative 5. The same percentage would hold if escalated costs for airfield improvements were used (i.e., $279,768,000 compared to $1,099,792,000). If one were to compare the total costs of the Alternative 2 improvements to the total costs of the Alternative 5 improvements, again, one can use either estimated costs in 2010 dollars or escalated costs, as both will yield the same ratio. If using estimated costs in 2010 dollars, the comparison would be Alternative 2 total improvement costs of $1,974,840,000 to Airfield 5 total improvement costs of $2,474,180,000 and the result would show that the total costs of improvements associated with Alternative 2 are approximately 80 percent of the total costs of improvements associated with Alternative 5. The same percentage would hold if escalated costs for total improvements were used (i.e., $2,601,629,000 compared to $3,282,424,000).

SPAS-PC00130-638

Comment:

ARSAC comments Preliminary SPAS Report Operational Analysis Attachment Section F-1 This section lays the ground work for much of the environmental assessments by establishing the flight mix of aircraft used. LAWA must identify the impact on these assessments for any necessary changes or inaccuracies.

Response:

The comment is noted. Please see Responses to Comments SPAS-PC00130-639 through SPAS-PC00130-686 below.

SPAS-PC00130-639

Comment:

General comments and some questions

1. SPAS Report Section F-1 states that the design data should be 2010, but uses the busiest day in the second highest traffic month- Tuesday, August 18, 2009. July 2009 was apparently the busiest month in 2009. Ground traffic data was gathered on a different date- a Friday in August 2011. Westchester/Playa del Rey residents have repeated called on LAWA to choose a traffic data gathering date in mid-September to account for traffic from Loyola Marymount University, Otis Institute for Art and the public and private K-12 schools in the area. Shouldn't the base design year data be the same for all elements of the EIR? Should the air traffic and ground traffic data be on the same date or at least the same month in the same year?

Response:

Please see Response to Comment SPAS-PC00130-52 for a discussion of the environmental baseline used in the SPAS Draft EIR. The 2009 Design Day Flight Schedule (DDFS) was developed for the purposes of operational analyses supporting the SPAS Draft EIR, such as airfield simulation, aircraft noise analysis, air quality, and safety. These operational analyses warranted the use of a peak month average day (PMAD) selected based on the month with the highest monthly number of operations in calendar year 2009, as opposed to one with the highest number of passengers. As described in Section 3.2 of the Preliminary LAX SPAS Report, in terms of the number of operations, August 2009 was the peak month with 48,448 operations, representing 8.9 percent of all operations in calendar year 2009, and yielded a PMAD number of operations at 1,563. In comparison, July 2009 was the second busiest month in calendar year 2009 at LAX in terms of operations, with 47,893 operations, representing 8.8 percent of all 2009 operations. In terms of passenger volumes, July 2009 was the busiest month in calendar year 2009, followed by August 2009.1

Sections 4.12.1.2, 4.12.1.3.11 and 4.12.1.3.12 of the SPAS Draft EIR summarize the methodology and trip generation estimates for off-airport vehicular traffic associated with the SPAS analysis. As described in the aforementioned sections, the roadway trip generation analysis is based on traffic activity occurring during a typical Friday in August 2009. August was selected as the basis for the airport-related trip generation because, as noted above, it represents the peak month for airport-related traffic activity. Friday is generally the busiest day of the week for CTA roadway traffic. Given the airport is the single largest traffic generator within the study area, it was determined that analysis of the off-airport roadway system should be based on peak August 2009 conditions. The use of traffic volumes collected during the peak summer months provides a more conservative assessment of traffic conditions (i.e., worst case level of service) within the vicinity of the airport than would traffic collected during a period when the airport is not operating at peak activity levels.

As discussed on page 4-1194 in Section 4.12.2 of the SPAS Draft EIR, intersection turning movement counts were collected during the weekday morning (a.m.), midday (m.d.), and afternoon (p.m.) time periods at the 164 analyzed locations in July and August 2010. July and August are considered to be the peak months for airport-related traffic around LAX; therefore, additional seasonal adjustments were not required to convert the counts to peak month conditions. Collecting counts during the peak months for airport-related traffic provides for a more conservative analysis as discussed on pages 4-1057 and 4-1194 of the SPAS Draft EIR. The study area intersections are located in close proximity to the airport and influenced by airport-related traffic activity; therefore, obtaining traffic count information when the airport is operating at peak conditions is important in obtaining a conservative estimate of traffic activity in the study area.

The commentor indicated that collecting traffic at the intersection of LMU Drive and Lincoln Boulevard during the August peak month may result in an undercount at that location for the nine months when LMU is in regular session. Loyola Marymount University (LMU) is located north of the airport, approximately 2.5 miles driving distance from the entrance to the CTA. As described previously, the traffic data collection and resulting analysis for the off-airport roadway system was conducted during July and August, which represents the peak months for airport-related traffic around LAX. It is recognized that individual businesses, schools, and other traffic generators may produce localized peak traffic conditions that may differ from the airport. For example, each individual traffic generator would likely experience peak seasons and produce peak hour conditions at their primary access locations that would differ from that of the airport and the overall study area. However, given the large scale of the SPAS traffic study analysis area, it is important to analyze the roadway network for the overall ambient peak condition which is influenced by the airport as the largest trip generator within the study area and to assess conditions when the project is producing the highest number of trips and would produce the most potential impacts within the study area. There are numerous large buildings, shopping centers, business campuses, educational facilities, sport and entertainment centers, and other facilities within the study area for the SPAS off-airport transportation analysis (please see Figure 4.12.2-1 of the SPAS Draft EIR). Many of these facilities generate localized traffic that can affect the roadway network in the immediate vicinity of their site, and with seasonal and hourly peaking characteristics that may differ from the overall study area roadway network. It would not be feasible or necessary for the SPAS Draft EIR impact analyses to study the traffic peaking characteristics of every individual trip generator within the geographic scope of the SPAS off-airport transportation analysis shown in Figure 4.12.2-1. Nor is this level of detail required by CEQA. As discussed in Section 15204(a) of the State CEQA Guidelines,

"reviewers should be aware that the adequacy of an EIR is determined in terms of what is reasonably feasible, in light of factors such as the magnitude of the project at issue, the severity of its likely environmental impacts, and the geographic scope of the project. CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters." (See also State CEQA Guidelines Section 15151.)

As shown in Tables 4.12.2-21 through 4.12.2-25 of the SPAS Draft EIR, the magnitude and severity of the traffic impacts at and surrounding LMU would be minimal. The commentor references the intersection of LMU Drive and Lincoln Boulevard (Intersection #104 shown in Figure 4.12.2-1). Intersection #104 would operate at LOS C or better with and without the proposed project in 2025 in the a.m., m.d., and p.m. peak hours. (See Tables 4.12.2-21 through 4.12.2-25 of the SPAS Draft EIR.) The intersection to the north of Intersection #104 (Intersection #22) and the intersection to the south (Intersection #111) would operate at LOS A and LOS C or better, respectively, with and without the project in the a.m., m.d., and p.m. peak hours. (See Tables 4.12.2-21 through 4.12.2-25 of the SPAS Draft EIR). It would not be feasible or necessary for the SPAS Draft EIR impact analyses to analyze individual traffic peaking characteristics within the geographic scope of the off-airport transportation analysis.

Finally, there is no requirement under CEQA that the "existing conditions" representing the environmental baseline be identical for each impact topic. Rather, lead agencies have flexibility in determining exactly how existing environmental conditions should most realistically be measured, as long as this determination is supported by substantial evidence. (Communities for a Better Environment v. South Coast Air Quality Management District (2010) 48 Cal.4th 310, 326-328.) Substantial evidence supporting the SPAS Draft EIR's choice of existing conditions to use as the baseline for air traffic and ground traffic impact analyses is summarized above.

1. City of Los Angeles, Los Angeles World Airport, LAX - Passenger Traffic Comparison by Terminal, Available: lawa.org/LAXStatistics.aspx; accessed November 10, 2012.

SPAS-PC00130-640

Comment:

2. The year 2025 was chosen as the future design date. Isn't the LAX Master Plan supposed to run through 2015? Where is the authority in CEQA or NEPA to push out the design date to 2025? (The FAA projects air traffic will double worldwide by 2031. Historically, since the start of the Jet Age in October 1958, worldwide air traffic generally has doubled every 20 years with about 50% of the world's air traffic in the USA.)

Response:

Consistent with the requirements of Section V.C. of the LAX Master Plan Stipulated Settlement, LAWA was to focus the SPAS on "Potential alternative designs, technologies, and configurations for the LAX Master Plan Program that would provide solutions to the problems that the Yellow Light Projects were designed to address consistent with a practical capacity of LAX at 78.9 million annual passengers." Based on the 2009 FAA Terminal Area Forecast (TAF) and the more recent 2011 TAF, the passenger activity level at LAX in 2015 was projected to be approximately 66-67 MAP. Had LAWA maintained 2015 as the planning horizon year for SPAS, the analysis of the SPAS alternatives would not be consistent with the requirements of the Stipulated Settlement and, moreover, would have not accurately reflect the impacts likely to occur as a result of buildout of the SPAS alternatives. Based on FAA data available at the time and a review of the historic, current, and anticipated annual growth rates in passenger activity levels at LAX, it was estimated that passenger activity levels at LAX would reach 78.9 MAP around 2025. Furthermore, as provided in footnote 13 on page 1-47 of the SPAS Draft EIR, 78.9 MAP is consistent with the regional growth projections adopted in the 2012 SCAG Regional Transportation Plan. An EIR may rely on projections contained in a previously approved land use document. (See Rialto Citizens for Responsible Growth v. City of Rialto (2012) 208 Cal.App.4th 899, 930-931; City of Maywood v. Los Angeles Unified School District (2012) 208 Cal.App.4th 362, 425.) The LAX 2009-2025 growth forecast approach and data used for the SPAS analysis are documented in Appendix F1-1 of the Preliminary LAX SPAS Report.

SPAS-PC00130-641

Comment:

3. SPAS Report Section F-1 lists 1,563 daily flights (passenger, cargo, general aviation, military) for 2009 and predicts 2,053 daily operations for 2025. LAX had about 2,000 daily operations in the year 2000 and LAX was bursting at the seams. Go-arounds for aircraft coming into land on the north complex were a daily occurrence, as the airfield could not handle the congestion. At 2,053 daily ops, capacity appears to exceed 85 MAP, well above the 78.9 MAP cap.

Response:

As discussed in Sections 3.2 and 4.2, respectively, of Appendix F-1 of the Preliminary LAX SPAS Report, the 2009 Design Day Flight Schedule (DDFS) includes 1,563 daily operations, while the 2025 DDFS is projected to include 2,053 operations. The projected number of future operations commensurate to 78.9 million annual passengers (MAP) was derived primarily based on assumed aircraft fleet mix, seat configurations, and passenger load factors, as described in Section 4.2 of Appendix F-1 of the Preliminary LAX SPAS Report.

While activity levels at LAX in 2000 were higher than those of 2009 (i.e., 67.3 MAP in 2000 compared to 56.5 MAP in 2009), the commentor's statements that LAX "was bursting at the seams" and that "Go-arounds for aircraft coming into (sic) land on the north complex were a daily occurrence" appear to be subjective opinions with no supporting evidence, as is also the case with the conjecture that "At 2,053 daily ops, capacity appears to exceed 85 MAP." As indicated above, the basis for LAWA's projection of 2,053 daily operations and associated 78.9 MAP in 2025 is documented in Section 4.2 of Appendix F-1 of the Preliminary LAX SPAS Report.

SPAS-PC00130-642

Comment:

4. There are many problems with the fleet mix.
a. There is no differentiation between all-passenger and all-cargo aircraft. This is important for determining which aircraft will park where on the airfield: passenger gates or cargo ramps.

Response:

As discussed in Sections 3 and 4 of Appendix F-1 of the Preliminary LAX SPAS Report, both passenger and all-cargo operations were analyzed and projected for the purposes of the SPAS Draft EIR. Both air carrier and air taxi cargo operations were analyzed. Accordingly, passenger and all-cargo operations were also assigned to appropriate passenger gates or cargo ramp parking positions around the airfield throughout the gating and simulation efforts.

The following table contains the numbers of daily all-cargo air carrier and air taxi operations included in the 2009 and 2025 DDFSs by aircraft type.

	2009	2025
Aircraft Type	DDFS	DDFS
A300	2	2
A300-600	4	4
A310	2	2
B190 (Air Taxi)	1	2
B747-200	2	4
B747-400	18	15

B747-800	0	8
B767-200	4	4
B767-300	5	6
B777-200	0	6
DC10	11	5
DC87	2	2
MD11	7	10
Total Daily Operations	58	70

SPAS-PC00130-643

Comment:

b. For ADG I and ADG II aircraft, the report breaks them down in Regional Jets and Propellers, however, it does not specify manufacturers and models of these aircraft. This is important to know because US airlines are sending the Bombardier Canadair 50-seat CRJ100 and CRJ200 into retirement. The costs to operate these aircraft have become too high and with upcoming major engine overhauls coming, no airline wants to pick up those costs. For the same hourly block hour cost, a US airline can have a 2-class 75 seat CRJ700 or a 90 seat CRJ-900. US airlines may also push out the Embrarer regional jets such as the 37 seat ERJ-135 and larger ERJ-140 and ERJ-145 jets. As of November 2012, American Airlines is replacing its American Eagle 44-seat ERJ-140 jet operation at LAX with contracted Skywest 50-seat Canadair CRJ-200's. Larger sized aircraft on a one-to-one flight replacement can result in a capacity increase.

Response:

Please see Responses to Comments SPAS-PC00130-770 and SPAS-PC00130-771 regarding the 2009 and 2025 Design Day Flight Schedules (DDFS) assumed fleet mixes and flight schedule information.

The commentor provided comments listed under "general comments and some questions" related to information presented in Appendix F-1 of the Preliminary LAX SPAS Report (i.e., Comments SPAS-PC00130-643 through SPAS-PC00130-654). In addition, "specific comments" were then provided on specific pages and tables in Appendix F-1 (i.e., Comments SPAS-PC00130-655 through SPAS-PC00130-679).

All these comments considered, Comments SPAS-PC00130-643 through SPAS-PC00130-654, and SPAS-PC00130-669 through SPAS-PC00130-679 all relate to the details of the fleet mixes assumed in the 2009 and 2025 DDFSs and suggest alternative mixes or discuss the inclusion or exclusion of various aircraft in or from the mixes.

As described in Section 3.2 in Appendix F-1 of the Preliminary LAX SPAS Report, the 2009 DDFS fleet mix was derived from published schedule data for scheduled-passenger activity and radar flight data for non-scheduled activity data. The projected 2025 DDFS fleet mix and other activity data required were based on a top-down development beginning with a passenger activity forecast, followed by determination of daily aircraft seats required, from which a projected set of aircraft was identified to represent activity in 2025. The assumptions used to develop the projected 2025 DDFS in Section 3.2 in Appendix F-1 were reasonable and supported by substantial evidence. In contrast, the commentor's speculations about potential changes to the 2025 DDFS are subjective, based on anecdotal observations and personal opinion, and not supported by substantial evidence.

Practically, the 2025 DDFS aircraft fleet mix was derived from forecast passenger increases, trends in aircraft seat capacity (including a number of trends that the commentor also cites) and flight load factors needed to serve 78.9 MAP. As described in Section 4.2 in Appendix F-1 of the Preliminary LAX SPAS Report, to meet the daily flight capacity for the 2025 plan year passenger level, the size and number of flights in the 2009 DDFS were increased to provide the needed number of additional daily aircraft seats

to maintain a reasonable passenger load factor for the daily equivalent of 78.9 MAP. This included taking into account trends in aircraft size, seating by aircraft type, new aircraft on order, and expected retirement of older and outdated aircraft. For example, the daily activity reflected in the gating and flight simulations took into account diminished numbers of 50-seat regional jets and the evolution of the Airbus 319/320 and Boeing 737 series of jets to newer models. The number of 767 aircraft in the 2025 mix reflects an assumed growth based on forecast percentages of flight demand out of 757s into larger aircraft such as the 767-300 and 787-800. While there are many Airbus 350 aircraft on order, they are similar in size and seating capacity to the Boeing 777 models for which there are 83 passenger operations assumed in the 2025 DDFS fleet mix. Similarly, the Boeing 747 represents a class of aircraft. All the Boeing 747s in the passenger fleet mix are 747-400s.

There are many different combinations of aircraft that could meet the future seat requirement commensurate to 78.9 million annual passengers (MAP). Table 12, which lists the assumed 2025 DDFS fleet mix, presents an allocation of aircraft meant to provide a reasonable representation of what aircraft types could make up future activity at LAX. They are not meant or expected to provide an exact picture of what will occur in 2025. In many cases, new aircraft that are not yet available and operational will provide replacements for aircraft that will become obsolete in the 2025 horizon. In these cases, the aircraft shown in Table 12 represent similar sized aircraft to those not yet developed or on order.

The commentor suggests many other possible aircraft combinations for the future 2025 activity. Most of these are similar to aircraft already included in the 2025 DDFS fleet mix. Experience has shown that these characteristics change in often unpredictable ways within time periods shorter than the 15-year horizon analyzed in the SPAS Draft EIR. The important factor is that the Preliminary LAX SPAS Report and Draft EIR analyses of facility development alternatives use reasonable assumptions about activity level and aircraft fleet mix supported by substantial evidence to evaluate differences. An EIR is not required to guarantee that its project description or implementation assumptions will be 100 percent accurate in the future. (Village Laguna of Laguna Beach Inc. v. Board of Supervisors (1982) 134 Cal.App.3d 1022,1030; Environmental Council of Sacramento v. City of Sacramento (2008) 142 Cal.App.4th 1018, 1036.)

Finally, some of the comments on the aircraft fleet mix request a level of detail far beyond that needed for the EIR to meaningfully evaluate the alternatives' environmental impacts. An EIR's project description is supposed to include a "general description" of the project's technical characteristics, and should not provide extensive detail beyond that needed for evaluation of environmental impacts. (State CEQA Guidelines Sections 15124, 15124(c)).

SPAS-PC00130-644

Comment:

c. Airbus A320 series (A318, A319, A320, A321) shows a modest increase from 259 to 273 daily flights. That number appears to be a little low. There have been a huge number of orders for the existing A320 series and the new A320 NEO (new engine option).

Response:

Please see Response to Comment SPAS-PC00130-643 regarding information on why assumptions on aircraft fleet mixes in the 2009 and 2025 Design Day Flight Schedules were reasonable and supported by substantial evidence.

SPAS-PC00130-645

Comment:

d. Boeing 737 series. Although one of the stated assumptions in Section F-1 is the older aircraft would be retired there again is no breakdown between the 737 Classics Series (-100 and -200, now retired, 300/400/500 series still in operation and being retired), the current NextGen 737 series (-600, -700, -800, and -900 and -900ER) and the new 737 MAX series.

Response:

Please see Response to Comment SPAS-PC00130-643 regarding information on why assumptions on aircraft fleet mixes in the 2009 and 2025 Design Day Flight Schedules were reasonable and supported by substantial evidence.

SPAS-PC00130-646

Comment:

e. Numbers for A300 and A310 remain at 8. These must be cargo aircraft, but are not specified as such. Number should be lower as FedEx retires these aircraft from their fleet in favor of converted passenger Boeing 757's and new Boeing 767's.

Response:

Please see Response to Comment SPAS-PC00130-643 regarding information on why assumptions on aircraft fleet mixes in the 2009 and 2025 Design Day Flight Schedules were reasonable and supported by substantial evidence.

SPAS-PC00130-647

Comment:

f. Boeing 767 series shows an INCREASE from 77 to 190 daily operations. This number appears unbelievable as airlines are retiring their 767's in favor of Boeing 787's or smaller aircraft such as Airbus 320 series or Boeing 737 Next Generation (-600, -700, -800, -900) or 737 MAX series.

Response:

Please see Response to Comment SPAS-PC00130-643 regarding information on why assumptions on aircraft fleet mixes in the 2009 and 2025 Design Day Flight Schedules were reasonable and supported by substantial evidence.

SPAS-PC00130-648

Comment:

g. DC-10 series declines from 11 to 5 daily operations. It is doubtful any DC-10's will be in service in 2025.

Response:

Please see Response to Comment SPAS-PC00130-643 regarding information on why assumptions on aircraft fleet mixes in the 2009 and 2025 Design Day Flight Schedules were reasonable and supported by substantial evidence.

SPAS-PC00130-649

Comment:

h. MD-11 series increases from 7 to 10 daily operations. Again, this number should decline. Airlines that have MD-11's as freighters are retiring these aircraft due to the cost of operation (e.g. fuel).

Response:

Please see Response to Comment SPAS-PC00130-643 regarding information on why assumptions on aircraft fleet mixes in the 2009 and 2025 Design Day Flight Schedules were reasonable and supported by substantial evidence.

SPAS-PC00130-650

Comment:

i. Two Lockheed C-130's a day into LAX. Does LAX really have that much military traffic into LAX every day?

Response:

As described in Section 3.2 in Appendix F-1 of the Preliminary LAX SPAS Report, based on the Federal Aviation Administration (FAA) aircraft categories, military operations were included in the 2009 Design Day Flight Schedule. Please see Responses to Comments SPAS-PC00130-770 and SPAS-PC00130-771 regarding why assumptions on military operations at LAX for the 2009 and 2025 Design Day Flight Schedules were reasonable and supported by substantial evidence.

SPAS-PC00130-651

Comment:

j. The Airbus A350, the competitor to the Boeing 777 and 787 Dreamliner, is not even listed in the report. Airlines at LAX (or previously at LAX and may return- Aer Lingus, Finnair, TAP Portugal) that have ordered the A350 include Hawaiian Airlines, China Airlines, Aeroflot, Alitalia, Asiana, Avianca, Cathay Pacific, Thai, and United. Other A350 buyers include Qatar Airways, TAM (Brazil) and Vietnam Airlines.

Response:

Please see Response to Comment SPAS-PC00130-643 regarding information on why assumptions on aircraft fleet mixes in the 2009 and 2025 Design Day Flight Schedules were reasonable and supported by substantial evidence.

SPAS-PC00130-652

Comment:

k. The ADG V Boeing 747 is way too high, declining from 74 to 65. Many passenger airlines are replacing their 747's with Airbus A380's or Boeing 777-300ER's. Again, there is no breakdown of 747 types here, so one has to assume that there are no more 747-100's, -200's and 300's, but how many are Boeing 747-400 passenger and cargo airplanes? Please list 747's projected in use at LAX by airlines and routes.

Response:

Please see Response to Comment SPAS-PC00130-643 regarding information on why assumptions on aircraft fleet mixes in the 2009 and 2025 Design Day Flight Schedules were reasonable and supported by substantial evidence.

SPAS-PC00130-653

Comment:

l. The A380 prediction is also very off with 27 predicted. The real number is a low of 12, a high of 16 and most likely 14. This is based upon which airlines have ordered the A380 and how they have announced to deploy them to LAX. For example, LAX may never see an Airbus A380 from Thai Airways (6 orders) or Malaysia Airways (2 orders) because those airlines are using those aircraft on the Kangaroo Route from London through their respective hubs of Bangkok and Kuala Lumpur to Australia.

Response:

Please see Response to Comment SPAS-PC00130-643 regarding information on why assumptions on aircraft fleet mixes in the 2009 and 2025 Design Day Flight Schedules were reasonable and supported by substantial evidence.

SPAS-PC00130-654

Comment:

m. The 747-8 prediction of 12 is also too high. Again, there is no breakdown between passenger and cargo flights. Most of the 747-8 order book is for the freighter version. Lufthansa (20 orders) has announced 747-8 passenger service between LAX and its 747 base in Frankfurt, Germany. Other likely 747-8 passenger operators include Korean Air (5 passenger and 5 cargo orders), Air China (5 passenger orders) and TransAero (Russia-4 unconfirmed orders). Cargo operators are Cathay Pacific (747-8F already seen at LAX), Cargolux, Atlas Air, Air Bridge (Volga-Dnepr), Nippon Cargo Airlines and Korean Airlines Cargo. A projection of 3 passenger flights and 7 cargo flights for a total of 10 747-8 flights a day is more likely.

Response:

Please see Response to Comment SPAS-PC00130-643 regarding information on why assumptions on aircraft fleet mixes in the 2009 and 2025 Design Day Flight Schedules were reasonable and supported by substantial evidence.

SPAS-PC00130-655

Comment:

Specific Questions

Page 16- Table 6
The report notes that August 18, 2009 was used as the design date. Table 6 shows a total of 1,563 average daily operations. In looking at the FAA Aircraft Movements for LAX in 2009, there were 544,833 operations that would average to 1,492 operations per day. According to the LAWA Volume of Air Traffic (VOAT) report for LAX posted on the LAWA website, the August 2009 monthly total for flight operations (scheduled, commuter, charter, but excluding cargo operations) is 50,047; this averages to 1,614 operations per day.

1. How did Ricondo arrive at the 1,438 daily flights for Scheduled Passenger Operations? Were the 2009 Air Carrier total from the Ten Year Summary of FAA Aircraft Movements simply divided by 365 for a daily average of 1,200 operations and the Air Taxi total from the same chart daily average of 238 simply added together to get 1,438 average daily operations? What accounts for the variances between the Ricondo figure, FAA and the LAX VOAT?

Response:

As discussed in Section 3.2 in Appendix F-1 of the Preliminary LAX SPAS Report, the 2009 DDFS operations were classified among four FAA aircraft categories: air carrier; air taxi; general aviation; and military. To ensure accuracy and consistency, the number of operations reported in the FAA Air Traffic Activity Data System (ATADS) for August 2009 was compared to the number of operations included in the LAX radar flight data provided by LAWA's Environmental Services Division.

It is important to note that the FAA "air carrier" category includes both scheduled and non-scheduled air carrier passenger operations (with aircraft with seat counts greater than 60 seats), as well as large all-cargo operations (e.g., FedEx, UPS). Similarly, the FAA "air taxi" category includes both scheduled and non-scheduled air taxi passenger operations (with aircraft with seats counts less than 60 seats), as well as air-taxi cargo operations (such as smaller cargo turbo propeller aircraft serving regional airports).

After a thorough analysis of the proportion of each operation type among the four FAA aircraft categories based on the LAX radar flight dataset, all operations were reconciled among the FAA aircraft

categories. The table below provides a breakdown of the information summarized in Table 6 on page 16 in Appendix F-1 of the Preliminary LAX SPAS Report, and provides an explanation of the 1,438 scheduled-passenger operations inquired by the commentor.

Type of Operations/ FAA Aircraft Category	Air Carrier	Air Taxi	General Aviation	Grand Military	Total
Scheduled					
Passenger	1,220	218	0	0	1,438
Non-Scheduled					
Cargo	57	1	0	0	58
General Aviation	0	0	46	0	46
Passenger	1	12	0	0	13
Military	0	0	0	8	8
Grand Total	1,278	231	46	8	1,563

SPAS-PC00130-656

Comment:

2. Why didn't Ricondo break out the Air Taxi numbers as a separate figure since there is established data for Air Taxi?

Response:

Please refer to Response to Comment SPAS-PC00130-655 regarding information on air taxi operations included in the 2009 Design Day Flight Schedule (DDFS).

SPAS-PC00130-657

Comment:

3. Where did Ricondo obtain data for the average number of Cargo flights? Was this number based on a 2009 annual average or an August 2009 monthly average or actual flight data?

Response:

The number of cargo operations included in the 2009 Design Day Flight Schedule (DDFS) was based on an analysis of the LAX radar flight data provided by LAWA's Environmental Services Division. Please refer to Response to Comment SPAS-PC00130-655 regarding the assumed number of cargo operations.

SPAS-PC00130-658

Comment:

4. How was the General Aviation daily average determined? Was this average derived from dividing the annual 16,797 operations by 365 to get a daily average of 58?

Response:

As discussed in the second paragraph of Section 3.2 and depicted in Table 5 in Appendix F-1 of the Preliminary LAX SPAS Report, the assumed daily number of general aviation (GA) operations in the 2009 Design Day Flight Schedule (DDFS) was derived by dividing the monthly number of GA

operations (i.e., 1,416 operations, by 31 days in the month August). The rounded result is therefore 46 daily GA operations.

SPAS-PC00130-659

Comment:

5. Where did Ricondo obtain data for the average number of Non-Scheduled Passenger flights? Was this number based on a 2009 annual average or an August 2009 monthly average or actual flight data?

Response:

The number of non-scheduled operations included in the 2009 Design Day Flight Schedule (DDFS) was based on an analysis of the LAX radar flight data provided by LAWA's Environmental Services Division. Please refer to Response to Comment SPAS-PC00130-655 regarding the assumed number of non-scheduled operations.

SPAS-PC00130-660

Comment:

6. For the Military daily average, was this average derived from dividing the annual 3,058 operations by 365 to get a daily average of 8?

Response:

As discussed in the second paragraph of Section 3.2 and depicted in Table 5 in Appendix F-1 of the Preliminary LAX SPAS Report, the assumed daily number of military operations in the 2009 Design Day Flight Schedule (DDFS) was derived by dividing the monthly number of military operations (i.e., 245 operations, by 31 days in the month August). The rounded result is therefore 8 daily military operations.

SPAS-PC00130-661

Comment:

Page 17- Table 7

1. It appears that the data in Table 6 is inconsistent with the data in Table 7 for Scheduled Passenger Operations. In Table 6, the number of operations is 1,438 and in Table 7 the total number of operations is 1,563. In Table 6, the figure 1,563 is a total for all operations (scheduled, cargo, military, etc.). What accounts for this difference?

Response:

Contrary to the suggestion in the comment, there is no inconsistency between Tables 6 and 7 in Appendix F-1 of the Preliminary LAX SPAS Report.

Table 6 on page 16 of Appendix F-1 summarizes the total number of daily operations included in the 2009 Design Day Flight Schedule (DDFS), between scheduled and non-scheduled operations. As presented in Table 6, the total number of daily operations in the 2009 DDFS is 1,563 operations.

Table 7 on page 17 of Appendix F-1 provides consistent information. The 1,563 daily operations are broken down among domestic and international arrivals and departures.

SPAS-PC00130-662

Comment:

2. In Seats/Operation, the Domestic and International totals do not add up. Was there a factor applied to the total? Why was this not clearly explained?

Response:

The commentor is incorrect. It would not be arithmetically accurate to derive the average number of total seats per operation by adding the average numbers of domestic and international seats per operation. Doing so would result in an average of 320 seats per operation, compared to the correct number of 134 seats per operations.

The results in terms of average numbers of seats per operation provided in Table 7 in Appendix F-1 of the Preliminary LAX SPAS Report were computed as follows:

- Domestic seats/operations = number of domestic seats divided by the number of domestic operations
- International seats/operations = number of international seats divided by the number of international operations
- Total seats/operations = number of total seats divided by the number of total operations

Table 7 on page 17 of Appendix F-1 provided all data necessary to compute these averages.

SPAS-PC00130-663

Comment:

Page 18- Table 8
1. In the ADG I, ADG II and ADG III, propellers and regional jets are not broken out by manufacturer and model (e.g. Canadair CRJ-200, Embraer 140). Why were these not specified? Please list this information.

Response:

Please see Response to Comment SPAS-PC00130-643 regarding information on why assumptions on aircraft fleet mixes in the 2009 and 2025 Design Day Flight Schedules were reasonable and supported by substantial evidence.

SPAS-PC00130-664

Comment:

2. The Airbus A330 has been operated at LAX by Aer Lingus, Air Berlin (formerly LTU), Korean Air and Qantas. Why is the A330 is not listed in Table 8?

Response:

As discussed in Section 3.2 of Appendix F-1 of the Preliminary LAX SPAS Report, a published flight schedule for Tuesday, August 18, 2009 was acquired from the Official Airline Guide (OAG) and was used as a base schedule for scheduled-passenger activity in the 2009 Design Day Flight Schedule (DDFS).

Based on the OAG flight schedule, no scheduled-passenger Airbus 330 was scheduled on Tuesday, August 18, 2009.

Please see Response to Comment SPAS-PC00130-643 regarding information on why assumptions on aircraft fleet mixes in the 2009 and 2025 Design Day Flight Schedules were reasonable and supported by substantial evidence.

SPAS-PC00130-665

Comment:

3. Are the aircraft listed in Table 8 solely passenger aircraft, or a combination of passenger, cargo combi aircraft (e.g. Boeing 747-400 Combi)? If cargo aircraft is included, then why are the Douglas DC-8 and Lockheed L-1011 not listed?

Response:

Aircraft listed in Table 8 in Appendix F-1 of the Preliminary LAX SPAS Report include both passenger and all-cargo aircraft in the 2009 Design Day Flight Schedule (DDFS).

As discussed in Section 3.2 of Appendix F-1 of the Preliminary LAX SPAS Report, flight radar data for Tuesday, August 18, 2009 was obtained and was used as a base schedule for non-scheduled activity. The DC-8 and Lockheed L-1011 were not included in the flight radar data for that day.

Please see Response to Comment SPAS-PC00130-643 regarding information on why assumptions on aircraft fleet mixes in the 2009 and 2025 Design Day Flight Schedules were reasonable and supported by substantial evidence.

SPAS-PC00130-666

Comment:

Page 21- Table 9
1. Air Berlin operated LAX-Dusseldorf in 2009 with an Airbus A330-200. Air Berlin had acquired LTU in 2007. Why is it not listed under TBIT?

Response:

As discussed in Section 3.2 of Appendix F-1 of the Preliminary LAX SPAS Report, a published flight schedule for Tuesday, August 18, 2009 was acquired from the Official Airline Guide (OAG) and was used as a base schedule for scheduled-passenger activity in the 2009 Design Day Flight Schedule (DDFS).

Based on the OAG flight schedule, on Tuesday, August 18, 2009, no flight operated by Air Berlin to or from Dusseldorf (DUS) was recorded. Therefore, Air Berlin was not listed in Table 9 of Appendix F-1 of the Preliminary LAX SPAS Report, which meant to list the terminal assignments of airlines included in the 2009 DDFS, as opposed to all airlines that may operate out of Tom Bradley International Terminal at any time.

Please see Response to Comment SPAS-PC00130-643 regarding information on why assumptions on aircraft fleet mixes in the 2009 and 2025 Design Day Flight Schedules were reasonable and supported by substantial evidence.

SPAS-PC00130-667

Comment:

Page 23- Departure and Arrival Times of Scheduled Activity
1. How does one know in the 2025 schedules presented what are an existing flight and a "new operation created"? Please provide a list of the 2009 flight routes including aircraft and the 2025 projection that shows aircraft changed for a route and also new routes added.

Response:

Please see Response to Comment SPAS-PC00130-643 regarding information on why assumptions on aircraft fleet mixes in the 2009 and 2025 Design Day Flight Schedules were reasonable and supported by substantial evidence.

SPAS-PC00130-668

Comment:

Page 24- Cargo Operations
1. Why were the 12 "orphan flights" not added to the 58 daily cargo flights for 2009? Could the 12 have been counted as half an operation and added into the daily total for a new total of 64 average daily cargo flights?

Response:

The comment relates to "orphan flights" in the cargo operations of the 2025 Design Day Flight Schedule (DDFS).

For the purposes of the SPAS Draft EIR analyses, an orphan flight refers to an aircraft that operates only once on the representative day. This might be the case under the following conditions:
- An aircraft arrives at LAX on the representative day and does not depart until the next day.
- An aircraft departs from LAX on the representative day but arrived on a previous day.

Please refer to Section 4.2 of the Preliminary LAX SPAS Report, under the "Cargo Operations" section, third paragraph, fourth sentence: "Out of 58, 12 flights were "orphan flights," with no departure or arrival flights on the same day." The 12 orphan flights are in fact 2009 flights and therefore counted toward the total of 58 cargo operations in the 2009 DDFS. For cargo flights, many flights are not daily flights (i.e., if they do not arrive and depart on the same day, there is not a corresponding flight from the day before or after with which to be paired).

Each orphan flight was counted as one operation. Because an operation is defined as either an arrival or a departure, the commentor's suggestion that the 12 orphan flights could be counted as halves of operations (resulting in 6 operations) would not be accurate. The 12 orphan flights are properly counted as 12 operations.

Also, please see Response to Comment SPAS-PC00130-643 regarding information on why assumptions on aircraft fleet mixes in the 2009 and 2025 Design Day Flight Schedules were reasonable and supported by substantial evidence.

SPAS-PC00130-669

Comment:

Page 26, Table 12
1. In the ADG I, ADG II and ADG III, propellers and regional jets are not broken out by manufacturer and model (e.g. Canadair CRJ-200, Embraer 140). Why were these not specified? Please list this information.

Response:

Please see Response to Comment SPAS-PC00130-643 regarding information on why assumptions on aircraft fleet mixes in the 2009 and 2025 Design Day Flight Schedules were reasonable and supported by substantial evidence.

SPAS-PC00130-670

Comment:

2. Why does the Airbus A320 series (A318, A319, A320, A321 and A320neo [New Engine Option]) show only a modest increase in aircraft while the Boeing 737 series shows a greater increase? Please break out the Airbus A320 series by number of models by airline and route.

Response:

Please see Response to Comment SPAS-PC00130-643 regarding information on why assumptions on aircraft fleet mixes in the 2009 and 2025 Design Day Flight Schedules were reasonable and supported by substantial evidence.

SPAS-PC00130-671

Comment:

3. The Boeing 717 has been operated at LAX by AirTran and Midwest Airlines. Although AirTran has been acquired by Southwest and Midwest has been aquired by Frontier Airlines, the 717 remains in commercial service with Hawaiian and soon, Delta Airlines under a sub-lease with Southwest. Delta may operate the 717 into LAX. The Boeing 717 was built between 1999 and 2006 so it will still be a serviceable aircraft in 2025. Why is the 717 not listed in Table 12?

Response:

Please see Response to Comment SPAS-PC00130-643 regarding information on why assumptions on aircraft fleet mixes in the 2009 and 2025 Design Day Flight Schedules were reasonable and supported by substantial evidence.

SPAS-PC00130-672

Comment:

4. Does this table account for retirement of older Boeing 737's such as first-generation -100 and -200 series as well as the second-generation -300, -400 and -500 series? How much of the total is 737 Next Generation aircraft, -600, -700, -800, -900 and -900ER series? How much is the new 737 MAX series? Please break out the Boeing 737 series by number of models by airline and route.

Response:

Please see Response to Comment SPAS-PC00130-643 regarding information on why assumptions on aircraft fleet mixes in the 2009 and 2025 Design Day Flight Schedules were reasonable and supported by substantial evidence.

SPAS-PC00130-673

Comment:

5. The Boeing 767 total dramatically increases from 77 in 2009 to 190 in 2025. What accounts for this increase in 767's when airlines are ordering 787's or smaller aircraft such as the 737 Next Generation or Airbus A321 as replacement aircraft for 767's? Please break out the Boeing 767 series by number of models by airline and route. Please differentiate between passenger and cargo aircraft.

Response:

Please see Response to Comment SPAS-PC00130-643 regarding information on why assumptions on aircraft fleet mixes in the 2009 and 2025 Design Day Flight Schedules were reasonable and supported by substantial evidence.

SPAS-PC00130-674

Comment:

6. On page 24, under cargo operations, an assumption is stated that the DC-10's will be replaced by 777F's. Why is the DC-10 still listed for 2025? Are these passenger or cargo aircraft or both? Please specify how many passenger and cargo and by airline.

Response:

Please see Response to Comment SPAS-PC00130-643 regarding information on why assumptions on aircraft fleet mixes in the 2009 and 2025 Design Day Flight Schedules were reasonable and supported by substantial evidence.

SPAS-PC00130-675

Comment:

7. The figure of 22 for the Airbus A340 series (A340-300, A340-500 and A340-600) appears to be too high. Production of the A340 has ceased and the A340-500 has been discarded by some airlines due to the high cost of operations. Only Singapore Airlines is operating an A340-500 into LAX once a day. What data is there is support the figure of 22?

Response:

Please see Response to Comment SPAS-PC00130-643 regarding information on why assumptions on aircraft fleet mixes in the 2009 and 2025 Design Day Flight Schedules were reasonable and supported by substantial evidence.

SPAS-PC00130-676

Comment:

8. The figure of 65 appears too high for the Boeing 747 (assumed to be -400 series). How many of these are passenger aircraft and how many are cargo aircraft? Many passenger airlines (Japan Airlines and All Nippon Airways are good examples) have retired their 747's in favor of the Boeing 777-300ER. Please break out the Boeing 747 series by number of models by airline and route.

Response:

Please see Response to Comment SPAS-PC00130-643 regarding information on why assumptions on aircraft fleet mixes in the 2009 and 2025 Design Day Flight Schedules were reasonable and supported by substantial evidence.

SPAS-PC00130-677

Comment:

9. The figure of 27 for the Airbus A380 series appears to be too high. What data is there is support the figure of 27? A total of 12 to 16 daily A380 flights appear to be a more reasonable number. What data is there is support the figure of 27?

Response:

Please see Response to Comment SPAS-PC00130-643 regarding information on why assumptions on aircraft fleet mixes in the 2009 and 2025 Design Day Flight Schedules were reasonable and supported by substantial evidence.

SPAS-PC00130-678

Comment:

10. The figure of 12 for the Boeing 747-8 appears to be too high. What data is there is support the figure of 12? How many are passenger aircraft and how many are cargo aircraft? A total of 10 daily 747-8 flights appear to be a more reasonable number. What data is there is support the figure of 12?

Response:

Please see Response to Comment SPAS-PC00130-643 regarding information on why assumptions on aircraft fleet mixes in the 2009 and 2025 Design Day Flight Schedules were reasonable and supported by substantial evidence.

SPAS-PC00130-679

Comment:

11. Why is the Airbus A350 XWB not listed on Table 12? Several airlines operating at LAX have ordered this aircraft and likely will operate it into LAX. Airline which have ordered the A350 include Hawaiian Airlines, China Airlines, Aeroflot, Alitalia, Asiana, Avianca, Cathay Pacific, Thai Airways and United Airlines. Former LAX tenants such as Aer Lingus, Finnair and TAP Portugal have also ordered the A350. Other A350 customer airlines not presently serving LAX include Qatar Airways, TAM (Brazil) and Vietnam Airlines.

Response:

Please see Response to Comment SPAS-PC00130-643 regarding information on why assumptions on aircraft fleet mixes in the 2009 and 2025 Design Day Flight Schedules were reasonable and supported by substantial evidence.

SPAS-PC00130-680

Comment:

Page 28- Gating
1. In Section 4.3, it states, "Non-scheduled aircraft were not gated." If LAWA or Ricondo has data concerning non-scheduled flights, then where were these aircraft parked on the LAX airfield?

Response:

The commentor is referring to a statement contained in the introductory paragraph of Section 4.3 in Appendix F-1 of the Preliminary LAX SPAS Report. The focus of Section 4.3 was to describe the gating analysis of scheduled passenger operations assigned to LAX passenger gates (at the various terminals and commuter parking positions).

Non-scheduled passenger aircraft were not assigned to any passenger gates, but rather, through the SIMMOD simulation exercise, to parking positions on the south airfield near the fixed-base operator facilities.

SPAS-PC00130-681

Comment:

2. Under Section 4.3.1, it states that "the gating exercise focused on only Alternatives 1 through 4" and that estimating "performance assumptions and projections for Alternatives 5 through 7, as utilized in the aircraft noise and air quality analyses." How can the public and decision makers make an "apples-to-apples" comparison of gate when Alternatives 1 through 4 used one standard of gate assumptions and the other Alternatives 5 through 7 used a different set of gate assumptions? This appears to be a deficiency in the Draft EIR to fail to properly evaluate the alternatives. Who made the decision "taking into account contract scope and budget considerations" to apply different standards to evaluate gating between the different gate configurations? What did the LAWA/Ricondo contract state about how the gates in all of the Alternatives were to be evaluated? Were different alternatives to be given different treatments in the contract?

Response:

Section 4.3.1 on page 28 of the Preliminary LAX SPAS Report discusses gating of the 2025 Design Day Flight Schedule (DDFS). Gating refers to the exercise of assigning each scheduled passenger aircraft to passenger gates, either at the passenger terminals or at commuter parking positions.

The 2025 DDFS was thoroughly analyzed and gated to the terminal conditions under Alternatives 1 through 4, with Alternatives 1 and 2 sharing the same terminal layout and number of available gates.

However, as discussed in Section 4.3.1 of the Preliminary LAX SPAS Report, Alternatives 5, 6, and 7 were not gated.

The decision not to gate Alternatives 5, 6, and 7 was made in light of the overall similarities of terminal layout and number of available gates in Alternatives 5, 6, and 7, compared with Alternatives 1 through 4. Had the technical team gated Alternatives 5, 6, and 7, the results would have yielded similar results to those of Alternatives 1 and 2 because of the fact that: 1) the gate layout for each alternative would include 153 passenger gates; 2) the distribution of gates within the terminal area in each of the seven alternatives is similar; 3) the same gating assumptions and methodology would have been used (e.g., if an aircraft could not be gated at one concourse, the gating model would assign an alternate gate at an adjacent or nearby terminal concourse); and, 4) the methodology based on average number of turns per gate (described in Section 4.3.3 of the Preliminary LAX Draft SPAS Report) indicated opportunities for additional aircraft to be accommodated with reasonable turns per gate results. Given these similarities, it was possible to draw reasonable conclusions about Alternatives 5, 6, and 7 based on the results of gating Alternatives 1 through 4.

SPAS-PC00130-682

Comment:

3. In Section 4.3.3, Methodology and Results, "For programmatic planning purposes and because airline assignments throughout the LAX terminals in 2025 would be uncertain at the time this analysis was undertaken, the focus of this analysis was placed on maximizing the level of service and gate utilization." While many long-term airline leases will have expired by 2025, the focus of gating exercise makes no sense in relation to the reality of airline operations. No airline would want to have their operations spread across 9 different terminals at LAX. With a few exceptions (e.g. United at Terminals 6, 7 and 8), airlines at LAX historically have kept their operations in one terminal to maximize the use of their personnel and for customer convenience, including access to the airlines' respective VIP lounges for their premium passengers. Reference the "LAX Terminal Leases as of 2012" below. Since the airlines in Terminals 4 through 8 have made substantial investments in their facilities and due to consolidation in the airline industry (less airlines), why was the gating simulation not performed on the basis of the existing terminal assignments? For example, in Figure 46, it appears that a Southwest Airlines flight is operating out of Gate 70B to Houston Hobby Airport (HOU). United Airlines, Terminal 7 tenant, operates only to Houston Intercontinental Airport (IAH) from LAX. Southwest has operated out of Terminal 1.

LAX Terminal Leases as of 2012

Terminal	Airline	Lease expires	Comment
4	American	December 4, 2024	American Airlines can reject the lease while in reorganizing under Chapter 11 of the US Bankruptcy code
5	Delta	November 1,	
6	United	August 17, 2017	Assumption of Continental Airlines lease
6	Alaska	March 20, 2022	New 10 year lease
7 & 8	United	August 17, 2017	

Response:

This comment contains a long list of subject matters and statements related to the assumptions made in gating the 2025 DDFS, as described in Section 4.3 of Appendix F-1 of the Preliminary LAX SPAS Report.

As a summary of the comment, the following is a list of subject matters discussed by the commentor: expiration of long-term airline leases by 2025; reality of airline operations; potential spread of operations across nine terminals; historical airline operations in one terminal with the exception of United Airlines;

substantial investments in Terminals 4 through 8; consolidation of the airline industry; and LAX terminal leases as of 2012.

In fact, the commentor referred to three important subject matters: the expiration of long-term airline leases by 2025; the consolidation of the airline industry; and the fact that American Airlines could reject their Terminal 4 lease while reorganizing under Chapter 11 of the U.S. Bankruptcy Code. These three subject matters support and reinforce the idea that, over a 16-year period, uncertainties in the airline industry and at LAX are real, specifically in terms of terminal assignments, alliance partnerships, existence of legacy and low carrier operations is existent. Please see Section 2.2.2 of Appendix F-1 of the Preliminary LAX SPAS Report for a discussion of historical operations at LAX, as well as how aircraft operations have fluctuated over the past decade due, in part, to factors affecting the entire aviation industry.

Therefore, the 2025 DDFS was developed to be a representative schedule of future activity at LAX with representative aircraft in the fleet; industry average turn-around times; average seat configurations; average load factors; and average distribution of operations through the day. In other words, the fleet mix, aircraft operating characteristics, and passenger flows were developed for the airport as a whole, with specific airline characteristics averaged across operators currently serving LAX.

As it relates to gating, the allocation of this activity among the terminal and airfield facilities (existing and proposed) was also generalized in recognition of the uncertain nature of future terminal assignments and tenants in activity, as discussed above. As described in Section 4.3 of Appendix F-1 of the Preliminary LAX SPAS Report, the gating exercise focused on spreading aircraft throughout the terminals and commuter parking positions based on an assumed level of service (average number of turns per gate) that LAWA is planning to be able to provide in the future.

That is not, however, to suggest that airline operations would be spread among multiple terminals in 2025. The SPAS Draft EIR is not a document meant to dictate the future state of negotiated terminal leases and terminal assignments at LAX. One would still expect to see terminals at LAX being solely operated by a single airline or alliance partners in the future.

Contrary to the commentor's statement, the flight shown operating at Gate 70B in Figure 46 of the Preliminary LAX SPAS Report is not a Southwest Airlines flight. In fact, the operator of this flight is unknown. For programmatic planning purposes, this Boeing 737-700 with winglets (73W) assigned to Terminal 7 Gate 70B was gated the same way regardless of the airline operating the aircraft. It is a flight representative of a departure to a domestic destination, located in the Southwest region, departing LAX at morning peak time around 7 a.m. on an average day in the peak month at LAX.

Finally, the Preliminary LAX SPAS Report and SPAS Draft EIR analyses of facility development alternatives use reasonable assumptions about gating supported by substantial evidence to evaluate differences. An EIR is not required to guarantee that its project description or implementation assumptions will be 100 percent accurate in the future. (Village Laguna of Laguna Beach Inc. v. Board of Supervisors (1982) 134 Cal.App.3d 1022,1030; Environmental Council of Sacramento v. City of Sacramento (2008) 142 Cal.App.4th 1018, 1036.)

SPAS-PC00130-683

Comment:

PDF pages 47 to 150- Appendix B- Ramp Charts

1. In the 2025 ramp charts (only Alternatives 1 through 4 were studied; Alternatives 5 through 7 were not studied), there are domestic flights listed at the Tom Bradley International Terminal (TBIT). From 1984 to 1987, World Airways had been the only domestic operator at TBIT. In the beginning of TBIT operations, some domestic World Airways passengers were sent to the US Customs Hall to claim their baggage. Will the new TBIT be set-up for domestic flights to avoid sending domestic passengers into the Customs Hall? Since the focus of TBIT is to be international flights, why were domestic flights included in the TBIT ramp simulations? Will domestic passengers get a good impression of LAX if they are sent to US Customs in error?

Response:

The comment is related to the ramp charts presented in Attachment B of Appendix F-1 of the Preliminary LAX SPAS Report. These ramp charts were attached for illustration purposes only to provide a sense of how busy each terminal is, and how aircraft have been spread among gates, based on the methodology presented in Section 4.3 of Appendix F-1 of the Preliminary LAX SPAS Report. They are however not meant to reflect specific assignments of flights in 2025, as described in Response to Comment SPAS-PC00130-682.

The commentor is incorrect in stating that "only Alternatives 1 through 4 were studied; Alternatives 5 through 7 were not studied." All seven of the airfield improvement alternatives were evaluated throughout the SPAS Draft EIR analysis. The four sets of ramp charts presented in Attachment B of Appendix F-1 of the Preliminary LAX SPAS Report depict the most notable differences in potential gating configurations within the range of airfield alternatives, with Figure A depicting 2009 baseline conditions. Figure B depicts the general gating configuration in 2025 with completion of the Bradley West Project, the Midfield Satellite Concourse, and improvements between Terminals 1 and 2 and between Terminals 2 and 3 (all of which would occur independent of SPAS), development of a new concourse at Terminal 3, demolition of the northern tip of Terminal 1, and addition of the new Concourse 0. Figure C depicts the general gating configuration in 2025 with completion of the Bradley West Project and the Midfield Satellite Concourse (both of which would occur independent of SPAS) and replacement of Terminals 1, 2, and 3 with a linear concourse. Figure D depicts the general gating configuration in 2025 with completion of the Bradley West Project, the Midfield Satellite Concourse, and improvements between Terminals 1 and 2 and between Terminals 2 and 3 (all of which would occur independent of SPAS), but no other improvements (i.e., no Yellow Light alternative improvements). Although Alternatives 5, 6, and 7 are not specifically called-out within the subject ramp charts, the gating configuration for those three alternatives would be generally comparable to that shown in Figure B for Alternatives 1 and 2. The basic similarities between the terminal configurations for Terminals 5, 6, and 7 and the terminal configurations for Terminals 1 and 2, can be seen in reviewing the alternatives development concepts presented in Chapter 1, Introduction and Executive Summary, of the SPAS Draft EIR (see Figures 1-5, 1-6, 1-9, 1-10, and 1-11).

The commentor is correct regarding a few domestic flights being gated at TBIT. These flights were assigned to TBIT because they were either matched with international flights (e.g., SAL-LAX-DFW at Gate 155 depicted in Figure 21 in Attachment B of Appendix F-1 of the Preliminary LAX SPAS Report) or because no domestic gate was available to accommodate them. However, these assignments do not reflect a LAWA policy decision to operate domestic flights at TBIT in 2025.

SPAS-PC00130-684

Comment:

2. In the 2025 ramp charts (see Figure 47 specifically), there are two Airbus A380 flights listed as Paris-Charles de Gaulle to Los Angeles and then and onward to London-Heathrow and vice versa (CDG-LAX-LHR and LHR-LAX-CDG) at Gates 156 and 154. There are other examples of these as well that seem extremely unrealistic- AKL-LAX-TPE, CDG-LAX-MUC, ZRH-LAX-CDG, BNE-LAX-LHR to list a few. There are no airlines presently operating those routes as described above. Airlines have operated certain flights on the same route and time for more than 50 years. The gating simulation does not appear to be realistic. Were these flight schedules used in the gating simulation derived from actual flight schedules? Were some of the flights invented? Were some of the aircraft choices for the routes arbitrarily chosen?
3. In the 2025 ramp charts (see Figure 50 specifically), there is a 747-400 flight listed at Gate MSC-4 at the Tom Bradley International Terminal (TBIT) with a routing of Dallas/Fort Worth-Los Angeles-Anchorage (DFW-LAX-ANC). This looks a like a cargo flight routing. No US passenger airline is operating a 747 on those routes. Were cargo flights listed at passenger gates as passenger flights on the gating charts? What are those flights?

Response:

Please refer to Response to Comment SPAS-PC00130-682 regarding why the assumptions and approach on 2025 Design Day Flight Schedule (DDFS) gating were reasonable and supported by substantial evidence.

In addition, the commentor is inquiring about city pairs (i.e., the arrival and departure cities served by a particular aircraft) depicted on the ramp charts in Attachment B of Appendix F-1 of the Preliminary LAX SPAS Report.

Matching of flights (i.e., assigning a departing flight to an arriving flight) was undertaken for the purposes of the airspace SIMMOD simulation. The methodology used to match the 2025 DDFS is similar to that described in Section 3.2 of Appendix F-1 of the Preliminary LAX SPAS Report for the 2009 DDFS. As explained in Response to Comment SPAS-PC00130-682, the 2025 DDFS was developed to be a generic flight schedule, independent from specific airlines. Because no airline information was available, unexpected city pairs resulted from the aircraft matching process. All arrivals and departures were sorted by aircraft type and time of day, and matched based on minimum gate turn times assumed for each aircraft.

The commentor also inquired if the 2025 DDFS was developed based on actual flight schedule, whether flights were invented and aircraft assigned arbitrarily to routes. As discussed in Section 4.2 of Appendix F-1 of the Preliminary LAX SPAS Report, the 2025 DDFS was based on an actual flight schedule, the 2009 DDFS. No flight was "invented," but rather new flights were created. The methodology to create new flights to contribute to the growth between 2009 and 2025 is also described in details in Section 4.2 of Appendix F-1 of the Preliminary LAX SPAS Report. All aircraft assigned to a newly created flight were selected based on industry standards of aircraft ranges and the ability for the origin or destination airport to accommodate such aircraft.

The commentor questioned a city pair DFW-LAX-ANC. Please refer to the third paragraph above which explains the matching of 2025 DDFS flights. This flight is not a cargo flight, and no cargo flight was accommodated at terminal passenger gates.

SPAS-PC00130-685

Comment:

Note that on Page 28- "....taking into account contract scope and budget considerations...the gating exercise focused on only Alternatives 1 through 4." "From a gating standing, the terminal and gate layouts assumed under SPAS Alternatives 1 and 2 are identical." Alternatives 5 through 7 were not analyzed in this section. WHERE IS THIS ANALYSIS COMPLETED? IF NOT, WHY NOT?

Response:

Please refer to Responses to Comments SPAS-PC00130-681 and SPAS-PC00130-683 regarding why gating assumptions made for Alternatives 5, 6, and 7 were reasonable and supported by substantial evidence.

SPAS-PC00130-686

Comment:

BACK-UP MATERIALS

Response:

It is acknowledged that the commentor provided the following information as part of the comment: "Statistics - Ten Year Summary - FAA Aircraft Movements" from the LAWA website http://www.lawa.org/welcomeLAX.aspx.

SPAS-PC00130-687

Comment:

Appendix E -2 LAX SPECIFIC PLAN AMENDMENT STUDY REPORT Ground Transportation Questions

Question: General question covering ground transportation planning. If LAWA was working with SPAS to address this type of issues, why have we not seen any inputs from STV (the writer of this evaluation in the DEIR) prior to the release of the DEIR? Alternatively, why doesn't STV mention any of the suggestions made at SPAS meetings?

Response:

Many comments were received containing questions regarding the LAX Ground Transportation Study (GTS) Report prepared by STV, provided in Appendix E2-1 of the Preliminary LAX SPAS Report. This response to comment provides a detailed discussion of the purpose of the LAX GTS Report, its relation to the SPAS Draft EIR, and the differences between the analyses presented in each document. Where appropriate, information presented in both documents is referenced in Responses to Comments SPAS-PC00130-688 through SPAS-PC00130-724 below. Detailed information about the SPAS Concept Development Process is included in Chapter 5 of the Preliminary LAX SPAS Report.

The purpose of SPAS is to identify "Potential alternative designs, technologies, and configurations for the LAX Master Plan Program that would provide solutions to the problems that the Yellow Light Projects were designed to address consistent with a practical capacity of LAX at 78.9 million annual passengers (MAP) (the "Alternative Projects")," as stated in Section V.D.1 of the Stipulated Settlement.

During the early SPAS planning process, LAWA studied various options that would provide solutions to the problems that the Yellow Light Projects were designed to address based on input from the SPAS Advisory Committee and community meetings. The concept development process is detailed in Chapter 5 of the Preliminary LAX SPAS Report, which identifies all of the concepts considered throughout the SPAS process, including concepts suggested by Advisory Committee members. LAWA circulated an NOP for the preparation of a SPAS Draft EIR in 2008, which included these options. Subsequent to circulation of the 2008 SPAS NOP, LAWA reconsidered and refined the options for potential alternative designs, technologies, and configurations to be evaluated in the SPAS Report and SPAS EIR. Input received during the SPAS EIR scoping meetings in 2008 contributed to the refinement of the alternatives, as did completion of a number of studies, identified in Section 5.3.1 of the Preliminary LAX SPAS Report. LAWA issued a revised NOP in 2010 which identified refined airfield, terminal, and ground access options. (See Section 5.4 of the Preliminary LAX SPAS Report.) Based on these iterative refinements to the SPAS concepts, LAWA identified the alternatives that were carried forward into the SPAS Draft EIR for detailed environmental review. As provided in the LAX GTS Report, while the study considered several operational and physical improvements to the ground transportation system at LAX, not all the improvements were included in the SPAS alternatives. (See page 2 of Appendix E2-1 of the Preliminary LAX SPAS Report.) The designs and improvements that were incorporated into an alternative were subject to environmental and public review in the SPAS Draft EIR. The LAX GTS Report was conducted during the concept development phase and was intended to evaluate and screen potential alternative designs, technologies, and configurations specific to the ground access component of the LAX Master Plan (i.e., the "alternative ground access projects") which could most effectively provide solutions to the issues that the Yellow Light Projects were designed to address at the 78.9 MAP activity level, expected to occur by 2025. The LAX GTS considered planning options both within and outside of the CTA, consistent with SPAS Project Objective 2 (Improve the Ground Access System at LAX to Better Accommodate Airport-Related Traffic, Especially as Related to the Central Terminal Area), presented on page 2-2 in Section 2.2 of the SPAS Draft EIR.

There are not only differences in the intent of the LAX GTS Report and the SPAS Draft EIR, but also differences in technical assumptions and methodologies used. Additionally, the results presented in the LAX GTS Report were used only to assess potential operational and physical improvements to the ground access system, and as guidance in assessing if such improvements should be considered for inclusion in the SPAS alternatives. The results presented in the LAX GTS Report were not used in the SPAS analyses or comparisons; rather, separate independent analyses were conducted to evaluate the SPAS alternatives in the SPAS Draft EIR. The GTS report was used only to identify and evaluate potential improvements that could be incorporated in the SPAS alternatives, which were analyzed separately for environmental impacts in the SPAS Draft EIR. Particularly, information developed from the LAX GTS analyses were used to screen improvements for the initial ground access concepts, which were further narrowed and refined to become the ground access components of Alternatives 1, 2, 4, 8,

and 9. Alternatives 1, 2, 4, 8, and 9, like all the SPAS alternatives, were analyzed in detail throughout the SPAS Draft EIR.

Some key differences in technical assumptions and methodologies used in the two studies include the following: (1) Analyses presented in the LAX GTS Report used micro-simulation modeling to evaluate the CTA traffic conditions for a variety of operational and physical improvements, some of which were included in the SPAS Draft EIR because evaluations showed they could have a positive impact on traffic conditions within the CTA whereas others which were less effective or determined to be unfeasible were not included. In contrast, the SPAS Draft EIR used a spreadsheet modeling approach. (2) The future 78.9 MAP gated aircraft schedules differed between the two analyses because LAX GTS analyses were nearing completion when the SPAS 2025 gated schedules were released. (3) For the simulation modeling portion of the LAX GTS Report, the planned MSC Passenger Processor in the CTA was not included. The MSC Passenger Processor was not modeled as part of the LAX GTS Report because conceptual planning for this improvement had not yet been completed. This is a key distinction since the LAX GTS Report assumed all MSC passengers would be processed through the Tom Bradley International Terminal (TBIT), whereas the SPAS analysis assumed the MSC Passenger Processor would be operational at 78.9 MAP, and used to process the majority of the MSC passengers. MSC passengers not processed at the new MSC Passenger Processor were distributed throughout the existing terminals. (4) While the planned North Terminals Improvements (also referred to as Terminals 1.5 and 2.5) were included as part of the assumed 78.9 MAP condition in the SPAS alternatives, they were not included in the simulation modeling portion of the LAX GTS Report. However some portion of the unallocated curbside located between the existing Terminal 1 and Terminal 2 processor buildings was allocated to specific commercial vehicle modes under certain conditions. Similar to the MSC Central Processor, the proposed Terminal 1.5 and Terminal 2.5 were not modeled as part of the LAX GTS Report because conceptual planning for these improvements had not yet been completed. Further, with start of the SPAS analyses, the study team was not asked to undertake additional modeling as part of the LAX GTS to include the proposed Terminal 1.5, Terminal 2.5, and MSC Passenger Processor in the CTA because (a) they were not proposed SPAS improvements, (b) it was assumed these improvements, along with the redistribution of MSC passengers for processing from TBIT and the additional departures and arrivals level curbsides, would improve traffic conditions within the CTA, and (c) such analysis was to be conducted as part of the SPAS Draft EIR analysis.

While the discussion above details key factors which differentiate these two efforts, the work completed in the LAX GTS represents assumed future conditions which in many ways present a more conservative or worst case scenario of traffic conditions within the CTA at 78.9 MAP and are valid for the purpose of conducting screening level analyses of ground transportation options. Additionally, the detailed simulation of traffic operations within the CTA provided a valuable understanding of how many of the operational and physical improvements evaluated as part of the LAX GTS could be expected to impact traffic flow in the future.

The results of the STV study were shared with the Advisory Committee and were incorporated into the concepts included in the 2010 SPAS NOP and the SPAS Draft EIR. Specifically, the Advisory Committee was made aware of the STV study at a meeting held on July 1, 2010. The preliminary concepts developed by STV were shared with the Advisory Committee on August 16, 2010. (Presentation materials from these meetings are provided in Appendix D-2 of the Preliminary LAX SPAS Report.) These concepts were incorporated into the 2010 SPAS NOP as Ground Transportation Concepts A and B. Components of these concepts were later refined for inclusion in Alternatives 1, 2, 8, and 9, which were analyzed in the SPAS Draft EIR.

The method of analysis, in which the studies and information obtained in the GTS was used to refine the SPAS alternatives, complies with CEQA. An EIR need not consider every conceivable alternative to the project. (In re Bay-Delta Programmatic Environmental Impact Report Coordinated Proceedings (2008) 43 Cal.4th 1143, 1163.) An EIR must describe a "range of reasonable alternatives" to the project which would attain most of the basic objectives of the project and evaluate the merits of the alternatives. (CEQA Guidelines Section 15126.6(a).) The SPAS alternatives, which include the options proposed and evaluated in the GTS, represent a reasonable range of alternatives. Moreover, as seen throughout the SPAS Draft EIR, the SPAS alternatives were presented and evaluated in a manner that fosters informed decision-making and public participation.

SPAS-PC00130-688

Comment:

Page 11 The study team also examined the disposition of existing CTA real estate, including best-use scenarios for underutilized parcels (e.g., long-term parking areas), current and future use of parking facilities, increase in passenger activity at the TBIT curbside, and the long-term planning of an expansion of Terminal 1 (T1) to the east, referred to as Terminal 0, as part of the LAX specific plan Amendment study (SPAS), and the construction of terminal buildings between T1 and Terminal 2 (T2) and between T2 and Terminal 3 (T3), referred to as Terminal 1.5 and Terminal 2.5, respectively. Terminals 1.5 and 2.5 are LAX Master plan projects independent of SPAS.

Question: Appendix E-2 Page 2 identifies Terminals 1.5 and 2.5 as part of the LAX Master Plan projects "independent of SPAS." Where are these identified in the LAX Master Plan, Alt ID?

Response:

Please see Response to Comment SPAS-PC00130-378 regarding the reconfiguration of the North Terminal Complex, including Terminal 1.5 and Terminal 2.5, as part of the LAX Master Plan, a project that is independent of SPAS.

SPAS-PC00130-689

Comment:

Page 11 SPAS Support - Various options were developed to support the SPAS process, including location of the following: dedicated busway or APM and its associated stations; ConRAC; employee and public parking; redesigned entry roadways; and support facilities.

Question: Appendix E-2 This full design effort and review was never discussed with SPAS. In scanning this section the suggestions and discussions with SPAS Committee for traffic improvements doesn't seem to be identified or discussed. Where are they located and how were they used?

Response:

Please see Response to Comment SPAS-PC00130-687 regarding the STV analysis of ground access conducted as part of SPAS, including consultation with the Advisory Committee regarding the analysis and its findings. As indicated in Response to Comment SPAS-PC00130-687, the Advisory Committee was specifically apprised of the fact that LAWA had contracted the firm STV to study ground transportation options for SPAS at a meeting held on July 1, 2010. See page 16 of the SPAS Advisory Committee Meeting presentation for July 1, 2010 provided in Appendix D-2 of the Preliminary LAX SPAS Report. The key elements of the ground transportation system improvement options that were formulated with input from STV were then presented to the SPAS Advisory Committee in a subsequent meeting on August 16, 2010, in advance of the publication of the 2010 SPAS NOP. See pages 6 through 12 of the SPAS Advisory Committee Meeting presentation for August 16, 2010 provided in Appendix D-2 of the Preliminary LAX SPAS Report. Two concepts were presented on August 16, 2010, Concept A and Concept B. Although these concepts were further refined through the SPAS process, they include the basic components of the ground access improvements incorporated in the SPAS alternatives, including a redesigned entry way; relocated commercial vehicle holding lot; parking/shuttle facility located between 96th and 98th Streets, and between Vicksburg Avenue and Airport Boulevard (later named the Intermodal Transportation Facility); surface parking and, under one of the options, a CONRAC in Manchester Square; connectivity to the planned Metro Light Rail Station at Century and Aviation Boulevards; and dedicated access (bus or APM) between Manchester Square and the CTA, with a stop at the ITF. These concepts are introduced on pages 5-78 and 5-79 and illustrated in Figures 5-43 and 5-44 of the Preliminary LAX SPAS Report. They were also included in the 2010 SPAS NOP, which was circulated for public review and comment between October 8, 2010 and November 29, 2010, and presented at public scoping meetings held on November 3 and November 6, 2010. Refinement of these concepts for inclusion in the alternatives evaluated in the SPAS Draft EIR is discussed on pages 5-106 and 5-107 of the Preliminary LAX SPAS Report. The final configurations included in the SPAS

Draft EIR alternatives are discussed on pages 5-110 and 5-111 of the Preliminary LAX SPAS Report, with details and illustrations provided in Chapter 6.

The LAX GTS Report by STV includes detailed information and analysis related to formulation and screening of the SPAS ground transportation system alternatives and also provides information and analysis related to other aspects of the circulation system within the CTA, including information related to future non-SPAS improvements such as the future Midfield Satellite Concourse Passenger Processor. As indicated in the Introduction of the GTS Report, the subject study provided a comprehensive look at the ground transportation system and conditions within the CTA and was initiated in parallel with, and in support of, SPAS. As noted above, the key elements of the ground transportation system alternatives related to SPAS as reflected in the GTS Report were, in fact, presented to the SPAS Advisory Committee.

As explained in the Response to Comment SPAS-PC00130-687, the technical analysis presented in the LAX GTS Report were not used in the SPAS analyses or comparisons; separate independent impact analyses were used to evaluate the SPAS alternatives. Information developed from the STV analysis was used to screen improvements for the initial ground access concepts, which were further narrowed to SPAS Alternatives 1, 2, 4, 8, and 9. Please also see Chapter 5 of the Preliminary LAX SPAS Report, and Appendices D-1 and D-2, for a discussion and documentation of the SPAS Concept Development process, including suggestions made by Advisory Committee members and members of the public throughout the process.

SPAS-PC00130-690

Comment:

Page 13-15 Traffic bottlenecks occur along the Arrivals roadway at peak travel times, particularly at T1 and on the approach to TBIT. Without improvements to the existing operation, these choke points will further deteriorate as traffic volumes increase. The VISSIM model was calibrated at 59.8 MAp, the LAX passenger activity level in 2008, which was the last full year of data available when STV began its study in 2009. passenger activity in the SPAS EIR baseline (i.e., 2010) was 59.1 MAP. The activity level in 2008 (i.e., 59.8 MAP) is sufficiently close (within one percent) to be considered representative of 2010 conditions. The model showed some queuing along West Way and minor to moderate congestion at various locations along the CTA roadways. Based on output from the model, recommendations independent of SPAS were made to address existing roadway capacity issues and improve traffic flow along the affected areas, including adding a traffic signal at West Way and World Way south and widening World Way across from TBIT between the driveway to p3 and Center Way to accommodate an additional lane of traffic. The latter recommendation was subsequently included as a component of the Cup project currently under construction.

Question: Appendix E-2 Page 15 Even though the MAP between 2009 and 2010 were comparable, weren't there some major changes (ie alliance consolidations and airline movements out of terminal 2 that could impact the model results? What changes were made to account for these changes in arrival times to ensure proper estimates of the peak hours?

Response:

Please see Response to Comment SPAS-PC00130-687 regarding the STV analysis of ground access conducted as part of SPAS. As noted therein, the LAX GTS Report was prepared prior to the SPAS Draft EIR to screen ground transportation concepts, and analyses prepared for the LAX GTS Report were not used in the SPAS Draft EIR.

The trip generation models developed for both LAX GTS Report and the SPAS Draft EIR were based on the existing conditions for the baseline of each study, and the models were calibrated to these conditions. Therefore, the baseline used in the respective studies represents the conditions existing at the time the study was conducted. A detailed discussion of baseline traffic conditions used in the SPAS Draft EIR is provided in Section 4.12.1.2.1 of the SPAS Draft EIR. As described therein, a number of factors were used to determine baseline traffic conditions, including arrivals and departures airport peak hours, on-airport traffic data, and roadway traffic volumes. (See Section 4.12.1.2.1 of the SPAS Draft EIR.) Please see Section 4.12.1.2.2 of the SPAS Draft EIR for a discussion of future (2025) traffic

conditions. As noted in Response to Comment SPAS-PC00130-687 (see discussion of key differences in assumptions and methodologies used in the LAX GTS compared to those used in the SPAS Draft EIR traffic analysis), each analysis used different future 78.9 million annual passengers (MAP) gated aircraft schedules because the GTS analysis was nearing completion when the SPAS 2025 gated schedule was released. Numerous factors are considered when developing a future gated aircraft schedule, including airline alliance information. To the extent possible, all information used to develop future gated aircraft schedules is the most up to date available when an analysis begins. When using future gated aircraft schedules to estimated future conditions, it should be noted that the estimate of future conditions is the best prediction available based on existing and historical information available at the time. While it is important to ensure that the most accurate and up to date information is included in the schedule development process, it is equally important to recognize that existing airline alliances may change in the future. It would be speculative to try and predict how these alliances might change by 2025.

SPAS-PC00130-691

Comment:

Page 15 The primary reason for this significant increase was the study's assumption that, at the 78.9 MAP activity level, passengers on flights gated at the MSC and TBIT would be processed through the TBIT Arrivals Hall, and that 41% of all arriving passengers would be processed through the TBIT compared to 19% with the 58.9 MAp level. This growth in passengers arriving on the TBIT curbside during the peak hour resulted in a 175% increase in vehicles trying to access the TBIT inner roadway curbsides. Commercial vehicle traffic, on the other hand, grew at a more moderate pace due to underlying efficiencies derived from high-occupancy vehicles (HoVs). note that an increase of 15 privately owned vehicle (poV) passengers would add 10 additional poVs into the network (assuming an occupancy of 1.5 passengers per poV), whereas, 15 rental car customers would warrant only one additional commercial vehicle (at 15 passengers per rental car shuttle). Based on the 175% (746-vehicle) increase in vehicles attempting to access the TBIT curbside with no accompanying facility improvements, the VISSIM simulation showed that vehicles block both the inner and outer roadway lanes from the TBIT curbsides back to the airport entry ramps from both Century and Sepulveda Boulevards. (UNDERLINE FOR EMPHASIS)

Question: Appendix E-2 Page 6 if the assumption is that TBIT and MSC are primarily the NLA sized gates which would be for international traffic, what is the justification for such an increase in international passengers? If they are international, is there a difference in percentage that are staying at LAX vs those who are on domestic flights? How is this accounted for in the model?

Response:

Please see Response to Comment SPAS-PC00130-687 regarding the STV analysis of ground access conducted as part of SPAS.

As part of the on-airport traffic analyses for the LAX GTS Report, the STV analyses assumed that all future MSC passengers would be processed through TBIT gates. At the time the GTS was started, definitive concept plans had not been developed for how or where MSC passenger processing would take place. (See page 70 of Appendix E2-1 of the Preliminary LAX SPAS Report.) The STV analyses assumed all future MSC passengers would be processed through TBIT gates to produce a conservative or worst case assessment of the impacts from the airport's growth and development of the MSC on the CTA ground transportation facilities. Thus, the GTS analysis is based upon the assumption that implementation of the MSC would create an increase in vehicles trying to access TBIT. The study does not say that there will be an increase in international passengers, only that the number of vehicles attempting to access TBIT will increase, due to the fact that passengers arriving at the MSC would be processed at TBIT. (See page 6-7 of Appendix E2-1 of the Preliminary LAX SPAS Report.)

There is a difference in the percentage of international passengers whose trip terminates at LAX compared to passengers arriving on domestic flights. Passengers traveling through LAX who use the curbside are either Origin or Destination (O&D) passengers. These are the passengers of interest in the ground transportation analyses as these passengers generate vehicle trips on both levels of the CTA roadways, whereas most connecting passengers have little or no impact on roadway conditions.

This difference is included in the trip generation models for both analyses by applying separate O&D percentages to international and domestic flights as estimated in the gated flight schedule.

SPAS-PC00130-692

Comment:

Page 16 The modeling revealed that if the curbsides are reversed, the overall congestion levels dropped significantly. The outer curbsides operated with some congestion but with significant improvement over the existing operation. on the inner curbsides, the commercial vehicles operated with a reasonable Los, although the change in congestion levels before and after the reversal of the curbside operations have not been quantified.

Question: Appendix E-2 Page 7 Talks about changes in LOC without quantification. Since SPAS was supposed to address the issues resolved by the yellow light projects, was there a quantification of the amount of curb space required or a specific estimate of the number of cars that must be handled identified so that options could be directly compared? If not, why not? If yes, where is this identified?

Response:

Please see Response to Comment SPAS-PC00130-687 regarding the STV analysis of ground access conducted as part of SPAS. As noted in Response to Comment SPAS-PC00130-687, the modeling efforts undertaken as part of the LAX GTS were intended to screen possible ground transportation concepts prior to evaluating them as part of SPAS. The LAX GTS and SPAS Draft EIR did not directly compare analyses of various ground transportation concepts for the reasons noted in the Response to Comment SPAS-PC00130-687. Also as noted in the LAX GTS, modeling activities were suspended before the post processing of model outputs were completed for quantitative analyses. (See page 70 of Appendix E2-1 of the Preliminary LAX SPAS Report.) Visual comparisons of the model's simulation of traffic operations within the CTA under a wide variety of ground transportation concepts, including reversing the Arrivals level curbsides, showed promising results which were not fully complete before the suspension of modeling activities.

Additionally, as stated in the Response to Comment SPAS-PC00130-687, the work completed in the LAX GTS represents assumed future conditions which in many ways should present a more conservative or worst case scenario of traffic conditions within the CTA at 78.9 MAP and are valid for the purpose of conducting screening level analyses of ground transportation options. Additionally, the detailed simulation of traffic operations within the CTA provided a valuable understanding of how many of the operational and physical improvements evaluated as part of the LAX GTS could be expected to impact traffic flow in the future.

SPAS-PC00130-693

Comment:

Page 16 Reprogramming Arrivals Curbside Operations
This section describes one of the planning initiatives, the reconfiguration of the Arrivals curbsides, that would dramatically change vehicular and passenger circulation and improve Los. The study team developed three options (options 1, 2, and 3) for reprogramming the inner and outer curbsides of the Arrivals level; bus traffic is relocated to the inner curbsides along with taxis, and private vehicles are relocated to the outer curbside. A fourth option...

Question: Appendix e-2 page 7 Discusses the arrivals reprogramming options from inner to outer locations for commercial vehicles. This was actually done during 2011 for at least a short time with the Lot C buses. What were the results and how did it correlate to the model results?

Response:

The commenter states the Lot C buses were moved from the arrivals level outer curbside to the inner curbside for a short period of time during 2011. LAWA is not aware of such an operational change

having ever been implemented, even on a temporary basis, at LAX, and the commentor presents no evidence in support of this statement.

SPAS-PC00130-694

Comment:

Page 18 under option 1, pedestrian crosswalks are consolidated at a limited number of signalized crossing locations to optimize bus and taxi frontage along the terminal curbs and to facilitate safe pedestrian circulation between the terminals and the relocated private vehicle pick-up areas within the parking structures. Architectural barriers would be added to the curbsides for directing passengers through reconfigured, signalized crosswalks. A new wayfinding program would be introduced to guide passengers to relocated pick-up areas. A future ApM right-of-way along the frontages of the parking structures is also incorporated to work in tandem with the proposed private vehicle pick-up areas (Figure 8).

Question: Appendix E-2 page 9 talks about option 1 which has drop offs in the parking lots and a reduction of the number of pedestrian cross walks. Although this is, in principle, a good idea to enhance traffic flow how much further must people walk to get across? Is there an ADA requirement for max walking distance? Does this meet that? How will it be accommodated?

Other options discussed early on was to substantially reduce the number of walkway options and to provide for passenger bridges to avoid stoppage of traffic. How was this included in the study? How does it compare to the option discussed?

Response:

Please see Response to Comment SPAS-PC00130-687 regarding the STV analysis of ground access conducted as part of SPAS.

Currently there is no specific Americans with Disabilities (ADA) requirement for maximum walking distances from terminal buildings to passenger pick up curbsides or parking spaces.

However, the ADA 2010 standards, Section 208.3 Location, Subsection 208.3.1 require the following: "Parking spaces complying with 502 that serve a particular building or facility shall be located on the shortest accessible route from parking to an entrance complying with 206.4. Where parking serves more than one accessible entrance, parking spaces complying with 502 shall be dispersed and located on the shortest accessible route to the accessible entrances. In parking facilities that do not serve a particular building or facility, parking spaces complying with 502 shall be located on the shortest accessible route to an accessible pedestrian entrance of the parking facility."

As noted in Response to Comment SPAS-PC00130-687, the intent of the LAX GTS was to screen potential ground transportation concepts to determine if they would have a positive impact on CTA traffic conditions and would provide solutions to the problems the Yellow Light Projects were designed to address. However, as also discussed in Response to Comment SPAS-PC00130-687, not all simulations of all concepts were completed as part of the GTS. The option to grade-separate pedestrian movements between the terminal buildings and the public parking structures, plus the removal of some traffic signals were considered and evaluated at a conceptual level but were not simulated. These conceptual level analyses showed that, under certain conditions, the elimination of traffic signals could improve traffic conditions. Grade separation of pedestrian movements between the terminal buildings and the public parking structures in all cases would improve pedestrian safety.

SPAS-PC00130-695

Comment:

Page 18 Traffic Simulation Analysis & Findings simulation modeling was performed to determine the advantages and disadvantages of option 1. in summary, relocation of the commercial shuttles to the inner roadway can create an additional lane on World Way; however, the need for additional right-of-way to integrate a future ApM alignment along the parking structures may eliminate that advantage.

Question: Appendix E-2 Page 9 addresses the elimination of parking spaces on the ground level. Are the structures assumed to be full at most times so that revenue is lost? With all of the rework necessary on the upper roadway, passenger bridges, and parking structures how difficult would a reconfiguration be? Was this considered? Why not?

Response:

Please see Response to Comment SPAS-PC00130-687 regarding the STV analysis of ground access conducted as part of SPAS. The LAX GTS Report did not consider impacts of potential revenue lost due to the various concepts tested. Constructability of the concepts tested in the LAX GTS were considered at a program level of planning to assess whether the improvements being tested could be built without significant impact to normal ground transportation operations within the CTA. Such program level analysis is appropriate at this stage of the planning process.

SPAS-PC00130-696

Comment:

Page 19 - parking structures may require modifications to accept the APM station and support structure requires new passenger wayfinding and passenger education through pamphlets and other outreach materials

Question: Appendix E-2 general- several of the options call for rebuilding Terminal three and moving it west. How does this change the traffic curb usage?

Was a third level roadway for commercial and emergency vehicles considered? Why not? What were the results of such a change?

Response:

Please see Response to Comment SPAS-PC00130-687 regarding the STV analysis of ground access conducted as part of SPAS. The LAX GTS Report did not analyze rebuilding Terminal 3 west of its current location. However, relocation of Terminal 3 as part of the SPAS alternatives was considered in the SPAS Draft EIR. Please see Response to Comment SPAS-PC00130-150 regarding the potential addition of a third level roadway.

SPAS-PC00130-697

Comment:

Page 20 Figure 14 provides a section of the proposed inner and outer roadway lanes with the outer curbside island widened from 10 feet to 20 feet to accommodate increased pedestrian activity. Widening the outer curbside towards the parking structures would result in the loss of a travel lane on the outer roadway of World Way. However, the reversed curbside operation also eliminates the need for many of the vehicle slip ramps which currently allow private vehicles and taxis to move between the inner and outer roadways. The closure of these...

Question: Appendix E-2 page 11. Has any option for curb space increase been considered? If vehicles are handled at an angle two deep, for instance, and then able to pull out? When congestion increases drop off gets to be very difficult. What provision for drop off protection of pedestrians is provided for those getting out of cars facing the circulating traffic?

Response:

Please see Response to Comment SPAS-PC00130-687 regarding the STV analysis of ground access conducted as part of SPAS.

The LAX GTS Report did consider alternatives for increasing curbside length, such as providing additional curbside within the garages, using under-utilized surface space with the CTA, and reversing

the arrivals level curbsides. Reversing the arrivals level inner and outer curbside operation by moving commercial vehicle activity to the inner roadway and all private vehicle loading to outer curbside would increase the length of available curbside on the outer curbside by eliminating most existing slip ramps connecting the inner and outer roadways. Angled loading or unloading spaces where vehicles would pull-in to a space, perform their loading or unloading operation, and then either pull-through or back-out of the space were not simulated, as this type of operation would reduce capacity and increase congestion along the curbside roadways on either level. No new provisions were considered for passengers exiting vehicles on the left side on the departures level curbsides. The designated lane for unloading passengers along the departures level curbside is approximately 20-feet wide, which is intended to provide sufficient space for passenger unloading bypassing vehicles. Passengers should refrain from exiting vehicles on the left side; however, in those cases where it is necessary, caution should be taken.

SPAS-PC00130-698

Comment:

Page 23 the p3 and p4 structures and the TBIT was modeled to assess the impact on traffic flow, specific grade-separation concepts have not been developed as part of this study. should a grade-separated pedestrian crossing be constructed at the TBIT, pedestrians currently required to cross the departures level roadway at grade would likely also use the grade-separated crossing, thereby allowing the departure level signals to be removed.

Question: When will these grade separations issues be addressed? Doesn't this have a major impact on traffic flow? The document states that grade-separated concepts were not developed as part of this study. Why not? Isn't passenger convenience a priority?

Response:

As discussed previously, the GTS was used to evaluate possible modifications for inclusion, and further analysis, into the SPAS alternatives. Please see Response to Comment SPAS-PC00130-687 for a discussion of the GTS and how it relates to the SPAS Draft EIR. The content of this comment is similar to comment SPAS-PC00130-694. Please see Response to Comment SPAS-PC00130-694 regarding advantages of grade-separating pedestrian and vehicle movements.

Please see the SPAS Draft EIR for an analysis of the modifications and improvements designed to facilitate transportation and circulation at LAX. All grade-separation modifications designed to improve traffic flow are discussed in Section 4.12.2 of the SPAS Draft EIR.

SPAS-PC00130-699

Comment:

Page 27 The 30-foot-wide inner roadway is currently striped with two travel lanes and one passenger loading lane. While it may be possible to operate large commercial vehicles such as a 40-foot bus in three lanes of the inner roadway along World Way north from T1 to T3, and along World Way south from T4 to T7, the 40-foot design vehicle would not be able to operate safely in three lanes as the inner roadway turns 90 degrees between T3 and the TBIT and between the TBIT and T4. Therefore, the study team proposed a roadway striping alternative for the curved sections of the Arrivals level inner roadway, shown in Figure 23.

Question: Appendix E-2 The analysis indicates the difficulties in handling multiple 40' buses. How long are the articulated buses and who many can be handled? Was this part of the assessment that assumes no APM but a busway instead? Where is this addressed?

Response:

Please see Response to Comment SPAS-PC00130-687 regarding the STV analysis of ground access conducted as part of SPAS. The LAX GTS Report does not make reference to, or propose the use of, articulated buses in the CTA, nor does the SPAS Draft EIR. As noted in Response to Comment SPAS-

PC00130-687, the intent of the LAX GTS was to screen ground transportation concepts to evaluate their potential to improve landside capacity within the CTA.

As described previously, the LAX GTS Report conducted analyses that were separate from those in the SPAS Draft EIR. For an analysis of the alternatives that include a busway, please see Section 4.12.1 of the SPAS Draft EIR.

SPAS-PC00130-700

Comment:

Page 28 Figure 22 - Plan for installation of 2-phase signal and jug handle at intersection of Sky Way and World Way North

Question: Appendix E-2 page 19. Figure 22 shows the current intersection and a 2 phase signal, but virtually all of the options contain a Terminal zero which changes this intersection completely. Where are the results of this changed CTA access analyzed?

Response:

Please see Response to Comment SPAS-PC00130-687 regarding the STV analysis of ground access conducted as part of SPAS. The LAX GTS Report was intended to screen ground transportation concepts to evaluate their potential to improve landside capacity within the CTA. The intent of the 2-phase signal and jig handle design at the intersection of Sky Way and World Way North was to evaluate an option for improving the northbound left-turn movement for buses in the event Terminal 0 was not built (see page 20 of the LAX GTS Report).

SPAS-PC00130-701

Comment:

Page 29 Figure 24 - Proposed location of Concourse 0 with realigned Taxilane D7 and ADG VI separation standards

Question: Appendix E-2 page 20 shows terminal 0 with four ADG IV gates. When all other ADG IV are planned to TBIT and MSC why have four of these gates instead of more mid-sized ones? Has LAWA fixed upon a design for T0? if so, what is it? How many gates? From the diagram it shows very little for passenger processing. Is this assumed to occur in T1?

Response:

Please see Response to Comment SPAS-PC00130-687 regarding the STV analysis of ground access conducted as part of SPAS.

The planning level concept layout for Terminal 0 is depicted in Figure 24 of the LAX GTS Report, which shows four Aircraft Design Group (ADG) IV aircraft gated with ADG IV taxilane separation standards.

This gate layout was subsequently refined. Please see Figures B through D in Attachment A of Appendix F-1 of the Preliminary LAX SPAS Report for an illustration of the gate layouts assumed in the SPAS Draft EIR. As shown in Figure B, TBIT gates are primarily intended for ADG V and VI aircraft. As depicted, the MSC would accommodate a range of aircraft sizes, between ADG IV and VI. Figure B in Appendix F-1 provides a conceptual gate layout at Terminal 0 with ADG III and IV gates.

At this time, LAWA is only in the preliminary stages of planning for a potential Terminal 0. The SPAS Draft EIR is a programmatic document, appropriate for this level of planning. No detailing planning or programing for Terminal 0 have been undertaken and will not occur unless a SPAS alternative is approved that includes this terminal and the project is proposed for implementation, at which time detailed, project-level planning, engineering design, and environmental review will be undertaken. As noted on page 4-1099 in Section 4.12.1.6.2 of the SPAS Draft EIR, "while it is presently assumed that all Terminal 0 passengers would be processed at Terminal 1 or Terminal 1.5, changes in security

processing or other processing requirements may necessitate those functions be incorporated into Terminal 0."

SPAS-PC00130-702

Comment:

Page 30 Option3-Tunnel under CTA Loop Roadway
This option looks to provide grade separation, i.e,. a tunnel, for the exiting sky Way traffc movement under World Way north. This allows the sky Way approach to shift to the eastern part of park one which provides a separate and enlarged T1 Arrivals curbside, common to the other options (Figure 27).

Question: Appendix E-2 has an option to tunnel under CTA Loop Roadway. How in the world is this even considered when the whole area around the CTA was so cluttered that the Central Utilities Plant utilidors were removed because it was impractical to bury them?

Response:

No response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)). Nevertheless, please see Response to Comment SPAS-PC00130-687 regarding the STV analysis of ground access conducted as part of SPAS.

CTA access improvements, Option 3 -- Tunnel under CTA Loop Roadway described on page 21 of the LAX GTS Report, was determined to be infeasible due to the need to construct the roadway beneath Terminal 0, a reduction in the area available for future airside operations near Terminal 0, and the potential impacts to underground utilities. Therefore, this CTA access option was documented in the LAX GTS Report as one of the options that was preliminarily considered, but rejected for further detailed study.

SPAS-PC00130-703

Comment:

Page 33 - Summary of Options for realignment of Sky Way

Question: Appendix E-2 Table 3 talks about options for realignment of Sky Way bridge on 96th street.

Why has no option for exiting out of CTA from modified skyway been considered? Drop off in an area of Park One could be built and allow for moving sidewalk or other conveyance to terminals 0 and 1 without going through the CTA traffic and instead exiting to Sepulveda. Was this rejected? It was brought up in SPAS.

Response:

Please see Response to Comment SPAS-PC00130-687 regarding the STV analysis of ground access conducted as part of SPAS.

The LAX GTS Report did consider alternatives to exit traffic out of the CTA northbound via the proposed Sky Way realignment as presented in Figure 28 on page 23 of the LAX GTS Report, but it was determined this alignment was not feasible because it would have required a new, signalized intersection to be constructed to allow traffic exiting via the airport return roadway (east of the LAWA Administration Building) to cross inbound traffic from Sepulveda and Century Boulevards. Physical constraints caused by the alignment of the airport return roadway and the existing departures level roadway support columns limited available queuing area for vehicles (mainly shuttle buses) which would exit the airport via Sky Way to only a few vehicles per signal cycle. This would result in unacceptable backups on the return roadway and likely the primary airport exit, the intersection of Center Way and World Way South.

As indicated in Table 2-3 and discussed on page 2-55 of the SPAS Draft EIR, under Alternatives 1, 2, and 5 through 9, the existing commercial vehicle holding lot would be relocated to the eastern portion of the Park One facility. Due to the importance of this site for the efficient operation of future commercial vehicle operations within the CTA, neither the LAX GTS nor the SPAS Draft EIR considered the development of a new passenger drop off curb in the portion of the existing Park One lot located east of a realigned Sky Way.

An EIR need not consider every conceivable alternative to the project. (In re Bay-Delta Programmatic Environmental Impact Report Coordinated Proceedings (2008) 43 Cal.4th 1143, 1163; State CEQA Guidelines Section 15126.6(a).) CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commentors. (State CEQA Guidelines Section 15204.) The EIR was prepared with a degree of analysis sufficient to provide the decision-makers with information which enables them to make a decision which intelligently takes account of environmental consequences. (State CEQA Guidelines 15151.)

SPAS-PC00130-704

Comment:

Page 24 ...were developed: (1) a processor that handled departures only, and (2) a full-service processor. This facility would be implemented independent SPAS; however, it was assumed to be in place in the future background (i.e., 2025) condition in the SPAS EIR.

Question: Appendix E-2 page 24 states that a full service processor is assumed to be in place but independent of SPAS. Is this required to support SPAS MSC? How much cost will this be? How will LAWA pay for it along with everything else they plan?

Response:

Please see Response to Comment SPAS-PC00130-687 regarding the STV analysis of ground access conducted as part of SPAS.

As noted in that response, the LAX GTS did not include the MSC Passenger Processor in the simulation evaluations of the CTA roadways, while the SPAS Draft EIR included it as a non-SPAS improvement project (see Section 5.3.2 of the SPAS Draft EIR and Section 4.3.1 of Appendix F-1 of the Preliminary LAX SPAS Report). As indicated on page 5-18 of the SPAS Draft EIR, the MSC Passenger Processor is an integral component of the MSC program. Please also see Section 4.12.1.6.2 of the SPAS Draft EIR for a discussion of the Midfield Satellite Concourse Passenger Processor. As provided in that section, the MSC Passenger Processor is designed to support the processing requirements of passengers using the future MSC. Please also see Responses to Comments SPAS-AL00007-44 and SPAS-PC00130-218 regarding the evaluation of the MSC in the SPAS Draft EIR.

Please see Response to Comment SPAS-PC00130-730 regarding the treatment of economic conditions in an EIR, which include project costs. Please also see Response to Comment SPAS-PC00096-2 regarding funding for the SPAS improvements.

SPAS-PC00130-705

Comment:

Page 37 Alternative 2 - MSC Dual-Level Processor
Alternative 2 expands the MsC processor to incorporate an Arrivals function in addition to departures. Adding an Arrivals level component in the processor would increase the size of the facility and potentially preclude the reversal of the Arrivals roadway curbs, described in reprogrammed Curbsides Alternatives 3 and 4, by limiting or removing curbside locations which are proposed to be in the same footprint as the processor. The expanded processor may also require removing p2B and p5, in addition to impacting both levels of West Way as well as Center Way between World Way and West Way.

Question: Appendix E-2 page 28. Alternative 2 of MSC Dual level processor points out that reversal of the curbs is precluded. If the previous section already stated that without doing the reversal the traffic

could back up to Century why is this even shown as a consideration? If this is still possible, is there another mitigation that could fix some of this traffic? What is it? Alternative 3 follows as a "solution" but one has to ask if this is included in the total costs of the Master Plan and where is any of this included in the approved Alt D?

Response:

Please see Response to Comment SPAS-PC00130-687 regarding the STV analysis of ground access conducted as part of SPAS. The commentor is incorrect in maintaining that the GTS Report states that the MSC dual-level processor would preclude the reversal of the curb. Rather, the text actually states that "[a]dding an Arrivals level component in the Processor would increases the size of the facility and potentially preclude the reversal of the Arrivals level roadway curbs…" Moreover, the text that follows this statement provides an option to mitigate this concern, concluding that "[p]reliminary analysis indicates that this arrangement may enable the proposal to reverse the Arrivals curbsides."

The conceptual layout of the MSC Passenger Processor roads and curbsides assumed in the SPAS Draft EIR is described on page 4-1094 in Section 4.12.1.6.2 of that document. Please also see Response to Comment SPAS-AL00007-44 regarding the evaluation of the MSC in the SPAS Draft EIR. The construction of passenger processing facilities in the CTA, in the area currently occupied by parking garages, is an approved component of the LAX Master Plan and is not a Yellow Light Project. The road and curbside changes associated with MSC Passenger Processor are reasonably foreseeable improvements that LAWA would implement as part of the MSC Passenger Processor, prior to full implementation of the LAX Master Plan, which, if implemented as approved, would close the CTA to private vehicle access.

Please see Response to Comment SPAS-PC00130-730 regarding the treatment of economic conditions in an EIR, including project costs.

SPAS-PC00130-706

Comment:

Page 40 Intermodal Connectivity
Shuttle/Bus Service Strategies shuttle and bus service strategies to reduce vehicular volumes in the CTA were studied. under these strategies, certain shuttles would no longer be allowed to operate in the CTA as they do currently; rather, these vehicles would drop off and pick up passengers at a facility constructed outside of the CTA. Consolidated buses would transport passengers between this facility and the CTA. For LAWA to accommodate any consolidated bus operation, a convenient facility beyond the CTA would need to be provided to allow for passengers to transfer between individual commercial vehicle modes/services and a consolidated busing operation. The facility should be located in proximity to the CTA to provide convenient shuttle access

Question: Appendix E-2 page 31 talks about an Intermodal connectivity center in which commercial vehicles will stop so that passengers can transfer to a consolidated bus. How does LAWA feel that this will improve service by making people change conveyances to get into the CTA? The section noted states that this will include ticketing. Will it include baggage drop off? What percentage of the travelers are expected to use this facility? Does LAWA expect all from the ConRAC to use this?

Response:

The construction of an ITF with a grade-separated access for either a LAWA-operated consolidated busing operation or an Automated People Mover (APM) would provide improved time-certain travel between the ITF and the CTA. An ITF would also provide a location for specific commercial vehicle modes to consolidate passengers from individual shuttles of different modes, which are often under-occupied, onto a common LAX-branded shuttle connecting the ITF with the CTA, thereby reducing the number of shuttles accessing the CTA. Also, including a kiss-and-ride curbside at the ITF for drivers/passengers accessing or departing LAX in a private vehicle who wish to avoid roadway congestion entering and exiting the CTA would reduce the number of private vehicles within the CTA.

Please also see Response to Comment SPAS-PC00130-139 regarding the impacts of consolidated specific commercial vehicle operations and offering a kiss-and-ride curb at the ITF.

The LAX GTS Report does suggest that passenger ticketing could be included within the ITF. The assumption is that this ticketing would be for passengers with carry-on bags only; passengers needing to check baggage would be expected to proceed to their appropriate terminal within the CTA. At the current level of planning, the specific design and functions of the ITF have not been finalized.

Section 4.12.1.6 of the SPAS Draft EIR defines what transportation modes were assumed to be assigned to the ITF for SPAS Alternatives 1, 2, 4, 8 and 9 (beginning on page 4-1091 under the subheading "Ground Transportation"). Table 4.12.1-15 on page 4-1103 provides a detailed breakdown of the peak hour percentage of passengers expected to use each transportation mode and specifically defines the percentage of passengers expect to use an elevated busway in Alternatives 1, 2, and 8, and an APM in Alternative 9.

Neither the LAX GTS Report nor the SPAS Draft EIR assumed that rental car companies would consolidate their passengers onto LAWA-operated buses at the ITF. SPAS Alternative 8, which includes a CONRAC at Manchester Square, assumes that rental car customers would ride a consolidated LAWA-operated bus between the CONRAC and the CTA. Under SPAS Alternatives 3 and 9, rental car customers would be consolidated on an APM to transfer between the CONRAC and the CTA.

SPAS-PC00130-707

Comment:

Page 45 Figure 50 - Bird's-eye view of Manchester Square Transit Hub illustrating multimodal integration with airport program

Question: Appendix E-2 page 36 illustration figures 49,50,51 of the transit stations would be much more easily recognized if an orientation and approximate scale were provided. What is the relative position to the CTA and 405 freeway?

Response:

As noted on page 35 of the LAX GTS Report, the Metro Crenshaw/LAX Transit Corridor Project will extend Metro's existing Exposition Line from the intersection of Crenshaw Boulevard and Exposition Boulevard to a new light rail station at Aviation and Century Boulevards, across the street from Manchester Square. Figures 49, 50, and 51 of the LAX GTS Report, show the proposed Transit Hub at Manchester Square located in the northwestern quadrant of the Aviation Boulevard and Century Boulevard intersection. The relationship of the Manchester Square improvements to the planned transit line and station are illustrated in later figures of the LAX GTS Report, including Figures 62 through 77.

The proposed transit hub at Manchester Square is located approximately 0.6 mile west of Interstate 405 and approximately 1.2 miles east of the CTA.

SPAS-PC00130-708

Comment:

Page 46: The following summarize the advantages and disadvantages of a Transit Hub at Manchester square. Pros:
- direct connectivity with the Metro Crenshaw/LAX and Green Line light rail transit corridors
- enhanced levels of service for passengers coming to the airport in private vehicles seeking remote weather protected parking with seamless transfer to airport consolidated service
- potential for economic development, if Manchester square is developed as an airport hub

Cons:
- potentially requires significant capital investment in terms of property acquisition and infrastructure.

Question: Appendix E-2 page 37 The only Con listed for a Manchester Square transit hub is property acquisition. Doesn't LAWA already own this property?

Response:

As discussed on pages 4-667 and 4-668 in Section 4.9.3.3 of the SPAS Draft EIR, while LAWA does own many of the individual properties in Manchester Square, they do not currently own all of the properties.

SPAS-PC00130-709

Comment:

Page 48 Figure 52 Inbound Departures roadway to accommodate busway, Option 1

Question: Appendix E-2 Busway figures show an elevated structure over Sepulveda. When 24L is extended east where does the RPZ land? Is this structure in it or must a waiver be provided?

Response:

With the proposed extension of Runway 6R/24L to the east, as depicted in Figure 2-1 of Chapter 2 of the SPAS Draft EIR, the Runway Protection Zone (RPZ) would also shift east as illustrated in Figure 4.7.2-7 of the SPAS Draft EIR.

The elevated bridge structure spanning Sepulveda Boulevard depicted in Figure 52 on page 39 of the LAX GTS Report is located outside of the proposed Runway 6R/24L RPZs.

SPAS-PC00130-710

Comment:

Page 54 Specific Plan Amendment Study (SPAS) Support
The SPAS process is being undertaken to identify and develop potential alternative designs, technologies, and configurations for the LAX Master plan program that would provide solutions to the problems that the yellow Light projects were designed to address consistent with a practical capacity of 78.9 MAP. The main ground transportation features of the approved LAX Master plan Alternative d include the following:

Question: Appendix E-2 page 54 states that for SPAS alternative designs are being identified which provide solutions to the problems... What are the target metrics for items being solved? What are the problems being solved?

Response:

Please see Response to Comment SPAS-PC00130-687 regarding the STV analysis of ground access conducted as part of SPAS.

As discussed on page 4-1043 in Section 4.12.1.1 of the SPAS Draft EIR, the purpose of the on-airport transportation analyses presented in the SPAS Draft EIR was to estimate the SPAS-related impacts on the operation of the CTA ground transportation facilities, pursuant to the requirements of CEQA.

The problems the Yellow Light Projects were designed to address, and to which the SPAS alternatives would provide solutions, are identified in Section 2.3.1 of the SPAS Draft EIR and in Chapter 3 of the Preliminary LAX SPAS Report.

SPAS-PC00130-711

Comment:

Page 65 Alternative 8, illustrated in Figure76, is characterized by the following features.
Ground Transportation

- ConRAC, located in a portion of Manchester square, would include a customer service area and approximately 8,271 spaces for ready/return vehicles.
- All other ground transportation improvements identified in Alternatives 1 and 2 apply to this alternative

Question: The report goes on to say, "Alternative 9, illustrated in Figure 77, is comparable to Alternative 8, except that an APM system is proposed between Manchester square and the CTA, with an intermediate stop at the ITF." This is inconsistent with the descriptions in the DEIR summary and other locations. What IS correct? What was used to reach conclusions of impact?

Response:

Please see Response to Comment SPAS-PC00130-687 regarding the STV analysis of ground access conducted as part of SPAS.

The commentor does not identify any specific inconsistencies in the descriptions of Alternatives 8 and 9 between the LAX GTS Report and the SPAS Draft EIR summary and other locations. The descriptions of Alternatives 8 and 9 provided in Section 2.3.1.8 and 2.3.1.9 in Chapter 2 and on pages 4-1092 and 4-1093 in Section 4.12.1.6.1 of the SPAS Draft EIR are correct and consistent with the descriptions of Alternatives 8 and 9 presented on page 56 and depicted in Figures 76 and 77 of the LAX GTS Report. After careful review of the SPAS Draft EIR, no inconsistencies between these descriptions of the Alternatives 8 and 9 ground transportation components were found. In the event an error was overlooked, the Alternative 8 and 9 descriptions provided in the SPAS Draft EIR supersede those presented in the LAX GTS Report.

The thresholds of significance used to determine whether on-airport transportation impacts were significant are described in detail in Section 4.12.1.4 of the SPAS Draft EIR.

SPAS-PC00130-712

Comment:

Page 69 The roadway modeling efforts were suspended on or about June 2010 while a new future 78.9 MAP gated (non-airline specific) flight schedule was reviewed and approved by LAWA. due to delays experienced by the team responsible for completing this non-airline specific flight schedule, and the subsequent kickoff of the SPAS process which has redefined many of the key assumptions related to how the CTA terminals and roadways will function in the future, the refinement of landside modeling was discontinued, with the exception of some specific analyses provided in this study report.

Question: Ground transportation Appendix A page 69 App E2 states: "The roadway modeling efforts were suspended on or about June 2010 while a new future 78.9 MAP gated (non-airline specific) flight schedule was reviewed and approved by LAWA. due to delays experienced by the team responsible for completing this non-airline specific flight schedule, and the subsequent kickoff of the SPAS process which has redefined many of the key assumptions related to how the CTA terminals and roadways will function in the future, the refinement of landside modeling was discontinued, with the exception of some specific analyses provided in this study report."
Does this mean that LAWA is acknowledging that their model is inaccurate and not representative? What does it mean?

Response:

Please see Response to Comment SPAS-PC00130-687 regarding the STV analysis of ground access conducted as part of SPAS. The statement to which the commentor refers does not state or imply that the modeling that was done as part of the LAX GTS Report was inaccurate or not representative. As explained in Response to Comment SPAS-PC00130-687, the purpose of the analyses conducted as part of the LAX GTS Report was to evaluate potential ground access concepts as part of the SPAS concept development process. The modeling and analysis that was done as part of the LAX GTS Report was valid for this purpose. As further explained in Response to Comment SPAS-PC00130-687, separate and independent modeling of on-airport transportation impacts was conducted for the SPAS Draft EIR.

SPAS-PC00130-713

Comment:

Page 69 The following field surveys were conducted to support the further development and refinement of the traffic models:
- Turning movement counts for intersections along Center Way
- Vehicle classification survey on the lower level at the entrance to the airport
- Vehicle dwell time survey at T1, T4, and T7
- Vehicle license plate survey at T1 and T7 Arrivals curbside

Question: Ground Eval Appendix E-2, Appendix A page 60 How were vehicle dwell times at T1. T4, and T7 conducted? Was a time recorded or were possible delay causes looked at and extrapolated? What times of day were used? What time of year? If, for instance, people are going to the east coast in winter there is likely more luggage.

Response:

Please see Response to Comment SPAS-PC00130-314 regarding the collection of vehicle dwell times conducted as part of SPAS.

The methodology used for the field surveys, including for vehicle dwell time at T1, T4, and T7, is provided on page 63 of Appendix E2-1 of the Preliminary LAX SPAS Report. As described in that section, the dates on which data were collected represented a typical busy day at the CTA.

SPAS-PC00130-714

Comment:

Page 70 Figure A-1 59.8 MAP and 78.9 MAP peak hour traffic volumes on the eastern end of the CTA

Question: Figure A-1 of Appendix E-2, page 70 Entry into the CTA is shown from two points (the bridge along T1 and Century) for a total of 3255 vehicles baseline and 3839 future. Why did vehicle entries increase by 18% while MAP increased by 32%?

Response:

As illustrated in Figure A-1 on page 61 of the LAX GTS Report, the inbound traffic volumes show the total baseline peak hour volume of 3,670 vehicles, with a future peak hour volume of 4,194 vehicles. This represents a 14.3 percent increase in peak hour vehicle entering the CTA, while the annual passenger activity level increases from 59.8 million annual passengers (MAP) to 78.9 MAP, which represents a 31.9 percent increase in passenger activity over a 16-year period. The percent increase in passenger activity is greater than the percent increase in vehicle volumes over the same time period because the growth in all vehicle volume is not a one-to-one relationship with the growth in passenger activity. Table A-2 of Appendix E2-1 of the Preliminary LAX SPAS Report provides the occupancy numbers for different modes of transit, as well as each mode's percentage share of transportation trips into the CTA. Single-party vehicles, such as private vehicles, taxicabs, and limousines, each grow in closer proportion to passenger growth than do multi-party vehicles because for each additional party using one of these modes, one additional private vehicle, taxicab or limousine will be needed. (A party, in this context, can be more than one person. In the case of the SPAS Draft EIR analysis, an average party size of 1.5 passengers/vehicle was used in the modeling.) However, for multi-party vehicles such as shuttles (buses and vans), an additional vehicle is not required to serve each additional party riding on the shuttle. As described in Table 4.12.1-5 on page 4-1073 of the SPAS Draft EIR, the assumed occupancy level for a charter bus, for baseline conditions, was 22.5, while the occupancy rate for a private vehicle was 1.5. Thus, when one charter bus enters the airport, that one entry adds 22.5 passengers. The operator of the shuttle may wait until they near their vehicle occupancy limit to add another shuttle to their route. As a result, the growth in the number of shuttle trips at LAX is a function of passenger volumes and vehicle occupancy which is not a one-to-one relationship.

SPAS-PC00130-715

Comment:

Page 73 Future Conditions Gated Passenger Schedule Figure A-7 provides a graphic representation of the assumed aircraft gating for the future (78.9 MAP) condition which includes a MSC (see below) but no yellow Light projects. The gated passenger schedule representing the aircraft gating scenario illustrated in the Figure A-7 used as the future condition for this study was created from the passenger schedule for the 78.9 MAP activity level, developed with the assistance of the national Aeronautics and Space Administration (NASA) to support various north airfield simulation efforts.

Question: Appendix E-2 Ground Transportation, p 64, "Future Conditions Gated Passenger Schedule" identifies Figure A-7 to represent the future condition, but doesn't show a terminal 0. Why and how is this accounted for in the models? It also says that NASA simulations were used in the development. Were these for the northside safety study or other studies since the design day aircraft was changed by the professors and the Recondo one wasn't used. What is correct? What will be the different estimated values if conditions were changed?

Response:

Figure A-7 of the LAX GTS Report represents the assumed aircraft gated scenario at 78.9 MAP with no Yellow Light Projects, meaning existing conditions with the projects identified in the LAX Master Plan as non-Yellow Light projects. Terminal 0 is not accounted for in the figure because it is an aspect of the potential alternatives to the Yellow Light Projects and was not identified in the LAX Master Plan. As described on page 64 of the LAX GTS Report, the No Yellow Light Projects scenario assumes, among other things, that the terminals remain in their current configurations and the ground transportation access to the CTA remains unchanged. Please see Appendix F-2 of the Preliminary LAX SPAS Report for figures that depict the gated assumptions of the SPAS alternatives.

Please see Response to Comment SPAS-PC00130-687 regarding the STV analysis of ground access conducted as part of SPAS. Terminal 0 is not accounted for in the models developed for the LAX GTS Report, which was a preliminary conceptual report, as planning for the facility was not developed with sufficient detail at the time of the study to understand the potential impacts it would have on the airfield, terminal, and landside components of the airport. As noted in Response to Comment SPAS-PC00130-687, the 78.9 MAP activity level gated aircraft schedule used in the LAX GTS Report differed from the schedule used in the SPAS Draft EIR because the new schedule was not available until the LAX GTS analyses were nearing completion. As part of planning efforts undertaken later in the LAX GTS, the study team evaluated potential Terminal 0 configurations and impacts on the Park One surface parking lot, as discussed beginning on page 20 of the LAX GTS Report.

Please refer to Response to Comment SPAS-PC00130-90 for a discussion of the Design Day Flight Schedule (DDFS) used for the North Airfield Safety Study (NASS). Figure A-7 on page 65 of the LAX GTS Report depicts the gate positions that were assumed to gate the DDFS that was provided to the NASS team. Again, however, the No Yellow Light Projects scenario, as represented by Figure A-7, assumed that terminal configurations and ground access would remain unchanged. The DDFS used for the NASS was also used by STV for the LAX GTS Report. The Academic Panel used the DDFS provided by LAWA and, as part of developing their analysis assumptions, made some minor modifications to the DDFS (e.g., aircraft upgrades), as discussed in the NASS preliminary report.1 These minor modifications did not invalidate the original DDFS provided by LAWA to the Academic Panel, which was used in the STV analysis. Moreover, as noted below, the DDFS used for the GTS, NASS, and SPAS Report, was not used in the SPAS Draft EIR analysis. A detailed discussion of the DDFSs that were used in the SPAS Draft EIR is provided in Section 4.12.1.7.1.

To clarify the origin of the DDFS that was used by STV for the SPAS analysis, pages 64 and 72 of Appendix E2-1 of the Preliminary LAX SPAS Report have been revised. Please see Chapter 4 of the Final LAX SPAS Report. As explained in Response to Comment SPAS-PC00130-687, use of two different schedules in the STV analysis and the SPAS Draft EIR does not undermine either analysis, as each analysis was conducted for a different purpose. The SPAS Draft EIR used the most current DDFS and represents forecasted activity for the SPAS horizon year of 2025.

SPAS-PC00130-716

Comment:

Page 73 Bradley West Project Mitigations
As a part of the Bradley West EIR, mitigation measures were developed to offset potential CTA traffic impacts generated by the project. The mitigation measures in the CTA included the modification of a left-turn only lane on World Way at Center Way (across from TBIT) to a through/left lane. This will be accomplished by widening World Way beginning at Center Way and continuing along the frontage of p4 to the first pedestrian signal on World Way south. in addition, the Bradley West EIR included a second mitigation which will construct a second dedicated right turn lane from World Way south to the southbound on-ramp to Sepulveda Boulevard. The locations of these projects are illustrated in Figure A-5.

Question: Appendix E-2 Ground Transportation, p73 Bradley West Project Mitigations are alluded to as a left turn only lane and widening of Center Way along P4. What impacts to traffic do these cause? Must people know which lane to be in or be squeezed into a location that they do not desire? How will drivers be alerted?

Response:

Programmed CTA roadway improvements are discussed beginning on page 63 and depicted in Figures A-5 and A-6 of the of the LAX GTS Report. Both of these mitigation measures are discussed in detail in Section 4.12.1.5 of the SPAS Draft EIR. Modifying the existing left-turn only lane on World Way at Center Way across from TBIT to a shared through/left-turn lane will provide another through travel lane for vehicle circulating around the west end of the CTA past TBIT. This additional vehicle capacity should provide needed relief for traffic congestion near TBIT. By extending this existing left-turn only or "trap" lane on World Way at Center Way (adjacent to TBIT) to a shared through/left-turn lane, drivers unfamiliar with the airport or who were distracted and found themselves in the existing left-turn only lane will now not need to merge right prior to Center Way to continue past TBIT onto World Way South as a result of this improvement. For a complete discussion of the impacts of the mitigation measures, please see Sections 4.1.9 and 4.1.10 of the LAX Bradley West Project Draft EIR (available at http://www.ourlax.org/NOP.aspx). As for wayfinding within the airport, drivers will continue to be alerted to their routing choices within the CTA with the use of guide signs mounted above or adjacent to their travel path. A traffic control plan with advance warning signs, flashing arrow boards, and temporary lane delineation will be approved by LAWA prior to construction of this roadway improvement.

SPAS-PC00130-717

Comment:

Page 75 ... through the TBIT based on consultations with LAWA staff. Details on a possible passenger processor facility in the CTA for all or some portion of the MSC's passengers were not available when the project began. As the study progressed, LAWA began developing a preliminary concept for a MSC passenger processor building. This preliminary concept assumed the passenger processor would be a departures only facility with all arriving MSC passengers continuing to be processed through the TBIT.

Question: Appendix E-2 ground access page 75 states, details on a possible passenger processor facility in the CTA for all or some portion of the MSC's passengers were not available when the project began. As the study progressed, LAWA began developing a preliminary concept for a MSC passenger processor building. This preliminary concept assumed the passenger processor would be a departures only facility with all arriving MSC passengers continuing to be processed through the TBIT" Since the other sections state that the passenger processing will be arriving as well as departures how is this accounted for in the model and results?

Response:

Please see Response to Comment SPAS-PC00130-687 regarding the STV analysis of ground access conducted as part of SPAS, including the analysis of the MSC Passenger Processor in the LAX GTS Report.

The Passenger Processor Facility Alternatives are discussed in detail on pages 24 through 31 of Appendix E2-1 of the Preliminary LAX SPAS Report. As discussed in Response to Comment SPAS-PC00130-687, the LAX GTS Report was intended to evaluate and assess surface transportation improvements that could be incorporated into SPAS alternatives. Improvements that were incorporated into the SPAS alternatives were analyzed in the SPAS Draft EIR. Please see Section 4.12.1 of the SPAS Draft EIR for a discussion of on-airport traffic improvements and impacts.

SPAS-PC00130-718

Comment:

Page 75 Passenger Activity TableA-1 provides the peak hour passenger activity for the Baseline (2008) and for 78.9 MAP future year conditions. The August 2008 gated airline schedule and the future conditions gated schedule with no yellow Light projects were used to estimate a rolling hour of originating (i.e., outbound flight) and terminating (i.e., inbound flight with LAX as the final destination) passenger volumes for each terminal. originating passenger volumes throughout each hour of the day were adjusted to account for the time passengers arrived at the curbside prior to...

Question: There have been many terminal location changes for varied airlines which changes the times of day that are peak for that airline which has moved as well as the location (which can impact the amount of luggage from a dwell time standpoint) since 2008. How is this accounted for in the model and results?

Response:

Please see Response to Comment SPAS-PC00130-687 regarding the STV analysis of ground access conducted as part of SPAS, including the analysis of the MSC Passenger Processor in the LAX GTS Report. For the LAX GTS Report, the VISSIM Model was calibrated at 59.8 MAP, the LAX passenger activity level in 2008, which was the last full year of data available when STV began its study in 2009. (See page 60 of Appendix E2-1 of the Preliminary LAX SPAS Report.) The activity level in 2008 was sufficiently close (within one percent) to be considered representative of 2010 conditions.

The SPAS Draft EIR used as a baseline the conditions existing at the time of the Notice of Preparation. (See Section 4.12.1.3 of the SPAS Draft EIR.) This complies with the requirements for baseline under CEQA. (See State CEQA Guidelines Section 15125.) Moreover, while terminal location changes and changes to flight arrival and departure times may occur, predicting such future changes would be highly speculative.

Dwell times represent the total time a vehicle is waiting at the curbside to either pick up or drop off a passenger. These commercial vehicles will be accommodating passengers carrying different amounts of baggage and with different trip purposes (business and personal travel). Dwell time data cannot be directly correlated with baggage and trip purpose and, therefore, cannot be reported. However, the dwell time data collected during the peak period does provide a composite of the dwell time for vehicles loading and unloading passengers with baggage and with different trip purposes. The composition of passengers with baggage and by trip purpose is not assumed to vary in the future to the extent that the dwell time required to actively load and unload a vehicle during the peak hour would change.

SPAS-PC00130-719

Comment:

Page 75 Passenger Mode Splits & Occupancy passenger mode splits were developed from the 2006 LAX Air passenger survey. The survey data included mode share choices of passengers by the time of the day. The passenger mode splits were determined by processing the raw survey data for the peak hours into a passenger mode split which included reviewing the survey questions to determine the exact nature of a passenger's choices. For example, some rental car customers answered that some of the passengers were dropped off at the curbside before returning their rental car. In this scenario, these passengers were factored in the poV mode choice as well as rental Car shuttle choice. These mode splits as well as other factors were adjusted slightly during the calibration process for the trip generation and distribution model to yield the number of vehicles (by mode) closely matching the existing

conditions. In addition, group sizes were also determined from the same survey data and served as starting point in determining a vehicle mode's occupancy. Table A-2 shows the mode share and occupancy assumptions utilized in the trip generation model.

Question: Appendix E-2 ground access page 75 If the baseline traffic is 2009 and it's based on Aug 2008 gated airline schedule data, how is this reconciled and what impacts on the estimated results? For future predictions the mode of arrival and departure (ie private vehicle vs mass transit) could be different by several percentage points. How is this accounted for and what are the assumed change assumptions (and where is it documented)?

Response:

Please see Response to Comment SPAS-PC00130-687 regarding the STV analysis of ground access conducted as part of SPAS. As noted in the Data Collection section beginning on page 60 of the LAX GTS Report, the traffic data from 2009 was used as supplemental information for purposes of refining the primary data set from 2008. Videos from the CCTV camera system collected in 2008 were used to determine the percentage of various vehicle modes using the CTA roadways. The percentage of vehicle modes observed in 2009 was then applied to 2008 total traffic volumes to estimate the volume of vehicles by mode accessing the CTA in 2008. There were no major transportation improvements or operational modifications that would create a significant change in vehicle allocation between 2008 and 2009; therefore, it can be reasonably assumed that the 2009 observations remain valid for 2008.

Table A-2 on page 69 of the LAX GTS Report presents the passenger mode share information used in this analysis. The future 78.9 MAP mode shares were assumed to be unchanged from the existing conditions (59.8 MAP) to generate a more conservative or worst case scenario of future traffic conditions within the CTA. Keeping passenger transportation mode shares unchanged in the future, particularly the privately-owned vehicle (POV), taxicab, and limousine mode shares which, as single-party vehicles, generate the most trips per passenger compared to multi-party vehicles (i.e., shuttles and vans), ensures that a more conservative or worst case scenario was analyzed.

The traffic model assumptions used to estimate future conditions are described on pages 63 through 66 of Appendix E2-1 of the Preliminary LAX SPAS Report. The future 78.9 MAP hourly passenger volumes were used to generate the future conditions vehicle volumes by mode. These vehicle volumes were then entered into the future conditions baseline VISSIM model to derive a simulated representation of the baseline 78.9 MAP CTA roadway conditions. (See page 70 of Appendix E2-1 of the Preliminary LAX SPAS Report.)

SPAS-PC00130-720

Comment:

Page 76 Table A-1 Passenger Activity During Arrivals and Departures Levels Peak Hours, Departures section of table...

Question: Appendix E-2 ground access page 67 Table A-1

Terminals 1 and 7 each have 12 gates shown in figure A-7 yet there is a substantial difference in the percentages of peak travel passengers shown for these two terminals. Why? What can be done to change this imbalance?

Response:

Table A1 on page 67 of the LAX GTS Report provides the number of passengers on each terminal's curbside during the peak hour for both the arrivals and departures level curbsides. LAX is made up of a series of individual unit terminals (T1 through T8 and TBIT) which each have their own limiting capacities. The number of passengers on each terminal's curbside during the peak hours is directly related to the gated airline schedule, the size of the aircraft, and how many gates are processing arriving and departing flights at that time. For example, during the arrivals peak hour, Terminal 7, which Table A-1 shows having a higher number of passengers on the curbside compared to Terminal 1, may have had more flights arrive, or larger aircraft during the time leading up to and during the peak hour.

Also, Terminal 1 may have had more of their gates processing flights for departures compared to Terminal 7, which would result in fewer passengers on the Terminal 1 arrivals level curbside.

The August 2008 gated airline schedule and the future conditions gated schedule with no Yellow Light Projects were used to estimate a rolling hour of originating (i.e., outbound flights) and terminating (i.e., inbound flight with LAX as the final destination) passenger volumes for each terminal. This information was obtained from gated passenger schedules previously developed for LAWA. (See page 63 of Appendix E2-1 of the Preliminary LAX SPAS Report.)

SPAS-PC00130-721

Comment:

Page 77 Figure a-8 Rolling Hour Originating Passenger Volumes at the Departures Curbside (78.9 MAP)

Question: Appendix E-2 Figure A-8 and -9 have curbside traffic for each terminal. Why does the summary from DEIR figure 4.12.1-9 differ in the total number of passengers? Figure 4.12.1-9 at noon total passengers is about 13.6K vs. Fig A-8 is about 8K+Fig A-9 is about 7.7K (15.7K).

Response:

Please see Response to Comment SPAS-PC00130-687 regarding the STV analysis of ground access conducted as part of SPAS. The LAX GTS Report and the SPAS Draft EIR analyses were different, including different sets of assumptions, data sets, terminal configurations, and passenger schedules. As explained in Response to Comment SPAS-PC00130-687, the future 78.9 MAP gated aircraft schedules differ between the two analyses. This difference results in different peaking characteristics throughout the design day for both gated schedules. By comparing the total passengers for only a single hour of the day, differences in when flights arrive at or depart a gate would be expected to result in different hourly totals of passengers on the curbsides. Figure 4.12.1-9 depicts the rolling hourly arriving and departing passenger flows for the 2025 SPAS alternatives. Therefore, the future terminal facilities that were assumed to be in place for each analyses, such as the MSC Passenger Processor, also contributes to the differences in the total number of passengers on the curbsides during any given hours.

SPAS-PC00130-722

Comment:

Page 79 Vehicle Dwell Time
Vehicle dwell times provide an estimate of the amount of time a vehicle will spend at the curbside loading and unloading passengers. Table A-3 provides the average vehicle dwell times and associated standard deviations by mode used in the VISSIM model for T1 through T7. The standard deviation represents the variation in dwell time from the average dwell time that a vehicle type will spend at a curbside. The standard deviation in vehicle dwell times were applied in the VISSIM simulation using a normal distribution. The data used to develop this table was collected at T1, T4, and T7.

Question: How was the dwell time data collected? What assumptions were made during the collection? What trend changes in dwell time is anticipated in the future? Where is this documented?

Response:

Please see Response to Comment SPAS-PC00130-314 regarding the collection of vehicle dwell times conducted as part of SPAS. The information cited in Response to Comment SPAS-PC00130-314 is valid for dwell times collected as part of the LAX GTS Report. Dwell time data used in the LAX GTS Report are provided in Table A-3 on page 69. Also, please see page 63 of Appendix E2-1 of the Preliminary LAX SPAS Report for a discussion of how field data, including vehicle dwell times, was collected.

SPAS-PC00130-723

Comment:

Page 79 Results
As discussed previously, the study's simulation modeling efforts were suspended pending the development and approval of a future non-airline specific gated schedule. Due to delays in receiving the new non-airline specific flight schedule, and the subsequent kickoff of the SPAS process which has redefined many of the key assumptions related to how the CTA terminals and roadways will function in the future, the continued refinement of landside modeling has not resumed. As a result, a number of the facility and operational improvements discussed above either have only been modeled and evaluated from a qualitative perspective or have not been modeled.

Question: Since the actual conditions were not modeled how is any of this information correlated to the real world or used to predict what will occur in the future? What conclusions can be drawn from the evaluations that were not based on actuals but based on assumptions? Where are these assumptions listed?

Response:

Please see Response to Comment SPAS-PC00130-687 regarding the STV analysis of ground access conducted as part of SPAS. Specific traffic modeling assumptions for the LAX GTS Report are discussed in the Traffic Model Assumptions section of the report beginning on page 63. As noted in Response to Comment SPAS-PC00130-687, separate and independent modeling of on-airport transportation impacts was conducted for the SPAS Draft EIR, and included all facility and operational changes associated with the SPAS alternatives.

SPAS-PC00130-724

Comment:

Page 81 Table A-4 Results of Analysis LOS (Single Level Busing)

Question: Each scenario shown for 78.9 MAP shows Level of Service F for most if not all of the time around TBIT. Where is the analysis to show an analysis of segregating the buses and commercial vehicles on a separate level? Yes, this would require significant vertical movement support, but is LAWA willing to accept a failing grade even before starting the course?

Response:

Please see Response to Comment SPAS-PC00130-687 regarding the STV analysis of ground access conducted as part of SPAS. Please see Response to Comment SPAS-PC00130-150 regarding the consideration of a third level roadway for busing operations within the CTA.

The on-airport transportation system would not fail with implementation of the SPAS alternatives. On the contrary, as indicated in Section 4.12.1 of the SPAS Draft EIR, on-airport traffic impacts related to curbsides and to departures and arrivals level roadways would be less than significant for Alternatives 1, 2, 4, 8, and 9. All of these alternatives would, however, result in a significant and unavoidable impact related to the volume to capacity level at one intersection within the CTA. No on-airport traffic impacts would occur under Alternative 3 because, under that scenario, the CTA would be closed to private vehicles.

SPAS-PC00130-725

Comment:

LAX SPAS DEIR COMMENTS -- ECONOMIC BENEFITS OF THE PROJECTS

THE DEIR AND SPAS REPORT STATES THE IMPORTANCE OF LAX AS AN ECONOMIC GENERATOR FOR THE REGION. THE ATTACHED CHARTS PRESENT AN ARSAC ASSESSMENT

OF HOW THE VARIOUS ALTERNATIVES RELATE TO JOB CREATION AND ECONOMIC BENEFITS.

Where in the DEIR has LAWA prepared an assessment of economic benefits and job creation to back up the statements made in the document? What are the benefits and job creation factors determined by LAWA?

TERMINAL CONSTRUCTION VS.
RUNWAY CONSTRUCTION
- 5 TIMES NUMBER OF JOBS
  - 40,908 NOT 7,752
- TWICE POSITIVE CONSTRUCTION-RELATED ECONOMIC IMPACT ON REGION
  - $5.1 BILLION NOT $2.6 BILLION
- TWICE DOLLARS BACK FOR DOLLARS INVESTED
  - $2.67 NOT $1.35
- 8 TIMES ONGOING TOURIST DOLLARS
  - $112.8 MILLION NOT $14.1 MILLION PER YEAR

Tables in original Comment Letter in Attachment 5.

Response:

The importance of LAX to the economic growth and vitality of the Los Angeles Region is addressed on page 1-12 of the SPAS Draft EIR and based on a study performed by the Los Angeles Economic Development Corporation (LAEDC). As stated in the SPAS Draft EIR, in 2006, an average transoceanic flight traveling round-trip from LAX every day added $623 million in economic output and sustained 3,120 direct and indirect jobs in Southern California with $156 million in wages. A more recent study of the economic impact of LAX was released by LAEDC subsequent to publication of the SPAS Draft EIR. That study found that, in 2011, capital spending and related visitor spending associated with LAX generated 294,400 jobs in Los Angeles County alone, with labor income of $13.6 billion and economic output of more than $39.7 billion, and added $2.5 billion to local and state revenues. The report estimated that future capital projects, which LAWA's projects will total $8.5 billion over a 10- to 15-year period, will generate 90,500 job-years in Los Angeles County, with labor income of $5.6 billion, and will add $520 million in state and local tax revenues over the project period.1

The commentor states that terminal construction generates more jobs than runway construction. The commentor does not provide any backup information or evidence, such as assumptions or model parameters, to substantiate the attached analysis or its conclusions as to job growth, labor dollars generated, economic impact, or customer satisfaction. Moreover, advancing the economic growth and vitality of the Los Angeles Region is only one of seven objectives of SPAS. Therefore, even if these claims were accurate, improvements to the north airfield address other SPAS objectives besides economic growth. See, in particular, Table 1-2 of the SPAS Draft EIR, which identifies how the various SPAS alternatives respond to the project objectives. These project objectives can only be met by a program that addresses all of the SPAS components, including airfield, terminal, and ground access features.

Finally, please note that purely economic impacts are not required to be analyzed under CEQA. (State CEQA Guidelines Section 15064(e).)

1. Los Angeles County Economic Development Corporation, Economic and Policy Analysis Group, Los Angeles International Airport in 2011: Economic Impact Analysis, August 2012.

SPAS-PC00130-726

Comment:

LAX SPAS DEIR Comments on topic of center-line taxiways...

Question: Why is operation with a center-line taxiway as conceived for the north complex safer since it results in operation of aircraft closer together and it introduces a new failure mode of errant landings on the taxiway?

Response:

Please see Responses to Comments SPAS-PC00130-63 and SPAS-PC00135-2 regarding the safety and operational benefits of a centerfield taxiway. In regards to errant landings on taxiways parallel to the intended runway, please see Response to Comment SPAS-PC00130-366.

SPAS-PC00130-727

Comment:

Below are data sources showing problems with these taxiways: Taxiway Takeoffs and Landings

By Robert Acherman, Vice President, Alliance for a Regional Solution to Airport Congestion October 3, 2012

Commercial airplanes landing and taking off on taxiways is a major worldwide problem. Causes include lack of situational awareness by pilots, complex airport geometry and poorly marked taxiways. In 2004, the issue became so pronounced that the US National Transportation Safety Board (NTSB) issued a Safety Recommendation on how to contain the taxiway landing and takeoff problem. The taxiway incidents in Seattle were the tipping point for a call to action. The NTSB Safety Recommendation also recaps other taxiway landings and takeoffs at Palm Springs, CA; Las Vegas McCarran, NV; and Tuscon, AZ.

http://seattletimes.nwsource.com/news/business/links/ntsb06-24-04.pdf
FAA response to NTSB

http://seattletimes.nwsource.com/news/business/links/faa03-09-05.pdf
NTSB response to FAA

http://seattletimes.nwsource.com/news/business/links/ntsb08-08-05.pdf

The FAA performed research and produced the following report. Several other US airports had taxiway operation problems including Palm Beach, FL; Lincoln, NE and Memphis, TN.

http://www.airporttech.tc.faa.gov/safety/downloads/TN07-54.pdf

In 2010, the FAA issued guidelines in 2010 on how airports can mark taxiways for increased pilot visibility.

http://www.faa.gov/airports/resources/advisory_circulars/index.cfm/go/document.current/documentNumber/150_5340-1

Aviation safety requires eternal vigilance. It requires the active participation of pilots, controllers, airport operators and the general public. Good taxiway design and technology can help resolve part of the taxiway landing and takeoff problem. Ultimately, though, the burden falls upon the pilot with the oversight of controllers to not land or takeoff on taxiways.

ARTICLES ABOUT AIRCRAFT LANDING ON TAXIWAYS

Seattle-Tacoma Airport (SEA)

1999-2004 various incidents

http://seattletimes.com/html/businesstechnology/2002621198_seatac13.html Newark, NJ (EWR)

October 26, 2006, Continental Airlines Boeing 757 lands on taxiway http://www.nj.com/news/index.ssf/2008/04/lighting_a_factor_in_newark_ta.html
Palembang, Indonesia

October 2008, Garuda Boeing 737-400 lands on taxiway

http://news.aviation-safety.net/2011/05/09/report-misaligned-vor-track-factor-in-indonesian-taxiway-landing/

Cagliari, Italy

April 21, 2009, Ryanair Boeing 737 lands on taxiway

http://www.flightglobal.com/news/articles/inquiry-as-ryanair-flight-lands-on-taxiway-at-cagliari-325060/

Atlanta Hartsfield-Jackson International Airport (ATL)

October 2009, Delta Boeing 767 from Rio de Janerio lands on taxiway

http://articles.cnn.com/2009-10-21/us/taxiway.landing_1_taxiway-approach-lights-main-runway?_s=PM:US

Paphos, Cyprus

September 21, 2011, Thomson Airways Boeing 737-800 lands on taxiway

http://www.avherald.com/h?article=44355a86&opt=0

ARTICLES ABOUT AIRCRAFT TAKING OFF ON TAXIWAYS

Anchorage, Alaska (ANC)

January 25, 2002, China Airlines Airbus A340-300 takes off on taxiway

http://www.asc.gov.tw/asc_en/accident_list_2.asp?accident_no=126

November 16, 2005, EVA Airways McDonnell Douglas MD-11 takes off on taxiway

http://news.aviation-safety.net/2005/11/16/md-11-cargo-plane-takes-off-on-taxiway-instead-of-runway-at-anchorage/

Oslo-Gardermoen Airport, Norway

October 23, 2005, Pegasus Airlines Boeing 737-800 takes off on taxiway http://www.asc.gov.tw/asc_en/accident list_2.asp?accident no=126
February 25, 2010, Aeroflot Airbus A320 takes off on taxiway

http://aviationsafetynetwork.wordpress.com/2010/12/14/report-airline-airport-and-controller-were-factors-in-a320-taxiway-takeoff-at-oslo-gardermoen/

Hong Kong International Airport (HKG)

September 13, 2008, Hong Kong Airlines Boeing 737 attempts takeoff on taxiway http://www.topnews.in/pilots-suspended-trying-take-taxiway-hong-kong-269191
November 27, 2010, Finnair Airbus A340 aborts takeoff on taxiway

http://news.aviation-safety.net/2012/01/14/hong-kong-cad-issues-final-report-on-a340-attempted-taxiway-takeoff/

Amsterdam, The Netherlands

February 10, 2012, KLM 737-300 takes off on taxiway

http://www.flightglobal.com/news/articles/klm-737-crew-lost-position-awareness-before-taxiway-take-off-366475/

Response:

Please see Response to Comment SPAS-PC00130-366 regarding errant landings on taxiways parallel to the intended runway.

It is acknowledged that the commentor provided a series of website links to articles and materials related to errant landing and takeoff operations on taxiways. The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00130-728

Comment:

Question: Why is the NASS study response to FAA questions not included in the DEIR or SPAS report?

From the Academic Panel's responses to the FAA which was neglected to be included in the DEIR... This is on PDF page 17 (print out page 15) (the hard copy pages of 8, 9, and 14-18):

"Note that only the 3 Runway (3R) configuration (one runway on the north complex) would meet FAA Group VI standards! This one would also eliminate runway incursions caused by runway crossing. There would be no runway crossing here as the same runway would be used for takeoffs and landings. ARSAC recommended the 3R configuration to be studied in the NASS."

Page 15 (hard copy)

"The Panel was asked to estimate the safety of operating the North Airfield under certain configurations and levels of demand, and not to assess the consistency of these operations with FAA design standards. The AP Panel recognizes that all the North Airfield configurations studied except 3R (a three-runway airport) would fall short of at least one FAA design standard. For example, the recommended lateral separation between parallel runways (for VFR Operations) for ADG V and VI is 1,200 feet (FAA AC 150/5300-13 Paragraph 208). This implies configurations Baseline, Baseline-S, 100-N, 340-N and 340-S all fail to meet the recommended standard. A second recommended standard for simultaneous approaches and departures recommends 1,200 feet of runway separation for ADG V and ADG VI. Again, only 3R would meet such a standard (as there is no parallel runway under this alternative). The South Airfield, as modified with the new centerline taxiway, does not meet that standard either.

In short, if deviations from recommended FAA design standards were enough to invalidate a configuration, there would have been no point in conducting the study.

Babbitt did say that runway incursions decreased 50% between 2009 and 2010 (25 to 12). He highlighted the Runway Status Lights technology. He did not say explicitly that RWSL contributed to the decline in runway incursions. RWSL are a tool in reducing incursions- see Fact Sheet below.

2010 Press release from Randy Babbitt at Boston Logan where RWSL was installed. http://www.faa.gov/news/press_releases/news_story.cfm?newsId=11959

FACT SHEET on Runway Incursions

2010 to 2011, 50% drop of incursions from 12 to 6.

http://www.faa.gov/news/fact_sheets/news_story.cfm?newsId=12783

Response:

The NASS academic panel's responses to FAA's comments and questions on the NASS Preliminary Report are included in the NASS Final Report of May 11, 2010, which is referenced in Footnote 398 on page 4-505 of the SPAS Draft EIR. Technical reports may be cited but not included in the EIR pursuant to State CEQA Guidelines Section 15148. Additionally, the NASS Final Report is included as Appendix H-6 in the Preliminary LAX SPAS Report.

The remainder of the comment, beginning with "Babbitt did say…" is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00130-729

Comment:

Re: Revised Notice of Preparation of a Draft EIR Report (SCH No. 1997061047), dated October 8, 2010 "LAX Specific Plan Amendment Study"

INTRODUCTION

In accordance with the February 2006 Stipulated Settlement with the City of Los Angeles calling for significant revisions to the 2005 LAX Master Plan Alternative D, ARSAC has been a member of the Specific Plan Amendment Study Committee.

We continue to be dedicated to a safe, secure, and convenient LAX of which the residents of this City can be proud. However, ARSAC is adamantly opposed to expanding LAX into the surrounding communities, especially any proposals that move Runway 24 Right to the north. ARSAC provides these comments in hopes that LAWA will revise its conduct so that the Amendment Study and EIR will be consistent with the Settlement Agreement, and will be sensitive to the impacts on the surrounding communities. ARSAC incorporates, by reference, the attached reference documents as noted throughout this document.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Responses to Comments SPAS-PC00130-730 through SPAS-PC00130-969 below, which address each separate comment provided in ARSAC's comment letters on the 2008 and 2010 NOPs for the SPAS Draft EIR, including comments provided in the attached reference documents that were incorporated by reference. The comments in both NOP comment letters were considered and addressed in the SPAS Draft EIR. Further, the SPAS process and preparation of the SPAS Draft EIR have been conducted in accordance with the Stipulated Settlement, as described in Section 1.1.2 of the SPAS Draft EIR and reflected throughout the main text and appendices of the Preliminary LAX SPAS Report.

SPAS-PC00130-730

Comment:

On the whole, the project options presented in the Revised NOP lack the specificity that is needed to fully assess the environmental impacts or operational efficiency of aircraft ground traffic. We expect LAWA to refine the options and to provide a level of detail in the EIR so that the social impacts as well as financial costs and other impacts of the project can be assessed by decision makers. The ultimate purpose of this EIR is to help the decision makers decide upon a preferred alternative of a Master Plan to be built. All costs-financial, health, environmental, and social-need to be addressed in order to make an informed decision.

Response:

A Notice of Preparation is required to include sufficient information to describe the project and the potential environmental effects in order to enable responsible agencies to provide a meaningful response (State CEQA Guidelines, Section 15082(a)(1)). The Revised NOP for SPAS provided sufficient specificity for these purposes. Following publication of the Revised NOP and the receipt of comments from public agencies and members of the public, LAWA subsequently refined the alternatives identified in the NOP to provide a greater level of detail, enabling the analysis of project impacts in the SPAS Draft EIR.

It should be noted that, per Section 15131(a) of the State CEQA Guidelines, "[e]conomic or social effects of a project shall not be treated as significant effects on the environment." This section of the guidelines further states that "intermediate economic or social changes need not be analyzed in any greater detail than necessary" to identify a physical change caused by the economic or social changes. As outlined in Section 15002(a) of the State CEQA Guidelines, the basic purposes of CEQA are to inform decision-makers and the public about the potential significant environmental effect of proposed activities; to identify means to reduce, avoid, or mitigate environmental damage; and to disclose reasons why the decision-makers approved a project if significant environmental effects are involved. Although considerations other than environmental impacts have a role in the action taken by the decision-makers, the purpose of an EIR is to focus on environmental effects.

SPAS-PC00130-731

Comment:

The Specific Plan Amendment Study (SPAS) was initially envisioned as an opportunity for LAWA to work cooperatively with stakeholders to rapidly update the LAX Master Plan and to facilitate renovation of LAX facilities. Contemplated schedules are overdue.

We encourage LAWA to work closely with stakeholders to get this EIR completed in a timely manner and to ensure that it addresses all of the issues so that delays and litigation are avoided. As a part of the Specific Plan City Ordinance and the Stipulated Settlement Agreement, LAWA was supposed to conduct outreach to affected stakeholders. It is unclear what outreach LAWA has been conducted and would like an enumeration of meetings showing what types of stakeholders participated, what suggestions were considered by LAWA and which, if any, were incorporated into their proposed options.

Response:

LAWA undertook an extensive public participation program in 2006, the outset of the SPAS process, to solicit public input from interested stakeholders. Section 4.1 of the Preliminary LAX SPAS Report discusses the thorough public outreach and community involvement process utilized during the planning process. As provided on page 4-1 in Section 4.2.2 of the Preliminary LAX SPAS Report, between March 2006 and December 2006, a series of six public meetings was held concerning various aspects of the SPAS planning process. These meetings were open to all members of the public, and included break-out sessions for participants to make suggestions regarding improvements. A table of the meetings subjects, dates and time, and locations is provided on page 4-2 in Section 4.2.2 of the Preliminary LAX SPAS Report. Copies of the meeting materials for each meeting, including the meeting notice, welcome sheet, handouts, attendee sign-in sheets, presentation, and public comments,

are included in Appendix D-1, Community Meeting Materials, of the Preliminary LAX SPAS Report. As documented in these meeting materials, LAWA studied many of the suggestions to determine their feasibility. A detailed accounting of the concept development process is provided in Chapter 5 of the Preliminary LAX SPAS Report. As provided in Section 5.1.2 of the LAX SPAS Report, the concepts for different components were presented in various public meetings and all public comments were considered by LAWA. Modifications and updates were made to the concepts, based upon input from community meetings.

In addition, in compliance with Section V.J of the Stipulated Settlement, LAWA established the LAX SPAS Advisory Committee. The Advisory Committee members included representatives from the County of Los Angeles, City of Los Angeles, City of El Segundo, City of Culver City, City of Inglewood, and Alliance for a Regional Solution to Airport Congestion (ARSAC). (See generally Section 5 of the Preliminary LAX SPAS Report.) LAWA held 24 meetings with the Advisory Committee between March 2006 and June 2012. A list of these dates is provided in Appendix D-2 of the Preliminary LAX SPAS Report. Meetings were scheduled prior to and following the public meetings that LAWA convened to seek community input on SPAS. The Advisory Committee members provided input and feedback on various aspects of the airport planning process, and suggested alternatives to be studied as part of SPAS. Inclusion of an alternative that would move Runway 6R/24L 100 feet south (i.e., SPAS Alternative 7) in the SPAS Draft EIR was a result of input from Advisory Committee members. Documentation of the Advisory Committee meetings is provided in Appendix D-2 of the Preliminary LAX SPAS Report.

Please see Response to Comment PC00130-990 regarding the release date of the SPAS Draft EIR relative to contemplated schedules.

SPAS-PC00130-732

Comment:

Since the NOP has divided the option elements into sections to be mixed/matched to be assembled into full Master Plan options, the comments of this letter are organized to accommodate LAWA response.

Response:

The comment is noted. Please see Responses to Comments SPAS-PC00130-733 through SPAS-PC00130-818 below.

SPAS-PC00130-733

Comment:

NORTH RUNWAY MOVEMENT OPTIONS

No runway movement is our preferred alternative for the north complex.

LAWA and the FAA spent most of the past five years using incursion reduction and runway safety improvement as justification for expanding the separation distances between the north runways. ARSAC has repeatedly stated that we want the safest runways practical and that there are other, more cost effective options to improve runway safety.

The FAA stated our case most eloquently in their FAA Runway Safety Report, Executive Summary June 2008 when it put runway incursion experience into context by stating, "Of the 24 serious incursions [nationally] in FY2007, eight involved commercial flights. At this rate (eight in over 25 million operations) a person could fly on one commercial flight every day for as many as 4,280 years without encountering a serious runway incursion." An appendix to this report provides numerous potential additions to airport safety that can be added without runway movement. One of the many examples provided was the one at Long Beach-Daugherty Field, Final Approach Occupancy Signal (FAROS). Another, Runway Status Lights, has only been partially installed at LAX with promises that a full installation will be made. Note that the most serious incursion at LAX occurred on the South runway complex at an intersection where it is believed that RSL could have avoided the incident. Like the FAA report, ARSAC has provided

LAWA with numerous suggestions to improve airfield safety through enhanced marking, lighting and signage; installation of Runway Status Lights and systems such as Enhanced Final Approach Runway Occupancy Signals (eFAROS). We went one step further by advocating for a full staffed control tower of highly experienced controllers. LAWA should conduct an unbiased evaluation of the options before the alternatives are finally selected for inclusion in the Draft EIR.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. The comment does not present specific alternatives that the commentor believes the SPAS Draft EIR should have considered. The SPAS Draft EIR includes a broad range of airfield improvement options, embodied in seven airfield improvement alternatives, including variations on runway moves, taxiway/taxilane configurations, and gating plans. Please refer to Response to Comment SPAS-PC00096-5 for a discussion of the safety improvements analyzed in the SPAS Draft EIR.

SPAS-PC00130-734

Comment:

The Revised NOP uses descriptors for runway safety conditions which are word crafted and biased toward justifying expansion north. NOP Section 2, item i, under Project Descriptions, for example, states "could create even greater safety..." implying significant possible improvements when the Academic Panel/NASA North Airfield Safety Study (NASS) stated "limited practical importance."

How has LAWA planned to incorporate each of the system improvements in the 2008 FAA Runway Safety Report into its safety and efficiency studies for each option?

The North Airfield Safety Study conducted by the Academic Panel came to a similar conclusion when it deemed the existing north runway complex as extremely safe. Their report states, "All of the proposals to create new configurations of the North Airfield would reduce by a substantial percentage the risk of a runway collision." Followed by "However, because the baseline level of collision is so low, reducing that risk by a substantial percentage is of limited practical importance." The NASS report concluded increasing runway separation would result in 72 deaths vs 80 deaths in 200 years with the current north airfield configuration.

Response:

The subject wording in the Revised NOP accurately describes the conclusions of the North Airfield Safety Study, which indicate that new configurations of the north runway that include runway separation and the addition of a centerfield taxiway would reduce by a substantial percentage (40-55 percent) the risk of a fatal runway collision. Please see Response to Comment SPAS-PC00130-168 regarding the academic panel's conclusion that reducing the risk of a fatal runway collision by a substantial level is of "limited practical importance," which is a value judgment not shared by the Federal Aviation Administration, the federal agency responsible for the safety of civil aviation. The ultimate determination of whether to select one of the SPAS alternatives and the rationale for such a determination is left to the decision-makers. This comment will be provided to them for their review prior to making a decision.

Regarding the commentor's question pertaining to how has LAWA planned to incorporate the system improvements in the "2008 FAA Runway Safety Report," it is unclear exactly what report is being referred to, and the comment does not provide any specific citation. If the commentor is referring to the FAA Runway Safety Area Evaluation and Analysis for Los Angeles International Airport of June 2006, Section 4.7.2 of the SPAS Draft EIR describes that study and how it relates to LAX.

SPAS-PC00130-735

Comment:

Runway options devised by LAWA expanding north to accomplish wider north runway complex separation are unacceptable because they increase the impacts on the communities along the north boundary, eastern areas, and on the south by facilitating increased air and ground traffic.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. It should be noted that the increase in passenger activity over time would occur with or without the SPAS alternatives, as stated on page 1-13 of the SPAS Draft EIR. Regarding impacts of moving Runway 6L/24R north, please see Response to Comment SPAS-PC00130-4. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00130-736

Comment:

During the September 2010 Specific Plan Amendment Committee meeting, LAWA presented the options that they intended to include in the NOP. In addition to the "no action" and "approved Alternative D of 340' south" configurations, each of the options called for moving runways north toward Westchester-Playa Del Rey.

If further runway separation is deemed mandatory, ARSAC stated that LAWA should move Runway 24 L south instead. After further discussion LAWA agreed to include an option moving runway 24L 100' south along with upgrading the taxiways to accommodate the newer, larger aircraft. ARSAC observed that the current taxiways were built for smaller aircraft in the 1960's and that substantial efficiencies could be achieved if special handling were avoided for larger aircraft around the terminals. LAWA agreed to prepare drawings of an alternative after consulting with ARSAC, but instead prepared two south alternatives moving runway 24L 100' south without input. Their plans failed to respond to our pre-NOP release requests and disappointingly, the LAWA runway south alternatives are the only ones included in the revised NOP.

LAWA stated that their two "100' S alternatives" would receive "at least cursory study" but the criteria for acceptance for formal, complete study have not been revealed in the NOP or other documents. ARSAC informed LAWA that both of "their" options are unacceptable because they fail to include what we requested for taxiway layouts. We request a modification of the existing LAWA plan to extend taxiway D without creating a potential bottleneck along the northern edges of Terminals 1 and 3.

LAWA should adjust its alternative to meet the criteria ARSAC described to modify the taxiways as requested. ARSAC requested that the second LAWA alternative also be modified. This is the one which has a Group VI Taxiway E all along Runway 24R and a Group V Taxiway D that is interrupted near the terminals. We requested that Taxiway D be extended straight instead of diverting away from the terminals. It will impact a small number of gates, but these impacted gates on the ends of the terminals can be replaced on the north complex in the area known as Park One by a new two-sided terminal.

The only runway option in the NOP that addresses the limited spacing taxiways to accommodate the larger aircraft adequately would be that requested by ARSAC. None of the options moving north addresses this issue.

Response:

The relocation of Runway 6R/24L 100 feet southward and the Taxilane D and Taxiway E configuration suggested in the comment (i.e., ADG VI Taxiway E and ADG V for Taxilane D as a continuous taxilane along the northern edge of Terminals 1, 2, and 3) are reflected in Alternative 7 of the Draft EIR. Alternative 7 also proposes the development of new aircraft gates in the area known as Park One,

through the addition of Terminal 0; however, the current Terminal 0 concept provides for gates only along the west side of the concourse. If this, or another alternative that includes a Terminal 0 concept in the area currently occupied by Park One, were adopted, the specific configuration of the concourse and its gates would be determined during project level planning and design, in conjunction with further refinement of the redesign of Sky Way and other transportation improvements that might occur in the same vicinity. Nevertheless, the gating configuration associated with Alternative 7 would still provide 153 passenger gates that can accommodate a variety of aircraft sizes, including large aircraft.

SPAS-PC00130-737

Comment:

At the present time LAWA-owned property located between Runway 24 R and Westchester Parkway is zoned for airfield-serving commercial purposes. This area includes property both inside and outside of the perimeter fence of LAX. Construction of buildings to accommodate such uses would provide a significant environmental buffer between airfield operations and the community to the north with respect to community safety, noise, vibration, light, air pollution, and aesthetics, in addition to the economic benefit of such uses for LAWA and/or the City of Los Angeles. Movement of Runway 24 R to the north will preclude construction of such buildings and hence the environmental and economic benefits of such uses. The environmental cost and financial loss if such land uses are precluded must be identified and studied.

Response:

The LAWA-owned property located between Runway 6L/24R and Westchester Parkway is a portion of LAX Northside, as shown in Figures 4.9-3, 4.9-4, and 4.9-5 of the SPAS Draft EIR. The zoning of the LAX Northside areas within this location is shown in Figure 4.9-5 and is defined in Appendix A of the LAX Specific Plan. These areas include Area 4A (light industrial uses and airline and airport support services); Area 4B (light industrial uses and airline and airport support services); Area 5 (offices, business park, and research and development); Area 6 (offices, business park, and research and development); Area 7 (offices, business park, and research and development); Area 8 (commercial uses); Area 9 (commercial uses); and Area 10 (public automobile parking). A portion of LAX Northside is also located north of Westchester Parkway, including Area 1 (offices, business park, and research and development); Area 2 (offices, business park, and research and development); Area 3 (commercial uses); Area 13 (recreational facilities and public benefit uses); Area 12B (commercial golf course); Area 12A (commercial uses); and Area 11 (commercial uses). (See Appendix A of the Preliminary LAX SPAS Report.) Together, areas of LAX Northside located both south and north of Westchester Parkway serve as an airport buffer zone (comprised of compatible development and landscape) between airfield operations and the Westchester community and is subject to use restrictions, height restrictions, setback requirements, and landscape requirements to avoid or reduce land use conflicts.

The potential impacts on the development of LAX Northside associated with the proposed movement of Runway 6L/24R northward under SPAS Alternatives 1, 5, and 6 are evaluated in Sections 4.9.6 and 5.5.9.1 of the SPAS Draft EIR. As indicated on pages 4-692 and 4-693 in Section 4.9.6.1, under Alternative 1 (and also applicable to Alternatives 5 and 6), within LAX Northside, no changes are proposed with the exception of the Lincoln Boulevard realignment. The movement of Runway 6L/24R north and the related realignment of Lincoln Boulevard would occur mostly within Area 8 and a portion of Area 9, both designated for commercial uses. As described on pages 5-96 and 5-97 in Section 5.5.9.1, and specifically within footnote 536, the potential for commercial uses within these areas without relocation of Runway 6L/24R is limited due to restrictions associated with the existing Airport Surveillance Radar (ASR) in Area 9 and the close proximity to the LAX north airfield and associated noise impacts, safety requirements, and height restrictions. In addition, even without the ability to develop limited commercial uses within Areas 8 and 9, LAX Northside would continue to provide a broad buffer zone between airport uses and residential communities to the north, because Areas 11, 12A, and 12B lie between Areas 8 and 9 and residential land uses to the north. Area 12B is the site of the Westchester Golf Course, which provides a substantial buffer between Areas 8 and 9 and residential land uses. Other buffers in this area include noise walls, which are located along West 88th Street and along portions of La Tijera and West 88th Place, and range in height from 8 to 20 feet. Compatible development would be permitted within Areas 11 and 12A, both of which also lie north of Westchester Parkway, between Areas 8 and 9 and residential uses to the north. The width of the buffer

area between Areas 8 and 9 and residential land uses would range from approximately 700 feet between Westchester Parkway and West 88th Street to as much as approximately 2,000 feet between Westchester Parkway and Manchester Avenue (across Westchester Golf Course). As stated in Appendix A of the LAX Specific Plan, Areas 12A and 11 are permitted to be developed with commercial uses. Furthermore, at the interface between LAX Northside and residential uses to the north, a landscaped buffer setback ranging between 15 to 30 feet is required. As stated on page 4-657 in Section 4.9 of the SPAS Draft EIR, LAX Plan Land Use - LAX Northside Policy P-1, requires that LAWA "Provide and maintain landscaped buffer areas along the northern boundary of LAX Northside that include setbacks, landscaping, screening, or other appropriate view-sensitive uses with the goal of avoiding land use conflicts, shielding lighting, enhancing privacy, and better screening views of airport facilities from adjacent residential uses." Therefore, in consideration of the above, there would continue to be sufficient buffers between airfield operations and the community to the north to address safety, noise, vibration, light, air pollution, and aesthetics concerns, with the exception of construction-related air quality and noise impacts (as analyzed in Sections 4.2 and 4.10.3 of the SPAS Draft EIR, respectively).

Regarding financial loss associated with the slight reduction in land available for development of commercial uses within Areas 8 and 9, economic impacts are not considered impacts on the environment under CEQA. (Please see Response to Comment SPAS-PC00130-730 concerning the treatment of social and economic changes in an EIR.) However, the area that would be affected by the realignment of Lincoln Boulevard has limited potential for commercial development, and since the reduction in land designated for commercial uses could be accommodated within other areas of LAX Northside, no significant economic effects are expected to occur.

SPAS-PC00130-738

Comment:

LAWA's knowledge of what lies below its runways is inadequate as proven by the discovery of a previously unknown runway below the south runway complex during construction of Runway 25 L and the adjacent taxiway. It is known that one and perhaps more than one tunnel exists below Runway 24 R. To understand the environmental, construction and economic cost and impact of moving the runway north, an extensive program of borings along the entire length of the north airfield must be undertaken and the environmental impact and financial cost thereof studied.

Response:

Please see Response to Comment SPAS-PC00130-904 regarding the abandoned runway that was excavated during construction of the South Airfield Improvement Project. Please see Responses to Comments SPAS-PC00130-1012 and SPAS-PC00130-808 regarding the abandoned tunnel segment that lies beneath Runway 6L/24R. The SPAS Draft EIR is a programmatic document. Project-level impacts associated with implementation of individual components, such as the north airfield improvements, will be assessed in future CEQA documents, which will be based on an appropriate level of engineering analysis and design.

SPAS-PC00130-739

Comment:

The intersection of Lincoln Blvd. and Sepulveda Blvd. adjacent to the LAX North Airfield is one of the most important roadways in all of Los Angeles County. It links all of the residential communities, businesses and land uses of the Westside (Marina del Rey, Venice, Mar Vista, Santa Monica, Pacific Palisades, Brentwood, Westwood, Beverly Hills, etc.) with the communities, businesses and land uses of the South Bay (El Segundo, Hawthorne, Manhattan Beach, Hermosa Beach, Redondo Beach, Torrance, Palos Verdes, etc.). If the perimeter fence of LAX is extended outward to accommodate the north movement of the runways, it will have an immense impact on these people, businesses and land uses both during construction and after completion of construction. In fact, the entire region will be impacted if the perimeter fence is moved outward. For each option that is to be evaluated identify the extent of roadway movement and the environmental cost and financial cost of doing so. Each option

should be studied including, without limitation, the impacts both during construction and after project completion on the region as a whole and on local traffic, air quality, noise, etc.

Response:

Please see Topical Response TR-SPAS-LR-1 for a discussion of the Lincoln Boulevard realignment associated with Alternatives 1, 5, and 6. Please note that this comment states the commentor's personal opinions, not supported by facts or evidence, regarding the importance of the Lincoln Boulevard and Sepulveda Boulevard intersection, and the impacts of Lincoln Boulevard realignment.

SPAS-PC00130-740

Comment:

Similarly, any impacts from sewer lines and oil pipelines rerouting must be assessed with adequate cost projections. The Hyperion treatment plant located adjacent to the southwest corner of LAX is the City of Los Angeles' most important waste water treatment plant. Huge sewer lines bring storm and sewer water to Hyperion near LAX. If the runways of the north airfield are moved and/or if the perimeter fence of LAX is extended outward to accommodate the north movement of the runways, it will likely impact the Hyperion pipeline feeder system. The environmental and financial cost of relocating sewer and storm water pipelines must be thoroughly studied including, without limitation, the impact both during construction and after project completion on regional and local traffic, land use, etc.

Response:

Please see Topical Response TR-SPAS-LR-1 for a discussion of the sewer lines and other utility lines, including oil pipelines, in the vicinity of the Lincoln Boulevard realignment associated with Alternatives 1, 5, and 6 and Response to Comment SPAS-PC00130-348 for a discussion of sewer lines beneath the north airfield.

SPAS-PC00130-741

Comment:

Westchester Central Business District impacts must be fully disclosed, including impacts on traffic, the costs of traffic improvements, and the economic losses that would occur if the 6L/26R runway is moved north.). The Westchester Central Business District is the life blood of the communities on the north of LAX. Depending on the runway option chosen, the impact could be to decimate as much as half of the business district due to FAA required removals to enforce the runway protection zone and runway safety area.

Response:

Potential traffic impacts and traffic improvements, including those within the Westchester Central Business District, were analyzed in Section 4.12.2 of the SPAS Draft EIR. Intersections within the Westchester Central Business District (i.e., Intersections 100, 101, 108, 114, 135, and 146) are shown on Figure 4.12.2-1 and mitigation measures proposed for the intersections that would impacted under the SPAS alternatives are evaluated in Section 4.12.2.7 of the SPAS Draft EIR. These include intersections within the Westchester Central Business District.

Regarding analysis of property acquisition impacts on the Westchester Business District associated with the RPZ, please see Responses to Comments SPAS-AL00007-26 and SPAS-PC00130-931. No acquisition is proposed within the Westchester community, as shown in Figure 2-11 and listed in Table 2-4 in Section 2.3.1.11 of the SPAS Draft EIR.

As indicated in Section 4.7.2.6.1 of the SPAS Draft EIR, there are several options that can be considered relative to addressing potential safety hazards associated with incompatible structures and uses being located within an RPZ; however, a determination as to the most suitable and practical option cannot be made until more detailed levels of planning and engineering on the selected alternative, if any, when a more complete evaluation of potential safety hazards can be conducted in consultation with

the FAA. It would be premature and speculative to say at this time whether incompatible structures or land uses within the RPZs would stay, be modified, or be removed. Such information would be developed during project-specific CEQA review should an alternative calling for shifting Runway 6L/24R northward be selected. It is appropriate for a first-tier program level EIR to defer detailed descriptions and impact analysis of individual projects in the program to future project-level CEQA documents. (State CEQA Guidelines Section 15383; Koster v. County of San Joaquin (1996) 47 Cal.App.4th 29, 37.) Section 4.7.2 of the SPAS Draft EIR, specifically pages 4-522 through 4-526 includes an analysis of impacts associated with modification or removal of structures and uses within the RPZ, should that occur in the future. In the event that it is determined in the future that relocation of an existing business is necessary, impacts associated with acquisition of the property and relocation of the business would be addressed in future project-specific CEQA documents, and by LAX Master Plan Commitment RBR-1 and LAX Master Plan Mitigation Measure MM-RBR-1.

SPAS-PC00130-742

Comment:

What would the effect be on the various schools and churches that are along the Westchester Parkway corridor - St. Bernard's, WHS, St. Anastasia, Paseo del Rey, Loyola Village, Visitation, etc.? This could include air and noise pollution or a safety risk if there was an air disaster.

Response:

The potential air quality, noise, and safety impacts of the proposed SPAS alternatives were analyzed in Sections 4.2, 4.7.1, 4.7.2, 4.9, 4.10.1, 4.10.2, and 4.10.3 of the SPAS Draft EIR.

The analysis of air quality impacts was conducted in accordance with the SCAQMD CEQA Air Quality Handbook (Handbook) and AQMD Modeling Guidance for AERMOD (Modeling Guidance). The Handbook identifies SCAQMD's CEQA thresholds of significance for air pollutant emissions and concentrations in the South Coast Air Basin. These thresholds of significance are identified in Tables 4.2-5 and 4.2-6 of the SPAS Draft EIR. As required by the Handbook, impacts associated with air quality emissions are determined based on the total emissions that would be generated by the project. Air quality pollutant concentration impacts were determined based on pollutant concentrations from construction and operational sources, as calculated to occur at the edge of the airport (i.e., at "fence-line receptors" that provide a conservative estimate of the pollutant concentration levels at the edge of airport property, which would decrease from that point outward into non-airport areas). Therefore, to determine if impacts associated with the SPAS alternatives would be significant, pollutant concentrations at the fence-line were modeled. If concentrations at any fence-line receptor exceeded the thresholds identified in Table 4.2-6, the impact was determined to be significant. CEQA does not require that air quality impacts at specific offsite receptors be determined. For the SPAS Draft EIR air quality impacts analysis, each fence-line receptor was identified by the type of land use closest to the receptor location, thereby providing a conservative estimate of the air pollutant concentration impacts to that land use type, understanding that the concentrations would become lower as one moved away from the fence-line and into each land use area type. Land use types considered included residential, recreation, school, offsite worker, and onsite occupational. Although air quality impacts at individual offsite locations were not determined, four schools were identified as the closest land uses to fence-line receptor locations. These schools are shown in Figure 4.10.1-7 of the SPAS Draft EIR, and include St. Bernard High School (PVS007), Westchester High School (PBS121), Westchester-Emerson Community Adult School (PBS062), and the Imperial Avenue Special Education Facility (which is now closed). Pollutant concentrations at each of these school locations are provided in Attachment 3 of Appendix C of the SPAS Draft EIR. Significant impacts were not determined on a receptor-by-receptor basis, including at each of these schools. Rather, in order to provide a conservative impacts analysis, if there was any exceedance of an ambient air quality standards at any fence-line location, the impact was determined to be significant. As presented in Table 4.2-17 and summarized on pages 4-156 through 4-160 in Section 4.2 of the SPAS Draft EIR, even with implementation of feasible construction-related mitigation measures, such as covering or treating ground surfaces to minimize fugitive dust emissions, minimizing off-site worker vehicle trips, and prohibiting parking adjacent to sensitive receptors, construction-related emissions and concentrations would be significant for all SPAS alternatives. Operational emissions and concentrations would also be significant for all SPAS alternatives, even with implementation of feasible operations-related mitigation measures, such as the

conversion of LAX ground support equipment to low and ultra-low emissions technologies and the electrification of passenger gates.

Regarding impacts to human health associated with exposure to toxic air contaminants, sensitive receptors nearest the LAX fence-line, including schools, residential, recreational, and workers were evaluated, as described above and on page 4-428 and shown in Figure 4.7.1-1 in Section 4.7.1 of the SPAS Draft EIR. For the exposure assessment, the receptors used for the health risk assessment included, among other things, off-airport school children, and covered a range of exposure scenarios for people who may be affected by emissions. As described on page 21 in Section 4.1.2.2 of Appendix G1 of the SPAS Draft EIR, "[s]chool children were evaluated at all school grid nodes and at grid nodes identified as residential locations because future schools could be located in any residentially zoned area." As noted in the air quality impacts discussion above, the grid nodes were all located along the LAX fence-line. Therefore, the impacts to off-airport school children assumed that the school children were located on the fence-line. As there are no schools that are situated on the fence-line, this assumption results in a conservative analysis of health risk impacts (i.e., the analysis overstates risks to school children. Cancer risks for the different receptors under each of the SPAS alternatives are summarized in Table 4.7.1.5 on page 4-445 and illustrated in Figures 4.7.1-2, and 4.7.1-3. As indicated in the figures, cancer risks at all receptor locations, including receptors identified as schools, would be less than significant. Non-cancer hazards for the different receptors under each of the SPAS alternatives are summarized in Table 4.7.1.6 on page 4-456 and illustrated in Figures 4.7.1-4, and 4.7.1-5. As indicated in the figures, the non-cancer hazards at all receptor locations, including the school locations (non-cancer hazards for school children are summarized in Table 4.7.1.6), would be less than significant. Acute non-cancer hazards from acrolein at the different receptor locations under each of the SPAS alternatives are illustrated in Figures 4.7.1-6, and 4.7.1-7 and summarized in Table 4.7.1.7 on page 4-465. As indicated in the figures, there would be significant impacts associated with acute non-cancer hazards from acrolein under each of the alternatives. Under some alternatives, significant impacts would occur at or near fence-line receptor sites that are identified as schools. As summarized in Table 4.7.1-10 and described on page 4-481 of the SPAS Draft EIR, even with implementation of applicable LAX Master Plan mitigation measures, acute non-cancer health hazard impacts under all of the SPAS alternatives are considered to be significant and unavoidable. Please also see Response to Comment SPAS-PC00130-459 regarding acute non-cancer hazards at or near the fence-line.

Aviation safety impacts were evaluated based on a number of factors, as identified in Section 4.7.2 of the SPAS Draft EIR. The methodology used to evaluate safety impacts did not require analysis of impacts at specific receptor locations to determine whether safety impacts of the SPAS alternatives were significant, and such a site-specific analysis is not required under CEQA. As described on pages 4-569 through 4-571 in Section 4.7.2.6.10 of the SPAS Draft EIR, impacts associated with aviation safety would be less than significant. Furthermore, implementation of Alternatives 1 through 7 would enhance the safety and efficiency of aircraft operations compared to baseline conditions (2010). The types of land uses that are currently located within the RPZ are identified in Table 4.2.7-3, and the land uses that would be located within the RPZ under each of the SPAS alternatives are identified in Tables 4.2.7-9 through 4.2.7-15. As indicated in these tables, although the northward relocation of Runway 6L/24R under Alternatives 1, 5, and 6 would move the RPZ northward, no schools or churches, including those along the Westchester Parkway corridor, would be located within the RPZ areas. In fact, the configurations of Runway 6L/24R under Alternatives 1, 5, and 6 would move the RPZ for that runway to the west, thereby avoiding existing conflicts with residential uses. Alternatives 8 and 9 focus on ground access improvements and would not have any effect on aviation safety.

Regarding aircraft noise impacts, as described on pages 4-776 through 4-778 in Section 4.9.6.10 of the SPAS Draft EIR, under Alternatives 1 through 7, some schools and churches, including those along the Westchester Parkway corridor, would be newly exposed to 65 CNEL or higher noise levels or experience an increase of 1.5 CNEL or higher within the 65 CNEL or higher noise contour compared to 2009 baseline conditions. Table 4 of Appendix I-2 of the SPAS Draft EIR provides a listing of the non-residential noise-sensitive facilities within the study area. There are a number of schools that fall within the study area, including St. Bernard High School (PVS007), Westchester High School (PBS121), St. Anastasia School (PVS093), Paseo del Rey Magnet School (PBS107), Loyola Village Elementary School (PBS099), and Visitation Catholic Elementary School (PVS011). Appendix I-2 also provides detailed discussions and listings of significantly impacted non-residential noise-sensitive receptors for

each alternative. However, as described in Section 4.10.1.8 of the SPAS Draft EIR, LAX Master Plan Mitigation Measure MM-LU-1, Implement Revised Aircraft Noise Mitigation Program, would incorporate all eligible dwellings and non -residential noise-sensitive facilities that are newly exposed to significant levels into the Aircraft Noise Management Program (ANMP) to mitigate the significant noise impacts. In addition, as analyzed in Section 4.10.1, some schools would be exposed to high single event noise levels, including Paseo del Rey Magnet School and Wish Charter Elementary School, under Alternatives 1, 2, 4, 5, 6, and 7, and Wish Charter Elementary School under Alternative 3. As summarized on pages 4-932 and 4-933 in Section 4.10.1.8, interim impacts prior to implementation of LAX Master Plan Mitigation Measures MM-LU-1, MM-LU-3, and MM-LU-4 would be significant and unavoidable.

Regarding road traffic noise impacts, as summarized on pages 4-942 and 4-943 in Section 4.10.2, no off-site noise-sensitive receptors, including Wish Charter Elementary School, would experience significant impacts due to changes in road traffic noise levels under Alternatives 1, 2, 3, 4, 8, and 9. The methodology used for the Road Traffic Noise section is provided on page 4-936 in Section 4.10.2.2 of the SPAS Draft EIR. As described therein, the selection of noise-sensitive receptors to address in the road traffic noise impacts assessment focused on those roadways most likely to experience increased traffic under each of the SPAS alternatives. Such roadways included those likely to be used for driving to or from the airport. As delineated in Table 4.10.2-1 and Figure 4.10.2-1 of the SPAS Draft EIR, 15 noise-sensitive receptors near roadways carrying airport-related traffic were included in the impacts analysis. Section 4.10.2.4 of the SPAS Draft EIR identifies the threshold of significance for road traffic noise impact as being an increase of 3 dBA or more in CNEL ambient noise levels, and, as described on page 4-945 of the SPAS Draft EIR, a doubling of traffic volumes on a roadway would be necessary to result in a 3 dBA increase in sound levels. As noted above, no off-site noise-sensitive receptors would experience significant impacts due to changes in road traffic noise levels, which includes those roadways considered most likely to be affected by changes in airport-related traffic. With the exception of the Wish Charter Elementary School, located near La Tijera Boulevard, which was addressed in the SPAS Draft EIR road traffic noise impact analysis, the schools identified by the commentor are located within neighborhoods where the nearby roadways would have little, if any, airport related traffic. The locations of these other schools relative to adjacent roadways can be seen in Figure 4.10.1-7 of the SPAS Draft EIR, including St. Bernard High School (PVS007), Westchester High School (PBS121), St. Anastasia School (PVS093), Paseo del Rey Magnet School (PBS107), Loyola Village Elementary School (PBS099), and Visitation Catholic Elementary School (PVS011). As such, it is not anticipated that significant road traffic noise impacts would occur at any of these schools. Alternatives 5, 6, and 7 do not include ground access improvements and would not, in themselves, affect road traffic noise levels at off-site noise-sensitive uses; however, depending on which ground access improvements (i.e., ground access improvements associated with Alternatives 1, 2, 8, or 9) are paired with airfield improvements under Alternative 5, 6, or 7, the road traffic noise impacts would be the same as above (i.e., less than significant).

The specific noise-sensitive receptors used to calculate temporary construction traffic and equipment noise impacts are indicated in Figures 4.10.1-7 through 4.10.1-9 in Section 4.10.1, Aircraft Noise. The analysis demonstrated that for temporary construction traffic and equipment noise impacts, as shown in Table 4.10.3-4 and described on pages 4-972 through 4-974 in Section 4.10.3 of the SPAS Draft EIR, construction equipment noise impacts on some schools located in proximity to airfield improvements, ground access improvements, and construction staging areas would be significant and unavoidable under all of the SPAS alternatives. Among the schools listed by the commentor, located within the Westchester Parkway corridor, only Saint Bernard High School would be subject to significant unavoidable impacts associated with construction traffic and equipment noise.

SPAS-PC00130-743

Comment:

In 2009-10 LAWA investigated some interim runway safety improvement projects which moved Taxiways W and Y and several other actions. An NOP was released in June and ARSAC comments are attached. If they are not considered part of the proposed runway option changes, why not?

Response:

The interim runway safety improvement projects to which commentor refers are discussed in Section 3.3 in Appendix H-6 of the Preliminary LAX SPAS Report. The interim runway safety improvement projects, which include reconfigured taxiways, provide the basis for and are incorporated into Alternative 2.

SPAS-PC00130-744

Comment:

Although LAWA has inadequate funding to construct all of the program projects that it wishes, approval of any Master Plan expanding north may have consequences for surrounding communities even before delayed projects are built. Schedule uncertainty can devastate businesses which would defer new projects. It would hurt property owners as businesses vacate to more stable environments, and resident values would suffer anticipated impacts.

Response:

The comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR; therefore no further response is required. The project's economic or social effects shall not be treated as significant effects on the environment. (State CEQA Guidelines Section 15131(a).) Moreover, the commentor provides no substantiation for the claim that schedule uncertainty would devastate businesses or defer new projects. Please see Response to Comment SPAS-PC00189-4 regarding impacts to property values. Please see Chapter 8 of the Preliminary LAX SPAS Report for a discussion of cost estimates and funding for the SPAS alternatives.

SPAS-PC00130-745

Comment:

PROCEDURAL ISSUES.

The initial NOP (Reference 1) calls for "project tiering" and use of prior data and studies as justification for specific project approvals. The revised NOP amends and supplements the initial one from 2008. The revised NOP states that conditions studied in support of the approved Master Plan Alternative D have changed. The Revised NOP Section 2, Project Background, acknowledges several major changes. Although it lists six specific items, far more items are of consequence, such as LAWA's purchase of the Manchester Square and Belford Square communities and numerous new development projects proposed and/or completed within the area of LAX impact. We call on LAWA to prepare a complete environmental study that does not rely on any old data and includes all of the known potential impact projects and the reasonably foreseeable [that is all that is required] worst case scenarios for projects on LAWA owned or controlled land.

Response:

The content of this comment is similar to the concerns expressed in comment SPAS-AL00007-41; please refer to Response to Comment SPAS-AL00007-41. Additionally, please note that Chapter 5 of the SPAS Draft EIR identifies all past, present, and reasonably foreseeable projects with potential impacts related or cumulative to the SPAS alternatives. Property acquisition at Manchester Square/Belford is specifically discussed in Section 5.3.4 of Chapter 5. The impacts of these and all other related projects are comprehensively evaluated in Section 5.5 of the SPAS Draft EIR.

SPAS-PC00130-746

Comment:

The LAX Specific Plan distinguishes between "green lighted" projects and "yellow light" projects which require additional consideration and study. ARSAC's interest in the "green lighted" projects is how soon these can be completed. The way the "yellow light" projects delineated in Section 7.H have been addressed to date is problematic. The Stipulated Settlement calls for enumeration of the impacts for

each of the yellow light projects in Section V. paragraphs C. (minimizing impacts) and D. ("...solutions to the problems that the Yellow Light Projects were designed to address..."). Despite numerous requests for quantifiable, detailed impacts that the new project elements are to address, LAWA has failed to provide us with the requested information. LAWA provided a handout at the NOP hearings listing general nature issues that were not quantified. A more detailed, quantified list of problems should be prepared to identify those issues that each yellow lighted project was designed to address. These highlighted, quantified issues should then be used as a gauge for assessment of the project's mitigation.

Response:

Implementation of a number of non-Yellow Light Master Plan projects has been completed or is underway, including the South Airfield Improvement Project, the Crossfield Taxiway Project, and the Bradley West Project. Detailed planning and design for the Midfield Satellite Concourse Project is currently underway.

The problems the Yellow Light Projects were designed to address were identified in the 2008 SPAS NOP and the 2010 SPAS NOP. A discussion of the problems the Yellow Light Projects were designed to address is also provided in Section 2.3 of the SPAS Draft EIR. The Stipulated Settlement does not require that the problems the Yellow Light Projects were designed to address be expressed in quantitative terms. The extent to which each SPAS alternative would provide solutions to the problems the Yellow Light Projects were designed to address is addressed in Chapter 6 of the Preliminary LAX SPAS Report. The impacts associated with the SPAS alternatives are disclosed throughout Chapter 4 of the SPAS Draft EIR, and are summarized in Chapter 1.

SPAS-PC00130-747

Comment:

LAWA has provided general descriptions of the alternatives that they identified for study in the EIR and stated that cursory review will be conducted and some will receive full assessment based on their ability to meet LAWA stated objectives. Quantifiable objectives and the judgment criteria to be used to evaluate each alternative needs to be stated prior to selection of projects to be scrutinized with a full assessment and before any elements of a "preferred" alternative are selected.

Response:

The SPAS alternatives selected for full examination in the SPAS Draft EIR reflect a reasonable range, consistent with the requirements of CEQA. An EIR need not consider every conceivable alternative, but must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation. (State CEQA Guidelines Section 15126.6(a)). CEQA requires a lead agency to identify any alternatives that were considered, but ultimately rejected during the scoping process and briefly explain the reasons underlying the determination. (State CEQA Guidelines Section 15126.6(c)).

The alternative discussion complies with the provisions of CEQA. The SPAS Draft EIR identified the reasons for analyzing Alternatives 1 through 9, which represent a reasonable range of alternatives. (see Sections 1.1.2 and 202 of the SPAS Draft EIR.) Section 2.3.2 of the SPAS Draft EIR describes, in substantial detail, the alternatives considered but rejected. Additionally, Chapter 5 of the Preliminary LAX SPAS Report describes the basis, nature, and characteristics of the early alternative concepts and the associated development process.

SPAS-PC00130-748

Comment:

Stipulated Settlement section D2 ("...security, traffic, and aviation activity...") calls for inclusion of substantial security elements in any design. This is not normally a required element of an EIR, but must be assessed for each alternative along with any environmental impacts created. ARSAC notes that several of the 2003 Rand Corporation security recommendations remain unaddressed, such as incorporating blast glass in the terminals. We note that Mayor Villaraigosa has recently convened a task

force on safety and security. LAWA has failed to incorporate fixes for prior security and safety issues highlighted into the planned study options. We call for LAWA to identify the design criteria which they used to ensure that LAX is safe and secure when they designed their study options. Further, we call on LAWA to incorporate community ideas of coordinated camera systems from the community presented by Arnie Corlin (short synopsis attached) as well as security improvements such as scales and cameras embedded in each of the roadway entrances to the Central Terminal Area (CTA).

Response:

Security is not an environmental impact and, therefore, is not required to be discussed in the SPAS Draft EIR under CEQA or any other law. However, a Security Assessment of the SPAS alternatives is included in Appendix I of the Preliminary LAX SPAS Report to comply with the Stipulated Settlement and Section 7.G(2) of the LAX Specific Plan. Summaries of the findings of the Security Assessment relative to each alternative are provided in Section 6.3 of the Preliminary LAX SPAS Report. Please see Response to Comment SPAS-PC00130-75 regarding the incorporation of security measures into the design of the SPAS alternatives. Please see Responses to Comments SPAS-PC00130-424 and SPAS-PC00130-152 regarding the implementation of security issues recommended by the RAND Corporation Please see Response to Comment SPAS-PC00130-1050 for a response to the synopsis prepared by Arnie Corlin.

SPAS-PC00130-749

Comment:

LAWA is required to conduct detail evaluations of airport efficiency in accordance with the Stipulated Settlement based on the location of gates, taxiways, and other airport features. Alternative program designs need to include the details of these elements so that this requirement can be met. LAWA should also analyze the environmental impacts that would result if all terminal buildings and taxiways specified in the plan are not built or are deferred.

Response:

Section V(D)(2) of the Stipulated Settlement calls for the SPAS (among other requirements) to focus on "security, traffic and aviation activity" of the SPAS alternatives, and the Preliminary LAX SPAS Report meets this requirement. Chapter 6 of the Preliminary LAX SPAS Report expressly evaluates the security, traffic, and aviation activity associated with each alternative.

There is no requirement in the Stipulated Settlement to conduct "detailed evaluations of airport efficiency" based on the location of gates, taxiways, and other airport features. The SPAS Draft EIR impacts analysis does, however, account for such factors related to aircraft operations, as included in the airport simulation modeling (SIMMOD) described on page 4-91 of the SPAS Draft EIR. The results of the SIMMOD modeling were used in the modeling of aircraft noise impacts and airfield-related air quality impacts associated with the SPAS alternatives.

The commentor requests that the EIR evaluate an alternative that does not build or defers all terminal buildings and taxiways in the plan (presumably the LAX Master Plan). This alternative would be infeasible because it would not accomplish any of the fundamental project objectives.

Further, this alternative would essentially be a "no build" no project alternative calling for no further airport construction. However, LAWA has the discretion to develop a no project alternative that describes existing conditions plus "what would be reasonably be expected to occur in the foreseeable future if the project were approved, based on current plans and assumptions." (State CEQA Guidelines Section 15126.6(e)(2)). When a proposed project is the revision of a plan, the Guidelines (Section 15126,6(e)(3)(A)) specifically provide that the no project alternative shall be the continuation of the existing plan into the future. For these reasons, the SPAS Draft EIR designates Alternative 3, which calls for LAX Master Plan projects to be implemented as originally envisioned, as the no project alternative.

SPAS-PC00130-750

Comment:

LAWA has separated the north runway complex from other design features and has told ARSAC that they plan to mix/match the north runway plan portion (i.e. airside) with the landside design (i.e. terminals, parking garages, etc.) option of choice. ARSAC is concerned that insufficient attention is being paid to landside projects. Only a narrow range of options is provided for vehicle traffic mitigation and elements, such as the Automated People Mover (APM) system, and it is not described with sufficient detail. One example is the APM-to-terminal interface in the Central Terminal Area.

Response:

The comment does not present specific alternatives that the commentor believes the SPAS Draft EIR should have considered.

The SPAS Draft EIR includes and addresses a broad range of landside (ground transportation system) improvement options. Alternatives 1 and 2 propose ground transportation system improvements that include development of an Intermodal Transportation Facility (ITF), parking at Manchester Square, and an elevated/dedicated busway to connect these facilities to the CTA, as well as to the future Metro Crenshaw/LAX Transit Station. Alternative 3 proposes an extensive array of ground transportation system improvements and modifications, including closing the CTA to private vehicles, development of a Ground Transportation Center (GTC), an Intermodal Transportation Center (ITC), a consolidated rental car (CONRAC) facility, two automated people mover (APM) systems, modifications to public parking areas, and construction of a west employee parking facility. Alternative 4 includes a CONRAC and construction of a parking structure at Continental City. Alternative 8 includes an ITF, a CONRAC and parking at Manchester Square, and an elevated/dedicated busway system to connect these facilities to the CTA, as well as connect with the future Metro station mentioned above. Alternative 9 offers improvements similar to Alternative 8, but proposes an elevated APM instead of the busway. There is a certain amount of interchangeability between some of the alternatives relative to the improvements described above. Based on the above, the public and decision-makers have a broad range of landside improvement options to consider for the SPAS.

SPAS-PC00130-751

Comment:

Since this is not a normal EIR but part of a settlement required SPAS Study, the identification of major cost factors should be identified. Examples include, but are not limited to, impacts from eminent domain powers, the costs of such exercise, the cost of dealing with existing tunnels, hydrology impacts, external infrastructure requirements, and construction phasing.

Response:

Preparation of an EIR for SPAS is required by Section 7.H of the LAX Specific Plan and is subject CEQA and the State CEQA Guidelines. The Stipulated Settlement includes additional requirements pertaining to SPAS, but does not mandate provisions concerning preparation of the EIR beyond stating, in Section V.E, that SPAS will be prepared pursuant to CEQA. Please see Response to Comment SPAS-PC00130-730 regarding CEQA requirements pertaining to the treatment of economic conditions in an EIR, including costs of proposed improvements. Although cost estimates are not a CEQA consideration, cost estimates were prepared during SPAS and are provided in Chapter 8 of the Preliminary LAX SPAS Report, with details included in Appendix G.

SPAS-PC00130-752

Comment:

Please annotate the Monitor Mitigation Reporting Program document prepared annually by LAWA addressing the Alternative D LAX Master Plan environmental mitigation commitments; commitments made as part of the out-of-court settlement agreement with the LAX Coalition (such as the air quality apportionment study); and commitments in Stipulated Settlement Agreement and then show how these

actions were (and will be) used in the establishment of criteria for the ultimate selection of options to be assessed.

Response:

The development concepts addressed in the SPAS Draft EIR provide a broad range of options for the public and decision-makers to consider relative to alternatives to the Yellow Light Projects associated with the LAX Master Plan, and were formulated based on the process described in Chapters 2 through 5 of the Preliminary LAX SPAS Report. It is unclear from the comment how or why a review of the LAX Master Plan Mitigation Monitoring and Reporting Program annual report, LAX Community Benefits Agreement commitments, and LAX Master Plan Stipulated Settlement Agreement commitments would provide criteria for the selection of alternatives to be assessed in the SPAS Draft EIR. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00130-753

Comment:

ARSAC has, over the past five years, presented numerous runway safety and efficiency improvement projects that do not require movement of runways. If LAWA is to engage non-runway airside improvements (i.e. FAROS as in Long Beach or improved aircraft tracking with enhanced ground radar; in-cockpit airport moving maps and Electronic Fight Bags) into its plans, then how will LAWA calculate the improved efficiency for each of the options that it finally analyzes?

Response:

The types of measures suggested in the comment are within the control and jurisdiction of the FAA. Please refer to Response to Comment SPAS-PC00096-5 for a discussion of the safety improvements analyzed in the SPAS Draft EIR.

SPAS-PC00130-754

Comment:

DESIGN OPTION ISSUES.

The possibility of installing another control tower is not addressed in any option. There have been reports in the news that LAWA and the FAA are investigating how to mitigate blind spots from the control tower at TBIT. Similar studies are necessary for the midfield terminal before it is built. To assure optimal airfield safety, Tower Controllers must have unobstructed views of the airfield to have appropriate situational awareness of aircraft and vehicles. Changes of this magnitude can impact any airside efficiency study and must be discussed in the EIR. Numerous option conditions needing study are noted in the attachments and are incorporated as a part of these comments.

Response:

Potential Air Traffic Control Tower (ATCT) line-of-sight issues are determined in conjunction with detailed planning and design. The SPAS alternatives provide development concepts for consideration at the program level. The selection and approval of a particular alternative, if any, would be followed by the preparation of more detailed plans, which would address any potential tower line-of-sight issues in consultation with FAA and ATCT staff.

SPAS-PC00130-755

Comment:

How is LAWA intending to address the environmental impacts of major safety issues such as finalizing installation of the Runway Status Lights, new roadway signs, redesign of the CTA curb areas, and other airfield safety fixes?

Response:

As indicated on page 4-502 of the SPAS Draft EIR, installation of Phase I of the Runway Status Lights program at LAX was completed in 2009 and Phase 2, for completion of the system, will occur based on FAA funding. New roadway signs are not currently proposed as part of SPAS; however, the provision of new roadway signs in and around the CTA would be evaluated in conjunction with more detailed project planning and design for the ground transportation system improvements proposed under the approved alternative, if any. The same would be true relative to any redesign of the CTA curb areas. The environmental impacts of the airfield safety improvements associated with each SPAS alternative are addressed throughout the SPAS Draft EIR.

SPAS-PC00130-756

Comment:

Is LAWA preparing a cost-benefit analysis comparing the costs of extended maintenance versus replacement of facilities such as the parking structures or pedestrian bridges from the structures to the terminals? ARSAC has identified and LAWA has acknowledged maintenance issues in the parking structures, CTA roadway, and pedestrian bridges (although there may be disagreement as to the extent of resolution required). Is LAWA planning to factor in the maintenance costs when deciding if it is desirable to modify traffic flow in the CTA? For instance, it is recognized that the passenger bridges are in need of repair. Has LAWA considered replacing them entirely with a much wider bridging structure to accommodate all foot traffic above the ground level in the CTA? We understand that closing the ground level to pedestrians would greatly improve traffic flow. Also, what reviews and options have been considered to create a third level on the CTA roadway for buses and VIP vehicles that could be used as an emergency evacuation path? Has LAWA considered moving bus and other commercial vehicle drop offs to the parking structures? How would that change the traffic flows and resultant EIR evaluations?

Response:

Please refer to Response to Comment SPAS-PC00130-411 regarding maintenance of the LAX second-level roadway. Ongoing maintenance and miscellaneous improvements were considered in the cumulative impacts analyses provided in Chapter 5 of the SPAS Draft EIR. (Section 5.3.2 of the SPAS Draft EIR.) Please see pages 5-17 through 5-22 for a description of the ongoing and planned maintenance-related improvements at LAX. Please see Response to Comment SPAS-PC00130-730 regarding the treatment of economic conditions in an EIR. As noted in that response, CEQA does not require a cost-benefit analysis as suggested by the commentor. (State CEQA Guidelines Section 15131; Pub. Resources Code Section 21068.) Nonetheless, rough-order-of-magnitude cost estimates for the SPAS alternatives were developed as part of SPAS. The cost estimates are discussed in Chapter 8 of the Preliminary LAX SPAS Report, with detailed information provided in Appendix G.

The commentor provides no evidence or factual support for the proposition that the passenger bridges are in need of repair. The replacement of passenger bridges with wider bridging structures is not proposed as part of the SPAS alternatives. The SPAS Draft EIR analyzes the alternatives at a programmatic level. As discussed in Section 2.3.1 of the SPAS Draft EIR, specific project-level details are unknown. However, if an alternative is selected, further review would be conducted. For example, SPAS Alternative 9 includes an APM system which would access the CTA above the elevation of the departures level roadway and existing parking structures. Should the selected alternative include an APM system within the CTA, future detailed project level planning would include assessments of track alignments for the system's guideway, the location and number of stations, and passenger connectivity between terminals and APM stations. Depending on the final alignment of an APM system and the location of the stations, use of the existing pedestrian bridges may be evaluated to assess if they could be integrated with the APM system. In addition, as presented in Section 4.12.1.6.2 on pages 4-1094 through 4-1096 of the SPAS Draft EIR, when non-SPAS facility improvements, such as the Midfield Satellite Concourse Passenger Processor, Terminal 1.5 and Terminal 2.5, undergo detailed project level planning, existing and new elevated pedestrian connections to the public parking structures will be evaluated. As part of these future planning efforts, LAWA may consider pedestrian bridge capacities and assess future needs, including the addition of concession facilities and passenger check-in capacity within wider pedestrian bridge structures.

The commentor provides no evidentiary support for the proposition that closing the ground level to pedestrians would greatly improve traffic flow or eliminate a significant impact. Moreover, the comment does not raise any new significant environmental issue or address the adequacy of the environmental analysis included in the SPAS Draft EIR. (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)). The analysis of on-airport traffic in Section 4.12.1 of the SPAS Draft EIR did not identify any significant impacts that would be eliminated or minimized by closing all at-grade pedestrian crossings of the arrivals level outer roadway between the public parking structures and the terminal buildings within the CTA. While eliminating at-grade pedestrian crossing on the arrivals level outer roadway should allow the number of existing traffic signals to be reduced, there is no evidence to suggest that this change would equate to an improvement in traffic flow within the CTA. The existing traffic signals create gaps in traffic which, during peak activity periods, limit the number of vehicles adjacent to a given section of curbside. This allows vehicles to more easily access and depart the outer curbside and the slip-ramps between the arrivals level inner and outer roadways. Another consideration associated with eliminating at-grade pedestrian crossing on the arrivals level outer roadway is the need for additional vertical circulation capacity for passengers (including baggage) on both sides of the roadways. The physical constraints at LAX, including limited offsets between the existing public parking structures and the roadway and limited space within the existing terminals for additional vertical circulation projects (i.e., elevators and escalators), make implementation of such projects exceedingly difficult and costly, and any construction is likely to generate significant circulation problems.

SPAS-related roadway improvements have been developed at a program level of planning for SPAS. Detailed design of the roadway improvements within the CTA, including the need for and physical constraints in providing for additional evacuation routes, will be determined during project-level planning and engineering design. Please see Response to Comment SPAS-PC00130-150 regarding the suggestion of a potential addition of a third level roadway for buses and emergency vehicles. Please see Response to Comment SPAS-PC00130-217 for a discussion of emergency response plans and services.

Relocating bus and commercial vehicle drop-offs to the parking structures is not proposed as part of the SPAS alternatives. As provided in Section 4.12.1 of the SPAS Draft EIR, with the addition of Mitigation Measure MM-ST(OA) (SPAS)-1, the SPAS alternatives would have no significant impact to on-airport traffic. The commentor does not provide any evidence that relocating bus and commercial vehicle drop-off areas to the parking structures would eliminate a significant on-airport traffic impact.

Further, relocating bus and commercial vehicle drop-off areas to the parking structure would have a number of disadvantages. The existing public parking structures provide a maximum vertical clearance of eight feet, two inches, which limits the commercial vehicles that could enter the structures. Low ceiling height and limited ventilation, coupled with the increase in the number of vehicles operating within the garage at any given time, would have to be considered. Additionally, relocating commercial modes to the public parking structures would increase the number of passengers who would be required to cross the arrivals level outer roadway. As part of Options 1, 2, and 4 documented in the LAX GTS Report (on pages 9, 10, and 15, respectively) , consideration was also given to relocating passenger pick up by private vehicles to inside the public parking structures; however analyses showed that vehicle queues at the garage entrances would adversely impact traffic flow on the arrivals level roadway. Relocating commercial vehicle traffic to the public parking structures would require that new exits, and in some cases new entrances be constructed on the ground level of the structures. These would be necessary to allow a commercial vehicle picking up passengers within the public parking structure at one terminal to exit and then drive to the next terminal's public parking structure to pick up additional passengers. Currently, none of the public parking structures within the CTA have an exit onto either World Way North or World Way South which commercial vehicle use to circulate within the CTA.

SPAS-PC00130-757

Comment:

Mandated air quality studies have not been completed as scheduled but are an important part of the assessment of air quality impacts. Particle matter monitoring and assessment is a requirement for study in this DEIR. We want to ensure that LAWA includes the impacts of 0.1 micron particle size as shown to

be important in the UCLA study of LAX air quality in June 2007. See the extended comments in the Reference 2 comments to the 2008 LAX NOP.

Response:

Please refer to Response to Comment SPAS-PC00130-36 for a discussion of the status of the LAX Air Quality and Source Apportionment Study (AQSAS). Particulate matter impacts, as PM10 and PM2.5, are included in the air quality impact analysis presented in Section 4.2 of the SPAS Draft EIR. Please refer to Response to Comment PC00130-225 for a discussion of ultrafine particles (PM0.1) and the 2007 UCLA study.

Air quality-related comments contained in the commentor's comment letter on the 2008 SPAS Draft EIR NOP are comments SPAS-PC00130-826, 829, 830, 831, 879, 923, and 946 below. Please refer to the Responses to Comments SPAS-PC00130-826, 829, 830, 831, 879, 923, and 946.

SPAS-PC00130-758

Comment:

LAWA has indicated that it plans to assume displaced thresholds at each end of the northern runway, Runway 24 R. Although we are told that the portion of runway beyond the threshold limit will not be utilized for take-offs on either end, we cannot assume that these displaced thresholds won't be summarily removed and/or mid-field take offs facilitated by the longer runways. How does LAWA intend to account for threshold changes and mid-runway takeoffs in the environmental review?

Response:

The displaced threshold proposed for the Runway 6L end in numerous SPAS alternatives is intended to remove residences on the west end from the Runway Protection Zone (RPZ) for arriving aircraft. The displaced threshold proposed for the Runway 24R end is to preserve existing aircraft landing heights for aircraft arriving from the east. Implementation of a displaced threshold reduces the length of pavement available to a landing aircraft to less than the physical length of the runway. This is published by the Federal Aviation Administration (FAA) through the use of declared distances. For a complete explanation of declared distances, please refer to Response to Comment SPAS-PC00130-437. For example, Alternative 1 establishes dual displaced landing thresholds to shift the existing approach RPZ for Runway 6L eastward by 104 feet and would shift the existing approach RPZ for Runway 24 R westward by 604 feet. That westward shift should place the RPZ outside of any existing residential development (i.e., residences located east of Runway 24R would no longer be within the RPZ). (See page 4-513 of the SPAS Draft EIR.) The use of displaced thresholds will ensure compliance with FAA Advisory Circular 150/5300-13A, which specifies that residential and commercial uses are not permissible in an RPZ without further evaluation by the FAA. (See page 72 of FAA Advisory Circular 50/5300-13A, Section 4.7.2.6 of the SPAS Draft EIR, and Section 3.1.2 of the Preliminary LAX SPAS Report.)

Additionally, Runway 6L/24R is primarily an arrival runway. While departures may occur on the runway in various circumstances, the proposed design of the entrance and exit taxiways in the SPAS alternatives ensures that aircraft departing from Runway 6L/24R will be departing from the runway ends. All other taxiways for Runway 6L/24R are high-speed exit taxiways.

All SPAS Alternatives, including those that proposed modifications to the runways and which include displaced thresholds, were analyzed for environmental impacts throughout the SPAS Draft EIR. As far as "mid-runway" takeoffs are concerned, these are fairly rare and are discouraged by the FAA as a standard operating practice. A mid-runway takeoff (which is essentially a departure from any point on a runway except the very end), can be requested by a pilot. It is almost exclusively requested by pilots of small aircraft that do not require the full runway length to take off. Therefore, mid-runway takeoffs were not assumed in the SPAS Draft EIR simulation modeling for airfield operations or aircraft noise.

SPAS-PC00130-759

Comment:

Terminal 0 and use of Park One needs refinement and resolution before options are fixed.

Response:

The commentor provides no indication of what refinements are needed and/or what problems and issues need to be resolved relative to Terminal 0 and use of Park One. As such, it is not possible for LAWA to develop a specific response to this comment. However, all of the SPAS alternatives evaluated in the SPAS Draft EIR are conceptual and are analyzed at a program-level of detail. Additional, project-level design and refinement would occur prior to implementation of any component of any of the SPAS alternatives.

SPAS-PC00130-760

Comment:

LAWA knows that parking structures and pedestrian bridges are in poor condition and has discussed creating larger bridges above the ground level to improve vehicle traffic flow. LAWA has discussed using bridges as pathways to the terminals that are wide enough to include concessions and even allow for self check-in kiosks (that is becoming more normal in the airline industry) that could ultimately pay for these improvements. It would also free up space in the terminals. Why are they not included in the options to improve LAX?

Response:

Please see Response to Comment SPAS-PC00130-756 regarding maintenance of parking structures and pedestrian bridges, as well as improvements to pedestrian bridges to incorporate concessions and passenger check-in functions.

SPAS-PC00130-761

Comment:

The described roadway designs are very basic and ARSAC wants more detail on what improvements are expected to result. A roadway to TBIT directly out of the Central Terminal Area is an improvement, but why have other suggestions that have been made, such as a third level to separate buses and VIP vehicles, that would serve as emergency lanes and evacuation routes not been addressed? Why are evacuation routes, especially from the CTA, for various potential disasters not included?

Response:

In compliance with CEQA, the SPAS Draft EIR evaluates the proposed alternatives at a programmatic level. Any potential impacts associated with the proposed improvements and modifications will be analyzed further during project-level review, when design and engineering plans become available. (State CEQA Guidelines Section 15383; Koster v. County of San Joaquin (1996) 47 Cal.App.4th 29, 37.) This includes all potential modifications to the CTA, such as evacuation routes. Please see Response to Comment SPAS-PC00130-235 for a discussion of the appropriateness of the programmatic level of review.

Specific on-airport roadway improvements associated with the proposed SPAS alternatives and non-SPAS improvements are described on pages 4-1090 through 4-1093 and pages 4-1094 through 4-1096 in Section 4.12.1.6 of the SPAS Draft EIR, respectively. The results of the on-airport traffic analysis for each of the SPAS alternatives, which is based on these improvements, are provided in Section 4.12.1 of the SPAS Draft EIR. SPAS-related roadway improvements have been developed at a program level of planning for SPAS. Detailed design of the roadway improvements within the CTA, including the need for and physical constraints in providing for additional evacuation routes, will be determined during project-level planning and engineering design. Please see Response to Comment SPAS-PC00130-150 regarding the suggestion of a potential addition of a third level roadway for buses and emergency

vehicles. Please see Response to Comment SPAS-PC00130-217 for a discussion of emergency response plans and services.

SPAS-PC00130-762

Comment:

Why have surrounding area roads outside of the CTA have not been addressed in the document to fix flows during peak hours? LAWA should present data to show the extent of vehicles entering the CTA by direction during the peak hours and adjust their designs accordingly.

Response:

The existing and projected flow of traffic within the CTA was among the considerations during the development of the SPAS alternatives. Baseline and projected traffic volumes at curbside locations within the CTA are presented in Tables 4.12.1-16 and 4.12.1-17 on pages 4-1107 through and 4-1110 of the SPAS Draft EIR. The results of the curbside impact analysis presented in Table 4.12.1-41 on page 4-1167 through 4-1169, show that one location (the inner curbside at TBIT on the arrivals level) would be significantly impacted under all alternatives under Future (2025) with Alternatives conditions. The impact would be mitigated, however, with the implementation of mitigation measure MM-ST(OA)(SPAS)-1 described on page 4-1178 of the SPAS Draft EIR.

Section 4.12.1 of the SPAS Draft EIR presents an extensive analysis of operations and potential impacts within LAX, within and beyond the CTA. Section 4.12.2 of the SPAS Draft EIR presents an extensive traffic analysis to analyze the potential for impacts to occur on roads outside the CTA. The study area extends several miles to the south, east and north of LAX. For each location where a significant traffic impact was identified, Sections 4.12.1.10 and 4.12.2.7 identify potential mitigation measures and, where feasible, recommend their implementation.

SPAS-PC00130-763

Comment:

The FAA has granted waivers to use the taxiways that were designed for smaller aircraft in the 1960's in the proximity of terminals. Since larger Group V aircraft (i.e. Airbus A340-600 and Boeing 777-300ER) and Group VI aircraft (i.e. Airbus A380, Antonov An-124 and An-225, Lockheed C-5 Galaxy) require special handling procedures. We understand that they restrict free flow of aircraft to the runways. Why do none of the options to move a runway north address this critical taxiway efficiency issue?

Response:

The SPAS Draft EIR presents many alternatives that address taxiways and runways for Aircraft Design Group (ADG) V and VI aircraft. The descriptions for these alternatives can be found in Section 2.3.1 of the SPAS Draft EIR. In particular, the Alternative 5 airfield meets the minimum design requirements for a full ADG VI airfield, including an ADG VI Category II/III outboard runway and an ADG VI Category I inboard runway. Taxiway E and Taxilane D dimensions would meet ADG VI standards.

SPAS-PC00130-764

Comment:

What will be the Automated People Mover location and how will it facilitate traffic improvements? LAWA has discussed several locations including part of Park One, the parking structures, and terminal roofs. How will each of these options impact flow in the CTA? The structural integrity of existing structures that will be expected to carry the additional weight must be addressed in the DEIR.

Response:

The Automated People Mover (APM) proposed as a part of Alternatives 3 and 9 are depicted and described in Chapter 2 of the SPAS Draft EIR, and have been developed at a program level of planning for SPAS. These alternatives do not define the final APM system alignment and station locations within

the CTA or the system technology. The SPAS Draft EIR includes two alternatives - Alternatives 3 and 9 - that would extend an APM system into the CTA. These alternatives, as well as the other alternatives addressed in the SPAS Draft EIR, are at a program level of planning and design. The alignment and design of the APM line(s) within the CTA will be determined and addressed at the project level, should one of those alternatives be approved. Issues relating to design considerations, such as structural integrity of the proposed system, would be addressed in project-level design and environmental review. Please also see Response to Comment SPAS-PC00130-816.

The APM systems proposed by LAWA to connect airport facilities outside of the CTA with the terminal area would replace a number of LAX and commercial shuttles accessing the CTA. With implementation of an APM, buses serving new facilities like the ITF, GTC, and CONRAC, as well as some other of commercial modes and about five percent of the private vehicles currently accessing the CTA, would no longer access the CTA. Instead, the passengers would be dropped off or picked up at the new facilities, and would use the APM system to connect to the CTA. The APM system would have higher capacities and operate with higher average passenger loads than would the commercial vehicles that would otherwise access the CTA. Consequently, the use of an APM system would result in a net decrease in the number of commercial vehicles accessing the CTA.

SPAS-PC00130-765

Comment:

Only movement of Consolidated Rental Car Facility (ConRAC) to Manchester Square is described in the NOP and no other options are shown in the NOP. A ConRAC should significantly reduce bus traffic into the CTA by reducing the number of bus trips required to pick up and deliver rental car clients to one location. What is the specific location proposed in Manchester Square for ConRAC placement and how will people be moved to the CTA? What will be the anticipated vehicular traffic flow from the ConRAC and how is this modeled in the overall assessments of traffic for LAX?

Response:

Please see Response to Comment SPAS-PC00130-185 regarding which SPAS alternatives include development of a CONRAC and the location under each such alternative. Please see Appendix E2-2 of the Preliminary LAX SPAS Report for a discussion of alternatives that include a CONRAC, and Figures 2-8 and 2-9 of the SPAS Draft EIR for the specific location of the CONRAC facility in Manchester Square under Alternatives 8 and 9. Under Alternative 8, a dedicated busway will be constructed and move people between Manchester Square and the CTA. Similarly, in Alternative 9, an automated people mover will provide transportation between Manchester Square and the CTA. (See Section 2.3.1.9 of the SPAS Draft EIR.)

The traffic analyses for on-airport traffic impacts and off-airport traffic impacts both took into account the absence or the presence and location of a CONRAC under each of the SPAS alternatives (specifically, Alternatives 1, 2, 3, 4, 8, and 9, which propose ground access system improvements). Please see Section 4.12 of the SPAS Draft EIR for a discussion of each alternative that included a CONRAC, the assumptions used in the analysis, and the results of evaluation.

SPAS-PC00130-766

Comment:

Measures to reduce the use of rolling billboards (rental car and hotel buses) trips through the CTA must be addressed, as they distract drivers and thus create safety hazards.

Response:

The comment is noted. Please see Response to Comment SPAS-PC00130-398 regarding LAWA's trip reduction programs for both rental car and hotel shuttle operators. Furthermore, these trips occur under existing conditions which are not impacts of the SPAS alternatives. (See State CEQA Guidelines Sections 15125(a) and 15126.2(a); Watsonville Pilots Association v. City of Watsonville (2010) 183 Cal. App.4th 1059 ["The FEIR was not required to resolve the [existing] overdraft problem, a feat that was far

beyond its scope"].) The City of Los Angeles adopted a new ordinance in 2012, which provides for the removal of mobile billboard advertising displays; codified under Los Angeles Municipal Code Section 87.53. Such displays include advertising displays that are attached to a mobile, non-motorized vehicle, device, or bicycle that carries, pulls, or transports a sign or billboard, and is for the primary purpose of advertising. Additional regulations for motor vehicles which contain advertising affixed to the body of the vehicle, are provided under Los Angeles Municipal Code Section 87.54. These regulations preclude advertising which makes the vehicle unsafe to be driven.

SPAS-PC00130-767

Comment:

What kinds of traffic impacts are anticipated from the additional uses of Manchester Square, Belford Square and the areas between 96th Street and 98th Street? Are there plans by LAWA to help make these areas walkable from the hotels? Please describe them. Also what levels of vehicle traffic are anticipated to be added?

Response:

The future uses planned for Manchester Square vary by SPAS alternative and include parking (Alternatives 1-2), a Ground Transportation Center (Alternative 3) or parking and a consolidated rental car facility (Alternatives 8 and 9), and the traffic impacts associated with those uses are included in the transportation impact analyses of each alternative included in Sections 4.12.1 and 4.12.2 of the SPAS Draft EIR.

The comment also asks how future plans for the Belford area are addressed in the traffic impact analysis for the SPAS Draft EIR. No future land uses are assumed for the Belford area in the SPAS Draft EIR as LAWA has no development plans at this time for this property; any assumptions regarding future land uses would be purely speculative. The impacts of the SPAS alternatives are, and can be evaluated without considering future uses for the Belford area. Impacts associated with any future development of the Belford area would be addressed in CEQA documentation prepared at such time as development is proposed. Please also see Response to Comment SPAS-PC00130-216 for discussion of cumulative impact analysis methodology for transportation impacts. With regard to the question about "plans by LAWA to help make these areas walkable from the hotels," it is expected that future development there would be consistent with the objectives of the LAX Street Frontage and Landscape Development Plan Update that are listed in on page 4-12 in Section 4.1.3.1.1 of the SPAS Draft EIR, specifically, the enhancement of pedestrian, bicycle, and vehicular circulation on streets internal to or surrounding LAX.

SPAS-PC00130-768

Comment:

How will the Metro plans for a train system to LAX be accounted for in the LAX planning and the EIR? What train assumptions are made (both routes and stations)?

Response:

Please see Topical Response TR-SPAS-T-1 regarding transit options into LAX.

SPAS-PC00130-769

Comment:

Explain the effects the Next Generation Air Traffic Control System (NextGen) Performance-Based Navigation (PBN) may have on the environmental impact conclusions of this program level study- especially aircraft safety, aircraft traffic flows, noise, pollution (from airfield taxiing impacts and from changes to air approaches and take offs for both easterly and westerly operations), etc. Please map out the change in noise and pollution impacts for the surrounding areas. The maps should highly newly impacted areas and any increases of decreases in currently affected areas. What will be the noise and

pollution mitigation plans? Discussion of NextGen considerations need to include design and implementation of automated flight paths as well as for airspace design and obstacle clearance via Radar Area Navigation (RNAV) procedures in place and anticipated and Required Navigation Performance with on-aircraft performance and alerting capability (RNP). What percentage of Continuous Descent Approach and Tailored Arrivals are assumed now and in the future? Please address this topic in relationship to anticipated implementation per the chart below from the FAA website

(http://www.faa.gov/news/fact_sheets/news_story.cfm?newsId=8768):

Graphic in original Comment Letter in Attachment 5.

Several additional design option questions are listed in the 2008

Response:

Please see Section 2.3.2.4 of the SPAS Draft EIR and Section 5.7.4 of the Preliminary LAX SPAS Report regarding consideration of the Next Generation Air Transportation System relative to SPAS alternatives.

SPAS-PC00130-770

Comment:

What is the assumed fleet mix for the DEIR? Please list the make and model of aircraft including engine make and model and Auxiliary Power Unit (APU) make and model cross-referenced by airline. Include the current and expected fleet mixes.

Response:

The commentor is inquiring about the current and expected fleet mixes assumed in the SPAS Draft EIR analyses. Please refer to Appendix F-1 of the Preliminary LAX SPAS Report regarding the assumed 2009 Design Day Flight Schedule (DDFS) fleet mix (Table 8 on page 18) and the projected 2025 DDFS fleet mix (Table 12 on page 26). Tables 8 and 12 list the fleet mixes by Aircraft Design Group (ADG).

In response to the comment for additional details, expanded tables containing the assumed 2009 and 2025 DDFS fleet mixes by ADG and by aircraft type are provided below in Tables 1 and 2, with the key to aircraft codes provided in Table 3.

Appendix F-1 was prepared to evaluate passenger activity that may be projected to occur under the alternative airfield and terminal configurations at LAX analyzed in the SPAS Report from 2009 through 2025. Appendix F-1 did not contain engine makes and models because such information is typically part of large simulation input databases used in modeling aircraft noise and air quality, as opposed to passenger and operation forecasts. Engine makes and models are assigned by the Integrated Noise Model (INM) based on aircraft types. The Federal Aviation Administration (FAA) created a list of engine makes and models to be assumed in noise modeling as part of the model input database. In INM, each INM aircraft type is assigned an engine make and model. As discussed on page 5 in Section 2.3.3 of Appendix J1-1 of the SPAS Draft EIR, for aircraft not included in the INM aircraft database, the FAA developed a list of approved aircraft substitutions for use in the INM.

With regard to air quality modeling in EDMS v.5.1.3, FAA has identified the most common engine used with the majority of aircraft listed in that model, and those engines are used in the air quality modeling. Several commercial aircraft do not have a common engine identified, therefore, professional judgment was used to select the engine. EDMS also includes default APU assignments for each aircraft, the defaults are used in the air quality analysis. The final aircraft engines and APUs used in the air quality impact analysis are included in Table 3 noted above.

Appendix F-1 does not provide information about which aircraft would be operated by which airline because this information is not available at this time, and it would be speculative to make such assumptions. An EIR's project description should not provide extensive detail beyond that needed for

evaluation and review of a project's environmental impacts. (State CEQA Guidelines Section 15124.) Also, for the purposes of the analysis in the SPAS Draft EIR, including operational analysis, noise, and air quality, it was not necessary to identify the airlines associated with specific aircraft. The information disclosed and analyzed was sufficient to provide decision-makers with information which enables them to make a decision which intelligently takes account of the project's environmental consequences. (See State CEQA Guidelines Section 15151.)

Table 1

LAX 2009 Design Day Flight Schedule
Aircraft Fleet Mix by Aircraft Design Group and Aircraft Type

Aircraft Design Group/ Aircraft Type	Numbers of Daily Operations				
	Passenger[1]	Cargo	GA	Military	Total
ADG I					**10**
BE19	2				2
BE36			1		1
LJ45	2			2	4
LJ60			2		2
P180	1				1
ADG II					**334**
B190		1	10		11
BE20			2		2
C441			1		1
C550			2		2
C560	2		2		4
C750	3		2		5
CL60			4	2	6
CRJ-700	99				99
EMB-120	116				116
ERJ-140	66				66
F2TH	2		2		4
F900			2		2
GALX			2		2
GLF4			8		8
H25B	2		2	2	6
ADG III					**757**
318	11				11
319	78				78
320	150				150
321	20				20
717-200	2				2
737-300	74				74
737-400	13				13
737-500	8				8
737-700	173				173
737-700 (with winglets)	2				2
737-800	68				68
737-800 (with winglets)	38				38
737-900	13				13
CRJ-705	2				2
CRJ-900	5				5
DH4	24				24
EMB-190	18				18
GLF5			4		4
MD-80	30				30
MD-83	22				22
MD-90	2				2
ADG IV					**313**
300		2			2

Table 1

LAX 2009 Design Day Flight Schedule
Aircraft Fleet Mix by Aircraft Design Group and Aircraft Type

Aircraft Design Group/ Aircraft Type	Numbers of Daily Operations				
	Passenger[1]	Cargo	GA	Military	Total
310		2			2
300-600		4			4
757-200	179				179
757-300	27				27
767-200	22	4			26
767-300	46	5			51
C130				2	2
DC-10		11			11
DC-87		2			2
MD-11		7			7
ADG V					**147**
340-300	8				8
340-500	4				4
340-600	10				10
747-200		2			2
747-400	54	18			72
777-200	33				33
777-200 LR	6				6
777-300	2				2
777-300 ER	10				10
ADG VI					**2**
380-800	2				2
Totals	**1,451**	**58**	**46**	**8**	**1,563**

[1] Includes both scheduled and non-scheduled passenger operations.

Source: Ricondo & Associates, Inc., October 2012 (numbers of daily operations by ADG and aircraft type).

Table 2

LAX 2025 Design Day Flight Schedule
Aircraft Fleet Mix by Aircraft Design Group and Aircraft Type

Aircraft Design Group/ Aircraft Type	Numbers of Daily Operations				
	Passenger[1]	Cargo	GA	Military	Total
ADG I					**12**
BE19			2		2
BE36			2		2
LJ45	2			2	4
LJ60			3		3
P180	1				1
ADG II					**432**
B190		2	10		12
BE20			2		2
C441			2		2
C550			2		2
C560	2		2		4
C750	4		2		6

Table 2

LAX 2025 Design Day Flight Schedule
Aircraft Fleet Mix by Aircraft Design Group and Aircraft Type

Aircraft Design Group/ Aircraft Type	Numbers of Daily Operations				
	Passenger[1]	Cargo	GA	Military	Total
CL60			4	2	6
CRJ-700	156				156
EMB-120	136				136
ERJ-140	84				84
F2TH	2		2		4
F900			2		2
GALX			2		2
GLF4			8		8
H25B	2		2	2	6
ADG III					**954**
318	2				2
319	52				52
320	162				162
321	57				57
737-300	70				70
737-400	2				2
737-700	17				17
737-700 (with winglets)	196				196
737-800	219				219
737-800 (with winglets)	36				36
737-900	48				48
CRJ-900	51				51
EMB-190	22				22
GLF5			4		4
MD-80	16				16
ADG IV					**401**
300		2			2
310		2			2
300-600		4			4
757-200	156				156
757-300	28				28
767-200	24	4			28
767-300	156	6			162
C130				2	2
DC-10		5			5
DC-87		2			2
MD-11		10			10
ADG V					**215**
330-300	6				6
340-300	14				14
340-500	2				2
340-600	6				6
747-200		4			4
747-400	46	15			61
777-200	50	6			56
777-200 LR	10				10
777-300	11				11
777-300 ER	12				12
787-800	13				13
787-900	20				20

Table 2

LAX 2025 Design Day Flight Schedule
Aircraft Fleet Mix by Aircraft Design Group and Aircraft Type

Aircraft Design Group/ Aircraft Type	Numbers of Daily Operations				
	Passenger[1]	Cargo	GA	Military	Total
ADG VI					**39**
380-800	27				27
747-800	4	8			12
Totals	**1,924**	**70**	**51**	**8**	**2,053**

[1] Includes both scheduled and non-scheduled passenger operations.

Source: Ricondo & Associates, Inc., October 2012 (numbers of daily operations by ADG and aircraft type).

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Table 3

Key Table

INM Aircraft		EDMS v.5.1.3 Engine and APU Assignments			
Aircraft Code	**Aircraft**	**EDMS Aircraft Code**	**EDMS Aircraft Description**	**Assigned Engine**	**Assigned APU Model**
300	AIRBUS INDUSTRIE A300	A300B4-2	Airbus A300B4-200 Series	CF6-50C2 Low emissions fuel nozzle	APU TSCP700-4B (142 HP)
310	AIRBUS INDUSTRIE A310	A310-2	Airbus A310-200 Series	CF6-80A3	APU GTCP331-200ER (143 HP)
318	AIRBUS INDUSTRIE A318	A318-1	Airbus A318-100 Series	CFM56-5B8/P SAC	APU GTCP 36-300 (80HP)
319	AIRBUS INDUSTRIE A319	A319-1	Airbus A319-100 Series	CFM56-5B6/P	APU GTCP 36-300 (80HP)
320	AIRBUS INDUSTRIE A320	A320-2	Airbus A320-200 Series	V2527-A5	APU GTCP 36-300 (80HP)
321	AIRBUS INDUSTRIE A321	A321-1	Airbus A321-100 Series	V2530-A5	APU GTCP 36-300 (80HP)
300-600	AIRBUS INDUSTRIE A300-600	A300F4-6	Airbus A300F4-600 Series	PW4158 Reduced smoke	APU GTCP331-200ER (143 HP)
330-300	AIRBUS INDUSTRIE A330-300	A330-3	Airbus A330-300 Series	CF6-80C2B8FA 1862M39	APU GTCP 331-350
340-300	AIRBUS INDUSTRIE A340-300	A340-3	Airbus A340-300 Series	CFM56-5C3	APU GTCP 331-350
340-500	AIRBUS INDUSTRIE A340-500	A340-5	Airbus A340-500 Series	Trent 556-61 Phase5 Tiled	APU GTCP 331-350
340-600	AIRBUS INDUSTRIE A340-600	A340-6	Airbus A340-600 Series	Trent 556-61 Phase5 Tiled	APU GTCP 331-350
380-800	AIRBUS INDUSTRIE A380-800	A380-8	Airbus A380-800	GE90-90B	APU GTCP 331-350
717-200	BOEING 717-200	B717-2	Boeing 717-200 Series	BR700-715A1-30 Improved fuel injector	APU GTCP 85 (200 HP)
737-300	BOEING 737-300	B737-3	Boeing 737-300 Series	CFM56-3-B1	APU GTCP85-129 (200 HP)
737-400	BOEING 737-400	B737-4	Boeing 737-400 Series	CFM56-3-B1	APU GTCP85-129 (200 HP)
737-500	BOEING 737-500	B737-5	Boeing 737-500 Series	CFM56-3C-1	APU GTCP85-129 (200 HP)
737-700	BOEING 737-700	B737-7	Boeing 737-700 Series	CFM56-7B22	APU 131-9
737-700 (with winglets)	BOEING 737-700	B737-7	Boeing 737-700 Series	CFM56-7B22	APU 131-9
737-800	BOEING 737-800	B737-8	Boeing 737-800 Series	CFM56-7B26	APU 131-9
737-800 (with winglets)	BOEING 737-800	B737-8	Boeing 737-800 Series	CFM56-7B26	APU 131-9
737-900	BOEING 737-900	B737-9	Boeing 737-900 Series	CFM56-7B24	APU 131-9
747-200	BOEING 747-200	B747-2	Boeing 747-200 Series	CF6-50E2 Low emissions fuel nozzle	APU GTCP 660 (300 HP)
747-400	BOEING 747-400	B747-4	Boeing 747-400 Series	PW4084D	APU PW901A
747-800	BOEING 747-800	B747-4F	Boeing 747-400 Freighter	PW4056	APU PW901A
757-200	BOEING 757-200	B757-2	Boeing 757-200 Series	PW2040	APU GTCP331-200ER (143 HP)
757-300	BOEING 757-300	B757-3	Boeing 757-300 Series	PW2040	APU GTCP331-200ER (143 HP)
767-200	BOEING 767-200	B767-2	Boeing 767-200 Series	CF6-80A	APU GTCP331-200ER (143 HP)
767-300	BOEING 767-300	B767-3	Boeing 767-300 Series	CF6-80A2	APU GTCP331-200ER (143 HP)
777-200	BOEING 777-200	B777-2	Boeing 777-200 Series	PW4077	APU GTCP331-500 (143 HP)
777-200 LR	BOEING 777-200LR	B777-2LR	Boeing 777-200-LR	GE90-115B DAC	APU GTCP331-500 (143 HP)
777-300	BOEING 777-300	B777-3	Boeing 777-300 Series	GE90-115B DAC	APU GTCP331-500 (143 HP)
777-300 ER	BOEING 777-300ER	B777-2ER	Boeing 777-200-ER	GE90-115B DAC	APU GTCP331-500 (143 HP)
787-800	BOEING 787-800	B787-800[1]	Boeing 787-800[1]	CF6-80C2B7F 1862M39	APU GTCP331-500 (143 HP)
787-900	BOEING 787-900	B787-900[1]	Boeing 787-900[1]	CF6-80C2B7F 1862M39	APU GTCP331-500 (143 HP)
B190	BEECH 1900	BEECH1900-D	Raytheon Beech 1900-D	PT6A-67D	No APU
BE19	BEECH SPORT 19/MUSKETEER SPORT	BEECH18	Raytheon Beech 18	TPE331-1	No APU
BE20	BEECH SUPER KING AIR 200	BEECH18	Raytheon Beech 18	TPE331-1	No APU
BE36	BEECH BONANZA 36	BEECH36	Raytheon Beech Bonanza 36	TIO-540-J2B2	No APU
C130	C-130 HERCULES	MIL-C130	Lockheed C-130 Hercules	T56-A-15	No APU
C441	CESSNA 441	CNA441	Cessna 441 Conquest II	TPE331-10	No APU
C550	CESSNA 550 CITATION BRAVO	CNA550	Cessna 550 Citation II	JT15D-4 series	No APU
C560	CESSNA 560 CITATION V	CNA560	Cessna 560 Citation V	JT15D-5, -5A, -5B	No APU
C750	CESSNA 750 CITATION X	CNA750	Cessna 750 Citation X	AE3007C Type 2	No APU
CL60	CANADAIR BOMBARDIER CL600/610 CHALLENGER	CL600	Bombardier Challenger 600	ALF 502L-2	APU GTCP 36-100
CRJ-700	CANADAIR REGIONAL JET 700	CRJ7	Bombardier CRJ-700	CF34-8C1	APU GTCP 85 (200 HP)
CRJ-705	CANADAIR REGIONAL JET 705	CRJ705-LR	Bombardier CRJ-705-LR	CF34-8C5 LEC	APU GTCP 85 (200 HP)
CRJ-900	CANADAIR REGIONAL JET 900	CRJ9	Bombardier CRJ-900	CF34-8C5 LEC	APU GTCP 85 (200 HP)
DC-10	MCDONNELL DOUGLAS DC-10	DC10-1	Boeing DC-10-10 Series	CF6-6D	APU TSCP700-4B (142 HP)
DC-87	MCDONNELL DOUGLAS DC-8-70	DC8-7	Boeing DC-8 Series 70	CFM56-2A series	APU GTCP85-98 (200 HP)
DH4	DE HAVILLAND DHC8-400 DASH 8Q	ERJ190-LR	Embraer ERJ190-LR	CF34-10E	No APU
EMB-120	EMBRAER 120 BRASILIA	EMB120	Embraer EMB120 Brasilia	PW118B	APU GTCP 36-150[]
EMB-190	EMBRAER 190	ERJ190-LR	Embraer ERJ190-LR	CF34-10E	No APU
ERJ-140	EMBRAER RJ140	ERJ140	Embraer ERJ140	AE3007A1/3 Type 3 (reduced emissions)	APU GTCP 36-150[]
F2TH	DASSAULT FALCON 2000	FAL2000	Dassault Falcon 2000	PW308C Annular	APU GTCP 36-150[]
F900	DASSAULT FALCON 900	FAL900EX	Dassault Falcon 900-EX	TFE731-3	APU GTCP 36-150[]

Table 3

Key Table

INM Aircraft		EDMS v.5.1.3 Engine and APU Assignments			
Aircraft Code	**Aircraft**	**EDMS Aircraft Code**	**EDMS Aircraft Description**	**Assigned Engine**	**Assigned APU Model**
GALX	GULFSTREAM G200	IAI1126	Israel IAI-1126 Galaxy	PW306A Annular	No APU
GLF4	GULFSTREAM IV	GULF450	Gulfstream G450	TAY 611-8C Transply IIJ	APU GTCP 36-100
GLF5	GULFSTREAM V	GULF5	Gulfstream G500	BR700-710A1-10	APU GTCP 36 (80HP)
H25B	RAYTHEON BAE-125-700/800	HS125-3	Hawker HS-125 Series 3	TFE731-3	No APU
LJ45	LEARJET 45	LEAR45	Bombardier Learjet 45	TFE731-2-2B	No APU
LJ60	LEARJET 60	LEAR60	Bombardier Learjet 60	TFE731-2/2A	No APU
MD-11	MCDONNELL DOUGLAS MD-11	MD11	Boeing MD-11	CF6-80C2D1F 1862M39	APU TSCP700-4B (142 HP)
MD-80	MCDONNELL DOUGLAS MD-80	MD83	Boeing MD-83	JT8D-219 Environmental Kit (E_Kit)	APU GTCP85-98 (200 HP)
MD-83	MCDONNELL DOUGLAS MD-83	MD83	Boeing MD-83	JT8D-219 Environmental Kit (E_Kit)	APU GTCP85-98 (200 HP)
MD-90	MCDONNELL DOUGLAS MD-90	MD90	Boeing MD-90	V2525-D5	APU 131-9
P180	PIAGGIO AERO AVANTI II	P180	Piaggio P.180 Avanti	PT6A-66	No APU

[1] Not in EDMS v.5.1.3. Flight profile based on B767-300 with CF6-80C2B7F 1862M39 engine. Assumed same APU as B777.

Source: Ricondo & Associates, Inc., October 2012.

SPAS-PC00130-771

Comment:

What is the assumed flight schedule for the DEIR? Please include the current schedule and future expected schedule. The schedule should include time, origin or destination airport, airline, aircraft make and model, engine make and model and APU make and model.

Response:

Please note that this comment requests information on flight assumptions much more detailed than that needed to assess the environmental impacts of the SPAS alternatives. An EIR's project description should not provide extensive detail beyond that needed for evaluation and review of a project's environmental impacts. (State CEQA Guidelines Section 15124.) Nevertheless, additional details on flight assumptions requested by the comment are presented below.

Please refer to Sections 3 and 4 in Appendix F-1 of the Preliminary LAX SPAS Report regarding the assumptions, methodology, and results of the development of the 2009 and 2025 Design Day Flight Schedules. In response to the comment, the entire 2009 and 2025 DDFSs are provided in tabular format below (Tables 1, 2, 3, and 4). As requested, time, origin and destination airport, airline and aircraft make and model were provided.

Refer to Response to Comment SPAS-PC-00130-770 regarding information on engine makes and models, and auxiliary power units (APU) makes and models assumed in the SPAS Draft EIR analyses.

Table 1

2009 Baseline Design Day Flight Schedule

A/D	Activity Type	Operator	Equipment	Origin/Dest.	Flight No.	Time	Passengers	Seats
A	CARGO_AC	ABX	762	MEX	ABX873	0:10	0	0
A	CARGO_AC	GEC	MD11	FRA	GEC861	1:40	0	0
A	CARGO_AC	ATN	DC87	TOL	ATN865	2:50	0	0
A	CARGO_AC	FDX	306	SNA	FDX887	3:20	0	0
A	CARGO_AC	CAL	744	TPE	CAL881	3:30	0	0
A	CARGO_AC	SHQ	MD11	PVG	SHQ862	3:30	0	0
A	CARGO_AC	JAL	744	NRT	JAL877	4:20	0	0
A	CARGO_AC	SQC	744	SIN	SQC882	4:20	0	0
A	CARGO_AC	FDX	MD11	HNL	FDX863	4:20	0	0
A	CARGO_AC	GTI	744	JFK	GTI875	4:40	0	0
A	CARGO_AC	FDX	310	OAK	FDX885	5:40	0	0
A	CARGO_AC	FDX	MD11	MEM	FDX864	6:10	0	0
A	CARGO_AC	FDX	DC10	MEM	FDX870	6:50	0	0
A	CARGO_AC	FDX	DC10	MEM	FDX8701	7:50	0	0
A	CARGO_AC	CKK	744	PVG	CKK879	9:50	0	0
A	CARGO_AC	NCA	744	NRT	NCA880	15:40	0	0
A	CARGO_AC	KAL	744	ICN	KAL883	16:10	0	0
A	CARGO_AC	FDX	DC10	IND	FDX869	17:10	0	0
A	CARGO_AC	FDX	306	EWR	FDX886	17:30	0	0
A	CARGO_AC	CAO	744	PVG	CAO876	17:30	0	0
A	CARGO_AC	CLX	744	LUX	CLX878	18:10	0	0
A	CARGO_AC	UPS	763	SDF	UPS871	19:40	0	0
A	CARGO_AC	FDX	DC10	MEM	FDX867	20:30	0	0
A	CARGO_AC	ABX	762	CVG	ABX874	20:50	0	0
A	CARGO_AC	TNO	300	GDL	TNO888	21:10	0	0
A	CARGO_AC	FDX	DC10	AFW	FDX868	21:20	0	0
A	CARGO_AC	CKS	742	HNL	CKS994	22:10	0	0
A	CARGO_AC	MAA	763	MEX	MAA872	23:20	0	0
A	CARGO_AT	AMF	B190	PHX	AMF884	22:50	0	0
A	GA	N	B190	VNY	N857	1:00	0	0
A	GA	N	BE20	PMD	N855	7:08	0	0
A	GA	N	C560	SFO	N852	7:51	0	0

Table 1

2009 Baseline Design Day Flight Schedule

A/D	Activity Type	Operator	Equipment	Origin/Dest.	Flight No.	Time	Passengers	Seats
A	GA	N	LJ60	LAS	N838	8:48	0	0
A	GA	N	C750	SJC	N851	8:54	0	0
A	GA	N	B190	LAS	N858	10:07	0	0
A	GA	N	BE19	PMD	N856	10:54	0	0
A	GA	N	B190	PMD	N859	11:40	0	0
A	GA	N	GLF5	STL	N841	12:25	0	0
A	GA	N	H25B	LAS	N839	13:04	0	0
A	GA	N	F2TH	STL	N848	13:30	0	0
A	GA	N	GLF5	IAD	N840	14:17	0	0
A	GA	N	GLF4	SFO	N842	14:36	0	0
A	GA	N	GLF4	LAS	N845	15:45	0	0
A	GA	N	GALX	LAS	N846	16:24	0	0
A	GA	N	B190	PMD	N860	16:30	0	0
A	GA	N	GLF4	SNA	N844	17:11	0	0
A	GA	N	GLF4	SJC	N843	17:22	0	0
A	GA	N	CL60	TEB	N850	18:10	0	0
A	GA	N	C441	PMD	N854	20:00	0	0
A	GA	N	CL60	APA	N849	21:55	0	0
A	GA	N	C550	LAS	N853	22:32	0	0
A	GA	N	F900	SBA	N847	23:20	0	0
A	MIL	MI	CL60	SFO	MI837	9:00	0	0
A	MIL	MI	LJ45	SDM	MI836	11:20	0	0
A	MIL	MI	H25B	LAS	MI835	12:20	0	0
A	MIL	MI	C130	SDL	MI834	15:15	0	0
A	SchedPax	AA	762	JFK	185	0:14	159	168
A	SchedPax	UA	320	IAD	925	0:23	131	138
A	SchedPax	CO	738	IAH	595	0:25	141	157
A	SchedPax	TA	320	GUA	510	0:30	107	150
A	SchedPax	CX	744	DFW	91	2:25	276	383
A	SchedPax	DL	757	LIH	1736	4:39	166	183
A	SchedPax	UA	752	OGG	46	4:40	159	182
A	SchedPax	UA	752	KOA	58	4:41	140	182
A	SchedPax	CO	757	HNL	12	5:00	160	175
A	SchedPax	UA	763	HNL	84	5:00	160	183
A	SchedPax	UA	752	LIH	68	5:05	152	182
A	SchedPax	AA	757	OGG	14	5:05	180	190
A	SchedPax	DL	757	KOA	1768	5:07	154	183
A	SchedPax	AA	757	LIH	286	5:20	172	190
A	SchedPax	DL	757	OGG	1212	5:25	117	183
A	SchedPax	AA	757	KOA	246	5:30	169	190
A	SchedPax	AA	757	HNL	298	5:38	177	190
A	SchedPax	A296	EM2	IYK	6281	6:03	12	30
A	SchedPax	DL	77L	SYD	16	6:10	188	276
A	SchedPax	NW	753	HNL	622	6:27	213	224
A	SchedPax	A296	CRJ	FAT	6024	6:30	34	50
A	SchedPax	QF	744	SYD	107	6:40	332	379
A	SchedPax	LY	772	TLV	5	6:40	233	279
A	SchedPax	LA	763	LIM	600	6:50	161	221
A	SchedPax	A296	EM2	PSP	6312	6:53	16	30
A	SchedPax	A296	EM2	SBA	6364	6:53	21	30
A	SchedPax	HA	763	HNL	4	6:55	227	252
A	SchedPax	MQ	ERD	FAT	3014	6:55	29	44
A	SchedPax	AS	73H	ANC	150	6:56	131	157
A	SchedPax	A296	CR7	SLC	6465	6:56	38	66
A	SchedPax	A296	EM2	SMX	6457	6:58	20	30
A	SchedPax	QF	744	BNE	15	7:00	282	379
A	SchedPax	A296	CR7	SAT	6435	7:02	55	66
A	SchedPax	UA	32S	LAS	282	7:05	85	138
A	SchedPax	MQ	ERD	SAN	3004	7:05	32	44

Table 1

2009 Baseline Design Day Flight Schedule

A/D	Activity Type	Operator	Equipment	Origin/Dest.	Flight No.	Time	Passengers	Seats
A	SchedPax	UA	752	OGG	30	7:11	159	182
A	SchedPax	A296	CR7	SAN	6100	7:12	50	66
A	SchedPax	WN	733	LAS	100	7:15	93	137
A	SchedPax	WN	73G	OAK	3997	7:20	84	137
A	SchedPax	A296	CR7	PHX	6523	7:20	57	66
A	SchedPax	UA	320	SFO	111	7:22	106	138
A	SchedPax	AA	757	DFW	2401	7:24	171	190
A	SchedPax	MX	318	MLM	128	7:30	73	100
A	SchedPax	QF	744	AKL	25	7:30	180	379
A	SchedPax	QF	744	MEL	93	7:30	343	379
A	SchedPax	QX	DH4	RNO	2441	7:30	60	74
A	SchedPax	A296	CRJ	SMF	6463	7:32	45	50
A	SchedPax	MQ	ERD	SBA	3034	7:35	32	44
A	SchedPax	WN	733	SMF	3811	7:40	98	137
A	SchedPax	WN	73G	ABQ	609	7:40	106	137
A	SchedPax	QX	DH4	STS	2467	7:40	57	74
A	SchedPax	A296	EM2	OXR	6299	7:43	12	30
A	SchedPax	A296	EM2	YUM	6480	7:45	14	30
A	SchedPax	A296	EM2	SGU	6432	7:46	12	30
A	SchedPax	VX	320	SFO	920	7:50	121	149
A	SchedPax	A296	CR7	TUS	6517	7:53	51	66
A	SchedPax	OO	CRJ	SLC	4515	7:53	41	50
A	SchedPax	WN	73G	SJC	3374	7:55	79	137
A	SchedPax	WN	73G	SLC	1163	7:55	78	137
A	SchedPax	MX	320	BJX	112	7:56	123	150
A	SchedPax	NW	320	TPA	649	7:58	140	148
A	SchedPax	A296	EM2	FAT	6239	7:59	20	30
A	SchedPax	NW	320	DTW	5536	8:00	142	148
A	SchedPax	A296	CR7	SJC	6500	8:04	50	66
A	SchedPax	WN	733	SFO	393	8:05	86	137
A	SchedPax	NW	320	LAS	628	8:07	89	148
A	SchedPax	US	319	LAS	101	8:10	89	124
A	SchedPax	WN	73G	RNO	3682	8:10	105	137
A	SchedPax	AM	737	GDL	460	8:15	102	124
A	SchedPax	WN	73G	DEN	3922	8:15	96	137
A	SchedPax	WN	73G	OAK	2921	8:20	84	137
A	SchedPax	QX	DH4	PRC	2497	8:20	56	74
A	SchedPax	UA	319	IAD	492	8:23	114	120
A	SchedPax	UA	752	SFO	261	8:23	140	182
A	SchedPax	WN	733	SMF	2207	8:25	98	137
A	SchedPax	A296	EM2	SAN	6320	8:28	23	30
A	SchedPax	A296	CR7	PDX	6076	8:29	58	66
A	SchedPax	WN	73G	LAS	224	8:30	93	137
A	SchedPax	WN	733	PHX	3442	8:35	92	137
A	SchedPax	F9	319	DEN	401	8:37	126	136
A	SchedPax	A296	EM2	PSP	6314	8:37	16	30
A	SchedPax	VX	320	SEA	780	8:40	139	149
A	SchedPax	AA	M80	AUS	311	8:40	126	140
A	SchedPax	MX	319	CUN	947	8:43	96	120
A	SchedPax	AS	73H	SEA	240	8:43	135	157
A	SchedPax	US	320	PHX	24	8:55	137	150
A	SchedPax	UA	32S	LAS	797	8:55	85	138
A	SchedPax	SY	738	MSP	421	8:55	135	162
A	SchedPax	WN	73G	SFO	1075	9:00	86	137
A	SchedPax	KE	772	NRT	1	9:00	197	301
A	SchedPax	MQ	ERD	SAN	3024	9:00	32	44
A	SchedPax	UA	752	ORD	103	9:03	170	182
A	SchedPax	DL	73H	GDL	456	9:04	145	160
A	SchedPax	DL	73H	MCO	1479	9:04	144	160

Table 1

2009 Baseline Design Day Flight Schedule

A/D	Activity Type	Operator	Equipment	Origin/Dest.	Flight No.	Time	Passengers	Seats
A	SchedPax	AA	M80	SFO	1929	9:05	125	140
A	SchedPax	AA	738	DFW	2407	9:10	133	148
A	SchedPax	DL	757	ATL	110	9:10	176	183
A	SchedPax	CO	757	IAH	495	9:10	158	175
A	SchedPax	UA	320	DEN	125	9:13	123	138
A	SchedPax	A296	EM2	CLD	6200	9:15	10	30
A	SchedPax	TN	343	PPT	102	9:20	243	294
A	SchedPax	WN	733	OAK	410	9:20	84	137
A	SchedPax	AS	73H	PDX	244	9:20	130	157
A	SchedPax	AA	M83	ORD	2099	9:20	132	140
A	SchedPax	UA	752	SFO	272	9:23	140	182
A	SchedPax	AS	734	SFO	720	9:24	118	144
A	SchedPax	A296	EM2	SAN	6321	9:24	23	30
A	SchedPax	VX	320	IAD	89	9:25	124	149
A	SchedPax	QX	DH4	MFR	2421	9:25	67	74
A	SchedPax	AS	739	YVR	258	9:30	155	172
A	SchedPax	NW	744	NRT	2	9:30	349	403
A	SchedPax	MQ	ERD	SJC	3175	9:30	36	44
A	SchedPax	DL	M90	SLC	1173	9:34	123	150
A	SchedPax	WN	733	ELP	620	9:35	104	137
A	SchedPax	WN	733	LAS	1726	9:35	93	137
A	SchedPax	WN	733	TUS	818	9:35	95	137
A	SchedPax	WN	73G	SMF	1954	9:35	98	137
A	SchedPax	AA	762	JFK	201	9:35	159	168
A	SchedPax	CO	738	EWR	1002	9:36	154	157
A	SchedPax	UA	757	JFK	23	9:37	103	110
A	SchedPax	WN	73G	MCI	1547	9:40	120	137
A	SchedPax	UA	763	DEN	979	9:42	164	183
A	SchedPax	UA	752	BOS	163	9:43	172	182
A	SchedPax	QF	388	SYD	11	9:45	395	450
A	SchedPax	AS	739	SEA	452	9:45	148	172
A	SchedPax	A296	CRJ	TUS	6509	9:45	38	50
A	SchedPax	US	321	CLT	1431	9:46	177	183
A	SchedPax	MX	319	GDL	912	9:50	97	120
A	SchedPax	WN	733	AUS	790	9:50	118	137
A	SchedPax	A296	EM2	SBA	6368	9:50	21	30
A	SchedPax	UA	319	BWI	477	9:53	114	120
A	SchedPax	AC	E90	YVR	550	9:59	80	93
A	SchedPax	F9	319	DEN	403	10:00	126	136
A	SchedPax	MX	320	MEX	900	10:00	126	150
A	SchedPax	AA	738	DFW	2411	10:04	133	148
A	SchedPax	QX	DH4	BOI	2415	10:05	60	74
A	SchedPax	DL	757	ATL	2081	10:06	176	183
A	SchedPax	WN	733	SFO	1464	10:10	86	137
A	SchedPax	MQ	ERD	SBA	3038	10:10	32	44
A	SchedPax	DL	73H	JFK	701	10:11	153	160
A	SchedPax	AC	E90	YYC	568	10:12	80	93
A	SchedPax	A296	EM2	SAN	6322	10:12	23	30
A	SchedPax	VX	320	BOS	363	10:15	136	149
A	SchedPax	US	321	PHL	797	10:16	175	183
A	SchedPax	NW	320	MEM	179	10:19	139	148
A	SchedPax	WN	733	OAK	316	10:20	84	137
A	SchedPax	AA	777	NRT	170	10:20	167	247
A	SchedPax	MQ	ERD	FAT	3016	10:20	29	44
A	SchedPax	UA	744	SYD	840	10:21	302	374
A	SchedPax	UA	763	ORD	842	10:21	171	183
A	SchedPax	UA	32S	SFO	877	10:22	106	138
A	SchedPax	VX	320	JFK	403	10:25	141	149
A	SchedPax	WN	733	SJC	1689	10:25	79	137

Table 1

2009 Baseline Design Day Flight Schedule

A/D	Activity Type	Operator	Equipment	Origin/Dest.	Flight No.	Time	Passengers	Seats
A	SchedPax	KE	744	ICN	17	10:25	280	335
A	SchedPax	QK	CRA	YEG	8594	10:26	65	75
A	SchedPax	YV	CRJ	PHX	2705	10:32	46	50
A	SchedPax	DL	738	SLC	1175	10:33	123	150
A	SchedPax	AS	739	LTO	263	10:34	58	172
A	SchedPax	YX	717	MCI	450	10:35	90	99
A	SchedPax	WN	73G	PHX	836	10:35	92	137
A	SchedPax	AA	777	MIA	299	10:35	227	247
A	SchedPax	DL	738	CVG	1121	10:37	145	150
A	SchedPax	OO	CR9	SLC	4701	10:39	58	70
A	SchedPax	TN	343	PPT	8	10:40	243	294
A	SchedPax	WN	73G	LAS	173	10:40	93	137
A	SchedPax	QX	DH4	PDX	2605	10:40	71	74
A	SchedPax	A296	EM2	OXR	6296	10:40	12	30
A	SchedPax	A296	EM2	IPL	6279	10:41	8	30
A	SchedPax	AC	320	YYZ	789	10:44	135	146
A	SchedPax	AA	757	BOS	25	10:44	183	190
A	SchedPax	CO	753	CLE	735	10:45	199	216
A	SchedPax	MQ	ERD	SAN	3046	10:45	32	44
A	SchedPax	MQ	ERD	SJC	3173	10:45	36	44
A	SchedPax	NW	757	DTW	658	10:47	175	182
A	SchedPax	AS	734	SEA	246	10:50	124	144
A	SchedPax	WN	73G	DEN	1052	10:50	96	137
A	SchedPax	FL	73G	MKE	217	10:50	129	137
A	SchedPax	AA	M80	DEN	1469	10:50	110	140
A	SchedPax	AA	M83	STL	417	10:50	121	140
A	SchedPax	US	319	LAS	103	10:52	89	124
A	SchedPax	CO	753	IAH	1495	10:52	194	216
A	SchedPax	AA	M80	LAS	774	10:54	119	140
A	SchedPax	NW	757	MSP	742	10:57	170	182
A	SchedPax	A296	CR7	YVR	6429	10:59	52	66
A	SchedPax	A296	EM2	BFL	6152	10:59	19	30
A	SchedPax	WN	73G	MDW	985	11:00	127	137
A	SchedPax	A296	EM2	PSP	6315	11:00	16	30
A	SchedPax	UA	319	SFO	202	11:02	92	120
A	SchedPax	A296	CR7	ABQ	6473	11:02	49	66
A	SchedPax	A296	CR7	SJC	6499	11:05	50	66
A	SchedPax	A296	EM2	MRY	6294	11:05	22	30
A	SchedPax	FL	73G	ATL	55	11:10	132	137
A	SchedPax	NH	777	NRT	6	11:10	261	382
A	SchedPax	AA	M83	SFO	1268	11:10	125	140
A	SchedPax	AA	738	IAD	149	11:13	135	148
A	SchedPax	UA	777	IAD	867	11:13	245	258
A	SchedPax	MX	320	GDL	936	11:15	121	150
A	SchedPax	AA	757	DFW	2413	11:15	171	190
A	SchedPax	UA	744	NRT	890	11:19	306	374
A	SchedPax	AM	737	MEX	19	11:20	108	124
A	SchedPax	WN	73G	OAK	3969	11:20	84	137
A	SchedPax	JL	744	NRT	62	11:20	431	546
A	SchedPax	MQ	ERD	SAN	3054	11:20	32	44
A	SchedPax	AC	319	YUL	797	11:24	108	120
A	SchedPax	CO	753	EWR	1402	11:24	211	216
A	SchedPax	MU	346	PVG	583	11:30	214	326
A	SchedPax	WN	73G	BNA	1714	11:30	125	137
A	SchedPax	DL	757	JFK	33	11:30	175	183
A	SchedPax	RW	E90	MKE	1501	11:30	94	98
A	SchedPax	US	320	PHX	27	11:31	137	150
A	SchedPax	AA	762	JFK	1	11:34	159	168
A	SchedPax	UA	319	ORD	107	11:35	112	120

Table 1

2009 Baseline Design Day Flight Schedule

A/D	Activity Type	Operator	Equipment	Origin/Dest.	Flight No.	Time	Passengers	Seats
A	SchedPax	VX	319	SFO	924	11:35	99	122
A	SchedPax	AA	M83	ORD	1063	11:35	132	140
A	SchedPax	UA	757	JFK	891	11:37	103	110
A	SchedPax	DL	763	ATL	2083	11:41	206	214
A	SchedPax	AS	73H	SEA	458	11:42	135	157
A	SchedPax	UA	752	IAD	83	11:44	173	182
A	SchedPax	AS	73H	DCA	5	11:48	139	157
A	SchedPax	WN	73G	SMF	3076	11:50	98	137
A	SchedPax	A296	EM2	SAN	6323	11:50	23	30
A	SchedPax	B6	320	JFK	671	11:54	142	150
A	SchedPax	US	321	CLT	1433	11:55	177	183
A	SchedPax	FL	73G	BWI	60	11:55	130	137
A	SchedPax	UA	752	SFO	858	11:55	140	182
A	SchedPax	AA	M80	DFW	2417	11:58	126	140
A	SchedPax	NW	320	LAS	630	12:00	89	148
A	SchedPax	OZ	747	ICN	202	12:00	255	280
A	SchedPax	UA	752	DEN	781	12:00	163	182
A	SchedPax	A296	EM2	CLD	6202	12:01	10	30
A	SchedPax	AA	M80	AUS	813	12:03	126	140
A	SchedPax	WN	733	LAS	341	12:05	93	137
A	SchedPax	UA	319	LAS	289	12:08	74	120
A	SchedPax	A296	EM2	SMX	6417	12:08	20	30
A	SchedPax	UA	752	ORD	531	12:10	170	182
A	SchedPax	A296	CRJ	SMF	6467	12:10	45	50
A	SchedPax	A296	CRJ	TUS	6119	12:10	38	50
A	SchedPax	UA	320	SFO	888	12:12	106	138
A	SchedPax	CO	733	IAH	1595	12:14	112	124
A	SchedPax	WN	73G	SJC	1617	12:15	79	137
A	SchedPax	A296	CR7	OKC	6443	12:15	57	66
A	SchedPax	MQ	ERD	SAN	3006	12:15	32	44
A	SchedPax	A296	CR7	PHX	6526	12:16	57	66
A	SchedPax	WN	73G	OAK	631	12:20	84	137
A	SchedPax	5D	ERJ	HMO	2200	12:20	38	50
A	SchedPax	DL	757	SLC	1735	12:22	150	183
A	SchedPax	AS	734	YVR	710	12:24	130	144
A	SchedPax	WN	73G	SAT	2977	12:25	121	137
A	SchedPax	AA	757	DFW	2421	12:28	171	190
A	SchedPax	WN	73G	TUS	3361	12:30	95	137
A	SchedPax	NZ	772	AKL	6	12:30	261	304
A	SchedPax	QX	DH4	RNO	2443	12:30	60	74
A	SchedPax	US	321	PHL	1419	12:33	175	183
A	SchedPax	US	319	LAS	104	12:38	89	124
A	SchedPax	AS	73H	SEA	460	12:38	135	157
A	SchedPax	VX	320	JFK	407	12:40	141	149
A	SchedPax	LH	744	FRA	456	12:40	322	350
A	SchedPax	QX	CR7	RDM	2547	12:40	55	70
A	SchedPax	A296	EM2	SAN	6325	12:40	23	30
A	SchedPax	MQ	ERD	FAT	3052	12:40	29	44
A	SchedPax	Y4	319	GDL	912	12:45	109	131
A	SchedPax	WN	73G	SFO	605	12:45	86	137
A	SchedPax	G4	M80	MFR	329	12:46	138	150
A	SchedPax	WN	73G	PHX	1919	12:50	92	137
A	SchedPax	VX	319	SFO	928	12:55	99	122
A	SchedPax	BA	744	LHR	279	12:55	285	299
A	SchedPax	WS	73H	YYC	884	12:56	148	166
A	SchedPax	NW	753	MSP	708	12:59	209	224
A	SchedPax	WN	735	ABQ	1190	13:00	94	122
A	SchedPax	SQ	744	NRT	12	13:00	281	375
A	SchedPax	UA	752	SFO	817	13:00	140	182

Table 1

2009 Baseline Design Day Flight Schedule

A/D	Activity Type	Operator	Equipment	Origin/Dest.	Flight No.	Time	Passengers	Seats
A	SchedPax	MQ	ERD	SBA	3032	13:00	32	44
A	SchedPax	TA	321	SAL	522	13:07	137	194
A	SchedPax	WS	73W	YEG	922	13:08	111	136
A	SchedPax	AF	77W	CDG	62	13:10	294	325
A	SchedPax	A296	EM2	IYK	6282	13:10	12	30
A	SchedPax	WN	733	SJC	2708	13:15	79	137
A	SchedPax	WN	73G	SLC	872	13:15	78	137
A	SchedPax	UA	752	DEN	69	13:15	163	182
A	SchedPax	A296	EM2	CLD	6203	13:18	10	30
A	SchedPax	CO	753	IAH	1605	13:19	194	216
A	SchedPax	A296	CRJ	COS	6514	13:19	42	50
A	SchedPax	WN	73G	HOU	3751	13:20	118	137
A	SchedPax	WN	73G	OAK	903	13:20	84	137
A	SchedPax	FJ	744	NAN	810	13:20	247	480
A	SchedPax	AA	757	SAL	798	13:20	138	190
A	SchedPax	AC	E90	YVR	552	13:24	80	93
A	SchedPax	AA	738	ORD	1247	13:25	139	148
A	SchedPax	MQ	ERD	MRY	3078	13:25	35	44
A	SchedPax	G4	M80	FAR	347	13:25	135	150
A	SchedPax	Y4	319	TLC	910	13:30	111	131
A	SchedPax	AA	757	MIA	271	13:30	174	190
A	SchedPax	AA	762	JFK	19	13:30	159	168
A	SchedPax	MX	319	MEX	918	13:35	101	120
A	SchedPax	DL	757	ATL	2085	13:39	176	183
A	SchedPax	WN	733	RNO	2445	13:40	105	137
A	SchedPax	WN	73G	PHX	82	13:40	92	137
A	SchedPax	WN	73G	SFO	646	13:40	86	137
A	SchedPax	AA	M80	SFO	1923	13:40	125	140
A	SchedPax	AA	M83	LAS	545	13:45	119	140
A	SchedPax	A296	EM2	YUM	6455	13:46	14	30
A	SchedPax	AS	73G	PDX	252	13:47	103	124
A	SchedPax	A296	EM2	SAN	6326	13:48	23	30
A	SchedPax	UA	777	LHR	935	13:49	239	258
A	SchedPax	B6	320	BOS	473	13:51	128	150
A	SchedPax	F9	319	DEN	413	13:55	126	136
A	SchedPax	AA	738	DFW	2196	13:55	133	148
A	SchedPax	EK	77L	DXB	215	13:55	211	266
A	SchedPax	MQ	ERD	SJC	3181	13:55	36	44
A	SchedPax	UA	752	SFO	855	13:57	140	182
A	SchedPax	VX	320	SEA	784	14:00	139	149
A	SchedPax	WN	733	SJC	1640	14:00	79	137
A	SchedPax	MQ	ERD	SAN	3070	14:00	32	44
A	SchedPax	DL	73H	JFK	707	14:02	153	160
A	SchedPax	NW	757	DTW	669	14:03	175	182
A	SchedPax	CI	744	TPE	6	14:05	326	397
A	SchedPax	UA	752	DEN	194	14:05	163	182
A	SchedPax	AA	757	BOS	725	14:09	183	190
A	SchedPax	WN	73G	MDW	1801	14:10	127	137
A	SchedPax	UA	320	ORD	945	14:12	129	138
A	SchedPax	AC	320	YYZ	799	14:12	135	146
A	SchedPax	WN	733	OAK	2964	14:15	84	137
A	SchedPax	WN	73G	SMF	367	14:15	98	137
A	SchedPax	CX	744	HKG	882	14:15	276	383
A	SchedPax	AA	777	LHR	137	14:15	223	247
A	SchedPax	QX	DH4	MFR	2425	14:15	67	74
A	SchedPax	A296	EM2	FAT	6241	14:15	20	30
A	SchedPax	VX	320	JFK	409	14:20	141	149
A	SchedPax	TN	343	CDG	7	14:20	242	294
A	SchedPax	A296	CR7	DFW	6229	14:20	57	66

Table 1

2009 Baseline Design Day Flight Schedule

A/D	Activity Type	Operator	Equipment	Origin/Dest.	Flight No.	Time	Passengers	Seats
A	SchedPax	FL	73G	ATL	54	14:25	132	137
A	SchedPax	A296	EM2	MRY	6288	14:25	22	30
A	SchedPax	UA	757	JFK	53	14:28	103	110
A	SchedPax	NZ	744	AKL	2	14:30	326	379
A	SchedPax	A296	CR7	SEA	6003	14:32	61	66
A	SchedPax	A296	EM2	BFL	6163	14:33	19	30
A	SchedPax	VS	346	LHR	7	14:35	183	308
A	SchedPax	WN	73G	LAS	235	14:35	93	137
A	SchedPax	AA	757	DFW	2433	14:35	171	190
A	SchedPax	MQ	ERD	SBA	3042	14:35	32	44
A	SchedPax	A296	EM2	SAN	6327	14:36	23	30
A	SchedPax	CO	738	IAH	1695	14:38	141	157
A	SchedPax	A296	CRJ	TUS	6376	14:38	38	50
A	SchedPax	CO	738	CLE	515	14:39	145	157
A	SchedPax	WN	733	SJC	1765	14:40	79	137
A	SchedPax	WN	73G	PHX	937	14:40	92	137
A	SchedPax	AS	73G	SEA	464	14:40	107	124
A	SchedPax	DL	738	SLC	1179	14:45	123	150
A	SchedPax	MQ	ERD	SAN	3048	14:45	32	44
A	SchedPax	A296	CR7	SAT	5995	14:50	55	66
A	SchedPax	A296	EM2	OXR	6295	14:52	12	30
A	SchedPax	A296	CRJ	BOI	6527	15:00	41	50
A	SchedPax	US	320	PHX	29	15:03	137	150
A	SchedPax	AA	762	JFK	3	15:03	159	168
A	SchedPax	UA	752	IAD	49	15:04	173	182
A	SchedPax	WN	733	TUS	1696	15:05	95	137
A	SchedPax	WN	73G	MDW	1027	15:05	127	137
A	SchedPax	BA	744	LHR	283	15:05	285	299
A	SchedPax	DL	757	ATL	2087	15:08	176	183
A	SchedPax	WN	733	ELP	3662	15:10	104	137
A	SchedPax	WN	733	SFO	2187	15:15	86	137
A	SchedPax	MQ	ERD	SAN	3020	15:15	32	44
A	SchedPax	UA	32S	SFO	761	15:18	106	138
A	SchedPax	AA	757	MCO	297	15:18	162	190
A	SchedPax	WN	733	LAS	1892	15:20	93	137
A	SchedPax	WN	73G	OAK	2904	15:20	84	137
A	SchedPax	KL	74M	AMS	601	15:20	261	278
A	SchedPax	UA	752	DEN	227	15:22	163	182
A	SchedPax	UA	763	HNL	80	15:23	160	183
A	SchedPax	AA	M80	SJD	338	15:24	118	140
A	SchedPax	AA	757	DFW	2445	15:25	171	190
A	SchedPax	KE	772	ICN	11	15:25	252	301
A	SchedPax	UA	763	ORD	611	15:26	171	183
A	SchedPax	A296	EM2	SAN	6329	15:30	23	30
A	SchedPax	A296	EM2	SBP	6385	15:30	21	30
A	SchedPax	AC	E90	YYC	570	15:32	80	93
A	SchedPax	WN	733	MCI	73	15:35	120	137
A	SchedPax	DL	738	CVG	5094	15:35	145	150
A	SchedPax	AA	757	MIA	203	15:35	174	190
A	SchedPax	AA	M83	SFO	1386	15:38	125	140
A	SchedPax	AA	757	HNL	270	15:43	177	190
A	SchedPax	US	319	LAS	110	15:45	89	124
A	SchedPax	UA	319	LAS	87	15:46	74	120
A	SchedPax	A296	CR7	YVR	6114	15:47	52	66
A	SchedPax	MX	318	GDL	920	15:50	81	100
A	SchedPax	AS	73H	YVR	704	15:50	141	157
A	SchedPax	OZ	777	ICN	204	15:50	283	310
A	SchedPax	A296	EM2	SMX	6444	15:50	20	30
A	SchedPax	AA	M83	STL	449	15:50	121	140

Table 1

2009 Baseline Design Day Flight Schedule

A/D	Activity Type	Operator	Equipment	Origin/Dest.	Flight No.	Time	Passengers	Seats
A	SchedPax	DL	738	SLC	1181	15:51	123	150
A	SchedPax	CO	757	EWR	17	15:52	171	175
A	SchedPax	A296	EM2	FAT	6242	15:53	20	30
A	SchedPax	A296	CRJ	PHX	6522	15:55	43	50
A	SchedPax	UA	319	SFO	139	16:00	92	120
A	SchedPax	AS	73H	SJD	251	16:00	141	157
A	SchedPax	AF	772	CDG	72	16:00	244	270
A	SchedPax	UA	320	DEN	255	16:07	123	138
A	SchedPax	WN	73G	PHX	2675	16:10	92	137
A	SchedPax	MQ	ERD	SBA	3082	16:10	32	44
A	SchedPax	AA	738	ORD	1345	16:13	139	148
A	SchedPax	WN	735	OAK	223	16:15	75	122
A	SchedPax	WN	733	SMF	159	16:20	98	137
A	SchedPax	QX	CR7	LTO	2602	16:20	40	70
A	SchedPax	NW	320	MEM	177	16:21	139	148
A	SchedPax	YV	CR9	PHX	2837	16:23	79	86
A	SchedPax	NW	320	MSP	709	16:24	138	148
A	SchedPax	WN	73G	LAS	915	16:25	93	137
A	SchedPax	HA	763	HNL	10	16:25	227	252
A	SchedPax	DL	757	JFK	5184	16:25	175	183
A	SchedPax	DL	763	ATL	1477	16:26	206	214
A	SchedPax	VA	77W	SYD	1	16:30	236	361
A	SchedPax	MQ	ERD	MRY	3030	16:30	35	44
A	SchedPax	CO	738	IAH	137	16:34	141	157
A	SchedPax	WN	733	AUS	3430	16:35	118	137
A	SchedPax	BR	77W	TPE	2	16:35	261	316
A	SchedPax	MQ	ERD	SAN	3068	16:35	32	44
A	SchedPax	F9	318	DEN	417	16:36	111	120
A	SchedPax	US	320	PHL	1405	16:37	144	150
A	SchedPax	UA	752	SFO	844	16:39	140	182
A	SchedPax	AA	M80	DFW	2453	16:39	126	140
A	SchedPax	LX	343	ZRH	40	16:40	220	228
A	SchedPax	NW	753	MSP	5621	16:40	209	224
A	SchedPax	UA	32S	SJD	798	16:42	124	138
A	SchedPax	A296	EM2	CLD	6204	16:44	10	30
A	SchedPax	MX	320	MEX	902	16:45	126	150
A	SchedPax	AS	734	SEA	466	16:46	124	144
A	SchedPax	AA	738	IAD	263	16:50	135	148
A	SchedPax	WN	73G	HOU	3473	16:50	118	137
A	SchedPax	SU	763	SVO	321	16:50	173	218
A	SchedPax	WN	73G	ABQ	507	17:00	106	137
A	SchedPax	AA	757	DFW	2457	17:00	171	190
A	SchedPax	A296	EM2	SAN	6335	17:00	23	30
A	SchedPax	UA	752	DEN	85	17:06	163	182
A	SchedPax	AA	762	JFK	117	17:08	159	168
A	SchedPax	SQ	345	SIN	38	17:09	67	100
A	SchedPax	WN	73G	LAS	1900	17:10	93	137
A	SchedPax	WN	735	PHX	1446	17:15	82	122
A	SchedPax	WN	73G	OAK	1947	17:15	84	137
A	SchedPax	A296	CR7	PDX	6082	17:15	58	66
A	SchedPax	MQ	ERD	SAN	3092	17:15	32	44
A	SchedPax	UA	320	SFO	955	17:18	106	138
A	SchedPax	UA	752	IAD	209	17:19	173	182
A	SchedPax	VX	320	SFO	936	17:20	121	149
A	SchedPax	LH	346	FRA	450	17:20	281	306
A	SchedPax	CO	733	IAH	795	17:20	112	124
A	SchedPax	WN	73G	SJC	2279	17:20	79	137
A	SchedPax	A296	CR7	ASE	6425	17:20	47	66
A	SchedPax	QX	DH4	FLG	2499	17:20	54	74

Table 1

2009 Baseline Design Day Flight Schedule

A/D	Activity Type	Operator	Equipment	Origin/Dest.	Flight No.	Time	Passengers	Seats
A	SchedPax	NW	320	DTW	737	17:24	142	148
A	SchedPax	AC	E90	YVR	554	17:24	80	93
A	SchedPax	A296	EM2	OXR	6297	17:24	12	30
A	SchedPax	MX	318	PVR	916	17:25	84	100
A	SchedPax	AS	739	PVR	259	17:25	162	172
A	SchedPax	AS	73H	SEA	474	17:25	135	157
A	SchedPax	AA	763	ORD	455	17:28	212	225
A	SchedPax	WN	733	SFO	3329	17:30	86	137
A	SchedPax	WN	73G	MDW	1341	17:30	127	137
A	SchedPax	UA	752	ORD	943	17:33	170	182
A	SchedPax	A296	CR7	SEA	5818	17:33	61	66
A	SchedPax	MQ	ERD	FAT	3022	17:35	29	44
A	SchedPax	UA	32S	LAS	328	17:40	85	138
A	SchedPax	WN	73G	SLC	1566	17:40	78	137
A	SchedPax	AA	763	MIA	277	17:40	206	225
A	SchedPax	A296	CRJ	ABQ	6471	17:40	37	50
A	SchedPax	OO	CR9	SLC	4703	17:44	58	70
A	SchedPax	A296	EM2	YUM	6475	17:45	14	30
A	SchedPax	AS	734	SEA	470	17:46	124	144
A	SchedPax	DL	757	JFK	709	17:46	175	183
A	SchedPax	AA	738	DEN	1519	17:48	116	148
A	SchedPax	A296	EM2	MRY	6291	17:49	22	30
A	SchedPax	WN	73G	TUS	3760	17:50	95	137
A	SchedPax	DL	757	ATL	125	17:55	176	183
A	SchedPax	AA	757	DFW	2459	17:55	171	190
A	SchedPax	WN	733	ELP	844	18:00	104	137
A	SchedPax	CA	74E	PEK	983	18:00	244	307
A	SchedPax	A296	EM2	SGU	6422	18:00	12	30
A	SchedPax	NW	320	IND	1607	18:04	140	148
A	SchedPax	MQ	ERD	SJC	3126	18:05	36	44
A	SchedPax	A296	EM2	SAN	6338	18:07	23	30
A	SchedPax	WN	73G	LAS	1172	18:10	93	137
A	SchedPax	AA	M80	SFO	530	18:10	125	140
A	SchedPax	A296	EM2	BFL	6169	18:12	19	30
A	SchedPax	UA	319	SFO	305	18:14	92	120
A	SchedPax	WN	733	SJC	970	18:15	79	137
A	SchedPax	WN	73G	OAK	3598	18:15	84	137
A	SchedPax	DL	738	CVG	1473	18:18	145	150
A	SchedPax	VX	320	SEA	792	18:20	139	149
A	SchedPax	WN	73G	PHX	1796	18:20	92	137
A	SchedPax	A296	CR7	DFW	6210	18:20	57	66
A	SchedPax	A296	EM2	SBP	6397	18:20	21	30
A	SchedPax	US	321	PHX	1511	18:24	167	183
A	SchedPax	CO	757	EWR	65	18:24	171	175
A	SchedPax	WN	73G	SFO	3402	18:25	86	137
A	SchedPax	A296	CRJ	SMF	6477	18:26	45	50
A	SchedPax	A296	CR7	TUL	6139	18:29	56	66
A	SchedPax	AS	739	ZIH	291	18:30	144	172
A	SchedPax	WN	73G	BNA	3963	18:35	125	137
A	SchedPax	US	319	LAS	108	18:38	89	124
A	SchedPax	MQ	ERD	SBA	3010	18:40	32	44
A	SchedPax	AA	M83	STL	521	18:40	121	140
A	SchedPax	UA	320	IAD	967	18:42	131	138
A	SchedPax	VS	346	LHR	23	18:45	183	308
A	SchedPax	US	321	CLT	705	18:48	177	183
A	SchedPax	LH	346	MUC	452	18:50	286	306
A	SchedPax	WN	73G	SMF	3158	18:50	98	137
A	SchedPax	CZ	772	CAN	327	18:50	185	292
A	SchedPax	QX	DH4	RNO	2445	18:50	60	74

Table 1

2009 Baseline Design Day Flight Schedule

A/D	Activity Type	Operator	Equipment	Origin/Dest.	Flight No.	Time	Passengers	Seats
A	SchedPax	US	320	PHL	755	18:53	144	150
A	SchedPax	OO	CRJ	SLC	4740	18:53	41	50
A	SchedPax	A296	EM2	SBA	6358	18:54	21	30
A	SchedPax	QX	DH4	BOI	2417	18:55	60	74
A	SchedPax	NW	753	MSP	710	18:57	209	224
A	SchedPax	A296	CRJ	COS	6440	18:57	42	50
A	SchedPax	CO	738	CLE	67	18:58	145	157
A	SchedPax	WN	73G	PHX	1657	19:00	92	137
A	SchedPax	BA	744	LHR	269	19:00	285	299
A	SchedPax	UA	320	ORD	372	19:02	129	138
A	SchedPax	AA	762	JFK	133	19:04	159	168
A	SchedPax	A296	EM2	SAN	6339	19:04	23	30
A	SchedPax	AA	738	ORD	557	19:05	139	148
A	SchedPax	AF	772	CDG	64	19:05	244	270
A	SchedPax	CO	757	HNL	1942	19:07	160	175
A	SchedPax	UA	757	JFK	27	19:07	103	110
A	SchedPax	WN	73G	LAS	1545	19:10	93	137
A	SchedPax	NW	320	DTW	661	19:11	142	148
A	SchedPax	F9	319	DEN	406	19:15	126	136
A	SchedPax	WN	733	MCI	1752	19:15	120	137
A	SchedPax	WN	733	SLC	1065	19:15	78	137
A	SchedPax	MQ	ERD	SAN	3002	19:15	32	44
A	SchedPax	AA	M83	AUS	427	19:15	126	140
A	SchedPax	UA	32S	SFO	978	19:20	106	138
A	SchedPax	WN	73G	OAK	851	19:20	84	137
A	SchedPax	DL	763	ATL	63	19:23	206	214
A	SchedPax	WN	73G	SAT	1275	19:25	121	137
A	SchedPax	DL	73H	MSY	1447	19:30	125	160
A	SchedPax	NZ	744	LHR	1	19:30	337	379
A	SchedPax	QX	CR7	PDX	2641	19:30	67	70
A	SchedPax	A296	CR7	SJC	6519	19:30	50	66
A	SchedPax	AA	M80	LAS	776	19:30	119	140
A	SchedPax	AA	757	DFW	2465	19:33	171	190
A	SchedPax	WN	73G	HOU	1783	19:35	118	137
A	SchedPax	WN	73G	MDW	1140	19:35	127	137
A	SchedPax	A296	CR7	YVR	6427	19:37	52	66
A	SchedPax	UA	752	DEN	765	19:39	163	182
A	SchedPax	QX	DH4	ACV	2310	19:40	64	74
A	SchedPax	AV	762	BOG	48	19:41	139	175
A	SchedPax	CO	753	IAH	1795	19:42	194	216
A	SchedPax	A296	EM2	CLD	6206	19:43	10	30
A	SchedPax	MQ	ERD	SJC	3115	19:45	36	44
A	SchedPax	MX	319	GDL	914	19:50	97	120
A	SchedPax	VX	320	BOS	367	19:50	136	149
A	SchedPax	WN	733	SFO	2112	19:50	86	137
A	SchedPax	UA	777	IAD	947	19:51	245	258
A	SchedPax	CO	757	EWR	702	19:55	171	175
A	SchedPax	A296	CRJ	SMF	6510	19:55	45	50
A	SchedPax	AC	320	YYZ	793	19:59	135	146
A	SchedPax	WN	73G	SMF	2950	20:00	98	137
A	SchedPax	UA	763	ORD	123	20:01	171	183
A	SchedPax	AC	E90	YVR	556	20:04	80	93
A	SchedPax	AA	738	BNA	1307	20:05	129	148
A	SchedPax	WN	73G	SJC	2619	20:05	79	137
A	SchedPax	PR	744	MNL	102	20:05	294	439
A	SchedPax	AA	762	JFK	181	20:05	159	168
A	SchedPax	G4	M80	BIL	337	20:05	142	150
A	SchedPax	US	319	PHX	34	20:06	113	124
A	SchedPax	AS	734	YVR	706	20:08	130	144

Table 1

2009 Baseline Design Day Flight Schedule

A/D	Activity Type	Operator	Equipment	Origin/Dest.	Flight No.	Time	Passengers	Seats
A	SchedPax	VX	320	IAD	97	20:10	124	149
A	SchedPax	AA	757	DFW	2473	20:10	171	190
A	SchedPax	AA	763	BOS	145	20:10	217	225
A	SchedPax	AA	M83	SFO	1943	20:10	125	140
A	SchedPax	A296	EM2	FAT	6243	20:11	20	30
A	SchedPax	NW	320	LAS	632	20:14	89	148
A	SchedPax	WN	73G	OAK	3490	20:15	84	137
A	SchedPax	UA	319	PIT	514	20:16	108	120
A	SchedPax	A296	EM2	SAN	6346	20:16	23	30
A	SchedPax	AA	738	ORD	699	20:19	139	148
A	SchedPax	DL	757	JFK	79	20:22	175	183
A	SchedPax	US	321	CLT	424	20:23	177	183
A	SchedPax	UA	319	MSY	263	20:25	105	120
A	SchedPax	AC	319	YUL	775	20:25	108	120
A	SchedPax	WN	73G	LAS	3885	20:25	93	137
A	SchedPax	UA	32S	LAS	349	20:26	85	138
A	SchedPax	VX	320	JFK	411	20:29	141	149
A	SchedPax	DL	757	SLC	1183	20:29	150	183
A	SchedPax	UA	320	SFO	931	20:30	106	138
A	SchedPax	MQ	ERD	SAN	3094	20:30	32	44
A	SchedPax	UA	763	OGG	44	20:31	160	183
A	SchedPax	AA	757	MIA	231	20:33	174	190
A	SchedPax	AA	757	IAD	75	20:35	173	190
A	SchedPax	DL	77L	ATL	243	20:35	265	276
A	SchedPax	NW	320	MEM	181	20:37	139	148
A	SchedPax	MX	320	MEX	910	20:37	126	150
A	SchedPax	AA	738	DFW	2485	20:38	133	148
A	SchedPax	WN	733	PHX	1046	20:40	92	137
A	SchedPax	CO	753	IAH	47	20:40	194	216
A	SchedPax	UA	763	KOA	52	20:40	141	183
A	SchedPax	UA	777	HNL	82	20:44	226	258
A	SchedPax	DL	738	FLL	1665	20:45	143	150
A	SchedPax	CI	744	TPE	8	20:45	326	397
A	SchedPax	A296	EM2	IPL	6280	20:47	8	30
A	SchedPax	AM	737	MEX	644	20:50	108	124
A	SchedPax	UA	320	ORD	839	20:52	129	138
A	SchedPax	UA	752	MCO	277	20:53	150	182
A	SchedPax	WN	73G	SJC	3847	20:55	79	137
A	SchedPax	A296	CRJ	ABQ	6479	20:56	37	50
A	SchedPax	US	321	PHL	39	20:57	175	183
A	SchedPax	UA	32S	CUN	810	20:58	124	138
A	SchedPax	DL	73H	MCO	1433	20:58	144	160
A	SchedPax	UA	320	BWI	307	21:00	131	138
A	SchedPax	MQ	ERD	FAT	3050	21:00	29	44
A	SchedPax	A296	CR7	SEA	6053	21:01	61	66
A	SchedPax	AA	738	YYZ	1553	21:03	135	148
A	SchedPax	A296	CRJ	BOI	6641	21:05	41	50
A	SchedPax	A296	EM2	SBP	6415	21:09	21	30
A	SchedPax	WN	733	SFO	123	21:10	86	137
A	SchedPax	WN	73G	RNO	1571	21:10	105	137
A	SchedPax	WN	73G	TUS	1917	21:10	95	137
A	SchedPax	BR	77W	TPE	16	21:10	261	316
A	SchedPax	UA	752	LIH	66	21:14	152	182
A	SchedPax	A296	EM2	PSP	6319	21:15	16	30
A	SchedPax	AA	757	HNL	162	21:18	177	190
A	SchedPax	A296	EM2	SAN	6347	21:20	23	30
A	SchedPax	MQ	ERD	SAN	3096	21:20	32	44
A	SchedPax	NW	753	MSP	711	21:22	209	224
A	SchedPax	NW	757	DTW	662	21:23	175	182

Table 1

2009 Baseline Design Day Flight Schedule

A/D	Activity Type	Operator	Equipment	Origin/Dest.	Flight No.	Time	Passengers	Seats
A	SchedPax	AC	E90	YYC	572	21:23	80	93
A	SchedPax	DL	763	HNL	1464	21:24	203	214
A	SchedPax	NK	319	DTW	706	21:25	137	145
A	SchedPax	TG	345	BKK	794	21:25	142	215
A	SchedPax	WN	733	OAK	797	21:25	84	137
A	SchedPax	AA	757	STL	1913	21:25	164	190
A	SchedPax	UA	757	JFK	25	21:26	103	110
A	SchedPax	AA	738	ORD	889	21:30	139	148
A	SchedPax	A296	CR7	SAT	6431	21:32	55	66
A	SchedPax	UA	752	BOS	167	21:33	172	182
A	SchedPax	G4	M80	XNA	345	21:33	139	150
A	SchedPax	WN	735	PHX	2544	21:35	82	122
A	SchedPax	CO	753	EWR	302	21:35	211	216
A	SchedPax	HA	763	HNL	2	21:35	227	252
A	SchedPax	UA	320	PHL	195	21:40	131	138
A	SchedPax	FL	73G	ATL	50	21:40	132	137
A	SchedPax	A296	CR7	SLC	6469	21:40	38	66
A	SchedPax	A296	EM2	SBA	6545	21:40	21	30
A	SchedPax	US	321	PHX	35	21:42	167	183
A	SchedPax	DL	757	ATL	2097	21:44	176	183
A	SchedPax	KE	772	GRU	62	21:45	238	301
A	SchedPax	UA	319	SFO	145	21:48	92	120
A	SchedPax	B6	320	JFK	673	21:48	142	150
A	SchedPax	AS	73H	SEA	88	21:48	135	157
A	SchedPax	VX	320	SFO	946	21:50	121	149
A	SchedPax	A296	CR7	PDX	6084	21:50	58	66
A	SchedPax	A296	EM2	MRY	6293	21:50	22	30
A	SchedPax	A296	EM2	IYK	6283	21:53	12	30
A	SchedPax	WN	73G	SMF	1137	21:55	98	137
A	SchedPax	DL	752	JFK	137	21:55	175	183
A	SchedPax	WN	733	DEN	1488	22:00	96	137
A	SchedPax	WN	73G	SFO	2016	22:00	86	137
A	SchedPax	A296	CRJ	PHX	6528	22:00	43	50
A	SchedPax	MX	319	MEX	908	22:05	101	120
A	SchedPax	WN	73G	LAS	3656	22:05	93	137
A	SchedPax	FL	73G	MKE	226	22:05	129	137
A	SchedPax	AA	762	EWR	119	22:05	155	168
A	SchedPax	CX	773	HKG	880	22:05	277	385
A	SchedPax	AC	E90	YVR	558	22:09	80	93
A	SchedPax	QF	744	JFK	108	22:10	305	379
A	SchedPax	AA	763	MIA	397	22:10	206	225
A	SchedPax	A296	EM2	SAN	6353	22:11	23	30
A	SchedPax	AA	757	OGG	254	22:15	180	190
A	SchedPax	WN	73G	OAK	2896	22:20	84	137
A	SchedPax	AC	319	YYZ	795	22:23	111	120
A	SchedPax	DL	73H	SLC	1185	22:24	131	160
A	SchedPax	VX	320	IAD	99	22:25	124	149
A	SchedPax	MQ	ERD	SJC	3135	22:25	36	44
A	SchedPax	UA	752	ORD	257	22:27	170	182
A	SchedPax	CO	738	EWR	1502	22:30	154	157
A	SchedPax	AM	737	GDL	466	22:35	102	124
A	SchedPax	AA	757	BOS	223	22:35	183	190
A	SchedPax	NK	319	FLL	339	22:40	136	145
A	SchedPax	WN	73G	SFO	204	22:40	86	137
A	SchedPax	CO	753	IAH	1095	22:40	194	216
A	SchedPax	US	320	LAS	870	22:42	108	150
A	SchedPax	AA	762	JFK	21	22:43	159	168
A	SchedPax	Y4	319	GDL	914	22:45	109	131
A	SchedPax	VX	320	JFK	415	22:45	141	149

Table 1

2009 Baseline Design Day Flight Schedule

A/D	Activity Type	Operator	Equipment	Origin/Dest.	Flight No.	Time	Passengers	Seats
A	SchedPax	AS	73G	SEA	468	22:45	107	124
A	SchedPax	UA	752	OGG	48	22:46	159	182
A	SchedPax	CO	739	CLE	507	22:48	159	173
A	SchedPax	F9	319	DEN	419	22:49	126	136
A	SchedPax	FL	73G	BWI	67	22:49	130	137
A	SchedPax	UA	319	SFO	807	22:54	92	120
A	SchedPax	AA	738	DFW	2489	22:54	133	148
A	SchedPax	DL	757	ATL	2099	22:57	176	183
A	SchedPax	AA	M83	ORD	607	23:00	132	140
A	SchedPax	LR	319	SJO	604	23:03	116	131
A	SchedPax	B6	320	BOS	479	23:04	128	150
A	SchedPax	NW	320	DTW	663	23:08	142	148
A	SchedPax	AA	763	HNL	284	23:08	210	225
A	SchedPax	AM	737	MEX	468	23:10	108	124
A	SchedPax	AS	73H	PDX	566	23:11	130	157
A	SchedPax	UA	320	DEN	815	23:15	123	138
A	SchedPax	AS	73H	ANC	156	23:25	131	157
A	SchedPax	VX	319	SEA	796	23:40	114	122
A	SchedPax	SY	738	MSP	409	23:40	135	162
A	SchedPax	UA	752	HNL	60	23:40	160	182
A	SchedPax	AA	738	DFW	2493	23:45	133	148
A	SchedPax	NW	753	MSP	655	23:48	209	224
A	SchedPax	VX	320	BOS	371	23:50	136	149
A	SchedPax	5D	EMJ	AGU	496	23:50	80	99
A	SchedPax	DL	752	JFK	715	23:51	175	183
A	SchedPax	UA	757	JFK	29	23:51	103	110
A	SchedPax	LR	320	GUA	640	23:55	118	150
A	SchedPax	FL	73G	ATL	49	23:55	132	137
A	SchedPax	UA	752	SFO	927	23:55	140	182
A	SchedPax	CM	738	PTY	302	23:57	143	155
A	SchedPax	AA	738	MIA	669	23:59	136	148
A	UnschedPax_AT	EJA	C560	SJC	EJA833	0:16	0	0
A	UnschedPax_AT	EJA	C750	SFO	EJA832	11:43	0	0
A	UnschedPax_AT	EJA	F2TH	CRQ	EJA830	13:20	0	0
A	UnschedPax_AT	OPT	H25B	SAF	OPT828	13:45	0	0
A	UnschedPax_AT	VNR	P180	BOI	VNR826	15:01	0	0
A	UnschedPax_AT	LXJ	LR45	SFO	LXJ829	17:01	0	0
A	UnschedPax_AT	EJA	C750	SFO	EJA831	19:28	0	0
D	CARGO_AC	TNO	300	GDL	TNO999	0:10	0	0
D	CARGO_AC	ABX	762	CVG	ABX984	0:10	0	0
D	CARGO_AC	NCA	744	NRT	NCA989	1:10	0	0
D	CARGO_AC	EVA	MD11	TPE	EVA971	2:10	0	0
D	CARGO_AC	ABX	762	MEX	ABX983	2:20	0	0
D	CARGO_AC	FWL	763	MIA	FWL980	3:10	0	0
D	CARGO_AC	CLX	744	LUX	CLX8781	3:50	0	0
D	CARGO_AC	FDX	306	OAK	FDX998	4:20	0	0
D	CARGO_AC	FDX	DC10	MEM	FDX975	5:20	0	0
D	CARGO_AC	PAC	744	ICN	PAC987	5:30	0	0
D	CARGO_AC	FDX	310	EWR	FDX996	6:40	0	0
D	CARGO_AC	UPS	763	SDF	UPS981	6:40	0	0
D	CARGO_AC	CAL	744	TPE	CAL990	6:50	0	0
D	CARGO_AC	FDX	MD11	HNL	FDX972	6:50	0	0
D	CARGO_AC	MAA	763	MEX	MAA982	7:30	0	0
D	CARGO_AC	CKK	744	PVG	CKK988	11:20	0	0
D	CARGO_AC	YZR	744	SHA	YZR986	14:40	0	0
D	CARGO_AC	FDX	DC10	AFW	FDX866	15:40	0	0
D	CARGO_AC	FDX	DC10	OAK	FDX979	17:20	0	0
D	CARGO_AC	FDX	MD11	MEM	FDX973	17:40	0	0
D	CARGO_AC	FDX	306	MEM	FDX997	19:30	0	0

Table 1

2009 Baseline Design Day Flight Schedule

A/D	Activity Type	Operator	Equipment	Origin/Dest.	Flight No.	Time	Passengers	Seats
D	CARGO_AC	FDX	DC10	IND	FDX978	19:30	0	0
D	CARGO_AC	AAR	744	ICN	AAR985	19:50	0	0
D	CARGO_AC	ATN	DC87	TOL	ATN974	20:30	0	0
D	CARGO_AC	SQC	744	SIN	SQC991	20:40	0	0
D	CARGO_AC	FDX	DC10	EWR	FDX977	20:40	0	0
D	CARGO_AC	SOO	742	ANC	SOO993	21:20	0	0
D	CARGO_AC	FDX	DC10	MEM	FDX976	22:10	0	0
D	CARGO_AC	KAL	744	ICN	KAL992	23:30	0	0
D	GA	N	GLF4	CRQ	N952	1:00	0	0
D	GA	N	C750	SFO	N961	6:28	0	0
D	GA	N	BE19	PMD	N966	7:00	0	0
D	GA	N	CL60	CRQ	N959	7:12	0	0
D	GA	N	C550	LAS	N963	8:10	0	0
D	GA	N	GLF5	SBA	N951	8:10	0	0
D	GA	N	B190	PMD	N970	9:20	0	0
D	GA	N	BE20	PMD	N965	11:05	0	0
D	GA	N	C560	SNA	N962	12:36	0	0
D	GA	N	GLF5	SMO	N950	13:10	0	0
D	GA	N	CL60	VNY	N960	13:20	0	0
D	GA	N	BE36	LAS	N964	13:52	0	0
D	GA	N	B190	VNY	N967	14:13	0	0
D	GA	N	LJ60	SNA	N948	15:01	0	0
D	GA	N	GLF4	VNY	N953	15:47	0	0
D	GA	N	GLF4	APA	N954	16:08	0	0
D	GA	N	GALX	STL	N956	16:25	0	0
D	GA	N	GLF4	TEB	N955	17:21	0	0
D	GA	N	F2TH	IAD	N958	18:38	0	0
D	GA	N	F900	SMO	N957	19:20	0	0
D	GA	N	B190	PMD	N969	21:00	0	0
D	GA	N	B190	LAS	N968	22:30	0	0
D	GA	N	H25B	STL	N949	23:10	0	0
D	MIL	MI	CL60	TEB	MI947	10:00	0	0
D	MIL	MI	LJ45	SDM	MI946	12:00	0	0
D	MIL	MI	H25B	LAS	MI945	12:30	0	0
D	MIL	MI	C130	SDL	MI944	20:20	0	0
D	SchedPax	MX	318	MEX	111	0:05	81	100
D	SchedPax	AM	737	GDL	467	0:10	102	124
D	SchedPax	AA	738	DFW	2400	0:10	127	148
D	SchedPax	KE	744	ICN	12	0:10	285	335
D	SchedPax	TA	320	GUA	511	0:20	107	150
D	SchedPax	OZ	777	ICN	203	0:20	292	310
D	SchedPax	5D	EMJ	AGU	5496	0:20	80	99
D	SchedPax	VA	77W	SYD	2	0:23	236	361
D	SchedPax	MX	320	GDL	127	0:25	123	150
D	SchedPax	SY	738	MSP	410	0:25	141	162
D	SchedPax	NW	757	MSP	691	0:25	172	182
D	SchedPax	Y4	319	GDL	913	0:30	109	131
D	SchedPax	CO	753	IAH	1094	0:30	200	216
D	SchedPax	DL	757	ATL	2078	0:50	178	183
D	SchedPax	AA	738	DFW	2408	0:55	127	148
D	SchedPax	MX	320	MEX	139	1:00	127	150
D	SchedPax	DL	73H	GDL	455	1:00	145	160
D	SchedPax	KE	772	ICN	62	1:10	243	301
D	SchedPax	CO	739	IAH	1684	1:15	158	173
D	SchedPax	CI	744	TPE	7	1:15	326	397
D	SchedPax	MX	319	ZCL	907	1:30	96	120
D	SchedPax	BR	77W	TPE	1	1:30	261	316
D	SchedPax	NW	320	MEM	178	1:40	139	148
D	SchedPax	LR	321	SAL	671	1:40	146	188

Table 1

2009 Baseline Design Day Flight Schedule

A/D	Activity Type	Operator	Equipment	Origin/Dest.	Flight No.	Time	Passengers	Seats
D	SchedPax	MH	744	TPE	95	1:40	287	386
D	SchedPax	CA	74E	PEK	984	1:40	244	307
D	SchedPax	LR	320	GUA	641	1:45	118	150
D	SchedPax	TA	320	SAL	531	1:45	106	150
D	SchedPax	CX	773	HKG	881	1:50	277	385
D	SchedPax	BR	77W	TPE	15	1:50	261	316
D	SchedPax	CM	738	PTY	303	2:00	143	155
D	SchedPax	LR	319	SJO	605	2:21	116	131
D	SchedPax	CX	744	ANC	91	5:47	277	383
D	SchedPax	WN	73G	OAK	2885	6:00	84	137
D	SchedPax	AS	73G	PDX	561	6:00	103	124
D	SchedPax	UA	752	DEN	18	6:00	161	182
D	SchedPax	UA	752	IAD	324	6:00	172	182
D	SchedPax	UA	752	SFO	508	6:00	132	182
D	SchedPax	DL	763	SLC	1768	6:00	114	214
D	SchedPax	G4	M80	FAR	346	6:00	135	150
D	SchedPax	AA	738	ORD	620	6:05	137	148
D	SchedPax	WN	73G	SFO	3668	6:05	89	137
D	SchedPax	DL	763	ATL	1212	6:05	206	214
D	SchedPax	UA	32S	LAS	353	6:06	77	138
D	SchedPax	NW	753	MSP	692	6:10	211	224
D	SchedPax	AA	763	MIA	456	6:10	206	225
D	SchedPax	UA	763	ORD	286	6:10	166	183
D	SchedPax	DL	738	CVG	1540	6:15	145	150
D	SchedPax	AA	738	DFW	2410	6:15	127	148
D	SchedPax	WN	73G	SMF	1532	6:15	91	137
D	SchedPax	UA	757	JFK	84	6:15	103	110
D	SchedPax	MQ	ERD	SJC	3193	6:15	36	44
D	SchedPax	F9	319	DEN	416	6:20	126	136
D	SchedPax	DL	757	JFK	198	6:20	174	183
D	SchedPax	A296	EM2	SAN	6320	6:23	23	30
D	SchedPax	CO	757	IAH	194	6:25	154	175
D	SchedPax	AA	M83	AUS	1182	6:25	126	140
D	SchedPax	VX	320	SFO	921	6:30	112	149
D	SchedPax	US	321	PHL	1418	6:30	175	183
D	SchedPax	US	321	PHX	250	6:30	175	183
D	SchedPax	WN	73G	LAS	423	6:30	98	137
D	SchedPax	AS	73H	SEA	477	6:30	137	157
D	SchedPax	UA	752	DEN	46	6:30	161	182
D	SchedPax	UA	752	SFO	90	6:30	132	182
D	SchedPax	US	319	PHX	21	6:35	118	124
D	SchedPax	AA	757	STL	662	6:40	161	190
D	SchedPax	MX	320	MEX	903	6:45	127	150
D	SchedPax	WN	73G	SJC	3025	6:45	77	137
D	SchedPax	CO	738	CLE	750	6:55	143	157
D	SchedPax	WN	73G	MDW	1288	6:55	125	137
D	SchedPax	AA	763	DFW	2412	6:55	195	225
D	SchedPax	MQ	ERD	SAN	3025	6:55	32	44
D	SchedPax	VX	320	BOS	360	7:00	136	149
D	SchedPax	NW	320	MEM	176	7:00	139	148
D	SchedPax	UA	320	ORD	944	7:00	131	138
D	SchedPax	WN	735	HOU	2537	7:00	102	122
D	SchedPax	CO	738	EWR	1403	7:00	154	157
D	SchedPax	FL	73G	ATL	48	7:00	132	137
D	SchedPax	WN	73G	OAK	579	7:00	84	137
D	SchedPax	NW	757	DTW	686	7:00	175	182
D	SchedPax	AA	762	JFK	118	7:00	159	168
D	SchedPax	AC	E90	YVR	551	7:00	80	93
D	SchedPax	A296	CRJ	ABQ	6472	7:03	41	50

Table 1

2009 Baseline Design Day Flight Schedule

A/D	Activity Type	Operator	Equipment	Origin/Dest.	Flight No.	Time	Passengers	Seats
D	SchedPax	US	320	LAS	1742	7:05	80	150
D	SchedPax	AA	738	ORD	1868	7:10	137	148
D	SchedPax	WN	73G	DEN	1549	7:10	96	137
D	SchedPax	WN	73G	SFO	1841	7:10	89	137
D	SchedPax	AA	757	DFW	2416	7:10	175	190
D	SchedPax	MQ	ERD	SJC	3131	7:10	36	44
D	SchedPax	DL	757	SLC	1174	7:15	157	183
D	SchedPax	AM	737	MEX	18	7:20	108	124
D	SchedPax	A296	EM2	CLD	6200	7:22	10	30
D	SchedPax	A296	EM2	SAN	6321	7:23	23	30
D	SchedPax	WN	73G	TUS	596	7:25	93	137
D	SchedPax	AC	E90	YYC	569	7:25	80	93
D	SchedPax	UA	752	DEN	58	7:28	161	182
D	SchedPax	US	320	CLT	704	7:30	145	150
D	SchedPax	VX	320	JFK	404	7:30	141	149
D	SchedPax	DL	752	JFK	78	7:30	174	183
D	SchedPax	AA	757	MIA	202	7:30	172	190
D	SchedPax	A296	CR7	SLC	6466	7:30	38	66
D	SchedPax	AA	M83	SFO	1920	7:30	125	140
D	SchedPax	WN	733	RNO	187	7:35	105	137
D	SchedPax	UA	752	SFO	889	7:36	132	182
D	SchedPax	A296	CR7	DFW	6234	7:38	57	66
D	SchedPax	VX	320	SEA	781	7:40	139	149
D	SchedPax	UA	32S	LAS	359	7:44	77	138
D	SchedPax	WN	733	LAS	1269	7:45	69	137
D	SchedPax	CO	738	IAH	294	7:45	137	157
D	SchedPax	MQ	ERD	FAT	3011	7:45	29	44
D	SchedPax	A296	CR7	PDX	6061	7:49	58	66
D	SchedPax	DL	77L	ATL	244	7:50	262	276
D	SchedPax	WN	73G	SJC	1904	7:55	77	137
D	SchedPax	UA	777	IAD	946	7:55	237	258
D	SchedPax	A296	CR7	SJC	6499	7:57	50	66
D	SchedPax	VX	319	SFO	925	8:00	104	122
D	SchedPax	AC	320	YYZ	788	8:00	135	146
D	SchedPax	WN	733	OAK	609	8:00	85	137
D	SchedPax	FL	73G	MKE	208	8:00	129	137
D	SchedPax	AS	73H	ANC	149	8:00	131	157
D	SchedPax	MQ	ERD	SBA	3039	8:00	32	44
D	SchedPax	A296	CRJ	COS	6512	8:02	42	50
D	SchedPax	NW	753	MSP	1024	8:03	211	224
D	SchedPax	WN	73G	MCI	3811	8:05	117	137
D	SchedPax	QX	DH4	STS	2474	8:05	57	74
D	SchedPax	AA	757	DFW	2422	8:10	175	190
D	SchedPax	G4	M80	BIL	336	8:10	142	150
D	SchedPax	A296	EM2	SAN	6322	8:13	23	30
D	SchedPax	UA	757	JFK	22	8:14	103	110
D	SchedPax	AA	738	ORD	898	8:15	137	148
D	SchedPax	AA	763	BOS	222	8:15	219	225
D	SchedPax	QX	DH4	RNO	2442	8:15	60	74
D	SchedPax	A296	EM2	IPL	6279	8:15	8	30
D	SchedPax	A296	EM2	SBA	6354	8:15	21	30
D	SchedPax	UA	752	ORD	106	8:16	171	182
D	SchedPax	A296	EM2	FAT	6246	8:18	22	30
D	SchedPax	UA	320	DEN	558	8:19	129	138
D	SchedPax	WN	73G	LAS	1250	8:20	98	137
D	SchedPax	WN	73G	PHX	3374	8:20	95	137
D	SchedPax	OO	CRJ	SLC	4516	8:25	42	50
D	SchedPax	MQ	ERD	SAN	3047	8:25	32	44
D	SchedPax	AA	M80	DFW	2428	8:25	130	140

Table 1

2009 Baseline Design Day Flight Schedule

A/D	Activity Type	Operator	Equipment	Origin/Dest.	Flight No.	Time	Passengers	Seats
D	SchedPax	MX	318	GDL	927	8:30	82	100
D	SchedPax	AC	319	YUL	782	8:30	108	120
D	SchedPax	WN	733	AUS	393	8:30	118	137
D	SchedPax	AS	73H	SEA	451	8:30	137	157
D	SchedPax	UA	752	BOS	162	8:30	172	182
D	SchedPax	CO	757	EWR	1703	8:30	172	175
D	SchedPax	AA	757	HNL	31	8:30	176	190
D	SchedPax	AA	757	MCO	244	8:30	162	190
D	SchedPax	AA	762	JFK	34	8:30	159	168
D	SchedPax	UA	763	KOA	57	8:33	132	183
D	SchedPax	UA	752	LIH	67	8:34	152	182
D	SchedPax	UA	752	SFO	94	8:34	132	182
D	SchedPax	UA	763	OGG	45	8:34	164	183
D	SchedPax	A296	EM2	SBP	6379	8:34	21	30
D	SchedPax	MX	320	MEX	929	8:35	127	150
D	SchedPax	WN	73G	SLC	503	8:35	78	137
D	SchedPax	WN	73G	SMF	3922	8:35	91	137
D	SchedPax	UA	777	HNL	81	8:38	224	258
D	SchedPax	US	321	PHL	754	8:40	175	183
D	SchedPax	AS	73H	YVR	709	8:40	146	157
D	SchedPax	DL	763	HNL	1465	8:40	203	214
D	SchedPax	UA	319	PHL	192	8:41	115	120
D	SchedPax	A296	CR7	SEA	6105	8:41	61	66
D	SchedPax	AA	762	EWR	114	8:45	155	168
D	SchedPax	HA	763	HNL	1	8:45	227	252
D	SchedPax	VX	320	IAD	108	8:50	124	149
D	SchedPax	WN	733	MDW	2921	8:50	129	137
D	SchedPax	WN	73G	SAT	2207	8:50	121	137
D	SchedPax	DL	757	ATL	116	8:50	178	183
D	SchedPax	NW	320	LAS	629	8:53	89	148
D	SchedPax	WN	73G	SFO	224	8:55	89	137
D	SchedPax	QX	DH4	RDM	2330	8:55	58	74
D	SchedPax	A296	CR7	PHX	6526	8:56	54	66
D	SchedPax	A296	EM2	OXR	6296	8:59	12	30
D	SchedPax	UA	319	IAD	966	9:00	117	120
D	SchedPax	US	319	LAS	102	9:00	93	124
D	SchedPax	NW	320	DTW	536	9:00	142	148
D	SchedPax	WN	733	BNA	3459	9:00	127	137
D	SchedPax	CO	753	IAH	1594	9:00	200	216
D	SchedPax	AA	757	IAD	76	9:00	175	190
D	SchedPax	AA	757	MIA	280	9:00	172	190
D	SchedPax	A296	EM2	PSP	6300	9:00	16	30
D	SchedPax	NW	320	MSP	622	9:02	134	148
D	SchedPax	A296	CR7	YVR	6114	9:12	52	66
D	SchedPax	QF	744	JFK	107	9:15	305	379
D	SchedPax	MQ	ERD	SJC	3190	9:15	36	44
D	SchedPax	F9	319	DEN	104	9:20	126	136
D	SchedPax	UA	320	BWI	306	9:20	132	138
D	SchedPax	WN	73G	ABQ	1075	9:20	106	137
D	SchedPax	DL	738	FLL	1434	9:30	143	150
D	SchedPax	AA	762	JFK	2	9:30	159	168
D	SchedPax	UA	319	PIT	963	9:40	108	120
D	SchedPax	SY	738	MSP	422	9:40	130	162
D	SchedPax	AA	757	DFW	2430	9:40	175	190
D	SchedPax	AA	763	ORD	1180	9:40	219	225
D	SchedPax	AA	M80	SJD	237	9:40	118	140
D	SchedPax	MX	319	CUN	949	9:43	96	120
D	SchedPax	MX	318	PVR	917	9:45	84	100
D	SchedPax	VX	320	JFK	406	9:45	141	149

Table 1

2009 Baseline Design Day Flight Schedule

A/D	Activity Type	Operator	Equipment	Origin/Dest.	Flight No.	Time	Passengers	Seats
D	SchedPax	US	320	PHX	14	9:45	134	150
D	SchedPax	UA	320	SFO	954	9:45	107	138
D	SchedPax	AM	737	GDL	471	9:45	102	124
D	SchedPax	A296	EM2	SAN	6323	9:45	23	30
D	SchedPax	WN	733	PHX	410	9:50	86	137
D	SchedPax	UA	752	MCO	272	9:53	150	182
D	SchedPax	UA	320	ORD	178	9:55	131	138
D	SchedPax	WN	733	SJC	818	9:55	84	137
D	SchedPax	AA	757	OGG	253	9:55	180	190
D	SchedPax	AA	M80	SFO	1928	9:55	125	140
D	SchedPax	A296	EM2	SMX	6417	9:56	20	30
D	SchedPax	WN	733	ELP	1954	10:00	110	137
D	SchedPax	WN	733	OAK	1726	10:00	85	137
D	SchedPax	DL	757	ATL	101	10:00	178	183
D	SchedPax	CO	757	HNL	3	10:00	160	175
D	SchedPax	QX	DH4	BOI	2416	10:00	60	74
D	SchedPax	WN	73G	LAS	2278	10:05	98	137
D	SchedPax	DL	73H	MCO	1430	10:05	144	160
D	SchedPax	UA	32S	CUN	809	10:08	124	138
D	SchedPax	AA	738	YYZ	1586	10:10	135	148
D	SchedPax	WN	73G	DEN	471	10:10	96	137
D	SchedPax	DL	73H	JFK	32	10:10	153	160
D	SchedPax	CO	757	EWR	16	10:10	172	175
D	SchedPax	MQ	ERD	SAN	3007	10:10	32	44
D	SchedPax	AA	M83	ORD	836	10:10	134	140
D	SchedPax	WN	733	SFO	790	10:15	82	137
D	SchedPax	AS	739	ZIH	272	10:15	144	172
D	SchedPax	MQ	ERD	FAT	3013	10:15	29	44
D	SchedPax	DL	M90	SLC	1176	10:15	135	150
D	SchedPax	A296	EM2	CLD	6202	10:18	10	30
D	SchedPax	AS	73H	SJD	250	10:25	141	157
D	SchedPax	UA	319	SFO	857	10:30	101	120
D	SchedPax	MX	320	MEX	5900	10:30	127	150
D	SchedPax	AS	734	SEA	453	10:30	121	144
D	SchedPax	CO	738	CLE	556	10:30	143	157
D	SchedPax	AA	763	HNL	283	10:30	211	225
D	SchedPax	AA	M83	LAS	733	10:30	119	140
D	SchedPax	WN	733	HOU	1464	10:35	124	137
D	SchedPax	MQ	ERD	MRY	3079	10:35	35	44
D	SchedPax	UA	320	DEN	814	10:40	129	138
D	SchedPax	WN	733	MCI	316	10:40	121	137
D	SchedPax	AS	739	PVR	258	10:40	162	172
D	SchedPax	UA	752	IAD	856	10:40	172	182
D	SchedPax	AA	757	DFW	2436	10:40	175	190
D	SchedPax	QX	DH4	ACV	2307	10:40	64	74
D	SchedPax	UA	763	ORD	942	10:42	166	183
D	SchedPax	WN	733	TUS	1689	10:45	97	137
D	SchedPax	HA	763	HNL	3	10:45	227	252
D	SchedPax	AC	E90	YVR	553	10:45	80	93
D	SchedPax	A296	EM2	SBA	6355	10:45	21	30
D	SchedPax	UA	752	OGG	89	10:47	157	182
D	SchedPax	AA	762	JFK	40	10:50	159	168
D	SchedPax	F9	319	DEN	400	10:55	126	136
D	SchedPax	DL	73H	MSY	1446	10:55	125	160
D	SchedPax	A296	CRJ	BOI	6506	10:55	41	50
D	SchedPax	AC	E90	YYC	571	10:55	80	93
D	SchedPax	VX	320	BOS	364	11:00	136	149
D	SchedPax	US	321	PHL	796	11:00	175	183
D	SchedPax	AA	738	BNA	1974	11:00	129	148

Table 1

2009 Baseline Design Day Flight Schedule

A/D	Activity Type	Operator	Equipment	Origin/Dest.	Flight No.	Time	Passengers	Seats
D	SchedPax	WN	73G	OAK	173	11:00	84	137
D	SchedPax	WN	73G	SMF	836	11:00	91	137
D	SchedPax	A296	EM2	IYK	6282	11:00	12	30
D	SchedPax	A296	EM2	YUM	6455	11:01	14	30
D	SchedPax	UA	32S	SJD	797	11:03	124	138
D	SchedPax	NW	320	DTW	687	11:05	142	148
D	SchedPax	AS	73H	PDX	567	11:05	131	157
D	SchedPax	DL	757	ATL	61	11:05	178	183
D	SchedPax	QK	CRA	YEG	8595	11:05	65	75
D	SchedPax	VX	320	IAD	110	11:10	124	149
D	SchedPax	YX	717	MCI	350	11:10	90	99
D	SchedPax	MQ	ERD	SBA	3033	11:10	32	44
D	SchedPax	MX	319	GDL	915	11:15	95	120
D	SchedPax	WN	73G	LAS	2542	11:15	98	137
D	SchedPax	YV	CRJ	PHX	2820	11:15	47	50
D	SchedPax	MQ	ERD	SAN	3045	11:15	32	44
D	SchedPax	US	321	CLT	1494	11:20	177	183
D	SchedPax	A296	EM2	MRY	6288	11:21	22	30
D	SchedPax	UA	32S	SFO	878	11:24	107	138
D	SchedPax	UA	752	HNL	61	11:25	165	182
D	SchedPax	OO	CR9	SLC	4700	11:30	55	70
D	SchedPax	QX	DH4	LTO	2601	11:30	42	74
D	SchedPax	AS	739	LTO	264	11:34	58	172
D	SchedPax	A296	EM2	FAT	6247	11:34	22	30
D	SchedPax	FL	73G	MKE	349	11:35	129	137
D	SchedPax	WN	73G	SLC	692	11:35	78	137
D	SchedPax	UA	763	ORD	840	11:35	166	183
D	SchedPax	A296	EM2	CLD	6203	11:35	10	30
D	SchedPax	A296	CR7	TUL	6138	11:36	56	66
D	SchedPax	A296	CR7	SEA	5818	11:37	61	66
D	SchedPax	DL	738	SLC	1178	11:38	130	150
D	SchedPax	US	319	LAS	105	11:40	93	124
D	SchedPax	KE	772	NRT	2	11:40	197	301
D	SchedPax	AA	M80	STL	812	11:40	122	140
D	SchedPax	UA	319	MSY	202	11:45	105	120
D	SchedPax	AC	320	YYZ	790	11:45	135	146
D	SchedPax	WN	73G	ABQ	3969	11:45	106	137
D	SchedPax	A296	CR7	PDX	6065	11:45	58	66
D	SchedPax	AA	M83	DFW	2440	11:45	130	140
D	SchedPax	CO	753	IAH	394	11:50	200	216
D	SchedPax	AA	757	BOS	264	11:50	183	190
D	SchedPax	AA	777	MIA	1520	11:50	225	247
D	SchedPax	UA	757	JFK	26	11:55	103	110
D	SchedPax	AA	M80	LAS	1915	11:55	119	140
D	SchedPax	CO	753	EWR	90	11:58	210	216
D	SchedPax	DL	738	CVG	1590	12:00	145	150
D	SchedPax	FL	73G	BWI	64	12:00	130	137
D	SchedPax	WN	73G	OAK	1714	12:00	84	137
D	SchedPax	AA	M83	SFO	581	12:00	125	140
D	SchedPax	NW	757	MSP	695	12:02	172	182
D	SchedPax	VX	320	SEA	789	12:05	139	149
D	SchedPax	MQ	ERD	SJC	3121	12:05	36	44
D	SchedPax	RW	E90	MKE	1500	12:10	94	98
D	SchedPax	UA	319	SFO	808	12:14	101	120
D	SchedPax	AC	319	YUL	798	12:15	108	120
D	SchedPax	AA	757	DFW	2444	12:15	175	190
D	SchedPax	AA	738	DEN	1458	12:20	126	148
D	SchedPax	WN	73G	MDW	3076	12:20	125	137
D	SchedPax	VX	319	SFO	929	12:25	104	122

Table 1

2009 Baseline Design Day Flight Schedule

A/D	Activity Type	Operator	Equipment	Origin/Dest.	Flight No.	Time	Passengers	Seats
D	SchedPax	US	320	PHX	46	12:25	134	150
D	SchedPax	WN	733	PHX	994	12:25	86	137
D	SchedPax	TN	343	CDG	8	12:30	242	294
D	SchedPax	AS	73H	SEA	459	12:30	137	157
D	SchedPax	KE	744	ICN	18	12:30	285	335
D	SchedPax	CO	753	IAH	494	12:30	200	216
D	SchedPax	DL	757	JFK	84	12:30	174	183
D	SchedPax	A296	EM2	BFL	6170	12:30	19	30
D	SchedPax	MQ	ERD	SAN	3049	12:30	32	44
D	SchedPax	WN	73G	ELP	1617	12:35	101	137
D	SchedPax	NW	757	DTW	688	12:40	175	182
D	SchedPax	A296	EM2	SAN	6327	12:40	23	30
D	SchedPax	DL	763	ATL	152	12:41	206	214
D	SchedPax	A296	CRJ	TUS	6452	12:42	38	50
D	SchedPax	A296	CRJ	PHX	6522	12:44	45	50
D	SchedPax	UA	319	LAS	378	12:45	88	120
D	SchedPax	NW	320	MEM	180	12:45	139	148
D	SchedPax	FL	73G	ATL	56	12:45	132	137
D	SchedPax	WN	73G	RNO	2977	12:45	105	137
D	SchedPax	WN	73G	SAT	631	12:45	121	137
D	SchedPax	UA	752	DEN	336	12:45	161	182
D	SchedPax	UA	752	ORD	146	12:45	171	182
D	SchedPax	AA	777	NRT	169	12:45	167	247
D	SchedPax	MQ	ERD	SBA	3043	12:45	32	44
D	SchedPax	AA	M83	ORD	681	12:45	134	140
D	SchedPax	A296	EM2	OXR	6295	12:49	12	30
D	SchedPax	AS	73H	DCA	6	12:50	139	157
D	SchedPax	A296	CR7	OKC	6442	12:50	57	66
D	SchedPax	AA	M80	DFW	2446	12:50	130	140
D	SchedPax	AS	734	PDX	5710	12:54	119	144
D	SchedPax	NH	777	NRT	5	12:55	261	382
D	SchedPax	AA	M80	AUS	1308	12:55	126	140
D	SchedPax	UA	320	IAD	236	12:57	132	138
D	SchedPax	A296	CR7	YVR	6483	12:58	52	66
D	SchedPax	CO	733	IAH	694	12:59	107	124
D	SchedPax	UA	777	LHR	934	12:59	239	258
D	SchedPax	TN	343	PPT	1	13:00	243	294
D	SchedPax	WN	73G	OAK	3361	13:00	84	137
D	SchedPax	DL	757	KOA	1767	13:00	154	183
D	SchedPax	A296	EM2	PSP	6302	13:00	16	30
D	SchedPax	B6	320	JFK	672	13:10	142	150
D	SchedPax	WN	73G	LAS	605	13:10	98	137
D	SchedPax	WN	73G	SFO	1919	13:10	89	137
D	SchedPax	UA	752	SFO	118	13:10	132	182
D	SchedPax	DL	757	SLC	1180	13:10	157	183
D	SchedPax	MQ	ERD	SAN	3021	13:10	32	44
D	SchedPax	UA	744	NRT	891	13:13	306	374
D	SchedPax	AS	734	YVR	703	13:15	128	144
D	SchedPax	AM	737	MEX	647	13:15	108	124
D	SchedPax	AA	762	JFK	32	13:15	159	168
D	SchedPax	MX	320	MEX	901	13:20	127	150
D	SchedPax	US	321	CLT	1496	13:20	177	183
D	SchedPax	WN	735	SMF	1190	13:20	95	122
D	SchedPax	NW	744	NRT	1	13:20	349	403
D	SchedPax	JL	744	NRT	61	13:20	431	546
D	SchedPax	LA	763	LIM	601	13:20	161	221
D	SchedPax	QX	DH4	FLG	2316	13:25	54	74
D	SchedPax	MU	346	PVG	586	13:30	214	326
D	SchedPax	AS	73H	SEA	461	13:30	137	157

Table 1

2009 Baseline Design Day Flight Schedule

A/D	Activity Type	Operator	Equipment	Origin/Dest.	Flight No.	Time	Passengers	Seats
D	SchedPax	UA	752	ORD	116	13:30	171	182
D	SchedPax	5D	ERJ	HMO	2201	13:30	38	50
D	SchedPax	A296	EM2	SAN	6329	13:33	23	30
D	SchedPax	VX	320	JFK	412	13:35	141	149
D	SchedPax	US	321	PHL	1416	13:35	175	183
D	SchedPax	AA	757	DFW	2448	13:35	175	190
D	SchedPax	A296	EM2	SMX	6444	13:38	20	30
D	SchedPax	WN	733	TUS	2708	13:40	97	137
D	SchedPax	WN	73G	DEN	1757	13:40	96	137
D	SchedPax	WS	73H	YYC	885	13:40	148	166
D	SchedPax	UA	757	JFK	890	13:40	103	110
D	SchedPax	A296	CR7	DFW	6219	13:40	57	66
D	SchedPax	LY	772	TLV	6	13:45	233	279
D	SchedPax	MQ	ERD	MRY	3031	13:45	35	44
D	SchedPax	A296	CRJ	COS	6440	13:48	42	50
D	SchedPax	US	319	LAS	162	13:50	93	124
D	SchedPax	WN	73G	LAS	3439	13:50	98	137
D	SchedPax	WS	73W	YEG	923	13:50	111	136
D	SchedPax	MQ	ERD	SAN	3001	13:50	32	44
D	SchedPax	G4	M80	MFR	394	13:52	138	150
D	SchedPax	VX	319	SFO	937	13:55	104	122
D	SchedPax	WN	73G	MDW	903	13:55	125	137
D	SchedPax	WN	733	OAK	82	14:00	85	137
D	SchedPax	OZ	747	ICN	201	14:00	247	280
D	SchedPax	QX	CR7	PDX	2640	14:00	67	70
D	SchedPax	Y4	319	TLC	917	14:05	111	131
D	SchedPax	WN	73G	BNA	2445	14:05	123	137
D	SchedPax	WN	73G	SLC	1271	14:05	78	137
D	SchedPax	A296	EM2	SGU	6422	14:08	12	30
D	SchedPax	AC	E90	YVR	555	14:10	80	93
D	SchedPax	G4	M80	BIL	336	14:10	142	150
D	SchedPax	AA	738	ORD	1624	14:20	137	148
D	SchedPax	CO	753	IAH	594	14:25	200	216
D	SchedPax	WN	733	SMF	2622	14:30	99	137
D	SchedPax	DL	757	ATL	2092	14:30	178	183
D	SchedPax	AA	757	STL	768	14:30	161	190
D	SchedPax	AA	M80	SFO	1954	14:30	125	140
D	SchedPax	MX	319	GDL	921	14:35	95	120
D	SchedPax	WN	73G	SJC	1801	14:35	77	137
D	SchedPax	AA	757	MIA	252	14:35	172	190
D	SchedPax	A296	EM2	FAT	6066	14:35	22	30
D	SchedPax	MQ	ERD	SAN	3067	14:35	32	44
D	SchedPax	UA	752	OGG	47	14:37	157	182
D	SchedPax	WN	733	AUS	2964	14:40	118	137
D	SchedPax	NW	753	HNL	623	14:40	213	224
D	SchedPax	A296	EM2	MRY	6291	14:44	22	30
D	SchedPax	B6	320	BOS	474	14:45	128	150
D	SchedPax	WN	73G	PHX	367	14:45	95	137
D	SchedPax	DL	73H	JFK	708	14:45	153	160
D	SchedPax	SQ	744	NRT	11	14:45	281	375
D	SchedPax	Y4	319	GDL	915	14:50	109	131
D	SchedPax	UA	752	SFO	806	14:50	132	182
D	SchedPax	AA	738	IAD	144	14:55	134	148
D	SchedPax	LH	744	FRA	457	14:55	327	350
D	SchedPax	UA	752	DEN	748	14:55	161	182
D	SchedPax	NW	757	MSP	696	14:55	172	182
D	SchedPax	A296	EM2	CLD	6204	14:59	10	30
D	SchedPax	F9	319	DEN	414	15:00	126	136
D	SchedPax	WN	733	OAK	937	15:00	85	137

Table 1

2009 Baseline Design Day Flight Schedule

A/D	Activity Type	Operator	Equipment	Origin/Dest.	Flight No.	Time	Passengers	Seats
D	SchedPax	WN	73G	DEN	1765	15:00	96	137
D	SchedPax	AA	762	JFK	22	15:00	159	168
D	SchedPax	UA	320	SFO	170	15:03	107	138
D	SchedPax	A296	EM2	SAN	6335	15:03	23	30
D	SchedPax	WN	73G	LAS	3702	15:05	98	137
D	SchedPax	MQ	ERD	SAN	3083	15:05	32	44
D	SchedPax	A296	CR7	SAT	6431	15:06	55	66
D	SchedPax	A296	CR7	SEA	6008	15:06	61	66
D	SchedPax	A296	CRJ	SMF	6477	15:08	45	50
D	SchedPax	AC	320	YYZ	796	15:10	135	146
D	SchedPax	A296	EM2	SBA	6357	15:10	21	30
D	SchedPax	MQ	ERD	FAT	3023	15:10	29	44
D	SchedPax	A296	EM2	PSP	6305	15:12	16	30
D	SchedPax	FL	73G	ATL	51	15:15	132	137
D	SchedPax	AA	757	BOS	726	15:15	183	190
D	SchedPax	QX	DH4	RNO	2444	15:15	60	74
D	SchedPax	VX	320	JFK	416	15:20	141	149
D	SchedPax	A296	CR7	ASE	6454	15:24	47	66
D	SchedPax	WN	733	SJC	1696	15:25	84	137
D	SchedPax	CO	738	CLE	514	15:30	143	157
D	SchedPax	AS	73G	SEA	465	15:30	115	124
D	SchedPax	WN	73G	SFO	1027	15:30	89	137
D	SchedPax	AF	77W	CDG	65	15:30	294	325
D	SchedPax	WN	733	SMF	3662	15:35	99	137
D	SchedPax	CO	738	EWR	1503	15:35	154	157
D	SchedPax	AA	757	DFW	2450	15:35	175	190
D	SchedPax	WN	733	TUS	2187	15:40	97	137
D	SchedPax	BA	744	LHR	278	15:40	285	299
D	SchedPax	WN	733	PHX	418	15:45	86	137
D	SchedPax	WN	73G	ABQ	2904	15:45	106	137
D	SchedPax	DL	738	SLC	1182	15:50	130	150
D	SchedPax	MQ	ERD	SJC	3140	15:50	36	44
D	SchedPax	A296	CRJ	ABQ	6474	15:53	41	50
D	SchedPax	VX	320	SEA	793	15:55	139	149
D	SchedPax	CI	744	TPE	5	15:55	326	397
D	SchedPax	A296	EM2	SBP	6397	15:56	21	30
D	SchedPax	UA	32S	SFO	293	15:58	107	138
D	SchedPax	WN	733	OAK	73	16:00	85	137
D	SchedPax	UA	777	DEN	948	16:00	218	258
D	SchedPax	UA	752	IAD	210	16:04	172	182
D	SchedPax	A296	EM2	BFL	6169	16:06	19	30
D	SchedPax	TN	343	PPT	7	16:10	243	294
D	SchedPax	A296	EM2	SAN	6338	16:10	23	30
D	SchedPax	A296	EM2	CLD	6205	16:13	10	30
D	SchedPax	AA	762	JFK	180	16:15	159	168
D	SchedPax	AC	E90	YYC	573	16:15	80	93
D	SchedPax	US	320	PHX	500	16:20	134	150
D	SchedPax	A296	CR7	SJC	6519	16:25	50	66
D	SchedPax	MQ	ERD	SAN	3085	16:25	32	44
D	SchedPax	AA	M80	LAS	741	16:25	119	140
D	SchedPax	UA	319	LAS	384	16:30	88	120
D	SchedPax	AS	73G	SEA	467	16:30	115	124
D	SchedPax	WN	73G	SJC	2675	16:30	77	137
D	SchedPax	NZ	744	LHR	2	16:30	337	379
D	SchedPax	UA	757	JFK	28	16:30	103	110
D	SchedPax	AA	M83	STL	1716	16:30	122	140
D	SchedPax	DL	738	ATL	2094	16:35	133	150
D	SchedPax	MQ	ERD	SBA	3037	16:35	32	44
D	SchedPax	UA	752	KOA	53	16:37	149	182

Table 1

2009 Baseline Design Day Flight Schedule

A/D	Activity Type	Operator	Equipment	Origin/Dest.	Flight No.	Time	Passengers	Seats
D	SchedPax	A296	CRJ	SMF	6491	16:37	45	50
D	SchedPax	WN	733	MCI	159	16:40	121	137
D	SchedPax	WN	735	PHX	223	16:40	95	122
D	SchedPax	UA	752	LIH	69	16:40	152	182
D	SchedPax	AA	757	DFW	2456	16:40	175	190
D	SchedPax	AA	757	LIH	285	16:40	172	190
D	SchedPax	AA	M83	SFO	1563	16:40	125	140
D	SchedPax	EK	77L	DXB	216	16:45	211	266
D	SchedPax	UA	763	HNL	87	16:46	158	183
D	SchedPax	UA	319	ORD	122	16:50	114	120
D	SchedPax	WN	73G	LAS	835	16:50	98	137
D	SchedPax	CO	757	IAH	541	16:50	154	175
D	SchedPax	AA	757	OGG	161	16:55	180	190
D	SchedPax	YV	CR9	PHX	2880	16:55	78	86
D	SchedPax	US	319	LAS	397	17:00	93	124
D	SchedPax	UA	320	SFO	926	17:00	107	138
D	SchedPax	WN	733	SFO	3430	17:00	82	137
D	SchedPax	A296	EM2	SBA	6358	17:05	21	30
D	SchedPax	MX	318	GDL	933	17:08	82	100
D	SchedPax	AA	757	HNL	297	17:08	176	190
D	SchedPax	NW	320	LAS	631	17:10	89	148
D	SchedPax	AA	738	ORD	1890	17:10	137	148
D	SchedPax	DL	757	OGG	1477	17:10	117	183
D	SchedPax	MQ	ERD	SAN	3003	17:10	32	44
D	SchedPax	NW	320	DTW	689	17:15	142	148
D	SchedPax	WN	73G	PHX	2724	17:15	95	137
D	SchedPax	AA	757	KOA	247	17:15	169	190
D	SchedPax	F9	318	DEN	412	17:20	111	120
D	SchedPax	DL	757	SLC	1184	17:25	157	183
D	SchedPax	WN	73G	SJC	507	17:30	77	137
D	SchedPax	AS	73H	SEA	457	17:30	137	157
D	SchedPax	A296	EM2	FAT	6249	17:30	22	30
D	SchedPax	AA	M80	DEN	678	17:30	100	140
D	SchedPax	VS	346	LHR	8	17:35	183	308
D	SchedPax	BA	744	LHR	282	17:35	285	299
D	SchedPax	WN	73G	DEN	2279	17:40	96	137
D	SchedPax	WN	73G	SFO	1900	17:40	89	137
D	SchedPax	KL	74M	AMS	602	17:40	261	278
D	SchedPax	NW	753	HNL	621	17:40	213	224
D	SchedPax	BR	77W	TPE	11	17:40	261	316
D	SchedPax	WN	735	SMF	1446	17:45	95	122
D	SchedPax	AA	738	DFW	2458	17:45	127	148
D	SchedPax	DL	763	HNL	1467	17:49	203	214
D	SchedPax	WN	73G	ELP	1947	17:50	101	137
D	SchedPax	A296	CR7	TUS	6498	17:50	54	66
D	SchedPax	A296	EM2	CLD	6206	17:50	10	30
D	SchedPax	MX	320	MEX	905	17:55	127	150
D	SchedPax	WN	733	MDW	3329	17:55	129	137
D	SchedPax	HA	763	HNL	9	17:55	227	252
D	SchedPax	QX	DH4	BOI	2418	17:55	60	74
D	SchedPax	US	320	PHX	1514	18:00	134	150
D	SchedPax	WN	73G	LAS	292	18:00	98	137
D	SchedPax	WN	73G	OAK	1341	18:00	84	137
D	SchedPax	UA	752	DEN	504	18:00	161	182
D	SchedPax	MQ	ERD	SAN	3093	18:00	32	44
D	SchedPax	CO	733	IAH	1542	18:05	107	124
D	SchedPax	A296	EM2	IPL	6280	18:05	8	30
D	SchedPax	UA	320	SFO	798	18:09	107	138
D	SchedPax	NW	320	MSP	698	18:10	134	148

Table 1

2009 Baseline Design Day Flight Schedule

A/D	Activity Type	Operator	Equipment	Origin/Dest.	Flight No.	Time	Passengers	Seats
D	SchedPax	VX	320	SFO	945	18:10	112	149
D	SchedPax	WN	73G	SJC	3760	18:15	77	137
D	SchedPax	UA	763	HNL	209	18:15	158	183
D	SchedPax	AC	E90	YVR	557	18:15	80	93
D	SchedPax	QX	CR7	PDX	2600	18:20	67	70
D	SchedPax	A296	CR7	YVR	6428	18:20	52	66
D	SchedPax	A296	CRJ	PHX	6528	18:20	45	50
D	SchedPax	A296	EM2	SAN	6340	18:20	23	30
D	SchedPax	A296	EM2	MRY	6292	18:22	22	30
D	SchedPax	WN	733	SMF	844	18:25	99	137
D	SchedPax	AS	734	YVR	707	18:25	128	144
D	SchedPax	AS	73H	PDX	245	18:25	131	157
D	SchedPax	AS	734	SEA	471	18:30	121	144
D	SchedPax	WN	73G	SLC	533	18:30	78	137
D	SchedPax	AA	757	HNL	267	18:30	176	190
D	SchedPax	SU	763	SVO	322	18:30	173	218
D	SchedPax	A296	CR7	PDX	6071	18:30	58	66
D	SchedPax	MQ	ERD	FAT	3017	18:30	29	44
D	SchedPax	WN	733	PHX	970	18:40	86	137
D	SchedPax	WN	73G	MDW	3598	18:40	125	137
D	SchedPax	A296	EM2	SBP	6409	18:43	21	30
D	SchedPax	WN	73G	HOU	3402	18:45	115	137
D	SchedPax	WN	73G	SFO	1796	18:45	89	137
D	SchedPax	AF	772	CDG	69	18:45	244	270
D	SchedPax	A296	EM2	PSP	6309	18:45	16	30
D	SchedPax	MQ	ERD	SJC	3168	18:45	36	44
D	SchedPax	UA	32S	LAS	866	18:47	77	138
D	SchedPax	AA	738	DFW	2468	18:50	127	148
D	SchedPax	UA	752	ORD	124	18:50	171	182
D	SchedPax	AS	739	YVR	705	18:55	154	172
D	SchedPax	A296	CRJ	COS	6496	18:56	42	50
D	SchedPax	WN	73G	OAK	3963	19:00	84	137
D	SchedPax	UA	752	OGG	49	19:00	157	182
D	SchedPax	AA	M80	AUS	2246	19:00	126	140
D	SchedPax	LH	346	FRA	451	19:10	276	306
D	SchedPax	A296	CR7	SAT	6430	19:10	55	66
D	SchedPax	A296	CR7	SLC	6470	19:10	38	66
D	SchedPax	A296	EM2	SAN	6341	19:12	23	30
D	SchedPax	VX	320	SEA	797	19:15	139	149
D	SchedPax	WN	73G	TUS	3158	19:15	93	137
D	SchedPax	A296	EM2	IYK	6283	19:15	12	30
D	SchedPax	MQ	ERD	SAN	3095	19:15	32	44
D	SchedPax	LX	343	ZRH	41	19:20	220	228
D	SchedPax	WN	73G	RNO	1657	19:20	105	137
D	SchedPax	US	319	LAS	117	19:25	93	124
D	SchedPax	AS	734	SEA	469	19:30	121	144
D	SchedPax	QX	DH4	PRC	2318	19:30	56	74
D	SchedPax	AA	M83	SFO	1798	19:30	125	140
D	SchedPax	A296	EM2	SBA	6362	19:34	21	30
D	SchedPax	WN	733	SFO	1545	19:35	82	137
D	SchedPax	WN	73G	LAS	384	19:35	98	137
D	SchedPax	UA	319	SFO	841	19:40	101	120
D	SchedPax	WN	733	SMF	1752	19:40	99	137
D	SchedPax	WN	73G	PHX	851	19:45	95	137
D	SchedPax	OO	CRJ	SLC	4746	19:45	42	50
D	SchedPax	WN	73G	SJC	1275	19:50	77	137
D	SchedPax	AA	777	LHR	136	19:50	223	247
D	SchedPax	F9	319	DEN	407	19:55	126	136
D	SchedPax	NW	320	LAS	633	19:55	89	148

Table 1

2009 Baseline Design Day Flight Schedule

A/D	Activity Type	Operator	Equipment	Origin/Dest.	Flight No.	Time	Passengers	Seats
D	SchedPax	WN	73G	ABQ	2206	19:55	106	137
D	SchedPax	QX	DH4	RNO	2446	19:55	60	74
D	SchedPax	UA	32S	SFO	320	20:00	107	138
D	SchedPax	WN	73G	OAK	1140	20:00	84	137
D	SchedPax	QX	CR7	MFR	2522	20:05	63	70
D	SchedPax	A296	EM2	SAN	6342	20:09	23	30
D	SchedPax	A296	CR7	ABQ	6436	20:13	38	66
D	SchedPax	A296	CR7	SEA	6032	20:13	61	66
D	SchedPax	WN	733	LAS	2112	20:15	69	137
D	SchedPax	QX	DH4	RDD	2304	20:15	63	74
D	SchedPax	A296	CRJ	TUS	6458	20:18	38	50
D	SchedPax	WN	73G	DEN	2950	20:20	96	137
D	SchedPax	UA	320	SFO	712	20:24	107	138
D	SchedPax	WN	73G	PHX	2619	20:30	95	137
D	SchedPax	A296	CRJ	FAT	6511	20:33	27	50
D	SchedPax	WN	73G	SFO	3577	20:35	89	137
D	SchedPax	AS	739	SEA	263	20:45	139	172
D	SchedPax	AC	E90	YVR	559	20:45	80	93
D	SchedPax	MQ	ERD	FAT	3019	20:45	29	44
D	SchedPax	AS	73H	ANC	157	20:50	131	157
D	SchedPax	VS	346	LHR	24	20:55	183	308
D	SchedPax	AS	734	SFO	721	20:55	118	144
D	SchedPax	AS	739	SEA	291	20:57	139	172
D	SchedPax	VX	320	BOS	370	21:00	136	149
D	SchedPax	WN	73G	OAK	1046	21:00	84	137
D	SchedPax	AV	762	BOG	49	21:00	139	175
D	SchedPax	A296	EM2	PSP	6310	21:00	16	30
D	SchedPax	A296	EM2	SGU	6424	21:00	12	30
D	SchedPax	MQ	ERD	SBA	3035	21:00	32	44
D	SchedPax	CO	757	HNL	1943	21:13	160	175
D	SchedPax	LH	346	MUC	453	21:15	286	306
D	SchedPax	AA	738	MIA	1254	21:15	139	148
D	SchedPax	BA	744	LHR	268	21:15	285	299
D	SchedPax	DL	757	JFK	712	21:15	174	183
D	SchedPax	AA	762	JFK	10	21:15	159	168
D	SchedPax	AF	772	CDG	67	21:15	244	270
D	SchedPax	MX	318	MLM	129	21:17	73	100
D	SchedPax	WN	733	SFO	1615	21:20	82	137
D	SchedPax	DL	738	CVG	1273	21:23	145	150
D	SchedPax	VX	320	JFK	418	21:30	141	149
D	SchedPax	NZ	744	AKL	1	21:30	326	379
D	SchedPax	A296	EM2	YUM	6461	21:35	14	30
D	SchedPax	NW	320	TPA	648	21:40	140	148
D	SchedPax	SQ	345	SIN	37	21:41	67	100
D	SchedPax	VX	320	IAD	114	21:45	124	149
D	SchedPax	CO	753	EWR	1803	21:45	210	216
D	SchedPax	A296	CR7	PDX	6073	21:45	58	66
D	SchedPax	A296	CRJ	SMF	6462	21:45	45	50
D	SchedPax	AA	738	MIA	276	22:15	139	148
D	SchedPax	NK	319	FLL	310	22:20	136	145
D	SchedPax	NW	320	IND	1604	22:20	140	148
D	SchedPax	US	321	PHL	36	22:20	175	183
D	SchedPax	A296	EM2	CLD	6207	22:20	10	30
D	SchedPax	UA	763	IAD	44	22:22	173	183
D	SchedPax	UA	757	JFK	82	22:25	103	110
D	SchedPax	FL	73G	ATL	58	22:29	132	137
D	SchedPax	AC	319	YYZ	794	22:30	111	120
D	SchedPax	QF	388	SYD	12	22:30	409	450
D	SchedPax	AA	757	BOS	192	22:30	183	190

Table 1

2009 Baseline Design Day Flight Schedule

A/D	Activity Type	Operator	Equipment	Origin/Dest.	Flight No.	Time	Passengers	Seats
D	SchedPax	NZ	772	AKL	5	22:30	261	304
D	SchedPax	MQ	ERD	SAN	3005	22:30	32	44
D	SchedPax	A296	CR7	PHX	6453	22:34	54	66
D	SchedPax	A296	CR7	SAN	6344	22:34	52	66
D	SchedPax	A296	CR7	SJC	6521	22:34	50	66
D	SchedPax	UA	744	SYD	839	22:35	302	374
D	SchedPax	UA	752	BOS	166	22:35	172	182
D	SchedPax	DL	77L	SYD	17	22:35	188	276
D	SchedPax	A296	CRJ	TUS	6445	22:35	38	50
D	SchedPax	UA	319	BWI	462	22:38	113	120
D	SchedPax	B6	320	JFK	674	22:40	142	150
D	SchedPax	UA	320	SFO	263	22:40	107	138
D	SchedPax	US	321	CLT	425	22:40	177	183
D	SchedPax	A296	EM2	BFL	6171	22:41	19	30
D	SchedPax	A296	EM2	IYK	6284	22:41	12	30
D	SchedPax	A296	EM2	SMX	6451	22:41	20	30
D	SchedPax	UA	320	PHL	130	22:45	130	138
D	SchedPax	NW	753	DTW	690	22:45	216	224
D	SchedPax	DL	763	ATL	2096	22:50	206	214
D	SchedPax	UA	32S	LAS	864	22:55	77	138
D	SchedPax	FL	73G	BWI	76	22:55	130	137
D	SchedPax	A296	EM2	OXR	6298	22:57	12	30
D	SchedPax	UA	752	ORD	126	22:58	171	182
D	SchedPax	A296	EM2	SBA	6363	22:59	21	30
D	SchedPax	AA	738	IAD	74	23:00	134	148
D	SchedPax	DL	752	JFK	714	23:00	174	183
D	SchedPax	CO	753	CLE	634	23:00	206	216
D	SchedPax	A296	EM2	PSP	6311	23:00	16	30
D	SchedPax	PR	744	MNL	103	23:08	294	439
D	SchedPax	TG	345	BKK	795	23:10	142	215
D	SchedPax	MX	318	MEX	137	23:15	81	100
D	SchedPax	A296	CRJ	FAT	6433	23:16	27	50
D	SchedPax	UA	320	IAD	99	23:20	132	138
D	SchedPax	QF	744	BNE	16	23:20	282	379
D	SchedPax	AM	737	MEX	469	23:30	108	124
D	SchedPax	CO	738	EWR	503	23:30	154	157
D	SchedPax	QF	744	MEL	94	23:30	343	379
D	SchedPax	FJ	744	NAN	811	23:30	247	480
D	SchedPax	NK	319	DTW	709	23:35	137	145
D	SchedPax	QF	744	AKL	26	23:45	180	379
D	SchedPax	VA	77W	SYD	2	23:45	236	361
D	SchedPax	CX	744	HKG	883	23:50	276	383
D	SchedPax	QF	744	SYD	108	23:50	321	379
D	SchedPax	CZ	772	CAN	328	23:50	185	292
D	SchedPax	B6	320	BOS	480	23:55	128	150
D	SchedPax	UA	320	ORD	114	23:55	131	138
D	SchedPax	AA	757	SAL	797	23:55	138	190
D	SchedPax	AA	762	JFK	30	23:55	159	168
D	SchedPax	AA	M83	ORD	1092	23:55	134	140
D	SchedPax	DL	757	ATL	2098	23:57	178	183
D	UnschedPax_AC	PCE	737	EWR	PCA938	10:48	0	0
D	UnschedPax_AT	LXJ	LR45	WYS	LXJ940	5:51	0	0
D	UnschedPax_AT	EJA	C560	VNY	EJA943	7:52	0	0

Table 1

2009 Baseline Design Day Flight Schedule

A/D	Activity Type	Operator	Equipment	Origin/Dest.	Flight No.	Time	Passengers	Seats
D	UnschedPax_AT	EJA	C750	ASE	EJA942	9:23	0	0
D	UnschedPax_AT	EJA	F2TH	SFO	EJA941	14:35	0	0
D	UnschedPax_AT	OPT	H25B	IND	OPT939	18:10	0	0

Notes:

CARGO_AC = Cargo Air Carrier; CARGO_AT = Cargo Air Taxi; GA = General Aviation; SchedPax = Scheduled Passenger; UnschedPax_AC = Unscheduled Passenger Air Carrier; UnschedPax_AT = Unscheduled Passenger Air Taxi

Source: Ricondo & Associates, Inc., October 2012 (design day flight schedule).

Table 2

2025 Baseline Design Day Flight Schedule

A/D	Activity Type	Equipment	Origin/Dest.	Flight No.	Time	Passengers	Seats
A	CARGO_AC	762	MEX	873	0:15	0	0
A	CARGO_AC	744	ICN	987	1:35	0	0
A	CARGO_AC	MD11	FRA	861	1:45	0	0
A	CARGO_AC	DC87	TOL	865	2:55	0	0
A	CARGO_AC	306	SNA	887	3:25	0	0
A	CARGO_AC	744	TPE	881	3:35	0	0
A	CARGO_AC	MD11	PVG	862	3:35	0	0
A	CARGO_AC	744	SIN	882	4:25	0	0
A	CARGO_AC	MD11	HNL	863	4:25	0	0
A	CARGO_AC	744	NRT	877	4:25	0	0
A	CARGO_AC	744	ICN	985	4:45	0	0
A	CARGO_AC	748	JFK	875	4:45	0	0
A	CARGO_AC	310	OAK	885	5:45	0	0
A	CARGO_AC	MD11	MEM	864	6:15	0	0
A	CARGO_AC	772	MEM	870	6:55	0	0
A	CARGO_AC	772	MEM	8701	7:55	0	0
A	CARGO_AC	744	PVG	879	9:55	0	0
A	CARGO_AC	763	MIA	980	12:15	0	0
A	CARGO_AC	742	ANC	993	13:25	0	0
A	CARGO_AC	748	NRT	880	15:45	0	0
A	CARGO_AC	748	ICN	883	16:15	0	0
A	CARGO_AC	DC10	IND	869	17:15	0	0
A	CARGO_AC	744	PVG	876	17:35	0	0
A	CARGO_AC	306	EWR	886	17:35	0	0
A	CARGO_AC	748	LUX	878	18:15	0	0
A	CARGO_AC	763	SDF	871	19:45	0	0
A	CARGO_AC	DC10	MEM	867	20:35	0	0
A	CARGO_AC	762	CVG	874	20:55	0	0
A	CARGO_AC	300	GDL	888	21:15	0	0
A	CARGO_AC	772	AFW	868	21:25	0	0
A	CARGO_AC	742	HNL	994	22:15	0	0
A	CARGO_AC	763	MEX	872	23:25	0	0
A	CARGO_AC	MD11	TPE	971	23:45	0	0
A	CARGO_AT	B190	PHX	884	22:55	0	0
A	GA	B190	VNY	N857	1:05	0	0
A	GA	BE20	PMD	N855	7:05	0	0
A	GA	C560	SFO	N852	7:55	0	0

Table 2

2025 Baseline Design Day Flight Schedule

A/D	Activity Type	Equipment	Origin/Dest.	Flight No.	Time	Passengers	Seats
A	GA	LJ60	LAS	N838	8:45	0	0
A	GA	C750	SJC	N851	8:55	0	0
A	GA	B190	LAS	N858	10:05	0	0
A	GA	BE36	LAS	N964	10:35	0	0
A	GA	BE19	PMD	N856	10:55	0	0
A	GA	B190	PMD	N859	11:45	0	0
A	GA	LJ60	LAS	N836	11:55	0	0
A	GA	GLF5	STL	N841	12:25	0	0
A	GA	H25B	LAS	N839	13:05	0	0
A	GA	F2TH	STL	N848	13:35	0	0
A	GA	GLF5	IAD	N840	14:15	0	0
A	GA	GLF4	SFO	N842	14:35	0	0
A	GA	GLF4	LAS	N845	15:45	0	0
A	GA	GALX	LAS	N846	16:25	0	0
A	GA	B190	PMD	N860	16:35	0	0
A	GA	GLF4	SNA	N844	17:15	0	0
A	GA	GLF4	SJC	N843	17:25	0	0
A	GA	B190	PMD	N861	17:35	0	0
A	GA	CL60	TEB	N850	18:15	0	0
A	GA	C441	PMD	N854	20:05	0	0
A	GA	CL60	APA	N849	21:55	0	0
A	GA	C550	LAS	N853	22:35	0	0
A	GA	F900	SBA	N847	23:25	0	0
A	MIL	CL60	SFO	MI837	9:05	0	0
A	MIL	LJ45	SDM	MI836	11:25	0	0
A	MIL	H25B	LAS	MI835	12:25	0	0
A	MIL	C130	SDL	MI834	15:15	0	0
A	SchedPax	738	IAH	595	0:15	129	151
A	SchedPax	762	JFK	185	0:30	140	169
A	SchedPax	773	ICN	38	0:30	324	385
A	SchedPax	321	GUA	510	0:45	151	184
A	SchedPax	738	IAD	10229	1:00	125	151
A	SchedPax	320	CUN	10020	1:00	112	147
A	SchedPax	744	DFW	91	3:15	316	381
A	SchedPax	752	OGG	58	4:35	154	182
A	SchedPax	763	HNL	68	4:35	173	211
A	SchedPax	763	HNL	84	4:45	173	211
A	SchedPax	752	LIH	1768	4:55	152	182
A	SchedPax	763	OGG	12	4:55	178	211
A	SchedPax	752	KOA	46	5:05	150	182
A	SchedPax	763	LIH	298	5:15	176	211
A	SchedPax	77L	SYD	16	5:25	235	273
A	SchedPax	CR7	PDX	10118	5:30	54	66
A	SchedPax	73H	PVR	10226	5:35	122	158
A	SchedPax	EM2	IYK	6281	5:40	18	30
A	SchedPax	763	LIH	14	5:45	176	211
A	SchedPax	752	KOA	1212	5:45	150	182
A	SchedPax	788	LIM	1495	6:00	208	250
A	SchedPax	CR7	SEA	10147	6:00	55	66
A	SchedPax	738	PTY	925	6:05	116	151
A	SchedPax	763	KOA	286	6:05	173	211
A	SchedPax	73H	PDX	10115	6:15	131	158
A	SchedPax	CR7	FAT	6024	6:20	49	66
A	SchedPax	739	SEA	10142	6:35	143	172
A	SchedPax	320	MSP	10223	6:35	119	147
A	SchedPax	73W	PHX	10126	6:35	111	136
A	SchedPax	73W	SLC	10167	6:35	110	136
A	SchedPax	753	HNL	622	6:35	179	219
A	SchedPax	EM2	PSP	6312	6:40	24	30

Table 2

2025 Baseline Design Day Flight Schedule

A/D	Activity Type	Equipment	Origin/Dest.	Flight No.	Time	Passengers	Seats
A	SchedPax	EM2	SBA	6364	6:40	24	30
A	SchedPax	763	HNL	2401	6:45	173	211
A	SchedPax	738	LAS	282	6:45	121	151
A	SchedPax	733	LAS	100	6:45	109	136
A	SchedPax	744	TLV	15	6:45	350	381
A	SchedPax	752	OGG	30	6:45	154	182
A	SchedPax	CR7	SLC	6465	6:50	53	66
A	SchedPax	CR7	CMH	10067	6:50	53	66
A	SchedPax	CR7	SAT	6435	6:50	50	66
A	SchedPax	73W	MDW	10013	6:55	106	136
A	SchedPax	CR9	PHX	4799	6:55	62	76
A	SchedPax	73W	OAK	3997	6:55	107	136
A	SchedPax	ERD	FAT	3014	7:00	33	44
A	SchedPax	ERD	SAN	10135	7:00	37	44
A	SchedPax	CR7	SAN	6100	7:00	56	66
A	SchedPax	738	DEN	10088	7:05	127	151
A	SchedPax	73H	ANC	150	7:05	135	158
A	SchedPax	E90	MKE	10019	7:05	70	94
A	SchedPax	319	BDL	10065	7:05	103	125
A	SchedPax	733	SMF	3811	7:05	108	136
A	SchedPax	763	HNL	246	7:05	173	211
A	SchedPax	73W	ABQ	609	7:05	104	136
A	SchedPax	CR7	PHX	6523	7:10	54	66
A	SchedPax	CR9	RNO	2441	7:15	56	76
A	SchedPax	763	DFW	4	7:15	175	211
A	SchedPax	738	SFO	111	7:15	124	151
A	SchedPax	ERD	SAN	3004	7:20	37	44
A	SchedPax	CR7	SMF	6463	7:20	52	66
A	SchedPax	CR7	STS	2467	7:20	42	66
A	SchedPax	73W	SJC	3374	7:25	105	136
A	SchedPax	73W	SLC	1163	7:25	110	136
A	SchedPax	752	CLE	10046	7:25	154	182
A	SchedPax	738	SLC	4515	7:25	123	151
A	SchedPax	EM2	SMX	6457	7:30	23	30
A	SchedPax	EM2	OXR	6299	7:30	18	30
A	SchedPax	EM2	YUM	6480	7:30	22	30
A	SchedPax	EM2	SGU	6432	7:30	18	30
A	SchedPax	E90	YVR	10210	7:35	75	94
A	SchedPax	319	CUL	10089	7:35	106	125
A	SchedPax	320	MEX	128	7:35	119	147
A	SchedPax	CR9	SFO	10155	7:35	62	76
A	SchedPax	73W	GEG	10184	7:35	110	136
A	SchedPax	733	SFO	393	7:35	112	136
A	SchedPax	319	DEN	10230	7:35	105	125
A	SchedPax	752	DEN	10093	7:35	153	182
A	SchedPax	752	SFO	492	7:35	149	182
A	SchedPax	77L	ATL	110	7:35	227	273
A	SchedPax	772	ICN	495	7:35	244	289
A	SchedPax	320	MLM	112	7:35	123	147
A	SchedPax	73W	RNO	3922	7:35	102	136
A	SchedPax	73W	DEN	3682	7:35	114	136
A	SchedPax	ERD	SBA	3034	7:40	35	44
A	SchedPax	738	TPA	10152	7:45	122	151
A	SchedPax	CR9	PDX	10116	7:45	62	76
A	SchedPax	738	SFO	10097	7:45	124	151
A	SchedPax	73W	ELP	10099	7:45	98	136
A	SchedPax	CR7	TUS	10186	7:50	51	66
A	SchedPax	EM2	FAT	6239	7:50	22	30
A	SchedPax	320	SFO	920	7:55	121	147

Table 2

2025 Baseline Design Day Flight Schedule

A/D	Activity Type	Equipment	Origin/Dest.	Flight No.	Time	Passengers	Seats
A	SchedPax	73W	OAK	2921	7:55	107	136
A	SchedPax	733	SMF	2207	7:55	108	136
A	SchedPax	738	DTW	628	7:55	123	151
A	SchedPax	73W	OAK	224	7:55	107	136
A	SchedPax	CR7	MOD	6517	8:00	49	66
A	SchedPax	CR7	SJC	10168	8:00	51	66
A	SchedPax	73W	TUS	10112	8:05	105	136
A	SchedPax	733	PHX	3442	8:05	111	136
A	SchedPax	738	GDL	649	8:05	128	151
A	SchedPax	737	QRO	10233	8:05	100	124
A	SchedPax	738	LAS	5536	8:05	121	151
A	SchedPax	320	BJX	10016	8:05	119	147
A	SchedPax	320	LAS	101	8:05	118	147
A	SchedPax	EM2	BFL	10174	8:10	22	30
A	SchedPax	CR7	SMF	2497	8:10	52	66
A	SchedPax	CR7	PRC	6500	8:10	43	66
A	SchedPax	EM2	SAN	6320	8:10	25	30
A	SchedPax	752	OGG	311	8:15	154	182
A	SchedPax	738	DEN	10070	8:15	127	151
A	SchedPax	320	MEM	10042	8:15	113	147
A	SchedPax	320	BOS	10149	8:15	120	147
A	SchedPax	738	RDU	10106	8:15	120	151
A	SchedPax	73W	LAS	10172	8:15	109	136
A	SchedPax	EM2	MRY	6314	8:20	25	30
A	SchedPax	CR7	PDX	10193	8:20	54	66
A	SchedPax	752	IAD	261	8:23	150	182
A	SchedPax	319	DEN	401	8:25	105	125
A	SchedPax	73W	SFO	1075	8:25	112	136
A	SchedPax	752	ORD	103	8:25	152	182
A	SchedPax	CR7	SUN	6076	8:30	54	66
A	SchedPax	EM2	PSP	10111	8:30	24	30
A	SchedPax	ERD	SAN	3024	8:30	37	44
A	SchedPax	739	SEA	10143	8:35	143	172
A	SchedPax	738	LAS	10227	8:35	121	151
A	SchedPax	73W	BWI	10045	8:35	107	136
A	SchedPax	763	GDL	456	8:35	178	211
A	SchedPax	CR7	EUG	10182	8:40	53	66
A	SchedPax	738	SJD	421	8:45	115	151
A	SchedPax	763	DFW	2407	8:45	175	211
A	SchedPax	752	AUS	1479	8:45	141	182
A	SchedPax	388	NRT	1	8:45	460	525
A	SchedPax	320	SEA	947	8:45	122	147
A	SchedPax	738	MSP	10036	8:45	123	151
A	SchedPax	738	STL	460	8:45	127	151
A	SchedPax	321	PHX	24	8:45	150	184
A	SchedPax	320	SEA	780	8:45	122	147
A	SchedPax	733	SMF	10169	8:45	108	136
A	SchedPax	ERD	FAT	10101	8:50	33	44
A	SchedPax	ERD	SAN	10136	8:50	37	44
A	SchedPax	CR7	PRC	10129	8:50	43	66
A	SchedPax	321	PHL	10063	8:55	147	184
A	SchedPax	738	SFO	410	8:55	124	151
A	SchedPax	752	MCO	10059	8:55	149	182
A	SchedPax	738	DEN	1929	8:55	127	151
A	SchedPax	733	ELP	620	8:55	98	136
A	SchedPax	EM2	CLD	6200	9:00	15	30
A	SchedPax	73H	SEA	10081	9:05	132	158
A	SchedPax	320	CUN	10056	9:05	112	147
A	SchedPax	CR9	MFR	2421	9:05	55	76

Table 2

2025 Baseline Design Day Flight Schedule

A/D	Activity Type	Equipment	Origin/Dest.	Flight No.	Time	Passengers	Seats
A	SchedPax	738	IAH	10007	9:05	129	151
A	SchedPax	738	OAK	1726	9:05	118	151
A	SchedPax	733	TUS	818	9:05	105	136
A	SchedPax	752	SFO	477	9:05	149	182
A	SchedPax	73W	SMF	1954	9:05	108	136
A	SchedPax	320	LAS	797	9:05	118	147
A	SchedPax	EM2	SAN	6321	9:10	25	30
A	SchedPax	738	ORD	2099	9:15	126	151
A	SchedPax	73W	MCI	1547	9:15	106	136
A	SchedPax	752	BOS	272	9:15	148	182
A	SchedPax	763	DEN	979	9:15	177	211
A	SchedPax	738	BOS	10041	9:15	123	151
A	SchedPax	739	SFO	452	9:15	141	172
A	SchedPax	738	SLC	1173	9:15	123	151
A	SchedPax	733	AUS	790	9:15	105	136
A	SchedPax	763	HNL	10074	9:15	173	211
A	SchedPax	752	BWI	163	9:15	143	182
A	SchedPax	CR7	ASE	10082	9:20	40	66
A	SchedPax	762	JFK	201	9:25	140	169
A	SchedPax	772	IAH	170	9:25	246	289
A	SchedPax	73H	ANC	240	9:25	135	158
A	SchedPax	ERD	SJC	3175	9:30	34	44
A	SchedPax	EM2	SBA	6368	9:30	24	30
A	SchedPax	738	LAS	10051	9:35	121	151
A	SchedPax	739	SEA	720	9:35	143	172
A	SchedPax	320	IAD	10021	9:35	121	147
A	SchedPax	320	JFK	900	9:35	122	147
A	SchedPax	738	EWR	1002	9:35	117	151
A	SchedPax	320	MSP	10156	9:35	119	147
A	SchedPax	748	ICN	17	9:35	394	467
A	SchedPax	752	SFO	877	9:35	149	182
A	SchedPax	733	SFO	1464	9:35	112	136
A	SchedPax	752	JFK	2081	9:35	151	182
A	SchedPax	73H	PDX	258	9:45	131	158
A	SchedPax	CR9	BOI	2415	9:45	50	76
A	SchedPax	738	IAD	125	9:45	125	151
A	SchedPax	733	OAK	316	9:45	107	136
A	SchedPax	319	YVR	550	9:45	99	125
A	SchedPax	73W	MDW	10014	9:45	106	136
A	SchedPax	733	SJC	1689	9:45	105	136
A	SchedPax	752	JFK	10057	9:45	151	182
A	SchedPax	CR7	TUS	10120	9:50	51	66
A	SchedPax	ERD	SBA	3038	9:50	35	44
A	SchedPax	E90	YYC	568	9:55	75	94
A	SchedPax	73H	YVR	701	9:55	125	158
A	SchedPax	319	DEN	403	9:55	105	125
A	SchedPax	EM2	SAN	6322	10:00	25	30
A	SchedPax	738	DFW	2411	10:05	125	151
A	SchedPax	73W	ATL	10039	10:05	113	136
A	SchedPax	739	IAH	10008	10:05	147	172
A	SchedPax	321	CLT	1431	10:05	151	184
A	SchedPax	320	GDL	89	10:05	124	147
A	SchedPax	73W	LAS	173	10:05	109	136
A	SchedPax	738	MEM	836	10:05	116	151
A	SchedPax	763	ORD	10027	10:05	176	211
A	SchedPax	789	MIA	10200	10:05	238	290
A	SchedPax	343	PPT	8	10:05	225	278
A	SchedPax	319	YEG	8594	10:05	101	125
A	SchedPax	73H	JFK	244	10:05	131	158

Table 2

2025 Baseline Design Day Flight Schedule

A/D	Activity Type	Equipment	Origin/Dest.	Flight No.	Time	Passengers	Seats
A	SchedPax	738	SFO	179	10:05	124	151
A	SchedPax	763	ORD	842	10:05	176	211
A	SchedPax	CR7	PHX	6509	10:10	54	66
A	SchedPax	E90	MCI	450	10:15	74	94
A	SchedPax	320	MEX	363	10:15	119	147
A	SchedPax	738	PHX	10153	10:15	124	151
A	SchedPax	320	SFO	912	10:15	121	147
A	SchedPax	738	SLC	1052	10:15	123	151
A	SchedPax	763	CVG	417	10:15	176	211
A	SchedPax	789	PEK	299	10:15	224	290
A	SchedPax	EM2	OXR	6296	10:20	18	30
A	SchedPax	EM2	IPL	6279	10:20	19	30
A	SchedPax	321	PHL	797	10:25	147	184
A	SchedPax	763	BOS	25	10:25	171	211
A	SchedPax	753	CLE	735	10:25	185	219
A	SchedPax	752	ATL	23	10:25	151	182
A	SchedPax	772	NRT	6	10:25	253	289
A	SchedPax	744	BNE	867	10:25	336	381
A	SchedPax	ERD	FAT	3016	10:30	33	44
A	SchedPax	ERD	SAN	3046	10:30	37	44
A	SchedPax	CR7	PHX	2705	10:30	54	66
A	SchedPax	739	SEA	10144	10:35	143	172
A	SchedPax	738	DEN	4701	10:35	127	151
A	SchedPax	CR9	LTO	10104	10:35	61	76
A	SchedPax	CR9	PDX	2605	10:35	62	76
A	SchedPax	320	BOS	10061	10:35	120	147
A	SchedPax	319	DGO	10231	10:35	101	125
A	SchedPax	762	JFK	10054	10:35	140	169
A	SchedPax	763	DTW	1121	10:35	172	211
A	SchedPax	343	PPT	102	10:35	225	278
A	SchedPax	763	STL	742	10:35	177	211
A	SchedPax	CR9	LAS	263	10:35	60	76
A	SchedPax	73W	MKE	217	10:35	102	136
A	SchedPax	73W	MDW	985	10:35	106	136
A	SchedPax	73H	SLC	1175	10:35	128	158
A	SchedPax	EM2	BFL	6152	10:40	22	30
A	SchedPax	738	DEN	1469	10:45	127	151
A	SchedPax	320	JFK	103	10:45	122	147
A	SchedPax	744	MEL	890	10:45	353	381
A	SchedPax	752	ORD	107	10:45	152	182
A	SchedPax	321	YYZ	789	10:45	158	184
A	SchedPax	320	LAS	202	10:45	118	147
A	SchedPax	73W	ATL	3969	10:45	113	136
A	SchedPax	733	SFO	10159	10:45	112	136
A	SchedPax	763	MSP	2413	10:45	171	211
A	SchedPax	CR7	YVR	10139	10:50	52	66
A	SchedPax	CR7	SAN	6315	10:50	56	66
A	SchedPax	EM2	MRY	6294	10:50	25	30
A	SchedPax	CR7	PSP	6429	10:50	54	66
A	SchedPax	CR7	ABQ	6473	10:50	50	66
A	SchedPax	738	LAS	10069	10:55	121	151
A	SchedPax	CR9	PHX	4793	10:55	62	76
A	SchedPax	744	NRT	2	10:55	333	381
A	SchedPax	77W	IAD	62	10:55	273	331
A	SchedPax	788	IAH	600	10:55	213	250
A	SchedPax	738	JAX	774	10:55	130	151
A	SchedPax	320	JFK	295	10:55	122	147
A	SchedPax	CR7	SJC	6499	11:00	51	66
A	SchedPax	738	SFO	1268	11:05	124	151

Table 2

2025 Baseline Design Day Flight Schedule

A/D	Activity Type	Equipment	Origin/Dest.	Flight No.	Time	Passengers	Seats
A	SchedPax	318	OMA	10026	11:05	84	104
A	SchedPax	73W	OAK	55	11:05	107	136
A	SchedPax	73W	BNA	1714	11:05	102	136
A	SchedPax	763	DFW	10072	11:05	175	211
A	SchedPax	752	JFK	33	11:05	151	182
A	SchedPax	753	EWR	1402	11:05	170	219
A	SchedPax	744	NRT	10196	11:05	333	381
A	SchedPax	346	PVG	583	11:05	300	311
A	SchedPax	320	SFO	403	11:05	121	147
A	SchedPax	E90	MKE	1501	11:15	70	94
A	SchedPax	763	HNL	658	11:15	173	211
A	SchedPax	763	ATL	2083	11:15	175	211
A	SchedPax	320	GDL	797	11:15	124	147
A	SchedPax	73W	SJC	10164	11:15	105	136
A	SchedPax	752	IAD	781	11:15	150	182
A	SchedPax	752	JFK	10060	11:15	151	182
A	SchedPax	752	SFO	858	11:15	149	182
A	SchedPax	744	NRT	5	11:15	333	381
A	SchedPax	772	SYD	10094	11:15	249	289
A	SchedPax	CR7	CMH	10068	11:20	53	66
A	SchedPax	ERD	SJC	3173	11:20	34	44
A	SchedPax	738	IAD	149	11:25	125	151
A	SchedPax	73W	SMF	3076	11:25	108	136
A	SchedPax	763	DFW	2417	11:25	175	211
A	SchedPax	321	PHX	27	11:25	150	184
A	SchedPax	319	SFO	924	11:25	103	125
A	SchedPax	733	AUS	341	11:25	105	136
A	SchedPax	752	DEN	888	11:25	153	182
A	SchedPax	739	SEA	458	11:35	143	172
A	SchedPax	M80	BIL	10083	11:35	106	143
A	SchedPax	CR9	BOI	10085	11:35	50	76
A	SchedPax	738	ORD	10023	11:35	126	151
A	SchedPax	733	LAS	10002	11:35	109	136
A	SchedPax	752	JFK	1736	11:35	151	182
A	SchedPax	772	NRT	202	11:35	253	289
A	SchedPax	73W	BWI	1617	11:35	107	136
A	SchedPax	752	SFO	83	11:44	149	182
A	SchedPax	752	JFK	1735	11:45	151	182
A	SchedPax	752	ORD	531	11:45	152	182
A	SchedPax	320	YUL	6467	11:45	121	147
A	SchedPax	738	MSP	1063	11:45	123	151
A	SchedPax	738	LAS	630	11:45	121	151
A	SchedPax	73W	SJC	60	11:45	105	136
A	SchedPax	320	JFK	289	11:45	122	147
A	SchedPax	73W	BNA	10040	11:45	102	136
A	SchedPax	73W	OAK	631	11:45	107	136
A	SchedPax	73W	SAT	2977	11:45	104	136
A	SchedPax	762	JFK	1	11:45	140	169
A	SchedPax	EM2	SAN	6323	11:50	25	30
A	SchedPax	ERD	SAN	3054	11:50	37	44
A	SchedPax	CR7	RNO	10132	11:50	49	66
A	SchedPax	CR7	MOD	10187	11:50	49	66
A	SchedPax	EM2	ONT	10189	11:50	24	30
A	SchedPax	739	SEA	5	11:55	143	172
A	SchedPax	319	OKC	6443	11:55	77	125
A	SchedPax	73H	YVR	710	11:55	125	158
A	SchedPax	738	AUS	813	11:55	117	151
A	SchedPax	388	FRA	456	11:55	458	525
A	SchedPax	320	LAS	1595	11:55	118	147

Table 2

2025 Baseline Design Day Flight Schedule

A/D	Activity Type	Equipment	Origin/Dest.	Flight No.	Time	Passengers	Seats
A	SchedPax	EM2	CLD	6202	12:00	15	30
A	SchedPax	CR7	TUS	6119	12:00	51	66
A	SchedPax	CR7	ABQ	10077	12:00	50	66
A	SchedPax	ERD	SAN	3006	12:00	37	44
A	SchedPax	EM2	SMX	6417	12:00	23	30
A	SchedPax	73W	ABQ	10078	12:05	104	136
A	SchedPax	73W	TUS	3361	12:05	105	136
A	SchedPax	763	SCL	10050	12:05	177	211
A	SchedPax	752	SFO	817	12:05	149	182
A	SchedPax	343	PPT	10204	12:05	225	278
A	SchedPax	763	DFW	2421	12:05	175	211
A	SchedPax	772	ICN	69	12:05	244	289
A	SchedPax	CR7	PHX	6526	12:10	54	66
A	SchedPax	320	SMF	671	12:15	117	147
A	SchedPax	738	ORD	1919	12:15	126	151
A	SchedPax	738	SFO	605	12:15	124	151
A	SchedPax	752	SLC	891	12:15	148	182
A	SchedPax	738	MSP	10028	12:15	123	151
A	SchedPax	E90	YYC	10213	12:15	75	94
A	SchedPax	737	MEX	19	12:15	101	124
A	SchedPax	739	DCA	246	12:15	142	172
A	SchedPax	744	ICN	12	12:15	321	381
A	SchedPax	EM2	SAN	6325	12:20	25	30
A	SchedPax	320	IAH	936	12:25	125	147
A	SchedPax	321	CLT	1433	12:25	151	184
A	SchedPax	73W	ABQ	1190	12:25	104	136
A	SchedPax	763	EWR	10234	12:25	163	211
A	SchedPax	77W	DEN	10199	12:25	278	331
A	SchedPax	772	DEN	855	12:25	243	289
A	SchedPax	CR9	RNO	2443	12:25	56	76
A	SchedPax	ERD	FAT	3052	12:30	33	44
A	SchedPax	EMJ	HMO	2200	12:35	52	99
A	SchedPax	739	SEA	460	12:35	143	172
A	SchedPax	738	PHX	10022	12:35	124	151
A	SchedPax	73W	MKE	10018	12:35	102	136
A	SchedPax	738	HOU	10006	12:35	115	151
A	SchedPax	733	MCI	10011	12:35	106	136
A	SchedPax	73W	PHX	10128	12:35	111	136
A	SchedPax	388	LHR	62	12:35	428	525
A	SchedPax	321	PHL	1419	12:35	147	184
A	SchedPax	320	LAS	407	12:35	118	147
A	SchedPax	762	JFK	10055	12:35	140	169
A	SchedPax	733	SJC	2708	12:45	105	136
A	SchedPax	73W	SLC	872	12:45	110	136
A	SchedPax	73W	YYC	884	12:45	108	136
A	SchedPax	388	CDG	279	12:45	407	525
A	SchedPax	738	ATL	10037	12:45	126	151
A	SchedPax	CR7	SJC	10162	12:50	51	66
A	SchedPax	EM2	IYK	6282	12:50	18	30
A	SchedPax	EM2	CLD	6203	12:50	15	30
A	SchedPax	320	JFK	104	12:55	122	147
A	SchedPax	73W	HOU	3751	12:55	103	136
A	SchedPax	73H	YEG	922	12:55	128	158
A	SchedPax	M80	MFR	329	12:55	104	143
A	SchedPax	319	SFO	928	12:55	103	125
A	SchedPax	738	AUS	903	12:55	117	151
A	SchedPax	753	MSP	1605	12:55	177	219
A	SchedPax	ERD	SBA	3032	13:00	35	44
A	SchedPax	CR7	COS	6514	13:00	50	66

Table 2

2025 Baseline Design Day Flight Schedule

A/D	Activity Type	Equipment	Origin/Dest.	Flight No.	Time	Passengers	Seats
A	SchedPax	738	OAK	10001	13:05	118	151
A	SchedPax	319	YVR	10090	13:05	99	125
A	SchedPax	CR9	RDM	2547	13:05	50	76
A	SchedPax	733	RNO	2445	13:05	102	136
A	SchedPax	73W	SAT	10035	13:05	104	136
A	SchedPax	763	SAL	10003	13:05	183	211
A	SchedPax	763	DFW	798	13:05	175	211
A	SchedPax	752	ATL	2085	13:05	151	182
A	SchedPax	763	DTW	10048	13:05	172	211
A	SchedPax	73W	PHX	82	13:05	111	136
A	SchedPax	73W	SFO	646	13:05	112	136
A	SchedPax	320	GDL	912	13:05	124	147
A	SchedPax	763	MIA	271	13:05	173	211
A	SchedPax	321	SAL	522	13:07	160	184
A	SchedPax	ERD	MRY	3078	13:10	37	44
A	SchedPax	319	DEN	552	13:15	105	125
A	SchedPax	M80	FAR	347	13:15	84	143
A	SchedPax	753	IAH	708	13:15	186	219
A	SchedPax	752	JFK	707	13:15	151	182
A	SchedPax	752	ORD	10030	13:15	152	182
A	SchedPax	77W	AKL	10207	13:15	278	331
A	SchedPax	EM2	YUM	6455	13:20	22	30
A	SchedPax	738	ORD	1247	13:25	126	151
A	SchedPax	752	SLC	10165	13:25	148	182
A	SchedPax	763	DTW	669	13:25	172	211
A	SchedPax	752	DEN	194	13:25	153	182
A	SchedPax	744	NRT	6	13:25	333	381
A	SchedPax	738	SFO	10071	13:35	124	151
A	SchedPax	738	RDU	1923	13:35	120	151
A	SchedPax	739	SEA	10145	13:35	143	172
A	SchedPax	CR9	ACV	10080	13:35	49	76
A	SchedPax	733	SJC	1640	13:35	105	136
A	SchedPax	762	JFK	19	13:35	140	169
A	SchedPax	772	NRT	935	13:35	253	289
A	SchedPax	752	ORD	945	13:35	152	182
A	SchedPax	320	TLC	918	13:35	126	147
A	SchedPax	738	LAS	1801	13:35	121	151
A	SchedPax	733	SFO	2964	13:45	112	136
A	SchedPax	733	OAK	10160	13:45	107	136
A	SchedPax	343	CDG	7	13:45	215	278
A	SchedPax	738	DFW	545	13:45	125	151
A	SchedPax	320	MEX	473	13:45	119	147
A	SchedPax	321	PHX	10122	13:45	150	184
A	SchedPax	73W	SMF	367	13:45	108	136
A	SchedPax	763	BOS	725	13:45	171	211
A	SchedPax	388	DXB	215	13:45	325	525
A	SchedPax	EM2	SAN	10190	13:50	25	30
A	SchedPax	EM2	ONT	6326	13:50	24	30
A	SchedPax	ERD	SJC	10175	13:50	34	44
A	SchedPax	ERD	SAN	3181	13:50	37	44
A	SchedPax	738	IAD	10052	13:55	125	151
A	SchedPax	320	BOS	910	13:55	120	147
A	SchedPax	738	MDW	2196	13:55	118	151
A	SchedPax	EM2	FAT	6241	14:00	22	30
A	SchedPax	319	DEN	413	14:05	105	125
A	SchedPax	73W	ATL	10100	14:05	113	136
A	SchedPax	73W	ELP	235	14:05	98	136
A	SchedPax	73W	MDW	10015	14:05	106	136
A	SchedPax	738	IAH	1765	14:05	129	151

Table 2

2025 Baseline Design Day Flight Schedule

A/D	Activity Type	Equipment	Origin/Dest.	Flight No.	Time	Passengers	Seats
A	SchedPax	753	IAH	10009	14:05	186	219
A	SchedPax	744	NAN	2	14:05	284	381
A	SchedPax	73W	LAS	937	14:05	109	136
A	SchedPax	763	DFW	2433	14:05	175	211
A	SchedPax	EM2	MRY	6288	14:10	25	30
A	SchedPax	321	YYZ	799	14:15	158	184
A	SchedPax	73W	PHX	54	14:15	111	136
A	SchedPax	CR9	MFR	2425	14:15	55	76
A	SchedPax	320	SEA	10043	14:15	122	147
A	SchedPax	320	JFK	10157	14:15	122	147
A	SchedPax	772	LHR	80	14:15	236	289
A	SchedPax	EM2	BFL	6163	14:20	22	30
A	SchedPax	ERD	SBA	3070	14:20	35	44
A	SchedPax	CR7	DFW	6229	14:20	54	66
A	SchedPax	CR7	SEA	6003	14:20	55	66
A	SchedPax	CR7	TUS	6376	14:20	51	66
A	SchedPax	320	BOS	784	14:25	120	147
A	SchedPax	752	IAD	10031	14:25	150	182
A	SchedPax	733	TUS	1696	14:25	105	136
A	SchedPax	752	ORD	761	14:25	152	182
A	SchedPax	EM2	SAN	6327	14:30	25	30
A	SchedPax	ERD	SBA	3042	14:30	35	44
A	SchedPax	EM2	OXR	6295	14:30	18	30
A	SchedPax	739	PDX	252	14:35	142	172
A	SchedPax	738	CLE	10038	14:35	128	151
A	SchedPax	320	MEX	10224	14:35	119	147
A	SchedPax	E90	MCI	10012	14:35	74	94
A	SchedPax	738	SJC	1695	14:35	117	151
A	SchedPax	320	SFO	10105	14:35	121	147
A	SchedPax	321	PHL	10064	14:35	147	184
A	SchedPax	321	PHX	10123	14:35	150	184
A	SchedPax	320	LAS	10044	14:35	118	147
A	SchedPax	738	ATL	1027	14:35	126	151
A	SchedPax	73W	RNO	10133	14:35	102	136
A	SchedPax	752	SFO	49	14:35	149	182
A	SchedPax	738	MDW	515	14:35	118	151
A	SchedPax	733	ELP	3662	14:35	98	136
A	SchedPax	388	LHR	283	14:35	428	525
A	SchedPax	CR7	SAT	5995	14:40	50	66
A	SchedPax	733	SFO	2187	14:45	112	136
A	SchedPax	738	ORD	1892	14:45	126	151
A	SchedPax	73W	OAK	2904	14:45	107	136
A	SchedPax	762	JFK	3	14:45	140	169
A	SchedPax	CR7	BOI	10086	14:50	44	66
A	SchedPax	CR7	PHX	10121	14:50	54	66
A	SchedPax	CR7	RDD	10130	14:50	46	66
A	SchedPax	737	TRC	10235	14:55	100	124
A	SchedPax	73H	SLC	1179	14:55	128	158
A	SchedPax	320	BOS	409	14:55	120	147
A	SchedPax	738	LAS	10029	15:05	121	151
A	SchedPax	73H	JFK	10058	15:05	131	158
A	SchedPax	M80	FAR	10005	15:05	84	143
A	SchedPax	319	IAD	10053	15:05	103	125
A	SchedPax	733	MCI	73	15:05	106	136
A	SchedPax	752	JFK	53	15:05	151	182
A	SchedPax	744	TPE	10208	15:05	322	381
A	SchedPax	763	MCO	5094	15:05	173	211
A	SchedPax	346	LHR	7	15:05	254	311
A	SchedPax	763	DEN	227	15:05	177	211

Table 2

2025 Baseline Design Day Flight Schedule

A/D	Activity Type	Equipment	Origin/Dest.	Flight No.	Time	Passengers	Seats
A	SchedPax	ERD	SAN	3048	15:10	37	44
A	SchedPax	CR7	BOI	6527	15:10	44	66
A	SchedPax	EM2	SAN	6329	15:10	25	30
A	SchedPax	320	YYZ	10215	15:15	126	147
A	SchedPax	CR9	PHX	4794	15:15	62	76
A	SchedPax	73W	DEN	10098	15:15	114	136
A	SchedPax	763	DFW	2445	15:15	175	211
A	SchedPax	763	CVG	297	15:15	176	211
A	SchedPax	744	AKL	2	15:15	320	381
A	SchedPax	773	TPE	601	15:15	326	385
A	SchedPax	E90	YYC	570	15:15	75	94
A	SchedPax	319	BDL	10091	15:15	103	125
A	SchedPax	319	DEN	10066	15:15	105	125
A	SchedPax	EM2	SBA	10177	15:20	24	30
A	SchedPax	CR7	PDX	10119	15:20	54	66
A	SchedPax	EM2	SBP	6385	15:20	21	30
A	SchedPax	321	PHX	29	15:25	150	184
A	SchedPax	763	MIA	17	15:25	173	211
A	SchedPax	738	SJD	338	15:25	115	151
A	SchedPax	733	SMF	10170	15:25	108	136
A	SchedPax	763	HNL	203	15:25	173	211
A	SchedPax	773	HKG	11	15:25	299	385
A	SchedPax	EM2	SMX	6444	15:30	23	30
A	SchedPax	EM2	FAT	6242	15:30	22	30
A	SchedPax	738	SFO	1386	15:35	124	151
A	SchedPax	739	SEA	464	15:35	143	172
A	SchedPax	CR9	PDX	10117	15:35	62	76
A	SchedPax	320	LAS	87	15:35	118	147
A	SchedPax	738	STL	2675	15:35	127	151
A	SchedPax	752	SLC	255	15:35	148	182
A	SchedPax	333	DUB	10217	15:35	238	295
A	SchedPax	763	EWR	270	15:35	163	211
A	SchedPax	772	SFO	955	15:35	237	289
A	SchedPax	CR7	YVR	6114	15:40	52	66
A	SchedPax	ERD	SAN	3020	15:40	37	44
A	SchedPax	738	PHX	449	15:45	124	151
A	SchedPax	738	ORD	223	15:45	126	151
A	SchedPax	733	SMF	159	15:45	108	136
A	SchedPax	73W	YYC	10214	15:45	108	136
A	SchedPax	752	ATL	2087	15:45	151	182
A	SchedPax	320	LAS	10062	15:45	118	147
A	SchedPax	772	HNL	611	15:45	237	289
A	SchedPax	CR7	PHX	10236	15:50	54	66
A	SchedPax	EM2	ONT	10191	15:50	24	30
A	SchedPax	772	ORD	204	15:50	241	289
A	SchedPax	73H	YVR	704	15:50	125	158
A	SchedPax	ERD	SBA	3082	15:50	35	44
A	SchedPax	CR7	TUL	6522	15:50	55	66
A	SchedPax	752	DEN	1181	15:51	153	182
A	SchedPax	320	GDL	139	15:55	124	147
A	SchedPax	738	OAK	915	15:55	118	151
A	SchedPax	CR9	LTO	2837	15:55	61	76
A	SchedPax	752	JFK	5184	15:55	151	182
A	SchedPax	CR7	COS	10087	16:00	50	66
A	SchedPax	ERD	FAT	10102	16:00	33	44
A	SchedPax	M80	MFR	10109	16:05	104	143
A	SchedPax	320	SFO	110	16:05	121	147
A	SchedPax	73W	ABQ	10079	16:05	104	136
A	SchedPax	733	AUS	3430	16:05	105	136

Table 2

2025 Baseline Design Day Flight Schedule

A/D	Activity Type	Equipment	Origin/Dest.	Flight No.	Time	Passengers	Seats
A	SchedPax	73W	OAK	10113	16:05	107	136
A	SchedPax	333	SVO	321	16:05	242	295
A	SchedPax	320	JFK	920	16:05	122	147
A	SchedPax	738	MEM	1345	16:15	116	151
A	SchedPax	738	MSP	177	16:15	123	151
A	SchedPax	753	MSP	5621	16:15	177	219
A	SchedPax	748	FRA	450	16:15	407	467
A	SchedPax	738	LAS	709	16:15	121	151
A	SchedPax	73W	HOU	3473	16:15	103	136
A	SchedPax	763	HNL	263	16:15	173	211
A	SchedPax	77W	CDG	72	16:15	257	331
A	SchedPax	343	ZRH	10216	16:15	177	278
A	SchedPax	763	ATL	1477	16:15	175	211
A	SchedPax	EM2	CLD	6204	16:20	15	30
A	SchedPax	319	DEN	417	16:25	105	125
A	SchedPax	752	ORD	10032	16:25	152	182
A	SchedPax	763	IAD	10	16:25	174	211
A	SchedPax	ERD	MRY	3030	16:30	37	44
A	SchedPax	744	TPE	1	16:30	322	381
A	SchedPax	CR7	SAN	10140	16:30	56	66
A	SchedPax	788	IAH	137	16:34	213	250
A	SchedPax	738	DFW	2453	16:35	125	151
A	SchedPax	737	MEX	10222	16:35	101	124
A	SchedPax	739	SJD	251	16:35	131	172
A	SchedPax	321	PHL	10047	16:35	147	184
A	SchedPax	320	MEX	10150	16:35	119	147
A	SchedPax	73W	ABQ	507	16:35	104	136
A	SchedPax	752	DEN	85	16:35	153	182
A	SchedPax	333	FCO	10218	16:35	238	295
A	SchedPax	772	ICN	10095	16:35	244	289
A	SchedPax	772	SFO	844	16:39	237	289
A	SchedPax	738	OAK	798	16:42	118	151
A	SchedPax	73W	LAS	1900	16:45	109	136
A	SchedPax	738	SJD	1947	16:45	115	151
A	SchedPax	737	PBC	10232	16:45	100	124
A	SchedPax	73W	PHX	1446	16:45	111	136
A	SchedPax	EM2	SAN	6335	16:50	25	30
A	SchedPax	CR7	SEA	10148	16:50	55	66
A	SchedPax	73W	SJC	2279	16:55	105	136
A	SchedPax	343	CDG	40	16:55	215	278
A	SchedPax	320	SEA	902	16:55	122	147
A	SchedPax	CR9	PHX	2499	16:55	62	76
A	SchedPax	738	SFO	3329	16:55	124	151
A	SchedPax	CR7	SJC	10163	17:00	51	66
A	SchedPax	738	DTW	10154	17:05	123	151
A	SchedPax	M80	BIL	10084	17:05	106	143
A	SchedPax	CR9	MEM	10017	17:05	58	76
A	SchedPax	CR9	MSY	10024	17:05	61	76
A	SchedPax	321	CLT	1405	17:05	151	184
A	SchedPax	73W	MDW	1341	17:05	106	136
A	SchedPax	73W	SLC	1566	17:05	110	136
A	SchedPax	763	DFW	2457	17:05	175	211
A	SchedPax	763	LHR	10219	17:05	172	211
A	SchedPax	320	IAH	795	17:05	125	147
A	SchedPax	762	JFK	117	17:08	140	169
A	SchedPax	EM2	OXR	6297	17:10	18	30
A	SchedPax	CR7	PDX	6082	17:10	54	66
A	SchedPax	738	SFO	737	17:15	124	151
A	SchedPax	320	SFO	936	17:15	121	147

Table 2

2025 Baseline Design Day Flight Schedule

A/D	Activity Type	Equipment	Origin/Dest.	Flight No.	Time	Passengers	Seats
A	SchedPax	319	YVR	554	17:15	99	125
A	SchedPax	73W	TUS	3760	17:15	105	136
A	SchedPax	73W	TUS	10173	17:15	105	136
A	SchedPax	ERD	SAN	10110	17:20	37	44
A	SchedPax	ERD	MRY	3068	17:20	37	44
A	SchedPax	CR7	STS	10181	17:20	42	66
A	SchedPax	EM2	YUM	6475	17:20	22	30
A	SchedPax	CR9	FLG	2602	17:25	61	76
A	SchedPax	752	JFK	1519	17:25	151	182
A	SchedPax	752	IAD	209	17:25	150	182
A	SchedPax	789	LHR	137	17:25	237	290
A	SchedPax	73H	SEA	474	17:25	132	158
A	SchedPax	733	ELP	844	17:25	98	136
A	SchedPax	789	SFO	455	17:28	238	290
A	SchedPax	CR7	ASE	10025	17:30	40	66
A	SchedPax	739	SEA	466	17:35	143	172
A	SchedPax	319	DEN	10092	17:35	105	125
A	SchedPax	CR9	SLC	10228	17:35	61	76
A	SchedPax	73W	RNO	1172	17:35	102	136
A	SchedPax	733	LAS	10107	17:35	109	136
A	SchedPax	73W	LAS	10134	17:35	109	136
A	SchedPax	753	HNL	10076	17:35	179	219
A	SchedPax	763	DFW	10075	17:35	175	211
A	SchedPax	752	ORD	943	17:35	152	182
A	SchedPax	CR7	SEA	6471	17:40	55	66
A	SchedPax	CR7	ABQ	6425	17:40	50	66
A	SchedPax	EM2	MRY	6291	17:40	25	30
A	SchedPax	EM2	SGU	6422	17:40	18	30
A	SchedPax	772	ORD	277	17:40	241	289
A	SchedPax	CR9	ZIH	4703	17:44	65	76
A	SchedPax	73W	OAK	3598	17:45	107	136
A	SchedPax	738	LAS	970	17:45	121	151
A	SchedPax	73W	PHX	1796	17:45	111	136
A	SchedPax	73W	SFO	3402	17:45	112	136
A	SchedPax	738	SFO	328	17:45	124	151
A	SchedPax	752	DEN	709	17:46	153	182
A	SchedPax	CR7	MSY	5818	17:50	53	66
A	SchedPax	EM2	SMX	10180	17:50	23	30
A	SchedPax	ERD	SAN	3092	17:50	37	44
A	SchedPax	772	MIA	372	17:55	237	289
A	SchedPax	763	HNL	2459	17:55	173	211
A	SchedPax	739	PVR	259	17:55	133	172
A	SchedPax	77L	ATL	125	17:55	227	273
A	SchedPax	EM2	SAN	6338	18:00	25	30
A	SchedPax	789	PEK	983	18:00	224	290
A	SchedPax	EM2	BFL	6169	18:00	22	30
A	SchedPax	ERD	FAT	3022	18:00	33	44
A	SchedPax	738	SJC	10103	18:05	117	151
A	SchedPax	738	LAS	530	18:05	121	151
A	SchedPax	73W	BNA	3963	18:05	102	136
A	SchedPax	763	EWR	10073	18:05	163	211
A	SchedPax	753	IAH	10010	18:05	186	219
A	SchedPax	CR7	DFW	6477	18:10	54	66
A	SchedPax	320	PVR	10225	18:15	114	147
A	SchedPax	319	TUL	6139	18:15	106	125
A	SchedPax	752	IND	305	18:15	162	182
A	SchedPax	320	MEX	792	18:15	119	147
A	SchedPax	73W	SMF	3158	18:15	108	136
A	SchedPax	388	MUC	64	18:15	421	525

Table 2

2025 Baseline Design Day Flight Schedule

A/D	Activity Type	Equipment	Origin/Dest.	Flight No.	Time	Passengers	Seats
A	SchedPax	388	LHR	269	18:15	428	525
A	SchedPax	388	CDG	452	18:15	407	525
A	SchedPax	321	PHX	1511	18:24	150	184
A	SchedPax	763	HNL	65	18:24	173	211
A	SchedPax	73W	PHX	1657	18:25	111	136
A	SchedPax	343	ZRH	10221	18:25	177	278
A	SchedPax	320	SEA	108	18:25	122	147
A	SchedPax	346	LHR	23	18:25	254	311
A	SchedPax	CR7	SMF	6210	18:30	52	66
A	SchedPax	EM2	SBP	6397	18:30	21	30
A	SchedPax	EM2	SBA	6358	18:30	24	30
A	SchedPax	ERD	SJC	3126	18:30	34	44
A	SchedPax	738	STL	521	18:35	127	151
A	SchedPax	739	SEA	470	18:35	143	172
A	SchedPax	321	PHX	10125	18:35	150	184
A	SchedPax	752	SFO	10034	18:35	149	182
A	SchedPax	752	CVG	978	18:35	152	182
A	SchedPax	73W	LAS	1545	18:35	109	136
A	SchedPax	733	MCI	1752	18:35	106	136
A	SchedPax	ERD	SBA	3010	18:40	35	44
A	SchedPax	738	IAD	967	18:42	125	151
A	SchedPax	733	SLC	1065	18:45	110	136
A	SchedPax	738	SLC	4740	18:45	123	151
A	SchedPax	73W	OAK	851	18:45	107	136
A	SchedPax	789	LHR	10220	18:45	237	290
A	SchedPax	321	CLT	705	18:48	151	184
A	SchedPax	ERD	SBA	10176	18:50	35	44
A	SchedPax	CR7	RNO	2445	18:50	49	66
A	SchedPax	CR7	COS	10183	18:50	50	66
A	SchedPax	CR7	EUG	10188	18:50	53	66
A	SchedPax	EM2	SAN	6339	18:50	25	30
A	SchedPax	321	PHL	755	18:53	147	184
A	SchedPax	73W	SAT	1275	18:55	104	136
A	SchedPax	738	CLE	661	18:55	128	151
A	SchedPax	319	DEN	406	18:55	105	125
A	SchedPax	CR9	BOI	2417	18:55	50	76
A	SchedPax	73W	HOU	1783	18:55	103	136
A	SchedPax	753	MSP	710	18:57	177	219
A	SchedPax	738	ORD	67	18:58	126	151
A	SchedPax	762	JFK	133	19:04	140	169
A	SchedPax	739	ZIH	10146	19:05	149	172
A	SchedPax	320	LAS	10158	19:05	118	147
A	SchedPax	73W	MDW	1140	19:05	106	136
A	SchedPax	752	ORD	10096	19:05	152	182
A	SchedPax	77W	AMS	1	19:05	280	331
A	SchedPax	789	SYD	10205	19:05	249	290
A	SchedPax	738	DTW	557	19:05	123	151
A	SchedPax	734	PDX	2641	19:05	119	144
A	SchedPax	752	JFK	27	19:07	151	182
A	SchedPax	ERD	SAN	3002	19:15	37	44
A	SchedPax	738	AUS	427	19:15	117	151
A	SchedPax	E90	YUL	10209	19:15	78	94
A	SchedPax	320	SFO	10151	19:15	121	147
A	SchedPax	73W	GEG	10185	19:15	110	136
A	SchedPax	733	SFO	2112	19:15	112	136
A	SchedPax	788	ATL	47	19:15	207	250
A	SchedPax	ERD	SJC	10161	19:20	34	44
A	SchedPax	CR7	MOD	10131	19:20	49	66
A	SchedPax	EM2	CLD	6206	19:20	15	30

Table 2

2025 Baseline Design Day Flight Schedule

A/D	Activity Type	Equipment	Origin/Dest.	Flight No.	Time	Passengers	Seats
A	SchedPax	788	IAD	63	19:23	206	250
A	SchedPax	73W	SMF	2950	19:25	108	136
A	SchedPax	ERD	SAN	10137	19:30	37	44
A	SchedPax	CR7	RDM	6519	19:30	44	66
A	SchedPax	CR7	SJC	6427	19:30	51	66
A	SchedPax	763	HNL	776	19:30	173	211
A	SchedPax	CR7	YVR	2310	19:30	52	66
A	SchedPax	763	MSY	1447	19:30	170	211
A	SchedPax	CR7	ACV	6440	19:30	43	66
A	SchedPax	763	DFW	2465	19:33	175	211
A	SchedPax	739	SEA	10211	19:35	143	172
A	SchedPax	73W	SJC	2619	19:35	105	136
A	SchedPax	763	LAS	48	19:35	169	211
A	SchedPax	752	SLC	10166	19:35	148	182
A	SchedPax	388	SYD	11	19:35	451	525
A	SchedPax	73W	OAK	3490	19:35	107	136
A	SchedPax	752	SFO	765	19:39	149	182
A	SchedPax	753	IAH	1795	19:42	186	219
A	SchedPax	763	BOG	1942	19:45	174	211
A	SchedPax	319	YVR	556	19:45	99	125
A	SchedPax	762	JFK	181	19:45	140	169
A	SchedPax	763	EWR	699	19:45	163	211
A	SchedPax	752	SLC	1183	19:45	148	182
A	SchedPax	CR7	SMF	10194	19:50	52	66
A	SchedPax	CR7	SUN	6510	19:50	54	66
A	SchedPax	320	SEA	914	19:50	122	147
A	SchedPax	788	IAH	947	19:51	213	250
A	SchedPax	CR9	PHX	4796	19:55	62	76
A	SchedPax	733	SMF	10171	19:55	108	136
A	SchedPax	752	DEN	1473	19:55	153	182
A	SchedPax	763	ORD	702	19:55	176	211
A	SchedPax	73H	YVR	706	19:55	125	158
A	SchedPax	739	YVR	291	19:55	136	172
A	SchedPax	321	YYZ	793	19:59	158	184
A	SchedPax	CR7	YVR	10212	20:00	52	66
A	SchedPax	ERD	SJC	3115	20:00	34	44
A	SchedPax	EM2	FAT	10192	20:00	22	30
A	SchedPax	763	BNA	123	20:01	158	211
A	SchedPax	320	GDL	97	20:05	124	147
A	SchedPax	73W	LAS	3885	20:05	109	136
A	SchedPax	77W	SIN	6	20:05	214	331
A	SchedPax	M80	BIL	337	20:05	106	143
A	SchedPax	763	DFW	1307	20:05	175	211
A	SchedPax	744	TPE	243	20:05	322	381
A	SchedPax	772	DEN	840	20:05	243	289
A	SchedPax	320	BOS	34	20:06	120	147
A	SchedPax	EM2	ONT	10178	20:10	24	30
A	SchedPax	772	ORD	145	20:10	241	289
A	SchedPax	763	ORD	2473	20:10	176	211
A	SchedPax	738	SFO	1943	20:10	124	151
A	SchedPax	733	LAS	10108	20:15	109	136
A	SchedPax	752	DEN	632	20:15	153	182
A	SchedPax	320	PHX	916	20:15	120	147
A	SchedPax	738	PIT	514	20:16	136	151
A	SchedPax	EM2	SAN	6243	20:20	25	30
A	SchedPax	EM2	SBA	6346	20:20	24	30
A	SchedPax	ERD	SAN	3094	20:20	37	44
A	SchedPax	77L	HNL	79	20:22	224	273
A	SchedPax	738	MEM	1046	20:25	116	151

Table 2

2025 Baseline Design Day Flight Schedule

A/D	Activity Type	Equipment	Origin/Dest.	Flight No.	Time	Passengers	Seats
A	SchedPax	77L	JFK	1464	20:25	227	273
A	SchedPax	388	AKL	107	20:25	441	525
A	SchedPax	320	IAD	263	20:25	121	147
A	SchedPax	752	LAS	349	20:26	146	182
A	SchedPax	752	LAS	931	20:30	146	182
A	SchedPax	763	OGG	231	20:33	178	211
A	SchedPax	320	MSY	411	20:35	119	147
A	SchedPax	772	BOS	10198	20:35	236	289
A	SchedPax	388	SYD	25	20:35	451	525
A	SchedPax	763	MIA	75	20:35	173	211
A	SchedPax	744	SYD	102	20:35	327	381
A	SchedPax	320	YUL	910	20:37	121	147
A	SchedPax	738	DFW	181	20:37	125	151
A	SchedPax	738	PHX	2485	20:38	124	151
A	SchedPax	ERD	SAN	10138	20:40	37	44
A	SchedPax	772	KOA	52	20:40	238	289
A	SchedPax	772	HNL	82	20:44	237	289
A	SchedPax	345	BKK	794	20:45	303	313
A	SchedPax	744	MNL	8	20:45	314	381
A	SchedPax	763	IAD	1665	20:45	174	211
A	SchedPax	320	JFK	367	20:45	122	147
A	SchedPax	763	FLL	1553	20:45	174	211
A	SchedPax	388	JFK	108	20:45	436	525
A	SchedPax	EM2	IPL	10141	20:50	19	30
A	SchedPax	EM2	SAN	10179	20:50	25	30
A	SchedPax	737	MEX	644	20:50	101	124
A	SchedPax	EM2	SBP	6280	20:50	21	30
A	SchedPax	752	ORD	277	20:53	152	182
A	SchedPax	752	SFO	1607	20:55	149	182
A	SchedPax	763	MCO	44	20:55	173	211
A	SchedPax	73W	SJC	3847	20:55	105	136
A	SchedPax	752	JFK	25	20:55	151	182
A	SchedPax	321	CLT	39	20:57	151	184
A	SchedPax	763	YYZ	1433	20:58	181	211
A	SchedPax	ERD	FAT	3050	21:00	33	44
A	SchedPax	CR7	ABQ	6479	21:00	50	66
A	SchedPax	CR7	SEA	6053	21:00	55	66
A	SchedPax	73W	TUS	10114	21:05	105	136
A	SchedPax	763	LIH	1913	21:05	176	211
A	SchedPax	744	ATL	810	21:05	316	381
A	SchedPax	752	MCO	167	21:05	149	182
A	SchedPax	752	BWI	145	21:05	143	182
A	SchedPax	744	TPE	16	21:10	322	381
A	SchedPax	738	CUN	1571	21:10	115	151
A	SchedPax	73W	SFO	1917	21:10	112	136
A	SchedPax	73W	OAK	123	21:10	107	136
A	SchedPax	763	HNL	66	21:14	173	211
A	SchedPax	752	BOS	839	21:15	148	182
A	SchedPax	753	MSP	711	21:15	177	219
A	SchedPax	752	PHL	307	21:15	146	182
A	SchedPax	789	MIA	10206	21:15	238	290
A	SchedPax	763	DTW	162	21:18	172	211
A	SchedPax	763	STL	662	21:23	177	211
A	SchedPax	319	YYC	572	21:23	100	125
A	SchedPax	320	MEX	706	21:25	119	147
A	SchedPax	321	PHL	35	21:25	147	184
A	SchedPax	773	LHR	882	21:25	314	385
A	SchedPax	772	CAN	327	21:25	268	289
A	SchedPax	744	TPE	93	21:25	322	381

Table 2

2025 Baseline Design Day Flight Schedule

A/D	Activity Type	Equipment	Origin/Dest.	Flight No.	Time	Passengers	Seats
A	SchedPax	73W	OAK	797	21:25	107	136
A	SchedPax	752	SFO	257	21:25	149	182
A	SchedPax	73W	PHX	50	21:25	111	136
A	SchedPax	M80	XNA	866	21:33	99	143
A	SchedPax	738	RNO	10049	21:35	113	151
A	SchedPax	320	DTW	775	21:35	120	147
A	SchedPax	752	JFK	137	21:35	151	182
A	SchedPax	753	EWR	302	21:35	170	219
A	SchedPax	73W	ATL	2544	21:35	113	136
A	SchedPax	763	HNL	2	21:35	173	211
A	SchedPax	EM2	SBP	6415	21:40	21	30
A	SchedPax	320	JFK	673	21:45	122	147
A	SchedPax	321	PHX	424	21:45	150	184
A	SchedPax	744	GRU	62	21:45	309	381
A	SchedPax	739	SEA	88	21:48	143	172
A	SchedPax	ERD	SAN	3096	21:50	37	44
A	SchedPax	CR7	BOI	6084	21:50	44	66
A	SchedPax	CR7	SAT	6431	21:50	50	66
A	SchedPax	CR7	SLC	6469	21:50	53	66
A	SchedPax	320	SFO	946	21:50	121	147
A	SchedPax	CR7	PDX	6641	21:50	54	66
A	SchedPax	752	ORD	195	21:55	152	182
A	SchedPax	738	ORD	1137	21:55	126	151
A	SchedPax	73W	SFO	226	21:55	112	136
A	SchedPax	738	EWR	810	21:55	117	151
A	SchedPax	EM2	PSP	6319	22:00	24	30
A	SchedPax	EM2	SAN	6347	22:00	25	30
A	SchedPax	EM2	SBA	6545	22:00	24	30
A	SchedPax	73W	MKE	2016	22:00	102	136
A	SchedPax	738	DEN	1488	22:00	127	151
A	SchedPax	738	SMF	889	22:05	120	151
A	SchedPax	763	ATL	1502	22:05	175	211
A	SchedPax	320	MEX	908	22:05	119	147
A	SchedPax	773	HKG	880	22:05	299	385
A	SchedPax	73W	LAS	3656	22:05	109	136
A	SchedPax	762	EWR	119	22:05	131	169
A	SchedPax	E90	YVR	558	22:09	75	94
A	SchedPax	789	SYD	397	22:10	249	290
A	SchedPax	EM2	MRY	6293	22:10	25	30
A	SchedPax	EM2	IYK	6283	22:10	18	30
A	SchedPax	EM2	SAN	6353	22:20	25	30
A	SchedPax	73W	OAK	2896	22:20	107	136
A	SchedPax	320	YYZ	795	22:23	126	147
A	SchedPax	77L	SLC	1185	22:24	222	273
A	SchedPax	320	IAD	99	22:25	121	147
A	SchedPax	ERD	SJC	3135	22:25	34	44
A	SchedPax	762	JFK	21	22:25	140	169
A	SchedPax	763	OGG	254	22:25	178	211
A	SchedPax	763	EWR	2097	22:25	163	211
A	SchedPax	CR7	PHX	6528	22:30	54	66
A	SchedPax	737	GDL	466	22:35	105	124
A	SchedPax	744	HND	10195	22:35	307	381
A	SchedPax	763	BOS	223	22:35	171	211
A	SchedPax	320	FLL	339	22:35	121	147
A	SchedPax	753	IAH	1095	22:40	186	219
A	SchedPax	73W	SFO	204	22:40	112	136
A	SchedPax	321	LAS	870	22:42	147	184
A	SchedPax	320	GDL	914	22:45	124	147
A	SchedPax	789	AKL	10201	22:45	244	290

Table 2

2025 Baseline Design Day Flight Schedule

A/D	Activity Type	Equipment	Origin/Dest.	Flight No.	Time	Passengers	Seats
A	SchedPax	73H	SEA	468	22:45	132	158
A	SchedPax	320	JFK	415	22:45	122	147
A	SchedPax	772	KIX	48	22:46	235	289
A	SchedPax	739	CLE	507	22:48	145	172
A	SchedPax	319	DEN	419	22:49	105	125
A	SchedPax	73W	BWI	67	22:49	107	136
A	SchedPax	738	DFW	2489	22:54	125	151
A	SchedPax	320	SFO	807	22:54	121	147
A	SchedPax	738	ORD	607	22:55	126	151
A	SchedPax	320	BOS	479	22:55	120	147
A	SchedPax	738	DTW	815	22:55	123	151
A	SchedPax	763	ATL	2099	22:57	175	211
A	SchedPax	772	OGG	10197	23:00	244	289
A	SchedPax	321	SJO	604	23:03	158	184
A	SchedPax	738	MEX	663	23:08	123	151
A	SchedPax	772	HNL	284	23:08	237	289
A	SchedPax	738	DEN	468	23:10	127	151
A	SchedPax	739	PDX	566	23:11	142	172
A	SchedPax	773	HKG	10202	23:20	299	385
A	SchedPax	73H	ANC	156	23:25	135	158
A	SchedPax	738	MSP	409	23:40	123	151
A	SchedPax	319	SEA	796	23:40	104	125
A	SchedPax	752	HNL	60	23:40	149	182
A	SchedPax	763	DFW	2493	23:45	175	211
A	SchedPax	744	MSP	655	23:48	309	381
A	SchedPax	737	AGU	496	23:50	111	124
A	SchedPax	320	BOS	371	23:50	120	147
A	SchedPax	752	JFK	715	23:51	151	182
A	SchedPax	752	JFK	29	23:51	151	182
A	SchedPax	321	GUA	640	23:55	151	184
A	SchedPax	73W	ATL	49	23:55	113	136
A	SchedPax	763	SFO	927	23:55	173	211
A	SchedPax	738	PTY	302	23:57	116	151
A	SchedPax	752	MIA	669	23:59	149	182
A	UnschedPax_AT	C560	SJC	833	0:15	0	0
A	UnschedPax_AT	C750	SFO	832	11:45	0	0
A	UnschedPax_AT	F2TH	CRQ	830	13:25	0	0
A	UnschedPax_AT	H25B	SAF	828	13:45	0	0
A	UnschedPax_AT	P180	BOI	826	15:05	0	0
A	UnschedPax_AT	LR45	SFO	829	17:05	0	0
A	UnschedPax_AT	C750	SFO	831	19:25	0	0
D	CARGO_AC	762	CVG	984	0:15	0	0
D	CARGO_AC	300	GDL	999	0:15	0	0
D	CARGO_AC	748	NRT	989	1:15	0	0
D	CARGO_AC	MD11	TPE	971	2:15	0	0
D	CARGO_AC	762	MEX	983	2:25	0	0
D	CARGO_AC	763	MIA	980	3:15	0	0
D	CARGO_AC	306	OAK	998	4:25	0	0
D	CARGO_AC	DC10	MEM	975	5:25	0	0
D	CARGO_AC	744	ICN	987	5:35	0	0
D	CARGO_AC	MD11	FRA	861	5:45	0	0
D	CARGO_AC	742	HNL	994	6:35	0	0
D	CARGO_AC	MD11	PVG	862	6:35	0	0
D	CARGO_AC	310	EWR	996	6:45	0	0
D	CARGO_AC	763	SDF	981	6:45	0	0
D	CARGO_AC	744	TPE	990	6:55	0	0
D	CARGO_AC	MD11	HNL	972	6:55	0	0
D	CARGO_AC	763	MEX	982	7:35	0	0
D	CARGO_AC	744	NRT	877	8:25	0	0

Table 2

2025 Baseline Design Day Flight Schedule

A/D	Activity Type	Equipment	Origin/Dest.	Flight No.	Time	Passengers	Seats
D	CARGO_AC	748	JFK	875	9:45	0	0
D	CARGO_AC	744	PVG	988	11:25	0	0
D	CARGO_AC	744	SHA	986	14:45	0	0
D	CARGO_AC	772	AFW	866	15:45	0	0
D	CARGO_AC	DC10	OAK	979	17:25	0	0
D	CARGO_AC	MD11	MEM	973	17:45	0	0
D	CARGO_AC	306	MEM	997	19:35	0	0
D	CARGO_AC	DC10	IND	978	19:35	0	0
D	CARGO_AC	744	ICN	985	19:55	0	0
D	CARGO_AC	DC87	TOL	974	20:35	0	0
D	CARGO_AC	772	EWR	977	20:45	0	0
D	CARGO_AC	744	SIN	991	20:45	0	0
D	CARGO_AC	742	ANC	993	21:25	0	0
D	CARGO_AC	748	LUX	878	21:35	0	0
D	CARGO_AC	772	MEM	976	22:15	0	0
D	CARGO_AC	744	PVG	876	22:35	0	0
D	CARGO_AC	748	ICN	992	23:35	0	0
D	CARGO_AT	B190	PHX	995	3:55	0	0
D	GA	GLF4	CRQ	N952	1:05	0	0
D	GA	C750	SFO	N961	6:25	0	0
D	GA	BE19	PMD	N966	7:05	0	0
D	GA	CL60	CRQ	N959	7:15	0	0
D	GA	C550	LAS	N963	8:15	0	0
D	GA	GLF5	SBA	N951	8:15	0	0
D	GA	B190	PMD	N970	9:25	0	0
D	GA	BE20	PMD	N965	11:05	0	0
D	GA	C560	SNA	N962	12:35	0	0
D	GA	GLF5	SMO	N950	13:15	0	0
D	GA	CL60	VNY	N960	13:25	0	0
D	GA	BE36	LAS	N964	13:55	0	0
D	GA	B190	VNY	N967	14:15	0	0
D	GA	LJ60	SNA	N948	15:05	0	0
D	GA	GLF4	VNY	N953	15:45	0	0
D	GA	GLF4	APA	N954	16:05	0	0
D	GA	GALX	STL	N956	16:25	0	0
D	GA	GLF4	TEB	N955	17:25	0	0
D	GA	F2TH	IAD	N958	18:35	0	0
D	GA	C441	PMD	N854	19:05	0	0
D	GA	F900	SMO	N957	19:25	0	0
D	GA	B190	PMD	N969	21:05	0	0
D	GA	B190	LAS	N968	22:35	0	0
D	GA	H25B	STL	N949	23:15	0	0
D	GA	B190	VNY	N968	23:35	0	0
D	MIL	CL60	TEB	MI947	10:05	0	0
D	MIL	LJ45	SDM	MI946	12:05	0	0
D	MIL	H25B	LAS	MI945	12:35	0	0
D	MIL	C130	SDL	MI944	20:25	0	0
D	SchedPax	320	MEX	111	0:05	125	147
D	SchedPax	744	HND	10195	0:05	307	381
D	SchedPax	388	ICN	12	0:15	427	525
D	SchedPax	738	GDL	467	0:15	130	151
D	SchedPax	763	DFW	2400	0:15	177	211
D	SchedPax	320	GDL	127	0:25	126	147
D	SchedPax	763	MSP	691	0:25	174	211
D	SchedPax	738	MSP	410	0:25	125	151
D	SchedPax	321	GUA	511	0:25	151	184
D	SchedPax	772	ICN	203	0:25	235	289
D	SchedPax	737	AGU	5496	0:25	111	124
D	SchedPax	744	SYD	2	0:25	325	381

Table 2

2025 Baseline Design Day Flight Schedule

A/D	Activity Type	Equipment	Origin/Dest.	Flight No.	Time	Passengers	Seats
D	SchedPax	753	IAH	1094	0:35	182	219
D	SchedPax	320	GDL	913	0:35	126	147
D	SchedPax	789	AKL	10201	0:45	213	290
D	SchedPax	763	ATL	2078	0:55	183	211
D	SchedPax	773	HKG	10202	0:55	304	385
D	SchedPax	752	DFW	2408	0:55	153	182
D	SchedPax	320	MEX	139	1:05	125	147
D	SchedPax	77L	GDL	455	1:05	234	273
D	SchedPax	744	ICN	62	1:15	309	381
D	SchedPax	744	TPE	7	1:15	316	381
D	SchedPax	739	IAH	1684	1:15	143	172
D	SchedPax	744	TPE	1	1:35	316	381
D	SchedPax	320	ZCL	907	1:35	130	147
D	SchedPax	772	ICN	10197	1:35	235	289
D	SchedPax	744	TPE	95	1:45	316	381
D	SchedPax	321	SAL	671	1:45	164	184
D	SchedPax	789	PEK	984	1:45	217	290
D	SchedPax	738	MEM	178	1:45	123	151
D	SchedPax	321	SAL	531	1:45	164	184
D	SchedPax	321	GUA	641	1:45	151	184
D	SchedPax	744	TPE	15	1:55	316	381
D	SchedPax	773	HKG	881	1:55	304	385
D	SchedPax	738	PTY	303	2:05	97	151
D	SchedPax	321	SJO	605	2:25	158	184
D	SchedPax	738	PTY	10229	4:05	97	151
D	SchedPax	744	ANC	91	5:45	328	381
D	SchedPax	752	DEN	18	6:05	150	182
D	SchedPax	763	IAD	324	6:05	173	211
D	SchedPax	752	SFO	508	6:05	150	182
D	SchedPax	788	SLC	1768	6:05	203	250
D	SchedPax	M80	FAR	346	6:05	84	143
D	SchedPax	73W	OAK	2885	6:05	102	136
D	SchedPax	73H	PDX	561	6:05	134	158
D	SchedPax	788	ATL	1212	6:05	218	250
D	SchedPax	738	ORD	620	6:05	126	151
D	SchedPax	738	SFO	3668	6:05	125	151
D	SchedPax	738	LAS	353	6:05	121	151
D	SchedPax	763	ORD	286	6:15	176	211
D	SchedPax	789	MIA	456	6:15	251	290
D	SchedPax	753	MSP	692	6:15	180	219
D	SchedPax	CR7	PDX	10118	6:15	56	66
D	SchedPax	752	CVG	1540	6:15	156	182
D	SchedPax	ERD	SJC	3193	6:15	35	44
D	SchedPax	752	JFK	84	6:15	151	182
D	SchedPax	763	DFW	2410	6:15	177	211
D	SchedPax	73W	SMF	1532	6:15	110	136
D	SchedPax	752	JFK	198	6:25	151	182
D	SchedPax	319	DEN	416	6:25	103	125
D	SchedPax	EM2	SAN	6320	6:25	26	30
D	SchedPax	763	IAH	194	6:25	176	211
D	SchedPax	738	AUS	1182	6:25	115	151
D	SchedPax	752	DEN	46	6:35	150	182
D	SchedPax	73H	PVR	10226	6:35	117	158
D	SchedPax	752	SFO	90	6:35	150	182
D	SchedPax	73H	SEA	477	6:35	133	158
D	SchedPax	321	PHL	1418	6:35	145	184
D	SchedPax	321	PHX	250	6:35	150	184
D	SchedPax	320	SFO	921	6:35	121	147
D	SchedPax	738	LAS	423	6:35	121	151

Table 2

2025 Baseline Design Day Flight Schedule

A/D	Activity Type	Equipment	Origin/Dest.	Flight No.	Time	Passengers	Seats
D	SchedPax	320	PHX	21	6:35	120	147
D	SchedPax	763	STL	662	6:45	166	211
D	SchedPax	CR7	SEA	10147	6:45	55	66
D	SchedPax	320	MEX	903	6:45	125	147
D	SchedPax	73W	SJC	3025	6:45	109	136
D	SchedPax	738	CLE	750	6:55	126	151
D	SchedPax	772	DFW	2412	6:55	243	289
D	SchedPax	ERD	SAN	3025	6:55	37	44
D	SchedPax	73W	MDW	1288	6:55	103	136
D	SchedPax	762	JFK	118	7:05	140	169
D	SchedPax	320	MSP	10020	7:05	121	147
D	SchedPax	738	ORD	944	7:05	126	151
D	SchedPax	763	DTW	686	7:05	182	211
D	SchedPax	788	EWR	1403	7:05	203	250
D	SchedPax	738	MEM	176	7:05	123	151
D	SchedPax	319	YVR	551	7:05	100	125
D	SchedPax	73W	HOU	2537	7:05	103	136
D	SchedPax	320	BOS	360	7:05	114	147
D	SchedPax	73W	OAK	579	7:05	102	136
D	SchedPax	73W	ATL	48	7:05	118	136
D	SchedPax	CR7	ABQ	6472	7:05	51	66
D	SchedPax	321	LAS	1742	7:05	147	184
D	SchedPax	73H	PDX	10115	7:15	134	158
D	SchedPax	763	DFW	2416	7:15	177	211
D	SchedPax	738	DEN	1549	7:15	125	151
D	SchedPax	73W	SFO	1841	7:15	112	136
D	SchedPax	738	ORD	1868	7:15	126	151
D	SchedPax	ERD	SJC	3131	7:15	35	44
D	SchedPax	752	SLC	1174	7:15	148	182
D	SchedPax	737	MEX	18	7:25	106	124
D	SchedPax	EM2	CLD	6200	7:25	15	30
D	SchedPax	EM2	SAN	6321	7:25	26	30
D	SchedPax	73W	TUS	596	7:25	105	136
D	SchedPax	E90	YYC	569	7:25	75	94
D	SchedPax	772	DEN	58	7:25	238	289
D	SchedPax	763	MIA	202	7:35	182	211
D	SchedPax	739	SEA	10142	7:35	145	172
D	SchedPax	320	MEX	10223	7:35	125	147
D	SchedPax	73W	PHX	10126	7:35	111	136
D	SchedPax	73W	SLC	10167	7:35	111	136
D	SchedPax	CR7	SLC	6466	7:35	53	66
D	SchedPax	CR7	CMH	10067	7:35	53	66
D	SchedPax	738	SFO	1920	7:35	125	151
D	SchedPax	321	CLT	704	7:35	156	184
D	SchedPax	320	JFK	404	7:35	122	147
D	SchedPax	752	JFK	78	7:35	151	182
D	SchedPax	73W	RNO	187	7:35	103	136
D	SchedPax	752	SFO	889	7:35	150	182
D	SchedPax	CR7	DFW	6234	7:35	55	66
D	SchedPax	320	SEA	781	7:45	124	147
D	SchedPax	738	LAS	359	7:45	121	151
D	SchedPax	733	LAS	1269	7:45	109	136
D	SchedPax	ERD	FAT	3011	7:45	33	44
D	SchedPax	ERD	SAN	10135	7:45	37	44
D	SchedPax	738	IAH	294	7:45	126	151
D	SchedPax	CR7	PDX	6061	7:45	56	66
D	SchedPax	77L	ATL	244	7:55	237	273
D	SchedPax	73W	MDW	10013	7:55	103	136
D	SchedPax	CR9	PHX	4793	7:55	61	76

Table 2

2025 Baseline Design Day Flight Schedule

A/D	Activity Type	Equipment	Origin/Dest.	Flight No.	Time	Passengers	Seats
D	SchedPax	73W	SJC	1904	7:55	109	136
D	SchedPax	788	IAD	946	7:55	205	250
D	SchedPax	CR7	SJC	6499	7:55	52	66
D	SchedPax	738	DEN	10088	8:05	125	151
D	SchedPax	73H	ANC	149	8:05	136	158
D	SchedPax	E90	MKE	10019	8:05	71	94
D	SchedPax	319	BDL	10065	8:05	101	125
D	SchedPax	733	OAK	609	8:05	102	136
D	SchedPax	ERD	SBA	3039	8:05	35	44
D	SchedPax	321	YYZ	788	8:05	152	184
D	SchedPax	319	SFO	925	8:05	103	125
D	SchedPax	73W	MKE	208	8:05	103	136
D	SchedPax	CR7	COS	6512	8:05	49	66
D	SchedPax	753	MSP	1024	8:05	180	219
D	SchedPax	73W	MCI	3811	8:05	106	136
D	SchedPax	CR7	STS	2474	8:05	42	66
D	SchedPax	763	DFW	2422	8:15	177	211
D	SchedPax	M80	BIL	336	8:15	106	143
D	SchedPax	EM2	SAN	6322	8:15	26	30
D	SchedPax	752	JFK	22	8:15	151	182
D	SchedPax	CR9	RNO	2442	8:15	57	76
D	SchedPax	EM2	IPL	6279	8:15	12	30
D	SchedPax	EM2	SBA	6354	8:15	24	30
D	SchedPax	772	BOS	222	8:15	224	289
D	SchedPax	738	ORD	898	8:15	126	151
D	SchedPax	752	ORD	106	8:15	152	182
D	SchedPax	EM2	FAT	6246	8:15	22	30
D	SchedPax	738	DEN	558	8:15	125	151
D	SchedPax	73W	LAS	1250	8:25	109	136
D	SchedPax	73W	PHX	3374	8:25	111	136
D	SchedPax	738	SLC	4516	8:25	123	151
D	SchedPax	ERD	SAN	3047	8:25	37	44
D	SchedPax	763	DFW	2428	8:25	177	211
D	SchedPax	763	HNL	31	8:35	160	211
D	SchedPax	E90	YVR	10210	8:35	76	94
D	SchedPax	319	DEN	10089	8:35	103	125
D	SchedPax	320	GDL	927	8:35	126	147
D	SchedPax	CR9	SFO	10155	8:35	62	76
D	SchedPax	73W	GEG	10184	8:35	110	136
D	SchedPax	733	AUS	393	8:35	103	136
D	SchedPax	319	CUL	10230	8:35	101	125
D	SchedPax	CR7	MOD	10186	8:35	53	66
D	SchedPax	762	JFK	34	8:35	140	169
D	SchedPax	763	MCO	244	8:35	177	211
D	SchedPax	763	EWR	1703	8:35	171	211
D	SchedPax	752	BOS	162	8:35	141	182
D	SchedPax	739	SEA	451	8:35	145	172
D	SchedPax	320	YUL	782	8:35	108	147
D	SchedPax	763	KOA	57	8:35	185	211
D	SchedPax	EM2	SBP	6379	8:35	24	30
D	SchedPax	772	OGG	45	8:35	240	289
D	SchedPax	763	LIH	67	8:35	191	211
D	SchedPax	772	SFO	94	8:35	239	289
D	SchedPax	320	MEX	929	8:35	125	147
D	SchedPax	73W	SMF	3922	8:35	110	136
D	SchedPax	73W	SLC	503	8:35	111	136
D	SchedPax	772	HNL	81	8:35	219	289
D	SchedPax	763	HNL	1465	8:45	160	211
D	SchedPax	321	PHL	754	8:45	145	184

Table 2

2025 Baseline Design Day Flight Schedule

A/D	Activity Type	Equipment	Origin/Dest.	Flight No.	Time	Passengers	Seats
D	SchedPax	739	YVR	709	8:45	138	172
D	SchedPax	CR7	SEA	6105	8:45	55	66
D	SchedPax	738	PHL	192	8:45	120	151
D	SchedPax	763	HNL	1	8:45	160	211
D	SchedPax	738	SFO	10152	8:45	125	151
D	SchedPax	CR9	PDX	10116	8:45	64	76
D	SchedPax	738	DEN	10097	8:45	125	151
D	SchedPax	73W	ELP	10099	8:45	96	136
D	SchedPax	CR7	SMF	10168	8:45	53	66
D	SchedPax	762	EWR	114	8:45	138	169
D	SchedPax	752	CLE	10046	8:55	152	182
D	SchedPax	320	IAD	108	8:55	121	147
D	SchedPax	73W	SAT	2207	8:55	104	136
D	SchedPax	733	MDW	2921	8:55	103	136
D	SchedPax	EM2	BFL	10174	8:55	22	30
D	SchedPax	752	ATL	116	8:55	158	182
D	SchedPax	738	LAS	629	8:55	121	151
D	SchedPax	73W	SFO	224	8:55	112	136
D	SchedPax	CR7	RDM	2330	8:55	42	66
D	SchedPax	CR7	PHX	6526	8:55	53	66
D	SchedPax	EM2	OXR	6296	8:55	18	30
D	SchedPax	752	DEN	10093	9:05	150	182
D	SchedPax	752	IAD	966	9:05	150	182
D	SchedPax	737	QRO	10233	9:05	100	124
D	SchedPax	738	DTW	536	9:05	130	151
D	SchedPax	320	MEM	10016	9:05	119	147
D	SchedPax	320	LAS	102	9:05	118	147
D	SchedPax	73W	OAK	10112	9:05	102	136
D	SchedPax	733	BNA	3459	9:05	104	136
D	SchedPax	EM2	PSP	6300	9:05	25	30
D	SchedPax	CR7	SUN	10193	9:05	53	66
D	SchedPax	763	IAD	76	9:05	173	211
D	SchedPax	753	IAH	1594	9:05	182	219
D	SchedPax	763	MIA	280	9:05	182	211
D	SchedPax	738	MSP	622	9:05	125	151
D	SchedPax	CR7	YVR	6114	9:15	52	66
D	SchedPax	744	JFK	107	9:15	315	381
D	SchedPax	738	RDU	10070	9:15	122	151
D	SchedPax	320	BOS	10042	9:15	114	147
D	SchedPax	320	SEA	10149	9:15	124	147
D	SchedPax	738	LAS	10106	9:15	121	151
D	SchedPax	73W	TUS	10172	9:15	105	136
D	SchedPax	EM2	MRY	10111	9:15	25	30
D	SchedPax	ERD	SJC	3190	9:15	35	44
D	SchedPax	319	DEN	104	9:25	103	125
D	SchedPax	73W	ABQ	1075	9:25	106	136
D	SchedPax	738	BWI	306	9:25	117	151
D	SchedPax	CR7	EUG	10182	9:25	53	66
D	SchedPax	739	SEA	10143	9:35	145	172
D	SchedPax	738	SJD	10227	9:35	119	151
D	SchedPax	73W	BWI	10045	9:35	105	136
D	SchedPax	ERD	FAT	10101	9:35	33	44
D	SchedPax	ERD	SAN	10136	9:35	37	44
D	SchedPax	CR7	PRC	10129	9:35	41	66
D	SchedPax	763	FLL	1434	9:35	171	211
D	SchedPax	762	JFK	2	9:35	140	169
D	SchedPax	752	SJD	237	9:45	143	182
D	SchedPax	738	MSP	422	9:45	125	151
D	SchedPax	320	PIT	963	9:45	132	147

Table 2

2025 Baseline Design Day Flight Schedule

A/D	Activity Type	Equipment	Origin/Dest.	Flight No.	Time	Passengers	Seats
D	SchedPax	763	DFW	2430	9:45	177	211
D	SchedPax	789	ORD	1180	9:45	243	290
D	SchedPax	320	CUN	949	9:45	103	147
D	SchedPax	738	STL	10036	9:45	119	151
D	SchedPax	738	GDL	471	9:45	130	151
D	SchedPax	321	PHX	14	9:45	150	184
D	SchedPax	320	JFK	406	9:45	122	147
D	SchedPax	733	SMF	10169	9:45	110	136
D	SchedPax	EM2	SAN	6323	9:45	26	30
D	SchedPax	320	PVR	917	9:45	109	147
D	SchedPax	752	SFO	954	9:45	150	182
D	SchedPax	321	PHL	10063	9:55	145	184
D	SchedPax	738	PHX	410	9:55	123	151
D	SchedPax	752	MCO	272	9:55	153	182
D	SchedPax	738	SFO	1928	9:55	125	151
D	SchedPax	733	SJC	818	9:55	109	136
D	SchedPax	738	ORD	178	9:55	126	151
D	SchedPax	763	OGG	253	9:55	174	211
D	SchedPax	EM2	SMX	6417	9:55	23	30
D	SchedPax	77L	ATL	101	10:05	237	273
D	SchedPax	772	HNL	3	10:05	219	289
D	SchedPax	73H	ANC	10081	10:05	136	158
D	SchedPax	320	JFK	10056	10:05	122	147
D	SchedPax	CR9	BOI	2416	10:05	48	76
D	SchedPax	738	IAH	10007	10:05	126	151
D	SchedPax	738	OAK	1726	10:05	113	151
D	SchedPax	733	ELP	1954	10:05	96	136
D	SchedPax	CR7	ASE	10082	10:05	36	66
D	SchedPax	763	MCO	1430	10:05	177	211
D	SchedPax	73W	LAS	2278	10:05	109	136
D	SchedPax	320	CUN	809	10:05	103	147
D	SchedPax	763	YYZ	1586	10:15	174	211
D	SchedPax	752	JFK	32	10:15	151	182
D	SchedPax	738	ORD	836	10:15	126	151
D	SchedPax	73W	DEN	471	10:15	112	136
D	SchedPax	ERD	SAN	3007	10:15	37	44
D	SchedPax	763	EWR	16	10:15	171	211
D	SchedPax	738	BOS	10041	10:15	117	151
D	SchedPax	739	ZIH	272	10:15	134	172
D	SchedPax	738	SLC	1176	10:15	123	151
D	SchedPax	733	SFO	790	10:15	112	136
D	SchedPax	ERD	FAT	3013	10:15	33	44
D	SchedPax	EM2	CLD	6202	10:15	15	30
D	SchedPax	752	JFK	10059	10:25	151	182
D	SchedPax	73H	SJD	250	10:25	124	158
D	SchedPax	752	SFO	857	10:35	150	182
D	SchedPax	738	IAD	10051	10:35	124	151
D	SchedPax	739	SEA	453	10:35	145	172
D	SchedPax	320	MSP	10021	10:35	121	147
D	SchedPax	320	MEX	5900	10:35	125	147
D	SchedPax	738	CLE	556	10:35	126	151
D	SchedPax	320	SFO	10156	10:35	121	147
D	SchedPax	CR7	PHX	10120	10:35	53	66
D	SchedPax	738	LAS	733	10:35	121	151
D	SchedPax	772	HNL	283	10:35	219	289
D	SchedPax	733	HOU	1464	10:35	103	136
D	SchedPax	ERD	MRY	3079	10:35	37	44
D	SchedPax	752	IAD	856	10:45	150	182
D	SchedPax	73H	PVR	258	10:45	117	158

Table 2

2025 Baseline Design Day Flight Schedule

A/D	Activity Type	Equipment	Origin/Dest.	Flight No.	Time	Passengers	Seats
D	SchedPax	CR9	ACV	2307	10:45	44	76
D	SchedPax	738	DEN	814	10:45	125	151
D	SchedPax	733	MCI	316	10:45	106	136
D	SchedPax	763	DFW	2436	10:45	177	211
D	SchedPax	763	ORD	942	10:45	176	211
D	SchedPax	763	HNL	10074	10:45	160	211
D	SchedPax	319	YVR	553	10:45	100	125
D	SchedPax	73W	MDW	10014	10:45	103	136
D	SchedPax	733	TUS	1689	10:45	105	136
D	SchedPax	EM2	SBA	6355	10:45	24	30
D	SchedPax	763	HNL	3	10:45	160	211
D	SchedPax	752	OGG	89	10:45	151	182
D	SchedPax	762	JFK	40	10:55	140	169
D	SchedPax	E90	YYC	571	10:55	75	94
D	SchedPax	73H	MSY	1446	10:55	109	158
D	SchedPax	319	DEN	400	10:55	103	125
D	SchedPax	CR7	BOI	6506	10:55	42	66
D	SchedPax	738	BNA	1974	11:05	115	151
D	SchedPax	73W	ATL	10039	11:05	118	136
D	SchedPax	739	IAH	10008	11:05	143	172
D	SchedPax	321	PHL	796	11:05	145	184
D	SchedPax	320	BOS	364	11:05	114	147
D	SchedPax	73W	SMF	836	11:05	110	136
D	SchedPax	738	OAK	173	11:05	113	151
D	SchedPax	EM2	IYK	6282	11:05	18	30
D	SchedPax	EM2	YUM	6455	11:05	22	30
D	SchedPax	752	SJD	797	11:05	143	182
D	SchedPax	752	ATL	61	11:05	158	182
D	SchedPax	319	YEG	8595	11:05	101	125
D	SchedPax	73H	PDX	567	11:05	134	158
D	SchedPax	738	DTW	687	11:05	130	151
D	SchedPax	E90	MCI	350	11:15	74	94
D	SchedPax	320	IAD	110	11:15	121	147
D	SchedPax	ERD	SBA	3033	11:15	35	44
D	SchedPax	752	JFK	10057	11:15	151	182
D	SchedPax	738	SFO	10153	11:15	125	151
D	SchedPax	320	GDL	915	11:15	126	147
D	SchedPax	738	LAS	2542	11:15	121	151
D	SchedPax	ERD	SAN	3045	11:15	37	44
D	SchedPax	CR7	PHX	2820	11:15	53	66
D	SchedPax	321	CLT	1494	11:25	156	184
D	SchedPax	EM2	MRY	6288	11:25	25	30
D	SchedPax	752	SFO	878	11:25	150	182
D	SchedPax	752	HNL	61	11:25	138	182
D	SchedPax	763	ORD	10027	11:35	176	211
D	SchedPax	739	SEA	10144	11:35	145	172
D	SchedPax	738	SLC	4700	11:35	123	151
D	SchedPax	CR9	LAS	10104	11:35	60	76
D	SchedPax	CR9	LTO	2601	11:35	61	76
D	SchedPax	320	JFK	10061	11:35	122	147
D	SchedPax	319	DGO	10231	11:35	101	125
D	SchedPax	CR7	SAN	10139	11:35	56	66
D	SchedPax	CR9	LTO	264	11:35	61	76
D	SchedPax	CR7	FAT	6247	11:35	49	66
D	SchedPax	763	ORD	840	11:35	176	211
D	SchedPax	73W	MKE	349	11:35	103	136
D	SchedPax	73W	SLC	692	11:35	111	136
D	SchedPax	EM2	CLD	6203	11:35	15	30
D	SchedPax	CR7	TUL	6138	11:35	36	66

Table 2

2025 Baseline Design Day Flight Schedule

A/D	Activity Type	Equipment	Origin/Dest.	Flight No.	Time	Passengers	Seats
D	SchedPax	CR7	SEA	5818	11:35	55	66
D	SchedPax	73H	SLC	1178	11:35	128	158
D	SchedPax	388	NRT	2	11:45	484	525
D	SchedPax	738	STL	812	11:45	119	151
D	SchedPax	320	LAS	105	11:45	118	147
D	SchedPax	763	DFW	2440	11:45	177	211
D	SchedPax	321	YYZ	790	11:45	152	184
D	SchedPax	320	MSY	202	11:45	101	147
D	SchedPax	73W	ABQ	3969	11:45	106	136
D	SchedPax	733	SFO	10159	11:45	112	136
D	SchedPax	CR7	PDX	6065	11:45	56	66
D	SchedPax	772	MIA	1520	11:55	250	289
D	SchedPax	763	BOS	264	11:55	163	211
D	SchedPax	753	IAH	394	11:55	182	219
D	SchedPax	738	JAX	10069	11:55	122	151
D	SchedPax	CR9	PHX	4794	11:55	61	76
D	SchedPax	752	JFK	26	11:55	151	182
D	SchedPax	738	LAS	1915	11:55	121	151
D	SchedPax	320	CUN	290	11:55	103	147
D	SchedPax	788	EWR	90	11:55	203	250
D	SchedPax	762	JFK	10054	12:05	140	169
D	SchedPax	763	CVG	1590	12:05	181	211
D	SchedPax	738	SFO	581	12:05	125	151
D	SchedPax	318	OMA	10026	12:05	84	104
D	SchedPax	73W	BWI	64	12:05	105	136
D	SchedPax	73W	OAK	1714	12:05	102	136
D	SchedPax	CR7	CMH	10068	12:05	53	66
D	SchedPax	763	MSP	695	12:05	174	211
D	SchedPax	320	SEA	789	12:05	124	147
D	SchedPax	ERD	SJC	3121	12:05	35	44
D	SchedPax	E90	MKE	1500	12:15	71	94
D	SchedPax	752	SFO	808	12:15	150	182
D	SchedPax	763	DFW	2444	12:15	177	211
D	SchedPax	320	YUL	798	12:15	108	147
D	SchedPax	73W	SJC	10164	12:15	109	136
D	SchedPax	738	DEN	1458	12:25	125	151
D	SchedPax	73W	MDW	3076	12:25	103	136
D	SchedPax	321	PHX	46	12:25	150	184
D	SchedPax	319	SFO	929	12:25	103	125
D	SchedPax	733	PHX	994	12:25	111	136
D	SchedPax	748	ICN	18	12:35	380	467
D	SchedPax	789	PEK	10200	12:35	217	290
D	SchedPax	343	CDG	8	12:35	205	278
D	SchedPax	763	HNL	10072	12:35	160	211
D	SchedPax	752	JFK	84	12:35	151	182
D	SchedPax	753	IAH	494	12:35	182	219
D	SchedPax	739	SEA	459	12:35	145	172
D	SchedPax	M80	BIL	10083	12:35	106	143
D	SchedPax	CR9	BOI	10085	12:35	48	76
D	SchedPax	738	MSP	10023	12:35	125	151
D	SchedPax	733	AUS	10002	12:35	103	136
D	SchedPax	EM2	BFL	6170	12:35	22	30
D	SchedPax	ERD	SAN	3049	12:35	37	44
D	SchedPax	CR7	RNO	10132	12:35	50	66
D	SchedPax	CR7	MOD	10187	12:35	53	66
D	SchedPax	EM2	ONT	10189	12:35	24	30
D	SchedPax	73W	ELP	1617	12:35	96	136
D	SchedPax	763	DTW	688	12:45	182	211
D	SchedPax	EM2	SAN	6327	12:45	26	30

Table 2

2025 Baseline Design Day Flight Schedule

A/D	Activity Type	Equipment	Origin/Dest.	Flight No.	Time	Passengers	Seats
D	SchedPax	763	ATL	152	12:45	183	211
D	SchedPax	320	TUS	6452	12:45	114	147
D	SchedPax	CR7	PHX	6522	12:45	53	66
D	SchedPax	789	NRT	169	12:45	268	290
D	SchedPax	752	ORD	146	12:45	152	182
D	SchedPax	752	JFK	10060	12:45	151	182
D	SchedPax	752	DEN	336	12:45	150	182
D	SchedPax	738	ORD	681	12:45	126	151
D	SchedPax	738	MEM	180	12:45	123	151
D	SchedPax	73W	ATL	56	12:45	118	136
D	SchedPax	320	LAS	378	12:45	118	147
D	SchedPax	73W	BNA	10040	12:45	104	136
D	SchedPax	73W	RNO	2977	12:45	103	136
D	SchedPax	73W	SAT	631	12:45	104	136
D	SchedPax	CR7	ABQ	10077	12:45	51	66
D	SchedPax	ERD	SBA	3043	12:45	35	44
D	SchedPax	EM2	OXR	6295	12:45	18	30
D	SchedPax	763	DFW	2446	12:55	177	211
D	SchedPax	739	DCA	6	12:55	159	172
D	SchedPax	319	OKC	6442	12:55	77	125
D	SchedPax	73H	PDX	5710	12:55	134	158
D	SchedPax	772	NRT	5	12:55	267	289
D	SchedPax	738	AUS	1308	12:55	115	151
D	SchedPax	752	IAD	236	12:55	150	182
D	SchedPax	CR7	YVR	6483	12:55	52	66
D	SchedPax	744	LHR	934	12:55	319	381
D	SchedPax	320	IAH	694	12:55	123	147
D	SchedPax	343	PPT	1	13:05	225	278
D	SchedPax	752	KOA	1767	13:05	160	182
D	SchedPax	73W	ABQ	10078	13:05	106	136
D	SchedPax	73W	OAK	3361	13:05	102	136
D	SchedPax	EM2	PSP	6302	13:05	25	30
D	SchedPax	752	SLC	1180	13:15	148	182
D	SchedPax	752	SFO	118	13:15	150	182
D	SchedPax	320	JFK	672	13:15	122	147
D	SchedPax	738	SFO	1919	13:15	125	151
D	SchedPax	738	LAS	605	13:15	121	151
D	SchedPax	ERD	SAN	3021	13:15	37	44
D	SchedPax	744	NRT	891	13:15	351	381
D	SchedPax	762	JFK	32	13:15	140	169
D	SchedPax	738	ORD	10028	13:15	126	151
D	SchedPax	E90	YYC	10213	13:15	75	94
D	SchedPax	737	MEX	647	13:15	106	124
D	SchedPax	739	YVR	703	13:15	138	172
D	SchedPax	744	NRT	1	13:25	351	381
D	SchedPax	77W	NRT	61	13:25	305	331
D	SchedPax	788	LIM	601	13:25	227	250
D	SchedPax	320	MEX	901	13:25	125	147
D	SchedPax	321	CLT	1496	13:25	156	184
D	SchedPax	73W	SMF	1190	13:25	110	136
D	SchedPax	CR9	FLG	2316	13:25	74	76
D	SchedPax	744	ICN	10196	13:35	309	381
D	SchedPax	346	PVG	586	13:35	300	311
D	SchedPax	763	EWR	10050	13:35	171	211
D	SchedPax	752	ORD	116	13:35	152	182
D	SchedPax	EMJ	HMO	2201	13:35	52	99
D	SchedPax	739	SEA	461	13:35	145	172
D	SchedPax	738	MSP	10022	13:35	125	151
D	SchedPax	73W	MKE	10018	13:35	103	136

Table 2

2025 Baseline Design Day Flight Schedule

A/D	Activity Type	Equipment	Origin/Dest.	Flight No.	Time	Passengers	Seats
D	SchedPax	738	HOU	10006	13:35	115	151
D	SchedPax	733	MCI	10011	13:35	106	136
D	SchedPax	73W	PHX	10128	13:35	111	136
D	SchedPax	CR7	SJC	10162	13:35	52	66
D	SchedPax	EM2	SAN	6329	13:35	26	30
D	SchedPax	763	DFW	2448	13:35	177	211
D	SchedPax	321	PHL	1416	13:35	145	184
D	SchedPax	320	JFK	412	13:35	122	147
D	SchedPax	EM2	SMX	6444	13:35	23	30
D	SchedPax	752	JFK	890	13:45	151	182
D	SchedPax	733	TUS	2708	13:45	105	136
D	SchedPax	73W	DEN	1757	13:45	112	136
D	SchedPax	73W	YYC	885	13:45	108	136
D	SchedPax	320	DFW	6219	13:45	124	147
D	SchedPax	744	TLV	6	13:45	319	381
D	SchedPax	772	DEN	10094	13:45	238	289
D	SchedPax	738	ATL	10037	13:45	131	151
D	SchedPax	ERD	MRY	3031	13:45	37	44
D	SchedPax	CR7	COS	6440	13:45	49	66
D	SchedPax	763	SCL	10234	13:55	170	211
D	SchedPax	320	LAS	162	13:55	118	147
D	SchedPax	73W	LAS	3439	13:55	109	136
D	SchedPax	73H	YEG	923	13:55	128	158
D	SchedPax	ERD	SAN	3001	13:55	37	44
D	SchedPax	M80	MFR	394	13:55	101	143
D	SchedPax	319	SFO	937	13:55	103	125
D	SchedPax	738	MDW	903	13:55	115	151
D	SchedPax	772	ICN	201	14:05	235	289
D	SchedPax	738	AUS	10001	14:05	115	151
D	SchedPax	319	DEN	10090	14:05	103	125
D	SchedPax	CR9	PDX	2640	14:05	64	76
D	SchedPax	733	OAK	82	14:05	102	136
D	SchedPax	73W	SAT	10035	14:05	104	136
D	SchedPax	762	JFK	10055	14:05	140	169
D	SchedPax	73W	BNA	2445	14:05	104	136
D	SchedPax	73W	SLC	1271	14:05	111	136
D	SchedPax	320	TLC	917	14:05	130	147
D	SchedPax	EM2	SGU	6422	14:05	18	30
D	SchedPax	319	YVR	555	14:15	100	125
D	SchedPax	M80	BIL	336	14:15	106	143
D	SchedPax	738	ORD	1624	14:25	126	151
D	SchedPax	753	IAH	594	14:25	182	219
D	SchedPax	343	PPT	10204	14:35	225	278
D	SchedPax	763	DFW	10003	14:35	177	211
D	SchedPax	763	STL	768	14:35	166	211
D	SchedPax	752	ATL	2092	14:35	158	182
D	SchedPax	763	DTW	10048	14:35	182	211
D	SchedPax	738	RDU	10071	14:35	122	151
D	SchedPax	738	SFO	1954	14:35	125	151
D	SchedPax	739	SEA	10145	14:35	145	172
D	SchedPax	CR9	ACV	10080	14:35	44	76
D	SchedPax	733	SMF	2622	14:35	110	136
D	SchedPax	EM2	ONT	10190	14:35	24	30
D	SchedPax	763	MIA	252	14:35	182	211
D	SchedPax	320	GDL	921	14:35	126	147
D	SchedPax	738	SJC	1801	14:35	121	151
D	SchedPax	EM2	FAT	6066	14:35	22	30
D	SchedPax	ERD	SBA	10175	14:35	35	44
D	SchedPax	ERD	SAN	3067	14:35	37	44

Table 2

2025 Baseline Design Day Flight Schedule

A/D	Activity Type	Equipment	Origin/Dest.	Flight No.	Time	Passengers	Seats
D	SchedPax	772	OGG	47	14:35	240	289
D	SchedPax	753	HNL	623	14:45	166	219
D	SchedPax	733	AUS	2964	14:45	103	136
D	SchedPax	733	SFO	10160	14:45	112	136
D	SchedPax	EM2	MRY	6291	14:45	25	30
D	SchedPax	744	NRT	11	14:45	351	381
D	SchedPax	752	JFK	708	14:45	151	182
D	SchedPax	752	ORD	10030	14:45	152	182
D	SchedPax	320	BOS	474	14:45	114	147
D	SchedPax	321	PHX	10122	14:45	150	184
D	SchedPax	73W	PHX	367	14:45	111	136
D	SchedPax	77W	NRT	10199	14:55	305	331
D	SchedPax	772	SFO	806	14:55	239	289
D	SchedPax	752	SLC	10165	14:55	148	182
D	SchedPax	738	IAD	10052	14:55	124	151
D	SchedPax	320	GDL	915	14:55	126	147
D	SchedPax	388	FRA	457	14:55	458	525
D	SchedPax	763	MSP	696	14:55	174	211
D	SchedPax	752	DEN	748	14:55	150	182
D	SchedPax	738	IAD	144	14:55	124	151
D	SchedPax	EM2	CLD	6204	14:55	15	30
D	SchedPax	762	JFK	22	15:05	140	169
D	SchedPax	319	DEN	414	15:05	103	125
D	SchedPax	73W	ELP	10100	15:05	96	136
D	SchedPax	73W	DEN	1765	15:05	112	136
D	SchedPax	73W	MDW	10015	15:05	103	136
D	SchedPax	738	OAK	937	15:05	113	151
D	SchedPax	752	SFO	170	15:05	150	182
D	SchedPax	EM2	SAN	6335	15:05	26	30
D	SchedPax	73W	LAS	3702	15:05	109	136
D	SchedPax	ERD	SAN	3083	15:05	37	44
D	SchedPax	CR7	SAT	6431	15:05	50	66
D	SchedPax	CR7	SEA	6008	15:05	55	66
D	SchedPax	CR7	SMF	6477	15:05	53	66
D	SchedPax	321	YYZ	796	15:15	152	184
D	SchedPax	EM2	SBA	6357	15:15	24	30
D	SchedPax	ERD	FAT	3023	15:15	33	44
D	SchedPax	EM2	PSP	6305	15:15	25	30
D	SchedPax	763	BOS	726	15:15	163	211
D	SchedPax	73W	ATL	51	15:15	118	136
D	SchedPax	CR9	RNO	2444	15:15	57	76
D	SchedPax	320	BOS	10043	15:15	114	147
D	SchedPax	320	SFO	10157	15:15	121	147
D	SchedPax	320	JFK	416	15:25	122	147
D	SchedPax	CR7	ASE	6454	15:25	36	66
D	SchedPax	733	SJC	1696	15:25	109	136
D	SchedPax	388	CDG	65	15:35	389	525
D	SchedPax	753	IAH	10009	15:35	182	219
D	SchedPax	739	SEA	465	15:35	145	172
D	SchedPax	738	ATL	10038	15:35	131	151
D	SchedPax	320	MEX	10224	15:35	125	147
D	SchedPax	E90	MCI	10012	15:35	74	94
D	SchedPax	738	CLE	514	15:35	126	151
D	SchedPax	320	LAS	10105	15:35	118	147
D	SchedPax	321	PHL	10064	15:35	145	184
D	SchedPax	321	PHX	10123	15:35	150	184
D	SchedPax	320	BOS	10044	15:35	114	147
D	SchedPax	738	SFO	1027	15:35	125	151
D	SchedPax	73W	RNO	10133	15:35	103	136

Table 2

2025 Baseline Design Day Flight Schedule

A/D	Activity Type	Equipment	Origin/Dest.	Flight No.	Time	Passengers	Seats
D	SchedPax	CR7	BOI	10086	15:35	42	66
D	SchedPax	CR7	PHX	10121	15:35	53	66
D	SchedPax	CR7	RDD	10130	15:35	46	66
D	SchedPax	763	DFW	2450	15:35	177	211
D	SchedPax	738	EWR	1503	15:35	123	151
D	SchedPax	733	SMF	3662	15:35	110	136
D	SchedPax	388	LHR	278	15:45	440	525
D	SchedPax	733	TUS	2187	15:45	105	136
D	SchedPax	77W	TPE	10207	15:45	275	331
D	SchedPax	738	PHX	418	15:45	123	151
D	SchedPax	73W	ABQ	2904	15:45	106	136
D	SchedPax	752	ORD	10031	15:55	152	182
D	SchedPax	737	TRC	10235	15:55	100	124
D	SchedPax	73H	SLC	1182	15:55	128	158
D	SchedPax	ERD	SJC	3140	15:55	35	44
D	SchedPax	CR7	ABQ	6474	15:55	51	66
D	SchedPax	744	TPE	5	15:55	316	381
D	SchedPax	320	SEA	793	15:55	124	147
D	SchedPax	EM2	SBP	6397	15:55	24	30
D	SchedPax	752	SFO	293	15:55	150	182
D	SchedPax	772	DEN	948	16:05	238	289
D	SchedPax	738	ORD	10029	16:05	126	151
D	SchedPax	73H	JFK	10058	16:05	131	158
D	SchedPax	M80	FAR	10005	16:05	84	143
D	SchedPax	319	IAD	10053	16:05	103	125
D	SchedPax	733	OAK	73	16:05	102	136
D	SchedPax	EM2	SBA	10177	16:05	24	30
D	SchedPax	752	IAD	210	16:05	150	182
D	SchedPax	CR7	PDX	10119	16:05	56	66
D	SchedPax	EM2	BFL	6169	16:05	22	30
D	SchedPax	343	PPT	7	16:15	225	278
D	SchedPax	320	YYZ	10215	16:15	121	147
D	SchedPax	CR9	PHX	4796	16:15	61	76
D	SchedPax	73W	DEN	10098	16:15	112	136
D	SchedPax	EM2	SAN	6338	16:15	26	30
D	SchedPax	EM2	CLD	6205	16:15	15	30
D	SchedPax	762	JFK	180	16:15	140	169
D	SchedPax	E90	YYC	573	16:15	75	94
D	SchedPax	319	DEN	10091	16:15	103	125
D	SchedPax	319	BDL	10066	16:15	101	125
D	SchedPax	321	PHX	500	16:25	150	184
D	SchedPax	738	LAS	741	16:25	121	151
D	SchedPax	733	SMF	10170	16:25	110	136
D	SchedPax	CR7	SJC	6519	16:25	52	66
D	SchedPax	ERD	SAN	3085	16:25	37	44
D	SchedPax	744	LHR	2	16:35	319	381
D	SchedPax	752	JFK	28	16:35	151	182
D	SchedPax	738	STL	1716	16:35	119	151
D	SchedPax	739	SEA	467	16:35	145	172
D	SchedPax	CR9	PDX	10117	16:35	64	76
D	SchedPax	320	LAS	384	16:35	118	147
D	SchedPax	738	SJC	2675	16:35	121	151
D	SchedPax	CR7	TUL	10236	16:35	36	66
D	SchedPax	EM2	ONT	10191	16:35	24	30
D	SchedPax	763	ATL	2094	16:35	183	211
D	SchedPax	ERD	SBA	3037	16:35	35	44
D	SchedPax	763	KOA	53	16:35	185	211
D	SchedPax	CR7	SMF	6491	16:35	53	66
D	SchedPax	763	LIH	285	16:45	191	211

Table 2

2025 Baseline Design Day Flight Schedule

A/D	Activity Type	Equipment	Origin/Dest.	Flight No.	Time	Passengers	Seats
D	SchedPax	763	DFW	2456	16:45	177	211
D	SchedPax	738	SFO	1563	16:45	125	151
D	SchedPax	738	PHX	223	16:45	123	151
D	SchedPax	733	MCI	159	16:45	106	136
D	SchedPax	73W	YYC	10214	16:45	108	136
D	SchedPax	763	LIH	69	16:45	191	211
D	SchedPax	388	DXB	216	16:45	325	525
D	SchedPax	320	JFK	10062	16:45	122	147
D	SchedPax	CR7	COS	10087	16:45	49	66
D	SchedPax	ERD	FAT	10102	16:45	33	44
D	SchedPax	772	HNL	87	16:45	219	289
D	SchedPax	763	IAH	541	16:55	176	211
D	SchedPax	320	ORD	122	16:55	123	147
D	SchedPax	738	LAS	835	16:55	121	151
D	SchedPax	763	OGG	161	16:55	174	211
D	SchedPax	CR9	PHX	2880	16:55	61	76
D	SchedPax	752	SFO	926	17:05	150	182
D	SchedPax	M80	MFR	10109	17:05	101	143
D	SchedPax	320	LAS	397	17:05	118	147
D	SchedPax	73W	ABQ	10079	17:05	106	136
D	SchedPax	733	SFO	3430	17:05	112	136
D	SchedPax	73W	OAK	10113	17:05	102	136
D	SchedPax	EM2	SBA	6358	17:05	24	30
D	SchedPax	763	HNL	297	17:05	160	211
D	SchedPax	320	GDL	933	17:05	126	147
D	SchedPax	752	OGG	1477	17:15	151	182
D	SchedPax	738	ORD	1890	17:15	126	151
D	SchedPax	738	LAS	631	17:15	121	151
D	SchedPax	ERD	SAN	3003	17:15	37	44
D	SchedPax	738	DTW	689	17:15	130	151
D	SchedPax	73W	PHX	2724	17:15	111	136
D	SchedPax	CR7	SAN	10140	17:15	56	66
D	SchedPax	763	KOA	247	17:15	185	211
D	SchedPax	319	DEN	412	17:25	103	125
D	SchedPax	752	SLC	1184	17:25	148	182
D	SchedPax	744	TPE	10208	17:35	316	381
D	SchedPax	738	DEN	678	17:35	125	151
D	SchedPax	737	MEX	10222	17:35	106	124
D	SchedPax	739	SEA	457	17:35	145	172
D	SchedPax	321	CLT	10047	17:35	156	184
D	SchedPax	320	SEA	10150	17:35	124	147
D	SchedPax	73W	SJC	507	17:35	109	136
D	SchedPax	EM2	FAT	6249	17:35	22	30
D	SchedPax	CR7	SEA	10148	17:35	55	66
D	SchedPax	388	LHR	282	17:35	440	525
D	SchedPax	346	LHR	8	17:35	261	311
D	SchedPax	744	TPE	11	17:45	316	381
D	SchedPax	773	AMS	602	17:45	339	385
D	SchedPax	753	HNL	621	17:45	166	219
D	SchedPax	73W	DEN	2279	17:45	112	136
D	SchedPax	738	SFO	1900	17:45	125	151
D	SchedPax	763	DFW	2458	17:45	177	211
D	SchedPax	737	PBC	10232	17:45	100	124
D	SchedPax	73W	SMF	1446	17:45	110	136
D	SchedPax	CR7	SJC	10163	17:45	52	66
D	SchedPax	763	HNL	1467	17:45	160	211
D	SchedPax	752	ORD	10032	17:55	152	182
D	SchedPax	73W	ELP	1947	17:55	96	136
D	SchedPax	EM2	CLD	6206	17:55	15	30

Table 2

2025 Baseline Design Day Flight Schedule

A/D	Activity Type	Equipment	Origin/Dest.	Flight No.	Time	Passengers	Seats
D	SchedPax	CR7	TUS	6498	17:55	51	66
D	SchedPax	763	HNL	9	17:55	160	211
D	SchedPax	320	MEX	905	17:55	125	147
D	SchedPax	CR9	BOI	2418	17:55	48	76
D	SchedPax	738	MDW	3329	17:55	115	151
D	SchedPax	333	DUB	10217	18:05	238	295
D	SchedPax	752	DEN	504	18:05	150	182
D	SchedPax	738	SFO	10154	18:05	125	151
D	SchedPax	M80	BIL	10084	18:05	106	143
D	SchedPax	CR9	MEM	10017	18:05	61	76
D	SchedPax	CR9	MSY	10024	18:05	52	76
D	SchedPax	321	PHX	1514	18:05	150	184
D	SchedPax	73W	LAS	292	18:05	109	136
D	SchedPax	73W	OAK	1341	18:05	102	136
D	SchedPax	ERD	MRY	10110	18:05	37	44
D	SchedPax	ERD	SAN	3093	18:05	37	44
D	SchedPax	CR7	STS	10181	18:05	42	66
D	SchedPax	320	IAH	1542	18:05	123	147
D	SchedPax	EM2	IPL	6280	18:05	12	30
D	SchedPax	772	SFO	798	18:05	239	289
D	SchedPax	738	MSP	698	18:15	125	151
D	SchedPax	320	SFO	945	18:15	121	147
D	SchedPax	772	HNL	209	18:15	219	289
D	SchedPax	319	YVR	557	18:15	100	125
D	SchedPax	73W	SJC	3760	18:15	109	136
D	SchedPax	73W	TUS	10173	18:15	105	136
D	SchedPax	CR7	MSY	10025	18:15	45	66
D	SchedPax	CR9	PDX	2600	18:25	64	76
D	SchedPax	CR7	PHX	6528	18:25	53	66
D	SchedPax	CR7	YVR	6428	18:25	52	66
D	SchedPax	EM2	SAN	6340	18:25	26	30
D	SchedPax	EM2	MRY	6292	18:25	25	30
D	SchedPax	73H	PDX	245	18:25	134	158
D	SchedPax	733	SMF	844	18:25	110	136
D	SchedPax	739	YVR	707	18:25	138	172
D	SchedPax	333	SVO	322	18:35	242	295
D	SchedPax	763	HNL	267	18:35	160	211
D	SchedPax	763	LHR	10219	18:35	177	211
D	SchedPax	739	SEA	471	18:35	145	172
D	SchedPax	319	DEN	10092	18:35	103	125
D	SchedPax	CR9	ZIH	10228	18:35	59	76
D	SchedPax	73W	SLC	533	18:35	111	136
D	SchedPax	733	LAS	10107	18:35	109	136
D	SchedPax	73W	RNO	10134	18:35	103	136
D	SchedPax	CR7	PDX	6071	18:35	56	66
D	SchedPax	EM2	SMX	10180	18:35	23	30
D	SchedPax	ERD	FAT	3017	18:35	33	44
D	SchedPax	73W	MDW	3598	18:45	103	136
D	SchedPax	738	PHX	970	18:45	123	151
D	SchedPax	EM2	SBP	6409	18:45	24	30
D	SchedPax	77W	CDG	69	18:45	245	331
D	SchedPax	343	CDG	10216	18:45	205	278
D	SchedPax	73W	HOU	3402	18:45	103	136
D	SchedPax	73W	SFO	1796	18:45	112	136
D	SchedPax	EM2	PSP	6309	18:45	25	30
D	SchedPax	ERD	SJC	3168	18:45	35	44
D	SchedPax	738	LAS	866	18:45	121	151
D	SchedPax	752	DFW	2468	18:55	153	182
D	SchedPax	752	ORD	124	18:55	152	182

Table 2

2025 Baseline Design Day Flight Schedule

A/D	Activity Type	Equipment	Origin/Dest.	Flight No.	Time	Passengers	Seats
D	SchedPax	739	YVR	705	18:55	138	172
D	SchedPax	CR7	COS	6496	18:55	49	66
D	SchedPax	333	FCO	10218	19:05	238	295
D	SchedPax	772	DEN	10095	19:05	238	289
D	SchedPax	753	HNL	10076	19:05	166	219
D	SchedPax	763	HNL	10075	19:05	160	211
D	SchedPax	752	OGG	49	19:05	151	182
D	SchedPax	738	LAS	10103	19:05	121	151
D	SchedPax	738	AUS	2246	19:05	115	151
D	SchedPax	73W	OAK	3963	19:05	102	136
D	SchedPax	748	FRA	451	19:15	407	467
D	SchedPax	320	MEX	10225	19:15	125	147
D	SchedPax	319	SAT	6430	19:15	95	125
D	SchedPax	CR7	SLC	6470	19:15	53	66
D	SchedPax	EM2	SAN	6341	19:15	26	30
D	SchedPax	320	SEA	797	19:15	124	147
D	SchedPax	73W	TUS	3158	19:15	105	136
D	SchedPax	EM2	IYK	6283	19:15	18	30
D	SchedPax	ERD	SAN	3095	19:15	37	44
D	SchedPax	343	ZRH	41	19:25	193	278
D	SchedPax	73W	RNO	1657	19:25	103	136
D	SchedPax	320	LAS	117	19:25	118	147
D	SchedPax	763	HNL	10073	19:35	160	211
D	SchedPax	753	IAH	10010	19:35	182	219
D	SchedPax	738	SFO	1798	19:35	125	151
D	SchedPax	739	SEA	469	19:35	145	172
D	SchedPax	321	PHX	10125	19:35	150	184
D	SchedPax	ERD	SBA	10176	19:35	35	44
D	SchedPax	CR7	PRC	2318	19:35	41	66
D	SchedPax	CR7	EUG	10183	19:35	53	66
D	SchedPax	CR7	MOD	10188	19:35	53	66
D	SchedPax	EM2	SBA	6362	19:35	24	30
D	SchedPax	73W	LAS	384	19:35	109	136
D	SchedPax	733	SFO	1545	19:35	112	136
D	SchedPax	752	SFO	841	19:45	150	182
D	SchedPax	733	SMF	1752	19:45	110	136
D	SchedPax	738	SLC	4746	19:45	123	151
D	SchedPax	73W	PHX	851	19:45	111	136
D	SchedPax	789	LHR	136	19:55	244	290
D	SchedPax	73W	SJC	1275	19:55	109	136
D	SchedPax	738	LAS	633	19:55	121	151
D	SchedPax	319	DEN	407	19:55	103	125
D	SchedPax	CR9	RNO	2446	19:55	57	76
D	SchedPax	73W	ABQ	2206	19:55	106	136
D	SchedPax	752	ORD	10034	20:05	152	182
D	SchedPax	752	SFO	320	20:05	150	182
D	SchedPax	739	SEA	10146	20:05	145	172
D	SchedPax	320	SFO	10158	20:05	121	147
D	SchedPax	73W	OAK	1140	20:05	102	136
D	SchedPax	ERD	SJC	10161	20:05	35	44
D	SchedPax	CR7	RDM	10131	20:05	42	66
D	SchedPax	734	MFR	2522	20:05	101	144
D	SchedPax	EM2	SAN	6342	20:05	26	30
D	SchedPax	ERD	SAN	10137	20:15	37	44
D	SchedPax	CR7	ABQ	6436	20:15	51	66
D	SchedPax	CR7	SEA	6032	20:15	55	66
D	SchedPax	E90	YUL	10209	20:15	68	94
D	SchedPax	320	SEA	10151	20:15	124	147
D	SchedPax	73W	GEG	10185	20:15	110	136

Table 2

2025 Baseline Design Day Flight Schedule

A/D	Activity Type	Equipment	Origin/Dest.	Flight No.	Time	Passengers	Seats
D	SchedPax	733	LAS	2112	20:15	109	136
D	SchedPax	CR7	RDD	2304	20:15	46	66
D	SchedPax	CR7	TUS	6458	20:15	51	66
D	SchedPax	73W	DEN	2950	20:25	112	136
D	SchedPax	772	SFO	712	20:25	239	289
D	SchedPax	752	DEN	10096	20:35	150	182
D	SchedPax	739	YVR	10211	20:35	138	172
D	SchedPax	73W	PHX	2619	20:35	111	136
D	SchedPax	CR7	SUN	10194	20:35	53	66
D	SchedPax	CR7	FAT	6511	20:35	49	66
D	SchedPax	73W	SFO	3577	20:35	112	136
D	SchedPax	CR7	YVR	10212	20:45	52	66
D	SchedPax	319	YVR	559	20:45	100	125
D	SchedPax	ERD	FAT	3019	20:45	33	44
D	SchedPax	EM2	ONT	10192	20:45	24	30
D	SchedPax	739	SEA	263	20:45	145	172
D	SchedPax	343	ZRH	10221	20:55	193	278
D	SchedPax	CR9	PHX	4797	20:55	61	76
D	SchedPax	733	SMF	10171	20:55	110	136
D	SchedPax	EM2	SBA	10178	20:55	24	30
D	SchedPax	73H	ANC	157	20:55	136	158
D	SchedPax	346	LHR	24	20:55	261	311
D	SchedPax	73H	SFO	721	20:55	130	158
D	SchedPax	739	SEA	291	20:55	145	172
D	SchedPax	763	BOG	49	21:05	192	211
D	SchedPax	752	SLC	10166	21:05	148	182
D	SchedPax	320	BOS	370	21:05	114	147
D	SchedPax	73W	OAK	1046	21:05	102	136
D	SchedPax	EM2	PSP	6310	21:05	25	30
D	SchedPax	EM2	SGU	6424	21:05	18	30
D	SchedPax	ERD	SBA	3035	21:05	35	44
D	SchedPax	733	LAS	10108	21:15	109	136
D	SchedPax	763	HNL	1943	21:15	160	211
D	SchedPax	388	CDG	67	21:15	389	525
D	SchedPax	388	LHR	268	21:15	440	525
D	SchedPax	388	MUC	453	21:15	409	525
D	SchedPax	789	LHR	10220	21:15	244	290
D	SchedPax	762	JFK	10	21:15	140	169
D	SchedPax	763	MIA	1254	21:15	182	211
D	SchedPax	752	JFK	712	21:15	151	182
D	SchedPax	320	MLM	129	21:15	100	147
D	SchedPax	738	SFO	1615	21:25	125	151
D	SchedPax	ERD	SAN	10138	21:25	37	44
D	SchedPax	752	CVG	1273	21:25	156	182
D	SchedPax	77W	AKL	1	21:35	244	331
D	SchedPax	789	SYD	10205	21:35	248	290
D	SchedPax	320	JFK	418	21:35	122	147
D	SchedPax	EM2	SAN	10141	21:35	26	30
D	SchedPax	EM2	SBP	10179	21:35	24	30
D	SchedPax	EM2	YUM	6461	21:35	22	30
D	SchedPax	752	TPA	648	21:45	159	182
D	SchedPax	773	SIN	37	21:45	253	385
D	SchedPax	788	EWR	1803	21:45	203	250
D	SchedPax	320	IAD	114	21:45	121	147
D	SchedPax	CR7	SMF	6462	21:45	53	66
D	SchedPax	CR7	PDX	6073	21:45	56	66
D	SchedPax	73W	OAK	10114	22:05	102	136
D	SchedPax	763	MIA	276	22:15	182	211
D	SchedPax	752	IND	1604	22:25	159	182

Table 2

2025 Baseline Design Day Flight Schedule

A/D	Activity Type	Equipment	Origin/Dest.	Flight No.	Time	Passengers	Seats
D	SchedPax	320	FLL	310	22:25	119	147
D	SchedPax	321	PHL	36	22:25	145	184
D	SchedPax	EM2	CLD	6207	22:25	15	30
D	SchedPax	763	IAD	44	22:25	173	211
D	SchedPax	752	JFK	82	22:25	151	182
D	SchedPax	73W	ATL	58	22:25	118	136
D	SchedPax	388	SYD	12	22:35	449	525
D	SchedPax	77W	AKL	5	22:35	244	331
D	SchedPax	763	BOS	192	22:35	163	211
D	SchedPax	738	EWR	10049	22:35	123	151
D	SchedPax	320	YYZ	794	22:35	121	147
D	SchedPax	ERD	SAN	3005	22:35	37	44
D	SchedPax	CR7	SJC	6521	22:35	52	66
D	SchedPax	CR7	PHX	6453	22:35	53	66
D	SchedPax	CR7	SAN	6344	22:35	56	66
D	SchedPax	744	SYD	17	22:35	325	381
D	SchedPax	772	SYD	839	22:35	247	289
D	SchedPax	752	BOS	166	22:35	141	182
D	SchedPax	CR7	TUS	6445	22:35	51	66
D	SchedPax	752	BWI	462	22:35	141	182
D	SchedPax	752	SFO	263	22:45	150	182
D	SchedPax	320	JFK	674	22:45	122	147
D	SchedPax	321	CLT	425	22:45	156	184
D	SchedPax	EM2	BFL	6171	22:45	22	30
D	SchedPax	EM2	IYK	6284	22:45	18	30
D	SchedPax	EM2	SMX	6451	22:45	23	30
D	SchedPax	753	DTW	690	22:45	189	219
D	SchedPax	752	PHL	130	22:45	144	182
D	SchedPax	77L	ATL	2096	22:55	237	273
D	SchedPax	73W	BWI	76	22:55	105	136
D	SchedPax	738	LAS	864	22:55	121	151
D	SchedPax	EM2	OXR	6298	22:55	18	30
D	SchedPax	752	ORD	126	22:55	152	182
D	SchedPax	EM2	SBA	6363	22:55	24	30
D	SchedPax	772	KIX	10198	23:05	234	289
D	SchedPax	752	JFK	714	23:05	151	182
D	SchedPax	753	CLE	634	23:05	183	219
D	SchedPax	738	IAD	74	23:05	124	151
D	SchedPax	EM2	PSP	6311	23:05	25	30
D	SchedPax	744	MNL	103	23:05	374	381
D	SchedPax	345	BKK	795	23:15	303	313
D	SchedPax	320	MEX	137	23:15	125	147
D	SchedPax	CR7	FAT	6433	23:15	49	66
D	SchedPax	388	BNE	16	23:25	482	525
D	SchedPax	752	IAD	99	23:25	150	182
D	SchedPax	388	MEL	94	23:35	469	525
D	SchedPax	744	NAN	811	23:35	288	381
D	SchedPax	763	EWR	503	23:35	171	211
D	SchedPax	737	MEX	469	23:35	106	124
D	SchedPax	320	DTW	709	23:35	127	147
D	SchedPax	388	AKL	26	23:45	387	525
D	SchedPax	789	SYD	10206	23:45	248	290
D	SchedPax	744	SYD	2	23:45	325	381
D	SchedPax	773	HKG	883	23:55	304	385
D	SchedPax	772	CAN	328	23:55	268	289
D	SchedPax	744	SYD	108	23:55	325	381
D	SchedPax	762	JFK	30	23:55	140	169
D	SchedPax	763	SAL	797	23:55	188	211
D	SchedPax	738	ORD	1092	23:55	126	151

Table 2

2025 Baseline Design Day Flight Schedule

A/D	Activity Type	Equipment	Origin/Dest.	Flight No.	Time	Passengers	Seats
D	SchedPax	320	BOS	480	23:55	114	147
D	SchedPax	738	ORD	114	23:55	126	151
D	SchedPax	763	ATL	2098	23:55	183	211
D	UnschedPax_AC	737	EWR	938	10:45	0	0
D	UnschedPax_AT	LR45	WYS	940	5:55	0	0
D	UnschedPax_AT	C560	VNY	943	7:55	0	0
D	UnschedPax_AT	C750	ASE	942	9:25	0	0
D	UnschedPax_AT	F2TH	SFO	941	14:35	0	0
D	UnschedPax_AT	H25B	IND	939	18:15	0	0
D	UnschedPax_AT	C750	ASE	944	20:05	0	0

Notes:

CARGO_AC = Cargo Air Carrier; CARGO_AT = Cargo Air Taxi; GA = General Aviation; SchedPax = Scheduled Passenger; UnschedPax_AC = Unscheduled Passenger Air Carrier; UnschedPax_AT = Unscheduled Passenger Air Taxi;

Source: Ricondo & Associates, Inc., October 2012 (design day flight schedule).

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Table 3

Key 1

INM Aircraft Aircraft Code	Aircraft Type	EDMS v.5.1.3 Engine and APU Assignments		Assigned Engine	Assigned APU Model
		EDMS Aircraft Code	EDMS Aircraft Description		
300	AIRBUS INDUSTRIE A300	A300B4-2	Airbus A300B4-200 Series	CF6-50C2 Low emissions fuel nozzle	APU TSCP700-4B (142 HP)
306	AIRBUS INDUSTRIE A300-600	A300F4-6	Airbus A300F4-600 Series	PW4158 Reduced smoke	APU GTCP331-200ER (143 HP)
310	AIRBUS INDUSTRIE A310	A310-2	Airbus A310-200 Series	CF6-80A3	APU GTCP331-200ER (143 HP)
318	AIRBUS INDUSTRIE A318	A318-1	Airbus A318-100 Series	CFM56-5B8/P SAC	APU GTCP 36-300 (80HP)
319	AIRBUS INDUSTRIE A319	A319-1	Airbus A319-100 Series	CFM56-5B6/P	APU GTCP 36-300 (80HP)
320	AIRBUS INDUSTRIE A320	A320-2	Airbus A320-200 Series	V2527-A5	APU GTCP 36-300 (80HP)
321	AIRBUS INDUSTRIE A321	A321-1	Airbus A321-100 Series	V2530-A5	APU GTCP 36-300 (80HP)
333	AIRBUS INDUSTRIE A330-300	A330-3	Airbus A330-300 Series	CF6-80C2B8FA 1862M39	APU GTCP 331-350
343	AIRBUS INDUSTRIE A340-300	A340-3	Airbus A340-300 Series	CFM56-5C3	APU GTCP 331-350
345	AIRBUS INDUSTRIE A340-500	A340-5	Airbus A340-500 Series	Trent 556-61 Phase5 Tiled	APU GTCP 331-350
346	AIRBUS INDUSTRIE A340-600	A340-6	Airbus A340-600 Series	Trent 556-61 Phase5 Tiled	APU GTCP 331-350
388	AIRBUS INDUSTRIE A380-800	A380-8	Airbus A380-800	GE90-90B	APU GTCP 331-350
717	BOEING 717-200	B717-2	Boeing 717-200 Series	BR700-715A1-30 Improved fuel injector	APU GTCP 85 (200 HP)
733	BOEING 737-300	B737-3	Boeing 737-300 Series	CFM56-3-B1	APU GTCP85-129 (200 HP)
734	BOEING 737-400	B737-4	Boeing 737-400 Series	CFM56-3-B1	APU GTCP85-129 (200 HP)
735	BOEING 737-500	B737-5	Boeing 737-500 Series	CFM56-3C-1	APU GTCP85-129 (200 HP)
737	BOEING 737-700	B737-7	Boeing 737-700 Series	CFM56-7B22	APU 131-9
738	BOEING 737-800	B737-8	Boeing 737-800 Series	CFM56-7B26	APU 131-9
739	BOEING 737-900	B737-9	Boeing 737-900 Series	CFM56-7B24	APU 131-9
742	BOEING 747-200	B747-2	Boeing 747-200 Series	CF6-50E2 Low emissions fuel nozzle	APU GTCP 660 (300 HP)
744	BOEING 747-400	B747-4	Boeing 747-400 Series	PW4084D	APU PW901A
747	BOEING 747 (GENERIC)	B747-4F	Boeing 747-400 Freighter	PW4056	APU PW901A
748	BOEING 747-800	B747-4F	Boeing 747-400 Freighter	PW4056	APU PW901A
752	BOEING 757-200	B757-2	Boeing 757-200 Series	PW2040	APU GTCP331-200ER (143 HP)
753	BOEING 757-300	B757-3	Boeing 757-300 Series	PW2040	APU GTCP331-200ER (143 HP)
757	BOEING 757 (GENERIC)	B757-2	Boeing 757-200 Series	PW2040	APU GTCP331-200ER (143 HP)
762	BOEING 767-200	B767-2	Boeing 767-200 Series	CF6-80A	APU GTCP331-200ER (143 HP)
763	BOEING 767-300	B767-3	Boeing 767-300 Series	CF6-80A2	APU GTCP331-200ER (143 HP)
772	BOEING 777-200	B777-2	Boeing 777-200 Series	PW4077	APU GTCP331-500 (143 HP)
773	BOEING 777-300	B777-3	Boeing 777-300 Series	GE90-115B DAC	APU GTCP331-500 (143 HP)
777	BOEING 777 (GENERIC)	B777-2	Boeing 777-200 Series	PW4077	APU GTCP331-500 (143 HP)
788	BOEING 787-800	B787-800[1]	Boeing 787-800[1]	CF6-80C2B7F 1862M39	APU GTCP331-500 (143 HP)
789	BOEING 787-900	B787-900[1]	Boeing 787-900[1]	CF6-80C2B7F 1862M39	APU GTCP331-500 (143 HP)
32S	AIRBUS INDUSTRIE A320	A320-2	Airbus A320-200 Series	V2527-A5	APU GTCP 36-300 (80HP)
73G	BOEING 737-700	B737-7	Boeing 737-700 Series	CFM56-7B22	APU 131-9
73H	BOEING 737-800 (WINGLETS)	B737-8	Boeing 737-800 Series	CFM56-7B26	APU 131-9
73W	BOEING 737-700 (WINGLETS)	B737-7	Boeing 737-700 Series	CFM56-7B22	APU 131-9
74E	BOEING 747-400 (MIXED CONFIG)	B747-4ER	Boeing 747-400 ER	CF6-80C2B5F 1862M39	APU PW901A
74M	BOEING 747 (MIXED CONFIG)	B747-4F	Boeing 747-400 Freighter	PW4056	APU PW901A
77L	BOEING 777-200LR	B777-2LR	Boeing 777-200-LR	GE90-115B DAC	APU GTCP331-500 (143 HP)
77W	BOEING 777-300ER	B777-2ER	Boeing 777-200-ER	GE90-115B DAC	APU GTCP331-500 (143 HP)
B190	BEECH 1900	BEECH1900-D	Raytheon Beech 1900-D	PT6A-67D	No APU
BE19	BEECH SPORT 19/MUSKETEER SPORT	BEECH18	Raytheon Beech 18	TPE331-1	No APU
BE20	BEECH SUPER KING AIR 200	BEECH18	Raytheon Beech 18	TPE331-1	No APU
BE36	BEECH BONANZA 36	BEECH36	Raytheon Beech Bonanza 36	TIO-540-J2B2	No APU
C130	C-130 HERCULES	MIL-C130	Lockheed C-130 Hercules	T56-A-15	No APU
C441	CESSNA 441	CNA441	Cessna 441 Conquest II	TPE331-10	No APU
C550	CESSNA 550 CITATION BRAVO	CNA550	Cessna 550 Citation II	JT15D-4 series	No APU
C560	CESSNA 560 CITATION V	CNA560	Cessna 560 Citation V	JT15D-5, -5A, -5B	No APU
C750	CESSNA 750 CITATION X	CNA750	Cessna 750 Citation X	AE3007C Type 2	No APU
CL60	CANADAIR BOMBARDIER CL600/610 CHALLENGER	CL600	Bombardier Challenger 600	ALF 502L-2	APU GTCP 36-100
CR7	CANADAIR REGIONAL JET 700	CRJ7	Bombardier CRJ-700	CF34-8C1	APU GTCP 85 (200 HP)
CR9	CANADAIR REGIONAL JET 900	CRJ9	Bombardier CRJ-900	CF34-8C5 LEC	APU GTCP 85 (200 HP)
CRA	CANADAIR REGIONAL JET 705	CRJ705-LR	Bombardier CRJ-705-LR	CF34-8C5 LEC	APU GTCP 85 (200 HP)
CRJ	CANADAIR REGIONAL JET (GENERIC)	CRJ7	Bombardier CRJ-700	CF34-8C1	APU GTCP 85 (200 HP)
DC10	MCDONNELL DOUGLAS DC-10	DC10-1	Boeing DC-10-10 Series	CF6-6D	APU TSCP700-4B (142 HP)

Table 3

Key 1

INM Aircraft Aircraft Code	Aircraft Type	EDMS v.5.1.3 Engine and APU Assignments			
		EDMS Aircraft Code	EDMS Aircraft Description	Assigned Engine	Assigned APU Model
DC87	MCDONNELL DOUGLAS DC-8-70	DC8-7	Boeing DC-8 Series 70	CFM56-2A series	APU GTCP85-98 (200 HP)
DH4	DE HAVILLAND DHC8-400 DASH 8Q	ERJ190-LR	Embraer ERJ190-LR	CF34-10E	No APU
E90	EMBRAER 190	ERJ190-LR	Embraer ERJ190-LR	CF34-10E	No APU
EM2	EMBRAER 120 BRASILIA	EMB120	Embraer EMB120 Brasilia	PW118B	APU GTCP 36-150[]
EMJ	EMBRAER 190	ERJ140	Embraer ERJ140	AE3007A1/3 Type 3 (reduced emissions)	APU GTCP 36-150[]
ERD	EMBRAER RJ140	ERJ140	Embraer ERJ140	AE3007A1/3 Type 3 (reduced emissions)	APU GTCP 36-150[]
ERJ	EMBRAER RJ 135/140/145	ERJ140	Embraer ERJ140	AE3007A1/3 Type 3 (reduced emissions)	APU GTCP 36-150[]
F2TH	DASSAULT FALCON 2000	FAL2000	Dassault Falcon 2000	PW308C Annular	APU GTCP 36-150[]
F900	DASSAULT FALCON 900	FAL900EX	Dassault Falcon 900-EX	TFE731-3	APU GTCP 36-150[]
GALX	GULFSTREAM G200	IAI1126	Israel IAI-1126 Galaxy	PW306A Annular	No APU
GLF4	GULFSTREAM IV	GULF450	Gulfstream G450	TAY 611-8C Transply IIJ	APU GTCP 36-100
GLF5	GULFSTREAM V	GULF5	Gulfstream G500	BR700-710A1-10	APU GTCP 36 (80HP)
H25B	RAYTHEON BAE-125-700/800	HS125-3	Hawker HS-125 Series 3	TFE731-3	No APU
LJ45	LEARJET 45	LEAR45	Bombardier Learjet 45	TFE731-2-2B	No APU
LJ60	LEARJET 60	LEAR60	Bombardier Learjet 60	TFE731-2/2A	No APU
LR45	LEARJET 45	LEAR45	Bombardier Learjet 45	TFE731-2-2B	No APU
M80	MCDONNELL DOUGLAS MD-80	MD83	Boeing MD-83	JT8D-219 Environmental Kit (E_Kit)	APU GTCP85-98 (200 HP)
M83	MCDONNELL DOUGLAS MD-83	MD83	Boeing MD-83	JT8D-219 Environmental Kit (E_Kit)	APU GTCP85-98 (200 HP)
M90	MCDONNELL DOUGLAS MD-90	MD90	Boeing MD-90	V2525-D5	APU 131-9
MD11	MCDONNELL DOUGLAS MD-11	MD11	Boeing MD-11	CF6-80C2D1F 1862M39	APU TSCP700-4B (142 HP)
P180	PIAGGIO AERO AVANTI II	P180	Piaggio P.180 Avanti	PT6A-66	No APU

[1] Not in EDMS v.5.1.3. Flight profile based on B767-300 with CF6-80C2B7F 1862M39 engine. Assumed same APU as B777.

Source: Ricondo & Associates, Inc., 2012.

Table 4

Key 2

Airport Code	Airport
ABQ	Albuquerque, NM, USA
ACV	Eureka/Arcata, CA, USA
AFW	Fort Worth Alliance, TX, USA
AGU	Aguascalientes, Mexico
AKL	Auckland, New Zealand
AMS	Amsterdam, Netherlands
ANC	Anchorage (Intl), AK, USA
APA	Arapahoe County, CO, USA
ASE	Aspen, CO, USA
ATL	Atlanta(Intl), GA, USA
AUS	Austin (Bergstrom Intl), TX, USA
BDL	Hartford (Bradley Intl), CT, USA
BFL	Bakersfield, CA, USA
BIL	Billings, MT, USA
BJX	Leon/Guanajuato, Mexico
BKK	Bangkok (Intl), Thailand
BNA	Nashville (Intl), TN, USA
BNE	Brisbane, QL, Australia
BOG	Bogota, Colombia
BOI	Boise, ID, USA
BOS	Boston (Intl), MA, USA
BWI	Baltimore (Intl), MD, USA
CAN	Guangzhou, China
CDG	Paris (Charles De Gaulle), France
CLD	San Diego (Carlsbad), CA, USA
CLE	Cleveland (Intl), OH, USA
CLT	Charlotte, NC, USA
CMH	Columbus (Intl), OH, USA
COS	Colorado Springs, CO, USA
CRQ	San Diego (Carlsbad), CA, USA
CUL	Culiacan, Mexico
CUN	Cancun, Mexico
CVG	Cincinnati (Intl), OH, USA
DCA	Washington (Reagan Nat'l), DC, USA
DEN	Denver (Intl), CO, USA
DFW	Dallas/Ft. Worth (Intl), TX, USA
DGO	Durango, Mexico
DTW	Detroit (Metro Wayne), MI, USA
DUB	Dublin, Ireland
DXB	Dubai, United Arab Emirates
ELP	El Paso, TX, USA
EUG	Eugene, OR, USA
EWR	Newark/New York (Liberty), NJ, USA
FAR	Fargo, ND, USA
FAT	Fresno (Yosemite Intl), CA, USA
FCO	Rome, Italy
FLG	FLG-Grand Canyon (Pulliam), AZ, USA
FLL	Ft. Lauderdale (Intl), FL, USA
FRA	Frankfurt, Germany
GDL	Guadalajara, Mexico
GEG	Spokane (Intl), WA, USA
GRU	Sao Paulo, Brazil
GUA	Guatemala City, Guatemala
HKG	Hong Kong (Intl), China
HMO	Hermosillo, Mexico
HND	Tokyo Haneda, Japan
HNL	Honolulu, Oahu, HI, USA
HOU	Houston (Hobby), TX, USA
IAD	Washington (Dulles Intl), DC, USA

Table 4

Key 2

Airport Code	Airport
IAH	Houston (G. Bush Intl), TX, USA
ICN	Seoul (Incheon Intl), Rep. of Korea
IND	Indianapolis, IN, USA
IPL	El Centro/Imperial, CA, USA
IYK	Inyokern, CA, USA
JAX	Jacksonville (Intl), FL, USA
JFK	New York (Kennedy), NY, USA
KIX	Osaka, Japan
KOA	Kona, Hawaii, HI, USA
LAS	Las Vegas (Intl), NV, USA
LHR	London (Heathrow), England
LIH	Lihue, Kauai, HI, USA
LIM	Lima, Peru
LTO	Loreto, Mexico
LUX	Luxembourg, Luxembourg
MCI	Kansas City (Intl), MO, USA
MCO	Orlando (Intl), FL, USA
MDW	Chicago (Midway), IL, USA
MEL	Melbourne (Intl), Australia
MEM	Memphis, TN, USA
MEX	Mexico City (Juarez Intl), Mexico
MFR	Medford, OR, USA
MIA	Miami (Intl), FL, USA
MKE	Milwaukee, WI, USA
MLM	Morelia, Mexico
MNL	Manila, Philippines
MOD	Modesto, CA, USA
MRY	Monterey, CA, USA
MSP	Minneapolis/St. Paul (Intl), MN, USA
MSY	New Orleans (Intl), LA, USA
MUC	Munich (Intl), Germany
NAN	Nadi, Fiji
NRT	Tokyo (Narita), Japan
OAK	Oakland, CA, USA
OGG	Kahului, Maui, HI, USA
OKC	Oklahoma City (Rogers), Oklahoma, USA
OMA	Omaha, NE, USA
ONT	Ontario (Intl), CA, USA
ORD	Chicago (O'Hare), IL, USA
OXR	Oxnard/Ventura, CA, USA
PBC	Hermanos Serdán International Airport, Mexico
PDX	Portland, OR, USA
PEK	Beijing (Capital), China
PHL	Philadelphia (Intl), PA, USA
PHX	Phoenix (Intl), AZ, USA
PIT	Pittsburgh (Intl), PA, USA
PMD	Palmdale Regional Airport , CA, USA
PPT	Papeete, French Polynesia
PRC	Prescott, AZ, USA
PSP	Palm Springs, CA, USA
PTY	Panama City (Intl), Panama
PVG	Shanghai (Pu Dong Intl), China
PVR	Puerto Vallarta, Mexico
QRO	Querétaro International Airport, Mexico
RDD	Redding, CA, USA
RDM	Redmond, OR, USA
RDU	Raleigh/Durham, NC, USA
RNO	Reno, NV, USA
SAF	Santa Fe NM USA
SAL	San Salvador, El Salvador

Table 4

Key 2

Airport Code	Airport
SAN	San Diego (Intl), CA, USA
SAT	San Antonio, TX, USA
SBA	Santa Barbara, CA, USA
SBP	San Luis Obispo, CA, USA
SCL	Santiago (Intl), Chile
SDF	Louisville International (Standiford Field), KY, USA
SDL	Scottsdale, AZ, USA
SDM	Brown Field San Diego, CA, USA
SEA	Seattle/Tacoma (Intl), WA, USA
SFO	San Francisco (Intl), CA, USA
SGU	St. George, UT, USA
SHA	Shanghai Hongqiao International, China
SIN	Singapore Changi International Airport, Singapore
SJC	San Jose, CA, USA
SJD	Los Cabos, Mexico
SJO	San Jose (Santamaria), Costa Rica
SLC	Salt Lake City, UT, USA
SMF	Sacramento (Metro), CA, USA
SMO	Santa Monica Municipal, CA, USA
SMX	Santa Maria, CA, USA
SNA	Santa Ana (J. Wayne), CA, USA
STL	St. Louis (Intl), MO, USA
STS	Santa Rosa, CA, USA
SUN	Sun Valley, ID, USA
SVO	Moscow (Sheremetyevo), Russian Fed.
SYD	Sydney (Intl), NS, Australia
TEB	Teterboro, NJ, USA
TLC	Mexico City (Toluca), Mexico
TLV	Ben Gurion Intl Tel Aviv, Israel
TOL	Toledo, OH, USA
TPA	Tampa (Intl), FL, USA
TPE	Tapei Taiwan Taoyuan International Airport, Taiwan
TRC	Torreon, Mexico
TUL	Tulsa, OK, USA
TUS	Tucson, AZ, USA
VNY	Van Nuys Los Angeles, CA, USA
WYS	West Yellowstone Montana, MT, USA
XNA	Fayetteville (Regional), AR, USA
YEG	Edmonton (Intl), AB, Canada
YUL	Montreal (P.E. Trudeau), QC, Canada
YUM	Yuma, AZ, USA
YVR	Vancouver (Intl), BC, Canada
YYC	Calgary, AB, Canada
YYZ	Toronto (Pearson Intl), ON, Canada
ZCL	Zacatecas, Mexico
ZIH	Ixtapa/Zihuatanejo, Mexico
ZRH	Zurich, Switzerland

Source: Ricondo & Associates, Inc., 2012.

SPAS-PC00130-772

Comment:

For each aircraft make and model, please provide noise and pollution data for each engine configuration and APU. The noise and pollution tests should be conducted from 50 feet, 100 feet, 500 feet, 1,000 feet, 1/2 mile and 1 mile every 30 degrees from a centerpoint of the aircraft. The tests should also collect the noise and pollution data at different power levels- start, taxi, takeoff, cruise and landing.

What substances are being emitted by the engines and the APU's? Please describe the toxics. In what quantities? Are any of these substances toxic to human beings?

Response:

The methodology suggested by the commentor is not the industry or government standard for emissions analysis. The database of aircraft emission indices for each engine is included in the Federal Aviation Administration's Emissions and Dispersion Modeling System (EDMS). This model is required for use in determining air quality impacts from airports for regulatory purposes 1. The database is also available from the International Civil Aviation Organization (ICAO), on the European Aviation Safety Agency web site 2. These emission indices provide the pollutant emissions from aircraft in grams of pollutant per kilogram of fuel burned in four operating modes: takeoff, climbout, approach, and taxi/idle. The current version of the EDMS model, v.5.1.3, also contains aircraft specification data that indicates the amount of time each airframe needs to takeoff, climbout, and land. The airport simulation modeling with (SIMMOD) is used to determine the aircraft taxi and delay (taxi/idle) time on the ground.

Unlike noise, which radiates spherically in all directions from the noise generation point, air pollution travels in the direction that the wind is blowing at a given moment. Therefore, attempting to measure air quality impacts from aircraft is incredibly difficult since the monitors must be lined up directly downwind of an aircraft to actually obtain measurements of the aircraft engine emissions. A series of recent efforts to measure aircraft engine emissions from real world engines mounted on aircraft has been summarized in two reports prepared by the U.S. Environmental Protection Agency 3 and Transportation Research Board 4. The Transportation Research Board report concluded that the gaseous emissions of oxides of nitrogen (NOx) and carbon monoxide (CO) measured in the field study matched, within uncertainty limits, the engine certification emissions in the ICAO database noted above. In addition, these studies were used to develop the particulate matter and hazardous air pollutant emission indices that are included in EDMS v.5.1.3. Therefore, modeling aircraft emissions using EDMS v.5.1.3, as was done for the SPAS Draft EIR air quality impact analysis, should provide reasonable results for criteria and hazardous (toxic) air pollutants.

Measurements of air pollutant concentrations are routinely taken on LAX property at the South Coast Air Quality Management District Southwest Coastal Monitoring Station (also known as the LAX Hastings monitoring station), shown in Figure 4.2-1 (page 4-89) of the SPAS Draft EIR. The most recent five years of measurements from this station are included in Table 4.2-3 (page 4-100) of the SPAS Draft EIR.

The criteria air pollutants emitted from aircraft engines and APUs include CO, NOx, (a precursor compound in the formation of nitrogen dioxide, NO2, and ozone), particulate matter (PM10 and PM2.5) sulfur dioxide (SO2), and volatile organic compounds (VOC, another precursor compound in the formation of ozone). Many of the toxic air contaminants listed in Table 4.7.1-1 (page 4-432) of the SPAS Draft EIR are emitted by aircraft and APUs. A notable exception is diesel particulate matter (Diesel PM), which is only emitted from diesel engines. The toxicity profiles in Attachment 1 of Appendix G1 of the SPAS Draft EIR identify the potentially toxic effects of each of the compounds analyzed in the Human Health Risk Assessment conducted for the SPAS Draft EIR. The general health effects of criteria pollutants are summarized in Section 4.2.1.1 (pages 4-83 through 4-85) of the SPAS Draft EIR.

The concentrations of the criteria pollutants for each alternative under different operating conditions (visual flight rules and instrument flight rules) are included in Attachment 3 of Appendix C of the SPAS Draft EIR. The peak project concentrations of the toxic air contaminants are included in Attachment 2 through Attachment 5 of Appendix G1 of the SPAS Draft EIR.

1. Federal Aviation Administration. 1998. Emissions and Dispersion Modeling System Policy for Airport Air Quality Analysis; Interim Guidance to FAA Orders 1050.1D and 5050.4A. U.S. Department of Transportation. 63 FR 18068 (April 13).
2. ICAO Aircraft Engine Exhaust Emissions Databank, European Aviation Safety Agency. Accessed at http://easa.europa.eu/environment/edb/docs/edb-emissions-databank.xls.

3. Kinsey, J.S. 2009. Characterization of Emissions from Commercial Aircraft Engines during the Aircraft Particle Emissions eXperiment (APEX) 1 to 3. EPA-600/R-09/130. U.S. Environmental Protection Agency, Office of Research and Development (October).
4. Whitefield, P.D., Lobo, P., Hagen, D.E., Timko, M.T., Miake-Lye, R.C., Taylor, C., Ratliff, G., Lukachko, S., Sequeira, C., Hileman, J., Waitz, I., Webb, S., Thrasher, T.G., Ohsfeldt, M.R., Kaing, H.K., and Essama, S.C. 2008. Summarizing and Interpreting Aircraft Gaseous and Particulate Emissions Data. ACRP Report 9. Transportation Research Board.

SPAS-PC00130-773

Comment:

SPECIFIC COMMENTS TO INITIAL STUDY AND CHECK LIST DATED OCTOBER 14, 2010.

The Initial Study checklist notes existing zoning as A, L, and N. The LAX Plan figure 1 only designates Open Space, Airport Landside, and Airport Airside. Some of the land in these areas owned by LAWA are still RX, CX, or MX, especially on the Northside Development, Manchester Square and areas south along Aviation boulevard, and Belford Square. Has LAWA identified areas of discrepant zoning? Which properties are specifically zoned other than A, L, and N? The checklist states "conforms to Plan," but the zoning doesn't match the LAX Plan (the sub-Plan to the City General Plan).

Response:

There is no "discrepant zoning" as suggested by the commentor, and it is unclear what is meant by the designations RX, CX, and MX in the comment as there are no such designations in the City of Los Angeles Planning and Zoning Code. The LAX Plan and the LAX Specific Plan land use and zoning designations are consistent with each other, with the exception of the Belford Special Study Area, which is not shown on the LAX Specific Plan. The existing zoning and General Plan designations for LAX, including LAX Northside, Manchester Square, and areas south along Aviation Boulevard, are described in Section 4.9 of the SPAS Draft EIR. As shown in Figure 4.9-3, the existing LAX Plan General Plan land use designations are Open Space, Airport Airside, Airport Landside, LAX Northside, Special Study Area: Belford - Medium Residential, and Special Study Area: Belford - Regional Center Commercial. This figure is the same figure as LAX Plan Figure 1. The LAX Specific Plan Zoning designations, as shown in Figure 4.9-4 of the SPAS Draft EIR, are: LAX - A Zone: Airport Airside Sub-Area; LAX - L Zone: Airport Airside Sub-Area; and LAX - N Zone: LAX Northside Sub-Area. This figure is the same as LAX Specific Plan Figure 2. The LAX Specific Plan establishes development standards consistent with the LAX Plan (see Section 4.9.3.2 of the SPAS Draft EIR).

As previously described, the LAX Plan designates Belford as a Special Study Area. Belford and Manchester Square are currently undergoing voluntary residential acquisition/relocation as part of the LAWA Relocation Plan. This program was established because residents within these areas requested that LAWA purchase their properties rather than undertake soundproofing under the LAX Residential Soundproofing Program (see page 4-667 in Section 4.9.3.3 of the SPAS Draft EIR).

SPAS-PC00130-774

Comment:

In both the 2008 and 2010 checklists "Geology/Soils" was left unchecked indicating no significant issues, yet there may be issues with tunnels, sink holes, toxic elements from gas and oil, and aquifers. How is this to be accounted for in cost assessments? Specifically, the Manchester Tunnel which runs north-south from Lincoln Boulevard under Runway 24 R toward El Segundo was found to have latent moisture. Has the source of the moisture been identified? What remediation efforts will be required?

Response:

Please see Response to Comment SPAS-PC00130-1012 regarding the abandoned tunnel segment located beneath the north airfield, and Response to Comment SPAS-PC00130-51 regarding sink holes at LAX. The commentor provides no substantiation for the claim that gas and oil presents toxic elements at LAX.

SPAS-PC00130-775

Comment:

Below are specific EIR topics listed in the CEQA Check list that we ask LAWA to address specific issues.

Response:

The comment is noted. Please see Responses to Comments SPAS-PC00130-776 through SPAS-PC00130-797 below.

SPAS-PC00130-776

Comment:

I. Aesthetics
Light and glare studies for air traffic controllers. Light glare was cited as a factor by the controller responsible for the 1991 USAir/SkyWest ground collision at LAX.

Response:

As discussed on page 4-34 in Section 4.1 of the SPAS Draft EIR, there are several light and glare related LAX Master Plan commitments applicable to the proposed SPAS alternatives. Commitments that would reduce light and glare visible from the Airport Traffic Control Tower include the following:

-LI-2. Use of Non-Glare Generating Building Materials. Prior to approval of final plans, LAWA will ensure that proposed LAX facilities will be constructed to maximize use of non-reflective materials and minimize use of undifferentiated expanses of glass.

-LI-3. Lighting Controls. Prior to final approval of plans for new lighting, LAWA will conduct reviews of lighting type and placement to ensure that lighting will not interfere with aeronautical lights or otherwise impair Airport Traffic Control Tower or pilot operations. Plan reviews will also ensure, where feasible, that lighting is shielded and focused to avoid glare or unnecessary light spillover. In addition, LAWA or its designee will undertake consultation in selection of appropriate lighting type and placement, where feasible, to ensure that new lights or changes in lighting will not have an adverse effect on the natural behavior of sensitive flora and fauna within the Habitat Restoration Area.

Furthermore, FAA regulations (including FAA Advisory Circular (AC) 150/5300-13A, Airport Design; AC 150/5345-53D, Airport Lighting Equipment Certification Program; AC 150/5345-56B, Specification for L-890 Airport Lighting Control and Monitoring System; and others) outline the type, location, and intensity of lighting permitted at airports. These regulations have been formulated to avoid substantial interference with daytime and nighttime views from the Airport Traffic Control Tower or by pilots on the ground or in the air.

Development under the SPAS alternatives would be required to comply with the above LAX Master Plan commitments and FAA regulations.

SPAS-PC00130-777

Comment:

II. Agricultural and Forest Resources

Response:

The potential for the SPAS alternatives to impact agricultural and forest resources was addressed in Section II of the Initial Study included in the 2010 LAX SPAS EIR Notice of Preparation (NOP), provided as Appendix A of the SPAS Draft EIR. As explained therein, the project is located within a developed airport and is surrounded by airport uses, urbanized areas, and the Los Angeles/El Segundo Dunes. No agricultural or forest resources or operations currently exist, or have existed in the recent past, at the

project site or surrounding areas. Further, there are no Williamson Act contracts in effect for the project site or surrounding areas. The proposed project would represent a continuation of the current airport-related and urban uses and would not convert farmland to non-agricultural use nor would it result in any conflicts with existing zoning for agricultural use or a Williamson Act contract. Similarly, it would not result in the conversion of forest land to non-forest use. Therefore, no impacts to agricultural or forest resources would occur with implementation of the proposed project, and no mitigation measures are required. As such, in accordance with Sections 15063(C)(3)(A) and 15128 of the State CEQA Guidelines, the potential for impacts to agricultural resources was not discussed in detail in the SPAS Draft EIR.

SPAS-PC00130-778

Comment:

III. Air Quality
Where is the Human Health Study promised in the LAX Master Plan commitments, LAX Coalition settlement and the Stipulated Settlement Agreement?
The DEIR should include study of PM 0.1 (one-tenth). Recent reports from AQMD indicate that these are potentially much more harmful to humans than the larger PM 2.5 particles. The study by John Froines of UCLA in 2007 highlighted the condition that the measurement of PM 2.5 particles is not a good monitor for the smaller particles.

Response:

Please refer to Response to Comment SPAS-PC-00130-36 regarding the status of the LAX Air Quality and Source Apportionment Study (AQSAS). Please refer to Response to Comment SPAS-PC00130-225 for a discussion of ultrafine particles (UFP, also known as PM0.1).

SPAS-PC00130-779

Comment:

IV. Biological Resources
Are there still any Riverside Fairy Shrimp at LAX? Where are they located? Are there any in Continental City?

Response:

As discussed in on pages 4-189 and 4-190 in Section 4.3 of the SPAS Draft EIR, it is assumed that Riverside fairy shrimp (Streptocephalus wootoni) is not present within the biological resources study area. Soil containing Riverside fairy shrimp cysts was removed from the LAX Master Plan project area pursuant to two Biological Opinions issued by USFWS in 2004 and 2005. As discussed in Section 4.7 of the Bradley West Project Draft EIR,1 wet-season surveys conducted in 2009 at potentially suitable seasonal pool habitat at the Continental City site for the Bradley West Project did not detect Riverside fairy shrimp. The Continental City site has been subsequently modified by construction activity associated with the Bradley West Project, for which it was used as the Southeast Construction Staging/Parking Area, such that it no longer supports suitable habitat for Riverside fairy shrimp.

1. Section 4.3 of the Bradley West Project Draft EIR is available at http://ourlax.org/pdf/LAX%20Bradley%20West%20Project%20DEIR%20Volume%202.pdf, accessed October 24, 2012.

SPAS-PC00130-780

Comment:

V. Cultural Resources

Response:

The impacts to cultural resources associated with the SPAS alternatives are addressed in Section 4.5 of the SPAS Draft EIR.

SPAS-PC00130-781

Comment:

VI. Geology and Soils
The stability of the soils in and around the Manchester Tunnel and Lincoln Tunnel under the North Airfield needs to be studied.

Response:

At a program level, the 2010 NOP Initial Study, attached as Appendix A to the SPAS Draft EIR, concludes that impacts of the SPAS alternatives related to soil stability would be less than significant. Please see Topical Response TR-SPAS-LR-1 for a discussion of the Lincoln Boulevard realignment associated with Alternatives 1, 5, and 6. As indicated in the topical response, evaluation of soil stability associated with the Lincoln Boulevard realignment would be conducted during detailed engineering for that project component, if it is a second-tier project proposed for implementation. Similar studies would be conducted for the North Airfield tunnel segment (referred to in this comment as the Manchester Tunnel) if it is part of a second-tier project proposed for implementation. Project-specific soil stability analyses would be presented in project-specific CEQA documents.

SPAS-PC00130-782

Comment:

VII. Greenhouse Gas Emissions

Response:

Greenhouse gas emission impacts associated with the SPAS alternatives are addressed in Section 4.6 of the SPAS Draft EIR.

SPAS-PC00130-783

Comment:

VIII. Hazards and Hazardous Materials
During the early and mid-1900s, the area surrounding Mines Field (now LAX) was largely an oil field. Active oil production was carried out in the tidal areas of Venice and Playa del Rey. Much of the area around LAX was owned by oil companies, including McCullough Oil, Superior Oil, and other oil companies. A major oil field still is in production in Baldwin Hills, and the Chevron refinery in El Segundo remains one of the most important economic forces in the region. Sepulveda Blvd. at its intersection with Westchester Parkway and Lincoln Blvd. is believed to be a location where numerous major oil pipelines converge. If the perimeter fence of LAX is extended outward to accommodate the north movement of the runways it will likely require the relocation of major petroleum pipelines which will have a large environmental and financial cost.

Response:

Please see Topical Response TR-SPAS-LR-1 regarding the need to relocate utilities as part of the realignment of Lincoln Boulevard under Alternatives 1, 5, and 6. As indicated in the topical response, LAWA has not identified major utilities, including oil pipelines, in the vicinity of Lincoln Boulevard that would require relocation. Nevertheless, it is expected that numerous utilities would require relocation, which could include sewers, water lines, storm drains, electrical lines, fiber optic cables, oil pipelines, and other utilities, and the rough-order-of-magnitude cost estimates for the Lincoln Boulevard realignment include allowances related to utilities, including oil pipelines.

SPAS-PC00130-784

Comment:

1. The DEIR should include hazardous materials such as jet fuel, avgas, lubricants, Skydrol, lavatory fluid and other liquids carried by aircraft, and ammunition and weapons carried onto aircraft

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Section 4.7.3 of the SPAS Draft EIR addresses impacts associated with an increase in the use of hazardous materials and the generation of hazardous waste during routine fueling and maintenance of aircraft, buses, and vehicles as well as impacts to areas with contaminated soils and/or groundwater associated with construction, in particular grading and excavation. Compliance with the Procedure for the Management of Contaminated Materials Encountered During Construction, prepared in accordance with LAX Master Plan Commitment HM-2, would ensure that spills and releases would not create a hazard to the public or the environment, and would not result in contamination of soil or groundwater. Lavatory fluids carried by aircraft are discharged to Hyperion Treatment Plant for treatment. Ammunition and weapons carried onto aircraft are regulated by the Transportation Security Administration. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00130-785

Comment:

2. Parts that have fallen off aircraft including landing gear components, engine cowlings, blue ice (frozen lavatory fluid), etc. These risks should be evaluated.

Response:

Section 4.7.2 of the SPAS Draft EIR, Safety, addresses safety related impacts of the SPAS alternatives, including the potential for aviation incidents and accidents, birdstrikes, and runway incursions. Incidents such as those referenced by the commentor, (i.e., the potential for parts to fall off aircraft) are not only highly unusual, but are related to aircraft airworthiness and therefore are completely unrelated to the SPAS alternatives.

The FAA is responsible for regulating all aspects of air transportation, including aircraft airworthiness and airports. FAA regulations ensure a high level of safety in airport operations. Any aircraft parts or related substances that have fallen off or from an aircraft should be reported to FAA immediately. The FAA Los Angeles Airports District Office can be contacted at (310) 725-3644.

The FAA issues Airport Operating Certificates to airports that follow the guidance of 14 Code of Federal Regulations (CFR) Part 139. Part 139 provides numerous operational and safety standards (including regular safety inspections) to ensure safe aircraft operations. LAX operates with a Part 139 certificate. LAX is required to follow all Part 139 procedures for current and future facility configurations, which would apply to any and all SPAS alternatives.

No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00130-786

Comment:

IX. Hydrology and Water Quality

LAWA had put together a Conceptual Drainage Plan for the South Airfield Improvement Project. Please create one for the North Airfield DEIR study.

Response:

The CDP referred to by the commentor was prepared to address the LAX Master Plan improvements in their entirety, not only the South Airfield Improvement Project, although the plan was published in conjunction with publication of the South Airfield Improvement Program Draft EIR in August 2005. As described in Section 4.8 of the SPAS Draft EIR, a new mitigation measure, MM-HWQ (SPAS)-1, is proposed to tailor the CDP recommendations to the specific characteristics of the selected SPAS alternative, if an alternative other than Alternative 3 is selected. The updated CDP would address the north airfield improvements.

SPAS-PC00130-787

Comment:

Please include a study of all sewer lines running underneath LAX. There are sewer lines dating back to the 1920's and more recent ones such as the North Outfall Sewer project in the 1990's.

Response:

Please see Responses to Comments SPAS-PC00130-348 and SPAS-PC00130-898 regarding outfall sewers that lie beneath LAX. Please also see Topical Response TR-SPAS-LR-1 for a discussion as to why detailed utility plans are not required to be provided in a program-level EIR.

SPAS-PC00130-788

Comment:

X. Land Use and Planning
LAWA checked as, "No impact" that the proposed project would physically divide an established community. In the proposals to move Runway 24 Right to the north, LAWA has produced maps that show land acquisition will be necessary for the Runway Protection Zone (RPZ). The land required would take over 25% of the Westchester Central Business District which provides local residents with jobs and services; services for airport employees and visitors and reliable property tax and sales tax revenue for the City of Los Angeles.
Please explain why lopping off the Westchester Business District has no impact?
Please enumerate by address (including suite numbers where applicable), potential job losses and business tax and property tax losses.

Response:

Regarding analysis of property acquisition impacts on the Westchester Business District associated with the RPZ, please see Responses to Comments SPAS-AL00007-26 and SPAS-PC00130-931. No acquisition is proposed within the Westchester Business District, as shown in Figure 2-11 and listed in Table 2-4 in Section 2.3.1.11 of the SPAS Draft EIR. Therefore, the SPAS alternatives would not physically divide the Westchester Business District.

Nonetheless, Section 4.7.2 of the SPAS Draft EIR, specifically pages 4-522 through 4-526, addresses changes in the potential secondary or indirect impacts associated with the modification or removal of structures or uses within the RPZ, if required in the future. The subject analysis includes discussion of potential measures to reduce physical impacts. Given that neither the need for, or nature of, actions to modify or remove existing structures or uses have been determined and will not be known until project-specific EIRs, if any, are prepared, it was premature and speculative to reach land use impact significance conclusions in the SPAS Draft EIR. Information on specific options to address safety risks would be developed during project-specific CEQA review should an alternative calling for shifting Runway 6L/24R northward be selected. It is appropriate for a first-tier program level EIR to defer detailed descriptions and impact analysis of individual projects in the program to future project-level CEQA documents. (CEQA Guidelines Section 15383; Koster v. County of San Joaquin (1996) 47 Cal.App.4th 29, 37.)

Regarding the potential for job and tax losses due to acquisition, CEQA does not require purely social or economic impacts to be analyzed in an EIR. (State CEQA Guidelines Section 15064(e).) Therefore, as reflected in the discussion on pages 4-522 through 4-526 in Section 4.7.2 of the SPAS Draft EIR, the focus of the analysis is on indirect physical impacts of acquisition options, rather than economic or social effects such as job or tax losses.

SPAS-PC00130-789

Comment:

XI. Mineral Resources

Response:

The potential for the SPAS alternatives to impact mineral resources was addressed in Section X of the Initial Study included in the 2010 LAX SPAS EIR Notice of Preparation (NOP), provided in Appendix A of the SPAS Draft EIR. As explained therein, there are no actively-mined mineral or timber resources on the project site. Therefore, the proposed SPAS alternatives would not affect access to or the availability of valued mineral resources, and no mitigation measures are required. In addition, the project site is not within an area delineated on the City of Los Angeles Oil Field & Oil Drilling Areas map in the City of Los Angeles General Plan Safety Element. Furthermore, the project site is developed or disturbed, and the proposed project would not affect the availability of a locally-important mineral resource recovery site. As such, in accordance with Sections 15063(c)(3)(A) and 15128 of the State CEQA Guidelines, the potential for impacts associated with mineral resources was not discussed in detail in the SPAS Draft EIR.

SPAS-PC00130-790

Comment:

XII. Noise

Response:

The noise impacts associated with the SPAS alternatives are addressed in Section 4.10 of the SPAS Draft EIR.

SPAS-PC00130-791

Comment:

XIII. Population and Housing
What property acquisition is required for each concept?

Response:

The property acquisition that would be required under Alternatives 1, 2, 3, 4, 8, and 9 is shown in Figures 2-11, 2-12, 2-13, and 2-14 and listed in Table 2-4 and Table 2-5 in Section 2.3.1.11 of the SPAS Draft EIR. In addition, Table 4.9-5 in Section 4.9 of the SPAS Draft EIR presents a comparison of acquisition areas by land use for the applicable SPAS alternatives. As noted in Table 4.9-5, no acquisition is proposed for Alternatives 5, 6, and 7 since these alternatives focus on airfield and terminal components only, although acquisition would be required for the ground access components with which these alternatives would be paired.

SPAS-PC00130-792

Comment:

Although Manchester Square is under a voluntary residential acquisition program, would LAWA consider building in this area even if all of the residential properties have not been purchased by LAWA through the voluntary program?

Response:

If the land acquisition for Manchester Square is not completed by the time facilities planned for that area are ready for implementation, the City of Los Angeles would use the most appropriate and practical means available to ensure that the area is vacated, which could include voluntary acquisition, leasing, and/or public condemnation.

SPAS-PC00130-793

Comment:

XIV. Public Services
Please study the noise and health effects on each public and private school in the Westchester/Playa del Rey area. These include Los Angeles Unified School District Schools, church schools, private schools, Otis Art Institute and Loyola Marymount University. Identify mitigation measures and the costs of these measures that can be provided to reduce the effects of airport operations at these institutions.

Response:

The potential noise and health effects of the SPAS project on sensitive receptors, including public and private schools in the communities of Westchester and Playa del Rey, were analyzed in Sections 4.2, 4.7.1, 4.9, 4.10.1, 4.10.2, and 4.10.3 of the SPAS Draft EIR.

Regarding health impacts related to air quality on schools in Westchester and Playa del Rey, as presented in Table 4.2-17 and summarized on pages 4-156 through 4-160 in Section 4.2 of the SPAS Draft EIR, even with implementation of feasible construction-related mitigation measures, such as covering or treating ground surfaces to minimize fugitive dust emissions, minimizing off-site worker vehicle trips, and prohibiting parking adjacent to sensitive receptors, construction-related emissions and concentrations would be significant for all SPAS alternatives. Operational emissions and concentrations would also be significant for all SPAS alternatives, even with implementation of feasible operations-related mitigation measures, such as the conversion of LAX ground support equipment to low and ultra-low emissions technologies and the electrification of passenger gates.

Regarding impacts to human health associated with exposure to toxic air contaminants, as indicated in Section 4.7.1 of the SPAS Draft EIR, incremental cancer risks and incremental chronic non-cancer health hazards within the study area under all the alternatives would be less than significant for all receptor types, including school children. Incremental acute non-cancer health hazards at small areas at or near the LAX fence-line under all the alternatives would be slightly above the threshold of significance and are considered to be significant and unavoidable for all analyzed receptor types, including school children. The primary toxic air contaminant of concern contributing to this impact is associated with emissions of acrolein from aircraft operations, which would occur in 2025 even in the absence of SPAS. It should be noted that, with the exception of Alternative 3, acute non-cancer health hazard impacts in 2025 would be lower under the SPAS alternatives than if no airfield improvements were implemented. Moreover, these significant impacts would occur at or near the fence-line; it is expected that actual impacts in the community would be less than significant.

Regarding aircraft noise impacts, as described on pages 4-776 through 4-778 in Section 4.9.6.10 of the SPAS Draft EIR, under Alternatives 1 through 7, some public and private schools in Westchester and Playa del Rey would be newly exposed to 65 CNEL or higher noise levels or experience an increase of 1.5 CNEL or higher within the 65 CNEL or higher noise contour compared to 2009 baseline conditions. With implementation of LAX Master Plan Mitigation Measure MM-LU-1, to achieve compatibility within both the existing and future noise impact areas associated with Alternatives 1 through 7 through implementation of a revised Aircraft Noise Mitigation Program, these impacts would be less than significant with the exception of interim impacts prior to sound insulation. A listing of private and public schools, including those located in Westchester and Playa del Rey, that would be affected by the respective SPAS alternatives is provided in Appendix I-2 of the SPAS Draft EIR. In addition, as analyzed in Section 4.10.1, some schools located in Westchester and Playa del Rey would be newly exposed to high single event noise levels, including Paseo del Rey Magnet School and Wish Charter Elementary School under Alternatives 1, 2, 4, 5, 6, and 7, and Wish Charter Elementary School under Alternative 3. As summarized on pages 4-932 and 4-933 in Section 4.10.1.8, interim impacts prior to

implementation of LAX Master Plan Mitigation Measures MM-LU-1, MM-LU-3, and MM-LU-4 would be significant and unavoidable.

Regarding road traffic noise impacts, as summarized on pages 4-942 and 4-943 in Section 4.10.2, no off-site noise-sensitive receptors, including schools in Westchester and Playa del Rey, would experience significant impacts due to changes in road traffic noise levels under Alternatives 1, 2, 3, 4, 8, and 9. Alternatives 5, 6, and 7 do not include ground access improvements and would not, in themselves, affect road traffic noise levels at off-site noise-sensitive uses; however, depending on which ground access improvements (i.e., ground access improvements associated with Alternatives 1, 2, 8, or 9) are paired with airfield improvements under Alternative 5, 6, or 7, the road traffic noise impacts would be the same as above (i.e., less than significant).

Regarding temporary construction traffic and equipment noise impacts, as shown in Table 4.10.3-4 and described on pages 4-972 through 4-974 in Section 4.10.3 of the SPAS Draft EIR, under all SPAS alternatives, Saint Bernard High School, located in Playa del Rey, would be subject to significant unavoidable impacts associated with construction and equipment noise.

Please also see Response to Comment SPAS-PH100024-2 regarding Otis College of Art and Design and Loyola Marymount University.

SPAS-PC00130-794

Comment:

XV. Recreation
LAWA checked no impact for this section, however, ARSAC would like LAWA to study noise and pollution impacts on Nielsen Park, Westchester Golf Course, Westchester Park and the Del Rey Lagoon.

Response:

The commentor suggests that the Initial Study/Notice of Preparation determined that there would be "no impacts" to recreational facilities in Section XV ("Recreation") of the 2010 Initial Study. The commentor is correct in that recreation impacts the Section XV of the Initial Study were determined to have "no impact;" however, the thresholds in this section do not stand for the proposition cited in the comment. The first threshold addressed whether project impacts would result in "increasing the use of existing neighborhood and regional parks… such that substantial physical deterioration of the facility would occur." The second threshold addressed whether the project would "include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment." The Initial Study correctly determined that the alternatives would result in no impact under these thresholds. (See SPAS Draft EIR Appendix A, page A-23.)

The SPAS Draft EIR did, however, address impacts to recreational facilities, or receptors that are representative of recreational uses, in individual resource chapters. For example, as discussed in Section 4.7.1.2.2 of the SPAS Draft EIR, "TAC concentrations were also estimated at 326 grid nodes at or near the LAX property line (fence-line) and at one grid node at the LAX Theme Building (see Figure 4.7.1-1). Receptor type (i.e., recreational, residential, commercial, or school) for each grid node was dictated by land use at or near the grid node location." That is, each fence-line receptor was identified by the type of land us closest to the receptor location. Receptors identified as recreational receptors in Figure 4.7.1-1 are located close to parks/recreational facilities and these grid points are considered representative for receptors at these locations. As indicated on page 4-428 of the SPAS Draft EIR, some grid points which are on the border between recreational facilities and residential areas were assumed to be residential uses for modeling purposes. Residential receptors would have a greater exposure frequency and duration (i.e., they are assumed to be at the designated receptor location for 24 hours a day and 365 days out of the year) than recreational receptors (who would likely visit the site a few hours a day and not necessarily every day of the year); therefore, residential receptors are considered to provide a conservative analysis for recreational receptors. Please also see Response to Comment SPAS-PC00130-742 regarding the fence-line receptors evaluated in the SPAS Draft EIR.

Please see Sections 4.2 and 4.7 of the SPAS Draft EIR for a discussion of impacts associated with air quality and health risk, respectively. Similarly, please see Sections 4.9 and 4.10 of the SPAS Draft EIR

regarding noise impacts to sensitive receptors, including parks. Table 4.9-4 of the SPAS Draft EIR specifically identifies parks that were considered in the impacts analysis.

SPAS-PC00130-795

Comment:

XVI. Transportation/Circulation

Response:

The transportation/circulation impacts associated with the SPAS alternatives are addressed in Section 4.12 of the SPAS Draft EIR.

SPAS-PC00130-796

Comment:

Utilities
XVII. LAX has experienced blackouts due to antiquated and vulnerable electrical lines. In one case, a crow had flown into a transformer at 98th Street and Vicksburg. Please address in the DEIR the adequacy of utilities serving LAX (e.g. electricity, water, sewage, telecommunications including high speed Internet lines, pipelines), redundancy and security measures to protect them.

Response:

The SPAS Draft EIR addresses the adequacy of electricity and water supplies, and wastewater treatment capacity, in Sections 4.13.1, 4.13.4, and 4.13.3, respectively. As noted in those sections, supplies and capacity are sufficient to accommodate the SPAS improvements and impacts to these utilities would be less than significant. The SPAS Draft EIR is a programmatic document. Details regarding utility infrastructure, including redundancy and security, have not been determined at this level of planning. Project-level impacts to utility infrastructure associated with implementation of individual SPAS components would be assessed in future CEQA documents. Please see Responses to Comments SPAS-PC00130-235 and SPAS-PC00130-142 for a discussion of the appropriateness of the programmatic review conducted for the SPAS project.

SPAS-PC00130-797

Comment:

XVIII. Mandatory Findings of Significance
Are there no Mandatory Findings of Significance highlighted?

Response:

As indicated in Section XVIII (pages IS-11, AS-27, and AS-28) of the of the Initial Study that accompanied the 2010 Notice of Preparation (NOP), provided as Appendix A of the SPAS Draft EIR, it was determined during preparation of the 2010 NOP that the SPAS alternatives: 1) have the potential to degrade the quality of the environment and have the potential to affect biological and cultural resources; 2) may result in cumulative impacts when considered with other past, present, and probable future projects on the airport and in the surrounding area; and 3) may result in adverse environmental effects which could potentially result in substantial adverse effects on humans.

The potential for the SPAS alternatives to result in significant impacts to biological and cultural resources is evaluated in Sections 4.3 and 4.5 of the SPAS Draft EIR, respectively. The potential for the SPAS alternatives to contribute to cumulative adverse environmental impacts is evaluated in Chapter 5 of the SPAS Draft EIR. The potential for the SPAS alternatives to result in significant adverse impacts on humans is evaluated in various sections within Chapters 4 and 5 of the SPAS Draft EIR.

SPAS-PC00130-798

Comment:

QUESTIONS ABOUT THE NOP DOCUMENTATION AND OPTIONS TO BE EVALUATED

In the airfield alternatives, the descriptions and the figures do not match. For 100 feet north, 200 feet north, 300 feet north and 400 feet north, there is only a description of extending Runway 24 Right 604 feet west. The drawings show 604 foot runway extensions on the east and west ends of the runways. What is LAWA proposing?

Response:

The comment is specific to the 2010 SPAS Draft EIR Notice of Preparation and does not pertain to the published SPAS Draft EIR. Nevertheless, in response to the question raised in the comment, the 604-foot dimension shown at each end of Runway 6L/24R under each alternative that moves the runway northward represents the "Dual Displaced Threshold" indicated in the title of each of the related figures. With the dual displaced thresholds, the west end of the runway would be extended by 604 feet to allow more aircraft departure length; however, the aircraft landing threshold (i.e., earliest point along the runway where landing aircraft can touch down) is approximately 604 feet from the physical end of the runway.

SPAS-PC00130-799

Comment:

There is no description on the drawings (NOP Figures 12, 13 and 14) of the future midfield satellite processor where the Parking 3 and 4 garages are presently located. This future facility should be included in the DEIR.

Response:

The figures depicting terminal options in the 2010 SPAS Draft EIR NOP identify the location of the Future Midfield Satellite Processor, but do not provide a description of the facility, as the facility is a future terminal improvement associated with the LAX Master Plan, and is not a SPAS component. However, this facility is described on the list of cumulative projects in Section 5.3.2 of the SPAS Draft EIR. Moreover, the cumulative impacts of this project, in conjunction with SPAS and other cumulative projects, are analyzed in the SPAS Draft EIR.

SPAS-PC00130-800

Comment:

The runway alternatives in the NOP do not include all of the runway alternatives studied in the North Airfield Safety Study conducted by the Academic Panel and NASA. A one-runway alternative is requested in the "Consideration of other alternatives" in this letter.

Response:

The runway configuration studied in the North Airfield Safety Study is described and evaluated in Section 2.3.2.3, Three-Runway Airfield, of the SPAS Draft EIR. This section presents several operational reasons why this alternative was considered infeasible, and was likely to result in environmental impacts comparable or greater to the alternatives evaluated in detail in the SPAS Draft EIR. Therefore, this alternative was not further evaluated in the SPAS Draft EIR.

SPAS-PC00130-801

Comment:

There is no discussion of Runway Protection Zones or Runway Safety Areas and their potential impact on surrounding land uses including possible land acquisition. The FAA has stated that they will no

longer grandfather existing structures with new or existing construction. Therefore, this impact needs to be included in the DEIR.

Response:

Section 4.7.2 of the SPAS Draft EIR addresses issues related to Runway Protection Zones (RPZs) and Runway Safety Areas (RSAs) for each SPAS alternative, and Section 4.9 provides additional discussion related to land use. The commentor provides no evidence to support the claim that FAA has stated that they will no longer "grandfather" existing structures with new or existing construction. Notwithstanding, the analysis presented in Section 4.7.2 accounts for the possibility of acquisition of property within RPZ areas, being only one of several potential options for addressing incompatible structures or uses that may exist within an RPZ. As described in Section 4.7.2, should a SPAS alternative be selected for implementation, potential options for addressing any incompatible structures or uses within an RPZ would be assessed and determined in consultation with the FAA at more detailed levels of planning.

SPAS-PC00130-802

Comment:

There is a taxi and shuttle van holding lot north of 96th Street and west of Sepulveda. There is no discussion of the existence of this holding lot and any potential relocation sites if Runway 24 Left is extended to the east. Possible relocation of this holding lot should be included in the DEIR.

Response:

As indicated on page 2-55 of the SPAS Draft EIR, the existing taxi holding lot is located between Sepulveda Boulevard and Alverstone Avenue and north of West 96th Street, beneath the 96th Street Bridge. The existing shared ride van holding lot is located on Avion Drive south of Century Boulevard and the charter bus/limousine holding lot is located in the southwest corner of Jenny Street and Westchester Parkway. As indicated in Table 2-3 (specifically page 2-50) in Section 2.3.1.10 of the SPAS Draft EIR, as well as under the heading of "Commercial Vehicle Hold Lots" on page 2-55, and clarified in Chapter 5, Corrections and Additions Related to the SPAS Draft EIR, the existing taxi holding lot and commercial vehicle holding lots for the shared-ride vans and charter buses/limousines under Alternatives 1, 2, 8, and 9 would be relocated to the eastern portion of the Park One facility. Under Alternative 3, the commercial vehicle holding lot would be relocated to the Ground Transportation Center (GTC), while under Alternative 4, the taxi holding lot would likely move to Park One or Lot C and other commercial vehicle holding lots would remain in their current locations. The proposed location of the taxi and commercial vehicle hold lot is included in the on-airport traffic analysis presented in Section 4.1.12 (see in particular page 4-1091) of the Draft SPAS EIR.

SPAS-PC00130-803

Comment:

The LAX Medical Clinic and the LAWA Police Department station may be in the path of a relocated Sky Way and 96th Street bridge. Where would these facilities be relocated?

Response:

As discussed on page 2-55 in Chapter 2 of the SPAS Draft EIR, under all alternatives except Alternative 4, the existing LAWAPD station and associated facilities and the urgent care medical facility would be removed due to the realignment, or the removal under Alternative 3, of the 96th Street Bridge/Sky Way. The existing LAWAPD station could be relocated to the future LAX Public Safety Complex, which is currently being planning independent of SPAS. The site for the planned LAX Public Safety Complex is still under consideration. The urgent care medical facility could potentially be relocated elsewhere in the airport area. This facility is privately operated; any decision to relocate would be at the discretion of the facility owners.

SPAS-PC00130-804

Comment:

Where will any lost parking resulting from the closure of Park One be relocated?

Response:

As indicated in Table 2-3 and page 2-55 of the SPAS Draft EIR, under all alternatives except Alternative 4, parking at the Park One facility would be eliminated. No relocation of the parking is anticipated. However, as shown in Table 2-2 of the SPAS Draft EIR, under all of the alternatives, the total number of parking spaces would increase compared to baseline conditions with development of proposed facilities such as the Ground Transportation Center (Alternative 3), Intermodal Transportation Center (Alternative 3), Intermodal Transportation Facility (Alternatives 1, 2, 8, and 9), as well as other surface and structured parking facilities (all alternatives).

For the purpose of the SPAS analyses, parking demand from Park One was assumed to be proportionally distributed to the other public parking facilities included in Alternatives 1, 2, 3, 8 and 9 as described in Section 4.12.1.6.1 of the SPAS Draft EIR.

SPAS-PC00130-805

Comment:

The proposed Transportation Facility is on a site where parking is used for office buildings on Century Boulevard. Does LAWA own this parking lot? Are there any parking covenants or leases with the office buildings concerning the use of this parking lot?

Response:

LAWA does not own the properties which the proposed Intermodal Transportation Facility (ITF) would be situated. The proposed ITF site under Alternatives 1, 2, 8, and 9, as described and depicted in Figures 2-1, 2-2, 2-8, and 2-9 in Chapter 2 of the SPAS Draft EIR, is located between 96th Street, 98th Street, Vicksburg Avenue and Airport Boulevard. Several different businesses are currently located on the ITF site which would have to be acquired, including a parking lot that is used by tenants of the Sky View office building south of 98th Street. LAWA currently has an option to purchase the Sky View office building and existing surface parking lot north of 98th Street. Parking would need to be provided for this building, but not necessarily in its current configuration. For additional discussion of property acquisition see Section 2.3.1.11 of the SPAS Draft EIR.

SPAS-PC00130-806

Comment:

Manchester Square property acquisition is being conducted under a Voluntary Residential Acquisition Program. If Manchester Square is utilized for a Ground Transportation Center or Consolidated Rent-a-car facility, then how will LAWA assemble needed properties that are not voluntarily willing to sell? Has LAWA identified which properties are essential to make a functional GTC or ConRAC?

Response:

The precise properties required for implementation of the GTC, parking, and/or a CONRAC in Manchester Square under Alternatives 1, 2, 3, 8, and 9 have not been determined at this level of programmatic planning. The properties preliminarily assumed to be required are those shown in the applicable figures that depict each SPAS alternative (Figures 1-5, 1-6, 1-7, 1-12, and 1-13 of the SPAS Draft EIR). If the land acquisition for Manchester Square is not completed by the time facilities planned for that area are ready for implementation, the City of Los Angeles would use the most appropriate and practical means available to ensure that the area is vacated, which could include voluntary acquisition, leasing, and/or public condemnation.

SPAS-PC00130-807

Comment:

LAWA needs to identify ingress and egress for all proposed projects and resulting traffic flows.

Response:

As discussed in Section 2.3.1 of the SPAS Draft EIR, the nine proposed alternatives were formulated and evaluated at a programmatic level. Therefore, because there are no design or engineering plans, LAWA is unable to identify locations of ingress and egress at the project-level. Detailed project level planning for each of the proposed new facilities included in the selected SPAS alternative would be analyzed at a greater level of detail and include site-specific driveways and circulation roadway. This project level planning analysis would also include operational conditions at adjacent intersections and roadway segments. Please see Response to Comment SPAS-PC00130-235 for a discussion of the appropriateness of the programmatic review conducted for the SPAS project.

A project level analysis of the impacts of the alternatives on on-airport and off-airport traffic is provided in Section 4.12 of the SPAS Draft EIR. The program level of analysis complies with the requirements of CEQA. An EIR is not required to speculate about the environmental consequences of future development that is unspecified or uncertain. (Environmental Protection Info. Ctr. v. Department of Forestry & Fire Protection (2008) 44 Cal.4th 459, 502; Tracy First v. City of Tracy (2009) 177 Cal.App.4th 912.)

SPAS-PC00130-808

Comment:

LAWA needs to discuss the existence of two tunnels underneath the North Runway Complex, the Manchester Tunnel which runs south from Lincoln to the Tom Bradley terminal and the Lincoln Tunnel which runs southeast from Lincoln to the Sepulveda Tunnel. In addition, LAWA needs to study all EIR topics with the tunnels.

Response:

Please see Response to Comment SPAS-PC00130-1012 regarding the north airfield abandoned tunnel segment. This tunnel segment is also referred to as the Manchester Tunnel or the Lincoln Tunnel. There is only one tunnel structure located beneath the north airfield, not two as stated by the commentor. The airfield improvements proposed under Alternatives 1, 5, and 6 have been developed at a program level of planning for SPAS. Specific details regarding the effect of the north airfield improvements on the tunnel segment will be determined and addressed at the project level, should one of those alternatives be approved. Environmental impacts related to the tunnel would be addressed in project-level design and environmental review. Please see Responses to Comments SPAS-PC00130-235 and SPAS-PC00130-142 for a discussion of the appropriateness of the programmatic review conducted for the SPAS project.

SPAS-PC00130-809

Comment:

The DEIR must address the restructuring of the Sky Way and 96th Street Bridge.

Response:

The realignment of existing Sky Way eastward, as depicted in Figures 2-1, 2-2, 2-8, and 2-9 in Chapter 2, of the SPAS Draft EIR, would not impact the portion of the existing 96th Street structure spanning Sepulveda Boulevard. The realignment of Sky Way would require that the existing portion of the roadway west of the 96th Street bridge structure be demolished and reconstructed along the alignment depicted in Figures 2-1, 2-2, 2-8, and 2-9. This realignment of Sky Way would also result in a corresponding shift in the Sky Way and World Way North intersection on both the departures and arrivals levels to the east, permitting southbound traffic flow only to the CTA. The northbound approach

to the existing Sky Way and World Way North intersection on the arrivals level roadways would remain; however, only left-turn movements would be permitted from this approach following the realignment of Sky Way. Vehicles currently using Sky Way to exit the airport onto either Sepulveda Boulevard or 96th Street would be required to exit the CTA via the Center Way and World Way South intersection.

The Future (2025) traffic analyses for Alternatives 1, 2, 8, and 9 presented in Section 4.12.1.8, beginning on page 4-1104, of the SPAS Draft EIR, include the relocation of the Sky Way and World Way North intersections on both the departures and arrivals level roadways.

SPAS-PC00130-810

Comment:

ITEMS THAT NEED SPECIAL EVALUATION IN THE EIR

When calculating the noise impacts on surrounding communities, LAWA should not only provide the "normal" CNEL bands, along with using 3 dB increases as a threshold for significance, but also calculate out to 60 DNL levels as is done in some parts of the country. Further, to give the decision makers more information upon which to make decisions, LAWA should identify effected communities on the basis of single event frequency over 65 dB using modeling techniques as seen in reports from Wyle Labs. Air quality impacts are substantial around airports.

Response:

The noise contour figures in Section 4.10.1 of the SPAS Draft EIR provide CNEL contours out to, and including, the 60 CNEL for baseline conditions and each SPAS alternative - see Figures 4.10.1-11, 4.10.1-14, 4.10.1-17, 4.10.1-20, 4.10.1-23, 4.10.1-25, 4.10.1-28, and 4.10.1-31. To the extent the commentor is suggesting the use of the "DNL" metric, LAWA determined that CNEL was the appropriate metric to use for the SPAS Draft EIR aircraft noise analysis, because (1) CNEL is considered more conservative as it further subdivides the evening and penalizes operations between 7:00 to 10:00 PM, and (2) "For the purposes of aircraft noise analysis in the State of California, the FAA recognizes the use of CNEL." (See pages 4-781 through 4-782 of the SPAS Draft EIR.)

Section 4.10.1 of the SPAS Draft EIR includes a comprehensive analysis of single event noise impacts using the Integrated Noise Model (INM) accepted by the FAA, other agencies, and the aircraft noise modeling/analysis industry in general, which provides complete and meaningful information for the public and decision-makers. The very particular and non-standard additional aircraft noise analysis requested by the commentor is unwarranted. CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commentors. (State CEQA Guidelines Section 15204.)

SPAS-PC00130-811

Comment:

What has LAWA determined are all of the noise sources and how are they currently controlled? Will there be improved control measures? If so, they must be clearly defined.

Since this is a special planning activity, what impacts on health are anticipated for noise and air quality? What controls will be initiated as mitigation?

Response:

The impacts from the SPAS alternatives associated with air quality, human health risk, and aircraft noise are provided in Sections 4.2, 4.7.1, 4.9, and 4.10.1 of the SPAS Draft EIR, respectively. Please see Sections 4.9.3.3 and 4.10.1.7 of the SPAS Draft EIR regarding the various abatement and mitigation techniques of aircraft noise analyzed in the SPAS Draft EIR. Please see Response to Comment SPAS-PC00201-1 regarding a discussion of the mitigation measures, including source controls, for air quality and human health risk as identified in Section 4.2.5 of the SPAS Draft EIR. Please see Response to Comment SPAS-PC00130-938 regarding the effects of noise on humans.

SPAS-PC00130-812

Comment:

Construction impacts and controls were highlighted in the Stipulated Settlement for the South Airfield Improvement Project and each of the subsequent project EIRs have stated that LAWA intends to handle these impacts just like the way it was done for the SAIP." Is LAWA continuing this commitment and when will we see the implementation of a construction hotline that will answer issues within minutes and a complementary Noise Plan?

Response:

It is unclear if the quoted statement in this comment ("just like the way it was done for the SAIP") reflects the commentor's opinion or if it was cited from another document. Because this statement was not included in the SPAS Draft EIR, it is assumed that it is a statement of the commentor's opinion. The commented is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project.

As described on page 4-2 of the SPAS Draft EIR, a number of LAX Master Plan commitments and mitigation measures, including those that address construction impacts, are applicable and would be implemented for the SPAS improvements. The LAX Master Plan commitments and mitigation measures applicable to the SPAS alternatives are identified and described throughout Chapter 4 and summarized in Table 1-6 of the SPAS Draft EIR. The LAX Master Plan commitments and mitigation measures that would be implemented for the SPAS improvements to reduce or avoid construction impacts include the following:

LAX Master Plan Commitments
- HM-2. Handling of Contaminated Materials Encountered During Construction
- C-1. Establishment of a Ground Transportation/Construction Coordination Office
- ST-2. Non-Peak CTA Deliveries
- ST-8. Limited Short-Term Lane Closures
- ST-9. Construction Deliveries
- ST-12. Designated Truck Delivery Hours
- ST-14. Construction Employee Shift Hours
- ST-16. Designated Haul Routes
- ST-17. Maintenance of Haul Routes
- ST-18. Construction Traffic Management Plan
- ST-19. Closure Restrictions of Existing Roadways
- ST-20. Stockpile Locations
- ST-21. Construction Employee Parking Locations
- ST-22. Designated Truck Routes

LAX Master Plan Mitigation Measures
- MM-DA-1. Construction Fencing
- MM-AQ-2. LAX Master Plan Mitigation Plan for Air Quality, Construction-Related Mitigation Measures
- MM-ET-3. El Segundo Blue Butterfly Conservation: Dust Control
- MM-ST-14. Ground Transportation/Construction Coordination Office Outreach Program
- MM-N-7. Construction Noise Control Plan
- MM-N-8. Construction Staging
- MM-N-9. Equipment Replacement

Regarding the implementation of a construction hotline, a construction hotline is currently in place, and has been throughout the LAX Master Plan development (beginning with the SAIP). Information on the construction hotline can be found at http://www.lawa.org/laxdev/Contact.aspx. The construction hotline phone number is (310) 649-5292.

It is unclear if the commentor is referring to construction noise plans when inquiring about a "complementary noise plan." As part of project-specific environmental analyses, construction noise plans may be prepared, to consider construction sites, construction staging areas, construction vehicle

routes, etc. Please see Responses to Comments SPAS-PC00130-235 and SPAS-PC00130-142 for a discussion of the appropriateness of the programmatic review conducted for the SPAS project.

SPAS-PC00130-813

Comment:

ADDITIONAL QUESTIONS

What outreach did LAWA make to other stakeholders such as the hotels, surrounding businesses, airlines and other tenants, and FAA concerning concepts in this NOP? Please provide meeting dates when LAWA met with organizations and/or individuals who were not members of the SPAS Committee to obtain input. Did LAWA solicit and respond to input or just show LAWA's intended plans options? Which community ideas did LAWA incorporate into this NOP? Which ideas were rejected and why? See the attached note from ARSAC presented to LAWA in 2006 at one of the SPAS meetings.

Response:

Please see Response to Comment PC00130-731 regarding the extensive public participation program LAWA undertook to allow stakeholders an opportunity to provide input to the SPAS planning process. Also, please see Chapter 4 of the Preliminary LAX SPAS Report. The NOP was the product of the extensive public outreach and involvement process, and incorporated comments and ideas shared at those hearings and meetings. Regarding the attached note from ARSAC referred to in this comment, it is assumed that the commentor is referring to the document dated November 9, 2006 that is included as part of their comment letter. Responses to comments in this document are provided in Responses to Comments SPAS-PC00130-1034 through SPAS-PC00130-1049 below.

SPAS-PC00130-814

Comment:

ALTERNATIVES PROJECTS NOT YET SET TO BE ANALYZED

Since LAWA is insisting on a full range of alternatives, additional alternatives for study should include the following:

1. A linear terminal to replace Terminal 1, 2 and 3. See Attachment 6 (ARSAC Concepts for SPAS PowerPoint). The linear terminal would be 200 feet wide with a 200 foot wide apron. The linear terminal would start 200 feet east of the Parking Limit Line of Taxilane "D10," which currently services Terminal 3 and the Tom Bradley International Terminal. The linear terminal would be set-up primarily for narrow body (single aisle) aircraft such as Airbus A320's and Boeing 737's. The concept of this linear terminal is Common Use for Low Cost Carriers (LCC's). A linear terminal would benefit passenger convenience by shortening the distance from the curb to the gate and increase efficiency of short-haul, high frequency airline operations such as those by LCC's. The linear terminal could be used with any concepts where Runway 24 Left is moved south.

Response:

The comment identifies several elements of a SPAS alternative concept suggested by ARSAC in November 2010. Those and other elements of that concept are described in an ARSAC PowerPoint presentation dated November 28, 2010, which was included as an attachment to this comment. The following summarizes the highlights of that alternative concept, as stated in ARSAC's presentation, and then presents LAWA's review and assessment of that concept.

In summary, six the seven main elements included in this alternative are the same or similar to elements already included in other SPAS alternatives. CEQA does not require an EIR to consider multiple variations or permutations of the alternatives analyzed in an EIR. (See, e.g., Mira Mar Mobile Community v. City of Oceanside (2004) 119 Cal.App.4th 477.) The seventh element, an elevated roadway system, is economically infeasible and infeasible from an engineering standpoint; an EIR need not consider alternatives (or elements of alternatives) that are infeasible (State CEQA Guidelines Section 15126.6(a)). Further, the ARSAC alternative concept is not required to be evaluated in detail in

the SPAS Draft EIR because it does not avoid or substantially lessen the SPAS alternatives' significant environmental impacts. (State CEQA Guidelines Section 15126.6(a),(b).) Also, as discussed below, the ARSAC alternative concept does not offer substantial operational advantages over the SPAS alternatives evaluated in the SPAS Draft EIR.

ARSAC Alternative Concept Highlights
- Keeps Runway 6L/24R from being moved north and moves Runway 6R/24L 340 feet south
- Terminals 1, 2, 3, and part of north wing of Tom Bradley International Terminal are torn down
- Low Cost Carrier (LCC) Terminals built to replace Terminals 1, 2, and 3 and airlines are - regrouped in terminals by airline alliances (e.g., SkyTeam, Star, oneworld)
- No changes to the parking garages in Central Terminal Area
- Consolidated Rent-a-car center (CONRAC) to be located in Manchester Square
- Automated People Mover to connect the CONRAC to the Central Terminal Area (CTA)
- Elevated roadways to connect the CTA to the CONRAC and the freeways

LAWA Analysis of ARSAC Concept
1. Keeps Runway 6L/24R from Being Moved North and Moves Runway 6R/24L 340 Feet South: This airfield improvement concept is no different from that in SPAS Alternative 3. ARSAC indicates that a benefit of this concept is that it moves airport and related operations away from residential communities and makes communities safer, quieter, and healthier. As demonstrated in the impacts analysis presented in Chapter 4 of the SPAS Draft EIR, that stated benefit would, at most, be limited to areas immediately north of the airport, and adverse environmental impacts to areas east of the airport and to the region would generally be worse than would otherwise occur by moving Runway 6L/24R northward and keeping Runway 6R/24L in its current location. As indicated in Table 1-16 of the SPAS Draft EIR, the number of residential units and population newly exposed to 65 dBA CNEL aircraft noise levels under Alternative 3 would be 5,056 and 13,443, respectively. The number of homes and population newly exposed to 65 CNEL under Alternative 1 (move Runway 6L/24R 260 feet north), Alternative 5 (move Runway 6L/24R 350 feet north), and Alternative 6 (move Runway 6L/24R 100 feet north) would be comparable to, or in several cases, greater than those of Alternative 3. That is also the case, if not more so, relative to homes and population that would experience a 1.5 dBA CNEL increase over 65 CNEL. Although moving Runway 6R/24L south by 340 feet would shift the north airfield noise contour away from the Westchester and Playa del Rey communities located immediately north of the airport, the changes in the overall airport noise contours including both the north and south airfields would encompass additional areas northeast and east of the airport, such as in Inglewood and unincorporated areas of the County, that are more intensely developed and more densely populated. In addition, the proposed configuration offers essentially the same safety profile of Alternative 3, which addresses many of the aviation safety objectives, except that it retains residential uses within the Runway Protection Zone (RPZ) of Runway 6L/24R.

As indicated in Tables 4.2-13 through 4.2-16 of the SPAS Draft EIR, the airfield-related (i.e., aircraft) air pollutant emissions and concentrations associated with Alternative 3 would be greater than those associated with Alternatives 1, 5, and 6 relative to carbon monoxide, volatile organic compounds, nitrogen oxides emissions (peak nitrogen dioxide concentrations would be slightly lower for Alternative 3), sulfur dioxide emissions (peak sulfur dioxide emissions concentrations related to the California Ambient Air Quality 1-hour standard would be slightly lower for Alternative 3), and particulate matter. As such, both local and regional air quality impacts would generally be worse in moving Runway 6R/24L south by 340 feet and in moving Runway 6L/24R northward.

Within the ARSAC presentation describing north airfield configurations that should be considered in the SPAS alternative airfield concepts, it was also suggested that the runway designs include runway status lights on all runways and taxiway entrances, Enhanced Final Approach Runway Occupancy Signal (eFAROS), and improved runway and taxiway lighting, signage, and striping. As described on page 4-502 of the SPAS Draft EIR, Phase 1 of installing runway status lights at LAX was completed in 2009 and Phase 2 to complete the installation is anticipated to occur with FAA approval of funding. Regarding Final Approach Runway Occupancy Signal (FAROS) and eFAROS technology, such systems are still in the testing and development phases, including at Dallas-Fort Worth International Airport (eFAROS) and Long Beach International Airport (FAROS). The FAA is currently working to publish an Advisory Circular (AC) for this system, so that any airport receiving AIP funding can procure a FAROS system and install it on the basis of the AC.1 All runway and taxiway lighting, signage, and striping associated with airfield improvements under any of the SPAS alternatives would occur in

compliance with FAA requirements. Such would also be the case relative to the width of runways in the north airfield, as determined in consultation with the FAA at more detailed design and engineering levels of planning.

ARSAC also recommended that the SPAS Draft EIR consider each runway concept with and without a centerline taxiway between Runways 6L/24R and 6R/24L. SPAS Alternatives 2 and 4 already reflect such a design and it is not necessary to consider each of the remaining five alternatives both with and without a centerline taxiway.

2. Terminals 1, 2, 3, and Part of North Wing of Tom Bradley International Terminal Are Torn Down: That aspect of the ARSAC alternative concept is the same as proposed under SPAS Alternative 3. Regarding terminal design described by the commentor, all elements listed by ARSAC in their LCC concept could be accommodated by SPAS Alternative 3, but some of the ARSAC-proposed design elements have operational disadvantages compared to Alternative 3.

The footprint and associated apron of the proposed north linear concourse assumed under SPAS Alternative 3 were inherited from the LAX Master Plan Alternative D concept. While ARSAC suggests that their LCC terminal design is comparable to that of John Wayne Airport (SNA) and San Jose Airport (SJC), the SNA and SJC terminal configurations were established based on narrow airport property configurations leaving minimum areas left for terminal and apron after required runway, taxiway, and landside access requirements are met. In other words, the terminal configurations for those two airports are the result of their particular physical constraints and are not indicative of them being able to specifically accommodate LCC operations.

The design of a linear concourse under Alternative 3 would result in simplified facilities, and would most definitely involve passenger conveyance through elevators and escalators, as requested in the ARSAC alternative concept. SPAS Alternative 3 provides for 20 gates with a combination of narrow and wide-body gates, only 3-4 gates less than the ARSAC alternative concept. The ARSAC configuration has more restricted gate sizing, and therefore is less flexible in providing needed wide-body gates during off-peak LCC operations.

The number of stories of the proposed North Linear Concourse would be determined during project-level design and CEQA review, should a SPAS alternative be selected for implementation. Such a concourse would be constructed following LEED standards or equivalent.

The ARSAC-suggested airside/landside terminal and concourse level stacking is typical of most existing or new terminals with the exception of the interstitial level for baggage screening and handling which often raises the passenger circulation and gate levels to unacceptable heights except for much larger (taller) wide-body aircraft.

Single-use terminals such as the one recommended by ARSAC have more restricted gate utilization from an aircraft parking standpoint than mixed-use terminals, since the flexibility of accommodating other different sized aircraft is lost during off-peak LCC time periods. Single-loaded (linear) concourses are also less efficient (with longer passenger walking distances for connecting passengers, more spread-out airline staffing) and more costly (one side of the concourse is unused) than double-loaded (aircraft gates on both sides) concourses.

3. Low Cost Carrier (LCC) Terminals Built to Replace Terminals 1, 2, and 3 and Airlines Are Regrouped in Terminals by Airline Alliances (e.g., SkyTeam, Star, oneworld): The basic physical design of the terminals proposed under the ARSAC alternative concept is essentially the same as the linear concourse proposed under SPAS Alternative 3. The details of that design would be determined in conjunction with the completion of project-level planning, design, and engineering should a SPAS alternative be selected for implementation; all of the SPAS alternatives are currently at only a program level of detail.

The ARSAC presentation indicates that their proposed terminals design provides opportunities to both LCC and alliance carriers and would allow airline locations to be arranged logically by alliances; however, such opportunities for both LCC and alliance carriers to operate together would be available under any and all of the SPAS alternatives. No assumption used in the SPAS Draft EIR gating analysis, as discussed in Section 4.3 of Appendix F-1 of the Preliminary LAX SPAS Report, would preclude LCC

and alliance carriers to efficiently co-locate and/or operate at LAX. The gating approach used in the SPAS Draft EIR does not constitute or reflect a LAWA policy decision in terms of future airline assignments or agreements.

Notwithstanding the above, the ARSAC alternative concept to locate the LCCs along the linear concourse designed for that purpose, which would replace Terminals 1, 2, and 3, would be of very limited benefit to overall airport operations and, if anything, could be detrimental. In August 2011, LCC passengers represented only 24.5 percent of all passengers. Based on today's operations, converting Terminals 1, 2, and 3 into LCC-only terminals would force some international and alliance operations into already busy south CTA terminals, operations which need wide-body gates to operate. This would result in an "imbalance" between the northern and southern portions of the airport, both in terms of landside operations and relative to airside operations (i.e., larger aircraft arriving on or departing from the north airfield would have longer taxiing times and distances by being served primarily on the west and south sides of the CTA).

Common Use Terminal Equipment (CUTE) systems, as suggested in the ARSAC alternative concept, are not limited to new or particular types of airline terminals. For example, the existing Terminal 3 could be retrofitted with CUTE services without reconstruction in the ARSAC suggested linear alternative.

Rapid aircraft turn round times can also be achieved in SPAS Alternative 3 as two narrow-body aircraft can be accommodated at once on each wide-body position depicted in Figure C in Appendix F-1 of the Preliminary LAX SPAS Report.

4. No Changes to the Parking Garages in Central Terminal Area: This element of the ARSAC alternative concept is no different than that of SPAS Alternatives 1, 2, 4, 5, 6, and 7, all of which are addressed in the SPAS Draft EIR.

5. Consolidated Rent-a-car Center (CONRAC) to be Located in Manchester Square: This element of the ARSAC alternative concept is no different than that of SPAS Alternatives 8 and 9, which are addressed in the SPAS Draft EIR.

6. Automated People Mover to Connect the CONRAC to the CTA: This element of the ARSAC alternative concept is no different than that of SPAS Alternatives 3 and 9. Although the ARSAC presentation includes several specific recommendations regarding the design of the APM, such as the alignment within the CTA, the location of stations, and whether the system has one or two tracks, such design considerations would be determined at more detailed levels of planning, design, and engineering, and CEQA review, should a SPAS alternative be selected for implementation.

7. Elevated Roadways to Connect the CTA to the CONRAC and the Freeways: The ARSAC alternative concept proposes a network of elevated roadways connecting the 405 Freeway (I-405) to the CTA. The in-bound route would extend west from I-405 at Century Boulevard to an access ramp for the CONRAC proposed at Manchester Square, then north to an access ramp connecting with Lot C on 96th Street, and then follow the 96th Street bridge alignment at Sepulveda Boulevard, then turn south to connect with the CTA at the World Way entrance bridge (i.e., relocated Sky Way). The in-bound route also envisions a built-in vehicle security screening area along the 96th Street portion the elevated roadway. The out-bound route from the CTA would extend east as an elevated roadway on piers along the grass median on the south side of Century Boulevard and then turn south at Aviation Boulevard to continue east along 102nd Street to connect with I-405. A separate elevated out-bound roadway would be constructed along Aviation Boulevard between the CONRAC at Manchester Square to connect with the main elevated roadway at 102nd Street.

This alternative concept for an elevated roadway network between I-405 and the CTA was has been reviewed and considered by LAWA, and was not carried forth into the SPAS alternatives for the reasons described below.

Implementation of this elevated roadway network would be very expensive to construct, would have construction-related traffic disruption, would be unlikely to result in substantial improvements in traffic conditions around the airport, and would not provide substantial traffic benefits over the ground transportation system improvements proposed within the current range of SPAS alternatives. Because there is no evidence that this concept would reduce any of the significant and unavoidable impacts of

the SPAS alternatives analyzed in the SPAS Draft EIR, it is not necessary to analyze this alternative in detail.

Based on the alignments depicted in the ARSAC presentation, it is estimated that this elevated roadway system would be approximately five miles in length and would include two new interchanges with I-405. Although ARSAC did not provide any cost estimates for this concept, the key features of the system are somewhat analogous to elements of the SPAS alternatives transportation system improvement options for which LAWA completed rough order of magnitude (ROM) cost estimates that are presented in Appendix G of the Preliminary LAX SPAS Report. Table GA-2 in that appendix includes estimates for construction of the elevated busway, which would be a 36-foot-wide elevated platform constructed on piers primarily along existing roadways. Such a system design would be generally analogous to the elevated roadway system identified in the ARSAC alternative concept. Based on an estimated total length of 5,300 linear feet (LF) of elevated busway at a total estimated construction cost of $50,533,300, the cost per LF would be $9,535. For a five-mile-long system, the total cost would be approximately $251,724,000. Table GA-8 in Appendix G includes a ROM cost estimate of $341,757,000 for construction of a new interchange with the I-405, as envisioned under SPAS Alternative 3. Under the ARSAC alternative concept, construction of the five-mile-long elevated busway system and two new interchanges with the I-405, the ROM estimated total cost would be approximately one billion dollars ($935,238,000). In comparison, the ROM estimated cost of the elevated busway system associated with SPAS Alternatives 1, 2, and 8 is approximately $98,000,000, including the bus stations along the way (see Table GA-1 in Appendix G of the Preliminary LAX SPAS Report). Based on this approximately ten-fold cost differential, the elevated roadway system is considered economically infeasible.

In addition to the very high cost of this system, the proposed locations of the new I-405 interchanges are infeasible from an engineering standpoint. For the in-bound route, the ARSAC alternative concept shows the elevated roadway near the CONRAC as having connection ramps with both the northbound lanes and southbound lanes of the I-105 just north of Century Boulevard. Although there is currently an exit from the southbound I-405 at that location, that interchange would need to be redesigned and reconstructed to allow for separation of LAX traffic going up onto the elevated roadway from local traffic staying at ground level. For the northbound I-405 ramp connecting to the elevated roadway, it is highly uncertain whether a flyover ramp going above all travel lanes on the I-405 could be constructed within any area that is not already occupied by the many existing freeway on-ramps and off-ramps at and north of Century Boulevard. There are similar major engineering and design feasibility uncertainties relative to developing both northbound and southbound freeway ramps for the outbound elevated roadway system at 102nd Street and the I-405. The existing at-grade southbound ramp at that location would need to be redesigned and reconstructed to allow for the connection of the elevated roadway, and the construction of a new flyover ramp to connect with the northbound I-405 lanes would need to extend a substantial distance above ground to pass above the existing freeway ramps at Century Boulevard or would require redesign and reconstruction of those existing ramps.

Even if this alternative concept roadway system could be successfully developed, it is not anticipated to draw a substantial amount of traffic away from other roads and access routes serving LAX. Based on traffic volumes and conditions anticipated to occur in 2025 (the planning horizon year for SPAS) on the I-405 near LAX, the vast majority of which would be regional traffic including as related to the I-105 interchange near LAX, and not necessarily airport traffic, it is likely that travelers to and from LAX may still seek alternative routes.

Another disadvantage is that construction of the elevated roadway system above numerous roadways around LAX would result in traffic disruption, delays, and detours during the construction periods.

Lastly, development of the elevated roadway system proposed under the ARSAC alternative concept would not offer a substantial traffic benefit over the systems proposed under certain SPAS alternatives. Alternatives 1, 2, and 8 include an elevated/dedicated busway system that would connect Manchester Square, which includes a CONRAC under Alternative 8, and a proposed Intermodal Transportation Facility located south of and adjacent to Lot C, and the CTA. Alternative 9 is similar to Alternative 8, but would use an APM in place of the busway. Access to the CONRAC at Manchester Square under Alternatives 8 and 9 would include integration with the existing southbound off-ramp at the I-405. Additionally, that proposed system under all of these alternatives includes a connection at the future Metro Crenshaw/LAX Transit Corridor and Station.

In summary, the ARSAC alternative ground transportation system concept was not carried forth by LAWA because it would be economically infeasible, would be infeasible from an engineering standpoint, would have substantial construction-related traffic disruption, would be unlikely to result in substantial improvements in traffic conditions around the airport, and would not provide substantial traffic benefits over the ground transportation system improvements proposed within the current range of SPAS alternatives.

1. U.S. Department of Transportation, Federal Aviation Administration, Advanced Technology Development and Prototyping Group (AJP-67), Final Approach Runway Occupancy Signal (FAROS), Available: http://www.faa.gov/about/office_org/headquarters_offices/ang/offices/ac_td/td/projects/faros/, accessed December 5, 2012.

SPAS-PC00130-815

Comment:

2. Please add to the DEIR study of North Airfield concepts the following:
a. A single runway concept with Runway 24 Left. In this concept, Runway 24 Right is closed and covered or removed.
b. Relocating Runway 24 Left 340 feet to the south and Runway 24 Right 240 feet to the south
c. Relocating Runway 24 Left 340 feet to the south and Runway 24 Right 140 feet to the south
d. Relocating Runway 24 Left 340 feet to the south and Runway 24 Right 40 feet to the south
e. For items b, c, and d above, consider no centerline taxiway and adding a centerline taxiway between the two relocated runways equidistant between the two runway centerlines.

Response:

Regarding concept "a." in the comment suggesting the elimination of one runway in the north airfield and leaving LAX with a three-runway airfield, please refer to Response to Comment SPAS-PC00130-800. Regarding concepts "b., c., and d." and the associated "e.", Section 2.3.2.6, Dual Runway Relocations, of the SPAS Draft EIR presents reasons why such an approach to reconfiguring the north airfield is considered infeasible, impractical, and likely to result in environmental impacts comparable or greater to the alternatives evaluated in detail in the SPAS Draft EIR. Further, Section 2.3.2.6 describes why this alternative is not within the range of the alternatives that the SPAS Draft EIR evaluates in detail. An EIR need not consider multiple variations on the range of alternatives evaluated in detail. (Village Laguna of Laguna Beach Inc. v. Board of Supervisors (1982) 134 Cal.App.3d 1022,1028.)

SPAS-PC00130-816

Comment:

3. Please add to the DEIR study of APM's two APM lines: a north line servicing Terminals 1, 2, 3 and terminating at the Tom Bradley International Terminal and a south line servicing Terminals 4 to 8 and terminating at TBIT. Ideally, these tracks will be above the terminals. The eastern end of each line would terminate at Manchester Square. There should be two options for trackage for the north and south lines. Option 1 is one set of tracks for north and south. Option 2 is two sets of tracks for north and south. For both options, the tracks will converge east of Sky Way and World Way into two tracks leading back to Manchester Square via 98th Street.

Response:

The SPAS Draft EIR includes two alternatives - Alternatives 3 and 9 - that extend an APM system into the CTA. These alternatives, as well as the other alternatives addressed in the SPAS Draft EIR, are at a program level of planning and design. The number, design, and alignment of the APM line(s) within the CTA, as well as the number and location of APM stations within the CTA, are all considerations that will be determined and addressed at the project level, should one of those alternatives be approved. It is appropriate for a first-tier, program level EIR to defer detailed descriptions and impact analysis of individual projects in the program to future project-level CEQA documents. (CEQA Guidelines Section 15383; Koster v. County of San Joaquin (1996) 47 Cal.App. 4th 29, 37.)

Detailed designs of the APMs are not needed for the EIR to meaningfully evaluate the Draft EIR's alternatives' environmental impacts at a program level. An EIR's project description is supposed to include a "general description" of the project's technical characteristics, and should not provide extensive detail beyond that needed for evaluation of environmental impacts. (State CEQA Guidelines Sections 15124 and 15124(c).

SPAS-PC00130-817

Comment:

DEIR COMMENT PERIOD

When the Draft EIR is completed we anticipate that it will be of the length seen in before Alternative D was approved. Since this could be many thousands of pages, ARSAC requests that the comment period be set for 120 days or at least 90 days based on the volume of data to be reviewed to allow the public adequate opportunity to study and comment on this complicated DEIR.

Response:

The commentor's request for an extended public comment period for the SPAS Draft EIR is noted. Please see Response to Comment SPAS-AL00007-59 regarding the length of the public review period for the SPAS Draft EIR.

SPAS-PC00130-818

Comment:

We understand that we have identified an enormous amount of issues with the proposed plans and look forward to working with LAWA to refine them into forward planning proposals. Please contact us if you have any questions: (310) 641-4199 or (213) 675-1817, denny@welivefree.com

Response:

The comment is noted. Issues were identified by ARSAC in comments letters on both the 2008 and 2010 NOPs for the SPAS Draft EIR. Copies of ARSAC's comment letters on the 2008 and 2010 NOPs are included as part of the comment package on the SPAS Draft EIR submitted by ARSAC. Copies of these comment letters are provided in the first part of Appendix A (pages 79 through 214) and the second part of Appendix A of the SPAS Draft EIR (pages 151 through 230), respectively. The comments in both NOP comment letters were considered and addressed in the SPAS Draft EIR. In addition, please see Responses to Comments SPAS-PC00130-729 through SPAS-PC00130-970, which address each separate comment provided in ARSAC's comment letters on the 2008 and 2010 NOPs for the SPAS Draft EIR.

SPAS-PC00130-819

Comment:

Comments re: Notice of Preparation of a Draft Environmental Impact Report (SCH No. 1997061047), Los Angeles International Airport (LAX) Master Plan Specific Plan Restudy

Dear Mr. Glasgow:

The Alliance for a Regional Solution to Airport Congestion (ARSAC) appreciates this opportunity to comment on the Notice of Preparation for the Specific Plan Amendment Study. In addition to these comments, ARSAC has adopted the attached "Petitioners' Overview of Guiding Principles for Environmental Analysis: LAX Specific Plan Amendment Study EIR."

A. The Proposed Reliance on Tiering is Problematic.

The NOP (p.4.) indicates that "[t]he SPAS EIR will be a Supplemental EIR that is tiered from the LAX Master Plan EIR..." This statement requires clarification, and the tiering approach requires

reconsideration by LAWA. While tiering may be appropriate when a Lead Agency has already certified an EIR for a project, in this case ARSAC strongly cautions against relying too heavily on the previous Master Plan EIR. Tiering is only appropriate when the later project is "consistent with the program, plan, policy, or ordinance for which an environmental impact report has been prepared and certified." Pub. Res. Code § 21094(b). Case law also stresses the need for consistency between the subsequent project and previously certified EIR. See Koster v. County of San Joaquin (1996) 47 Cal. App. 4th 29, 36. The very purpose of the project now proposed is to change some of the key underlying assumptions of the Master Plan EIR. Therefore, it is very difficult to argue that the SPAS EIR project could be consistent with the previously certified Master Plan EIR.

The NOP for the SPAS EIR proposes significant changes to the Master Plan, including movement of Runway 6R/24L; changes to the proposed closure of the CTA to surface traffic; development of an off-site ticketing facility; and the future of Terminals 1, 2, and 3. Given the magnitude of the changes, ARSAC questions the viability of the Master Plan as a document off of which LAWA may appropriately tier the SPAS EIR. While some aspects of the Master Plan remain unchanged, the better approach would be to incorporate by reference the portions of the Master Plan unaffected by the proposed changes (see Guidelines Section 15150), but develop the SPAS EIR as a primarily stand alone document that address the significant, and previously unstudied, impacts of the project now proposed.

In addition, tiering is not appropriate under Section 21094(b) when a Lead Agency determines that the provisions of Public Resources Code Section 21166 apply. The existence of the NOP and proposal for the SPAS EIR make the applicability of Section 21166 self evident. Section 21166 requires a subsequent or supplemental EIR when "[s]ubstantial changes are proposed in the project which will require major revisions to the environmental impact report." Pub. Res. Code §21166(a). LAWA has rightly determined that this section applies. However, because this section applies, the tiering provisions of Section 21094 are inapplicable, and LAWA should prepare a primarily stand-alone document.

LAWA should also rethink the proposal to develop a Supplemental EIR. Preparation of a Supplemental EIR should occur when "[o]nly minor additions or changes would be necessary to make the previous EIR adequately apply to the project in the changed condition." Guidelines §15163(a)(2). By contrast, a Subsequent EIR is required when "[s]ubstantial changes are proposed in the project which will require major revisions of the previous EIR..." Guidelines §15162(a)(2). The proposed changes are clearly substantial and go well beyond "minor additions" to the Master Plan. Therefore, LAWA should not treat the SPAS EIR as a Supplement to the Master Plan, but rather as a stand-alone Subsequent EIR.

Response:

The content of this comment is similar to the concerns expressed in comment SPAS-AL00007-41; please refer to Response to Comment SPAS-AL00007-41.

SPAS-PC00130-820

Comment:

B. Analysis of Impacts.

The checklist of impacts in the subject NOP includes specific comments that raise numerous concerns for ARSAC. First, greenhouse gas emissions should be specifically addressed in the impacts analysis, as is acknowledged on the Initial Study, Attachment A, p. 3. However, the scope of that analysis appears too narrow. Since greenhouse gas emissions were not analyzed in the 2004 EIR, the analysis of emissions should not be limited to the construction and operation of the LAX SPAS alternatives, but should include all airport operations.

Response:

Section 4.6 of the SPAS Draft EIR provides a comprehensive analysis of greenhouse gas (GHG) emissions and impacts associated with each of the SPAS alternatives. The commentor does not provide any examples of sources that were omitted. As discussed in Section 4.6.2 of the SPAS Draft EIR, the EIR analyzed numerous operational sources of GHGs, including aircraft, ground support equipment, traffic traveling to or from LAX, and stationary sources such as natural gas combustion, purchased electricity, water delivery, wastewater treatment, and solid waste disposal. Section 5.5.6 of

the SPAS Draft EIR provides a cumulative analysis of GHGs. The analysis considers other projects that would contribute to cumulative impacts related to GHGs, as well as the contribution of the SPAS alternatives to those cumulative impacts.

SPAS-PC00130-821

Comment:

ARSAC expects LAWA and the City will have to find significant impacts in the areas of aesthetics, air quality, emission of greenhouse gases, biological resources, cultural resources (i.e. the "Sea to Shining Sea" mosaic tile mural in Terminal 3), geology and soils, hazards and hazardous materials, hydrology and water quality, land use and planning, noise, population and housing, public services, recreation, transportation/circulation, and utilities.

Response:

The comment is noted. Table 1-4 in Chapter 1 of the SPAS Draft EIR summarizes the environmental impacts after mitigation of the SPAS alternatives as identified in Chapter 4 of the SPAS Draft EIR and identifies which of the environmental topics raised in this comment were found to result in significant impacts and under which SPAS alternatives those significant impacts would occur. Table 1-5 in Chapter 1 of the SPAS Draft EIR provides additional summary information regarding the nature and extent of the unavoidable significant impacts associated with the nine SPAS alternatives. Detailed discussions of the significance conclusions for each environmental topic where significant impacts would occur are provided in Chapter 4 of the SPAS Draft EIR.

As described on page 7-6 in Section 7.7 of the SPAS Draft EIR, the Initial Study included in the October 2010 LAX SPAS EIR Notice of Preparation, provided as Appendix A of the SPAS Draft EIR, determined, for the reasons explained therein, that effects on the following resource areas raised in this comment would result in no impact, or less than significant impacts, and were therefore not discussed in detail in the SPAS Draft EIR: geology and soils, population/housing, and recreation. Please see Response to Comment SPAS-PC00130-53 for further discussion of the specific issue areas where it was determined, in accordance with the State CEQA Guidelines, that detailed discussions were not required in the SPAS Draft EIR.

Please see Response to Comment SPAS-PC00201-11 for a discussion as to why the mosaic mural attached to the wall of the tunnel that is part of Terminal 3 is not an eligible or designated historical resource under CEQA.

SPAS-PC00130-822

Comment:

1. The list of impacts proposed for study is incomplete.

a. Geology/Soils.

Although LAWA has not checked off plans to study geology and soils, population and housing and recreation, LAWA should include these in the EIR. Geology and soils are critical concerns with any construction project. Several projects and/or ongoing geology/soils concerns should be considered in the EIR. Presently, there are proposals to build a ground water runoff retention basin on the northwest corner of the LAX airfield. An underground storage facility is also proposed. LAWA should examine the potential for leaks, and to the Impacts on the soil above. As this location is near the El Segundo Dunes, the soil tends to contain more sand than the eastern boundaries of the LAX property. Additionally, there are old sewer lines running underneath LAX dating back to the 1920's. Some of these lines in Playa del Rey (such as on Zitola Terrace) have collapsed, and the City of Los Angeles has had to buy out certain homeowners (e.g. James Marcinkus). Another proposed project could affect LAX is the Woodside Natural Gas pipeline that will use part of LAX property in the El Segundo Dunes and will traverse underneath Westchester Parkway to a facility near 98th Street and Bellanca. The EIR should address potential cumulative geology/soils impacts.

Response:

As described on page 7-6 in Section 7.4 of the SPAS Draft EIR, the Initial Study included in the October 2010 LAX SPAS EIR Notice of Preparation, provided as Appendix A of the SPAS Draft EIR, determined, for the reasons explained therein, that effects on the following resource areas would result in no impact, or less than significant impacts, and were therefore not discussed in detail in the SPAS Draft EIR: agricultural resources, geology and soils, mineral resources, population/housing, and recreation. In particular, the NOP determined that all geology and soils impacts would be less than significant. Please see Response to Comment SPAS-PC00130-921 for an explanation of why such impacts would be less than significant.

The comment regarding the proposal to construct a stormwater infiltration and treatment facility on airport property is noted. This project was included in the list of cumulative projects evaluated in the SPAS Draft EIR (see page 5-22 in Section 5.3.5 of the SPAS Draft EIR). The potential for the stormwater infiltration and treatment facility project to result in leaks and impacts to soils would be addressed in environmental documentation prepared for that project, and there is no evidence that such impacts, if they were to occur, would add to any geology and soils impacts of the SPAS alternatives.

Please see Response to Comment SPAS-PC00130-898 regarding the presence of sewer lines beneath LAX.

The Woodside Natural Gas pipeline project referred to in this comment was suspended by the project proponent subsequent to preparation of this comment.1 Therefore, this project was not included in the cumulative analysis in the SPAS Draft EIR.

The comment does not present any facts or evidence suggesting that the impacts of the SPAS alternatives related to geology and soils would be cumulatively considerable.

1. Woodside Petroleum Ltd., Woodside Suspends Oceanway Development, January 16, 2009.

SPAS-PC00130-823

Comment:

b. Population/Housing.

Population and housing are expected to increase in the Westchester/Playa del Rey/Playa Vista community plan area. Although this area presently has over 50,000 residents, Playa Vista will be adding more housing stock as will the new apartment complex on the corner of Manchester and Lincoln (former Furama Hotel site). Furthermore, the proposed revision to the Housing Element to the City of Los Angeles General Plan seeks to double housing in the Westchester/Playa del Rey/Playa Vista area. With increased housing and population come increased traffic and pollution impacts as well as additional stresses on infrastructure such as roads, water usage, power consumption and sanitation (trash pick-up and sewer). The EIR should address any cumulative impacts.

Response:

As described on page 7-6 in Section 7.4 of the SPAS Draft EIR, the Initial Study included in the October 2010 LAX SPAS EIR Notice of Preparation, provided as Appendix A of the SPAS Draft EIR, determined, for the reasons explained therein, that effects on the following resource areas would result in no impact, or less than significant impacts, and were therefore not discussed in detail in the SPAS Draft EIR: agricultural resources, geology and soils, mineral resources, population/housing, and recreation. The NOP determined that all impacts related to population and housing would be less than significant (2010 SPAS NOP, pages A-20 and A-21). As discussed therein, it is not expected that the growth implications associated with operation of the LAX SPAS alternatives would be materially different than those previously addressed in the LAX Master Plan EIR. Moreover, neither the LAX Master Plan nor the SPAS alternatives include residential or business development and do not involve the expansion or extension of infrastructure into under-developed or undeveloped areas. Thus, they are not anticipated to result in substantial direct or indirect growth. Therefore, in accordance with Sections 15063(c)(3)(A) and 15128 of the State CEQA Guidelines, the potential for impacts associated with population/housing was not discussed in detail in the SPAS Draft EIR, as it was determined not to

be significant at either the project or the cumulative level. Although the SPAS Draft EIR did not evaluate impacts to housing, as explained in Section 5.2 of the SPAS Draft EIR, the analysis of cumulative impacts was based on regional projections of population and housing growth prepared and adopted by SCAG in the 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS; see Table 5-1 of the SPAS Draft EIR). In addition, in conjunction with the use of the SCAG data, the analysis considered 140 planned projects in the LAX area. (See Section 5.1 of the SPAS Draft EIR.) This list of projects is provided in Table 5-2 of the SPAS Draft EIR, and includes the Village at Playa Vista project (Project #128) and other past, present, and reasonably foreseeable future projects. The cumulative impact analysis, including the adopted growth projections and identified specific past, present, and reasonably anticipated future projects, is "reasonable and practical", and sufficient to determine whether the effects "of the project should be considered significant in the context of the existing cumulative effect." (See Environmental Protection Information Center v. California Department of Forestry and Fire Protection (2008) 44 Cal.4th 459, 525; see also Communities for a Better Environment v. California Resources Agency (2002) 103 Cal.App.4th 98, 118.)

These regional growth projections were used as the basis for the cumulative impact analysis of traffic and air quality, among other topics. Cumulative impacts related to public utilities were based on planning documents prepared by the agencies or entities with jurisdiction, which consider future demand based on regional growth projections. As identified in Section 5.5.13.4, cumulative impacts related to water usage considered the entire LADWP service area and were based on LADWP's 2010 Urban Water Management Plan and considered growth projections from SCAGs 2012-2035 RTP/SCS. As identified in Section 5.5.13.1 of the SPAS Draft EIR, cumulative impacts related to power consumption considered regional growth and were based on future projections of electricity and natural gas demand and supply from the City of Los Angeles' Power Integrated Resource Plan and the annual California Gas Report, respectively. As stated in Section 5.5.13.2, cumulative solid waste impacts relied on regional projections of landfill availability provided in the 2010 Annual Report of the Countywide Summary Plan and Countywide Siting Element. Cumulative wastewater impacts were based on the City of Los Angeles Department of Water and Power's Integrated Resources Plan updates, which consider regional growth. Therefore, cumulative impacts associated with increased housing and population were addressed in the SPAS Draft EIR.

SPAS-PC00130-824

Comment:

c. Recreation.

Recreation is another area that must be studied. For nearly two decades, LAWA has promised to restore the 3 holes removed from Westchester Golf Course when Westchester Parkway was constructed. The Westchester Golf Course is one of the most heavily used golf courses in the City of Los Angeles. Earlier this year, LAWA also held a public meeting at Loyola Marymount University to gather ideas for uses of the LAX Northside property. Many of these uses that garnered positive responses were recreation uses. Furthermore, LAWA may be deficient in producing this EIR if LAX Northside land use issues were not discussed. The FAA's 2005 Record of Decision on the LAX Master Plan specifically excluded approval of the LAX Northside from the Airport Layout Plan on the basis of inconsistency due to, "markedly different assumptions underlying the analysis of environmental impacts that may be expected to result form the LAX Northside portion of the LAX Master Plan."

Response:

Please see Response to Comment SPAS-PC00130-821 concerning why recreation was not studied in the SPAS Draft EIR.

The Westchester Golf Course Three-Hole Restoration Project was completed in 2010, subsequent to the commentor's submittal on the 2008 SPAS Draft EIR NOP on June 17, 2008. (See page 5-22 in Chapter 5 of the SPAS Draft EIR.) This project is not related to SPAS elements. (See Section 5.3 of the SPAS Draft EIR.)

The LAX Northside is identified in Figure 5-2 and on page 5-22 in Chapter 5 of the SPAS Draft EIR as a land development and miscellaneous improvement at or adjacent to LAX which is not related to the SPAS alternatives. This project, and the proposed LAX Northside Plan Update, are evaluated under

cumulative impacts in Section 5.5 of the SPAS Draft EIR. As described in that section, formulation of a new reduced land use development program for the LAX Northside is currently in process, which will be followed by completion of environmental review studies.

SPAS-PC00130-825

Comment:

We request that each of these potential impact areas be thoroughly addressed, even when LAWA feels that impacts can be avoided or reduced by feasible mitigation measures or alternatives.

Response:

The comment is noted. Please see Responses to Comments SPAS-PC00130-822 through SPAS-PC00130-824 above.

SPAS-PC00130-826

Comment:

2. Specific Concerns Regarding Particular Impacts.

a. Traffic Impacts.

Sources of pollution outside of those from LAX operations are cumulatively significant and must be included in the study. In addition to pollution sources from vehicular traffic, aircraft flying in the skies surrounding LAX are also expected to have increased impacts. Additionally, pollution from local refineries, treatment plants, and other sources should be considered additive when determining impact significance.

Response:

The cumulative impacts analysis for air quality is included in Section 5.5.2 of the SPAS Draft EIR, and the projects that were considered in the cumulative impacts are noted in Sections 5.2 and 5.3 of the SPAS Draft EIR. Both construction and operational impacts of all SPAS alternatives were determined to have cumulatively considerable impacts on air quality. The impacts of air pollutant emissions from SPAS-related traffic and aircraft on ambient air quality are presented in Section 4.2.6 and Appendix C of the SPAS Draft EIR.

SPAS-PC00130-827

Comment:

The communities surrounding LAX are generally used as thoroughfares for north-south traffic and few alternative routes exist. The 405 freeway, Vista del Mar and Pershing on the west, Lincoln Blvd., Sepulveda Blvd., and La Cienega all bear heavy traffic, including that associated with LAX operatives. The environmental impact analysis must include those above and beyond the normal operations of LAX, but also the impacts on traffic by travelers and cargo operations forced to go long distances within Southern California to get to LAX. Traffic on the 405 freeway can become bumper-to-bumper at any time of the day or evening. The 405 traffic "spill off" can cause level E and F service on the few other major routes or other alternative routes through the communities. The economic impacts and health impacts of these delays should be identified and quantified.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Section 4.12.2 of the SPAS Draft EIR for a discussion of impacts to the off-airport roadway system. As described in Section 4.12.2.2.2 of the SPAS Draft EIR, the traffic analysis in the SPAS Draft EIR employed a focused travel demand forecasting model to assist in estimating the routes that airport-generated traffic would use, as well as the routes of other traffic in the vicinity. Development of the model for use in this study included both static and dynamic validation tests. Because the model was determined to operate within

accepted standards for accuracy, it was found to be appropriate for the SPAS Draft EIR traffic impact analysis. Figure 4.12.2-2 of the SPAS Draft EIR shows the model process, which includes iterative traffic assignment until traffic is optimally distributed over the freeway and street network. The volume of project-related traffic assigned to each route is partly determined by the roadway capacity and the demand volume on those routes. This dynamic assignment process accounts for traffic diversion from congested routes, including the I-405 Freeway, to other available routes.

As discussed in Section 4.12.2 of the SPAS Draft EIR, the majority of the 200 intersections evaluated within the SPAS off-airport transportation study area would not be significantly impacted under Alternatives 1, 2, 3, 4, 8, and 9; however, significant impacts to some off-airport intersections and/or Congestion Management Plan (CMP) facilities would occur under each of these alternatives. The total number of significantly-impacted intersections and/or CMP facilities would vary slightly among those alternatives. Alternatives 5, 6, and 7 focus on airfield and terminal improvements that, in themselves, would not affect off-airport traffic, but would be coupled with the ground transportation improvements proposed under Alternatives 1, 2, 8, or 9, the impacts of which are summarized above.

As indicated on page 4-83 in Section 4.2 of the SPAS Draft EIR, the air quality analysis conducted for the SPAS alternatives addresses criteria pollutant emissions from operational activities, including off-site regional traffic, that would occur at buildout in the horizon year of 2025. Section 4.7.1 of the SPAS Draft EIR addresses the potential human health risk for people exposed to toxic air contaminants (TACs) resulting from construction and operation, including TACs from motor vehicles, associated with the SPAS alternatives.

Regarding economic effects, "economic or social effects of a project shall not be treated as significant effects on the environment." (State CEQA Guidelines Section 15131(a).) While economic (and social) effects can be part of a chain of relationships that ultimately result in physical impacts on the environment, analysis in the SPAS Draft EIR fully evaluates environmental effects associated with traffic (Section 4.12) and air quality impacts (Section 4.2). The air quality analysis also included emissions associated with vehicle trips, as described in greater detail in Section 4.2.2.2 of the SPAS Draft EIR; emissions associated with construction are described in Section 4.2.2.1. Section 4.7.1 provides a Human Health Risk Assessment.

SPAS-PC00130-828

Comment:

Community growth is increasing the number of people within the communities surrounding LAX. We want to ensure that any related impacts to the community growth are included in the total impact. Population growth and traffic increases resulting from all further land utilization allowed by zoning within community plans must also be considered. LAWA should use maximum use zoning in their analysis, not just those projects that have been approved. City Community Plans call for substantial increases in housing density with resultant traffic and increased numbers of people who will be impacted by airport related pollution. The numbers projected by the Westchester-Playa del Rey Community Plan EIR should be used after modification for further increases enabled by other LA City ordinances such as transit corridor bonuses and affordable housing bonuses and the Housing Element of the LA City General Plan.

Response:

Cumulative impacts related to community growth are analyzed in Chapter 5 of the SPAS Draft EIR. As described on pages 5-1 and 5-2 of the SPAS Draft EIR, CEQA requires a discussion of cumulative impacts. A discussion of cumulative impacts must include "either (1) a list of past, present, and reasonably anticipated future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency, or (2) or a summary of projections contained in an adopted general plan or related planning document, or in a prior environmental document which has been adopted or certified, which described or evaluated regional or areawide conditions contributing to the cumulative impact." (State CEQA Guidelines Section 15130.) The cumulative impact analysis presented in Chapter 5 considers the adopted growth projections set forth in the Southern California Association of Governments (SCAG) 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and also identifies and addresses specific projects at or near LAX, including those that would be carried out or approved by LAWA, as well as those outside of LAWA's

control. Table 5-1 provides background for the evaluation of cumulative impacts based on the adopted growth projections set forth in the SCAG RTP/SCS for population, households, and employment. The reasonably foreseeable growth occurring in the SPAS study area is based on the demographic projections adopted by SCAG as extrapolated for 2025, the year of project buildout. SCAG's forecasts are developed in consultation with jurisdictions such as the City of Los Angeles and are derived in part from the potential buildout of communities pursuant to their approved land use plans. In conjunction with the review and use of SCAG data, the cumulative impact analysis has also considered a total of 140 projects in the LAX area as illustrated in Figure 5-1 and described in Table 5-2 of the SPAS Draft EIR. These include both approved and proposed projects. As further described on page 5-2, the 140 projects on the list were evaluated against SCAG's RTP forecast data by traffic analysis zone, relative to residential density and diversity of land use types. If it appeared that projects were not fully accounted for in the SCAG forecast numbers, the numbers were adjusted upward. Therefore, the methodology used to analyze cumulative traffic impacts considers numbers projected in the Westchester Playa del Rey Community Plan as well as existing and proposed projects at or adjacent to LAX.

The commentor suggests that maximum "use zoning" or buildout should be used in the analysis. However, maximum buildout is unlikely and would be speculative, given that population fluctuations, building demands, and building restrictions affect the total buildout. (See Save Round Valley Alliance v. County of Inyo (2007) 157 Cal.App.4th 1437 [holding the DEIR did not need to assume second dwelling unit (theoretical build-out) would be constructed even though allowed by zoning]; Sondermann Ring Partners-Ventura Harbor v. City of San Buena Ventura 2008 WL 1822452 (Unpublished) ["Sondermann asserts the EIR does not comply with CEQA because it does not analyze impacts of full build-out under the updated general plan…The updated general plan analyzes growth potential over the 20-year life of the plan. [A]n EIR is not required to engage in speculation in order to analyze a 'worst case scenario.'"]; Sierra Club v. County of Tehama (2012, Case C066996) 2012 WL 5987582 (Unpublished) ["this [theoretical buildout] projection, is purely a unit per acre calculation and does not reduce units because of environmental, infrastructural or other type of constraints that would limit the number of units on a parcel…[a]s a result, the Draft EIR does not consider the maximum development potential for the whole of the project…Thus, the EIR in this case was not required to analyze specific impacts of the theoretical buildout."]). By using growth projections, the City is able to capture the net effect of these other constraints which cannot be individually quantified. As discussed above, the conservative approach used, namely to use the RTP/SCS projections and specific projects, complies with CEQA. The cumulative impacts analysis looks at a substantial number of projects and was prepared with a sufficient degree of analysis to provide decision-makers with information which will enable them to make a decision which intelligently accounts for environmental consequences.

SPAS-PC00130-829

Comment:

LAX physical layout changes and/or operations at LAX should be considered when determining ground traffic pollution contributions.

Response:

The air quality impact analysis incorporates the layouts of each alternative, including roadways, runways, taxiways, and terminal facilities, into the evaluation. The results of the analysis are included in Section 4.2.6 and Appendix C of the SPAS Draft EIR. In general, construction emissions were found to be significant for carbon monoxide (CO), volatile organic compounds (VOC), oxides of nitrogen (NOx), and particulate matter (PM10 and PM2.5) under all alternatives. Concentrations of nitrogen dioxide (NO2) and PM10 were found to be significant under all alternatives. Operational emissions of sulfur dioxide (SO2), PM10, and PM2.5 were found to be significant under all alternatives, as were operational concentrations of NO2, PM10, and PM2.5. A summary of air quality impact significance findings is included in Table 1-7 (page 1-63) of the SPAS Draft EIR.

SPAS-PC00130-830

Comment:

b. Air Quality Impacts and Public Health.

Recent studies of pollution sources have identified serious impacts by air pollution on human health. LAWA should consider the latest air quality information from AQMD and California Air Resources Board to assess the various project alternatives for pollution impacts. Average pollution over a long period of time should be determined, but also pollution concentrations in any four-hour period since air and ground traffic tend to have peak hours.

Please see and analyze in the EIR the attached reports from the following websites as examples of the air impacts that have been studied.

http://www.arb.ca.gov/newsrel/nr052208.htm
http://www.arb.ca.gov/research/health/pm-mort/pm-mort.htm
http://www.arb.ca.gov/research/health/pm-mort/pm-mortdraft.pdf

Response:

CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commentors. (State CEQA Guidelines Section 15204.) The studies listed in the comment describe methodologies and results for estimating premature deaths associated with long-term exposures to fine airborne particulate matter (PM2.5) in California. Such studies are appropriate for use by regulatory agencies for developing and updating ambient air quality standards for PM2.5 on a statewide or national basis. It is not appropriate to include such studies in a site-specific CEQA study. The CEQA analysis included in Section 4.2 of the SPAS Draft EIR correctly addresses the significance of PM2.5 relative to ambient air quality standards and South Coast Air Quality Management District CEQA thresholds. These standards and thresholds should be based on findings of research studies such as those listed in the comment. The ambient concentrations of PM2.5 were found to be significant under all SPAS alternatives, as shown in Section 4.2.6 of the SPAS Draft EIR.

SPAS-PC00130-831

Comment:

LAWA is conducting an air pollution contribution apportionment study to fulfill a Settlement promise. Along with an air pollution contributions analysis, LAWA will be following up a study contract ("Monitoring and Modeling of Ultrafine Particles and Black Carbon at Los Angeles International Airport," Froines, John, ARB Contract 04-325, 3-5-2007) in which ultra fine particle studies smaller than those normally measured were correlated with aircraft operations. Additionally a 2000 report by McDonnell (http://www.nature.com/jes/journal/v10/n5/pdf/7500095a.pdf) highlighted a method to investigate particle impacts on health that should be followed in the assessment of air quality impacts. "This study did not have direct measures of PM2.5 but relied on TSP and PM10 data. In a follow-up analysis (McDonnell et al. 2000), visibility data were used to estimate PM2.5 exposures of a subset of males who lived near an airport." We ask that air quality measurements be taken on LAX property and in surrounding communities that are in close proximity to LAX.

Response:

Please refer to Response to Comment SPAS-PC00130-225 for a discussion of ultrafine particles (UFP, also known as PM0.1), and the 2007 UCLA study. Please refer to Response to Comment SPAS-PC00130-36 regarding the status of the LAX Air Quality and Source Apportionment Study (AQSAS).

The South Coast Air Quality Management District routinely collects particulate matter (PM10) measurements at its Southwest Coastal Monitoring Stations (also known as the LAX Hastings monitoring station) the located of which is shown in Figure 4.2-1 of the SPAS Draft EIR. The most recent five years of measurements from this station are included in Table 4.2-3 of the SPAS Draft EIR.

SPAS-PC00130-832

Comment:

c. Operations Analysis.

In examining all alternatives, LAWA must examine the use of, and the impact of, operating the LAX in various configurations including Westerly operations, Easterly operations and Over-Ocean operations. Safety impacts of the varied scenarios must be assessed. Furthermore, other operational scenarios using outboard runways for take-offs and inboard runways for landings need to be considered, as well as parallel landings on the north or the south runway complexes. Further, any changes in facilities should trigger personnel safety reviews to identify and mitigate potential hazards on both the landside and airside of LAX.

Response:

The SPAS Draft EIR analyzed the operations, and the impacts of operations, of the various alternative configurations of LAX. Appendix F-2 of the Preliminary LAX SPAS Report, studied, among other things, alternative configurations, aircraft operations and movement statistics, and travel paths of aircraft. In order to identify the four runway operating configurations that were modeled, annual weather conditions and FAA operating data from the Federal Aviation Administration's (FAA) Aviation System Performance Metrics (ASPM) Airport Efficiency module from January 2000 to June 2008 were analyzed.

The introduction of additional operational scenarios not currently used at LAX were not evaluated due to compliance with FAA Air Traffic Control (ATC) procedures. Additionally, segregation of arrivals and departures between the north and south airfields would not be beneficial due to the increased amount of taxiing traffic volume and time. The range of alternatives considered in the SPAS Draft EIR included those that could feasibly accomplish the basic objectives of the project and avoid or substantially lessen one or more of the significant effects. (State CEQA Guidelines Section 15126.6(c)). CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commentors. (State CEQA Guidelines Section 15204.)

Section 4.7.2 of the SPAS Draft EIR addresses the safety analyses related to the SPAS alternatives.

SPAS-PC00130-833

Comment:

C. Specific Questions that Should be Addressed.

ARSAC's comments in the attached "Table of NOP Comments" pose questions that should be addressed in the course of the EIR preparation. The comments have been made to correspond with the NOP document organization.

Response:

The comment is noted. Please see Responses to Comments SPAS-PC00130-856 through SPAS-PC00130-961 below.

SPAS-PC00130-834

Comment:

We understand project impacts deleted from Alternative D by the Stipulated Settlement, and designated as "yellow light projects," will not be analyzed, except for the no action alternative. However, the EIR should analyze the worst case for each of the individual projects' impacts. Further, if a derivative of a yellow light project is proposed in one of the alternatives (e.g., moving runway 24L 340'south), the impacts shall be segregated and not tied to a requirement to impose other yellow light elements, but any worst-case alternative use must be included.

Response:

It is not clear what the commentor is referring to in the statement that "the EIR should analyze the worst case for each of the individual projects' impacts." The SPAS Draft EIR comprehensively evaluates the impacts of nine alternatives. Conservative assumptions are made throughout the analysis to present reasonably-foreseeable impacts associated with each alternative. The impacts of individual

components of the SPAS alternatives were not evaluated separately (i.e., they were not "segregated," as requested by the commentor). CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended by or demanded by commentors. (State CEQA Guidelines Section 15204.) The SPAS Draft EIR was prepared with a sufficient degree of analysis to provide decision-makers with information which enables them to make a decision which intelligently takes account of environmental consequences. (State CEQA Guidelines Section 15151.) Section 7.H.1 of the LAX Specific Plan, as amended, requires LAWA to initiate a complete LAX Specific Plan Amendment Study prior to seeking an LAX Plan Compliance determination for any one of the Yellow Light Projects. To evaluate the impacts of the components separately could result in a "piecemealed" analysis and could understate the impacts of the entire SPAS program.

SPAS-PC00130-835

Comment:

In 2004, LAWA took credit for the reduction in development at the Northside Development area from the 4.5 million square feet assumed in the 1982 EIR to 1.5 feet 5 million square of light industrial and commercial space. However, the ROD excluded the Northside Development. The DEIR should clearly specify what is planned at this time, and the full impact of such development. Similarly, all proposed uses of the Belford Square area should be delineated in the assumptions used to assess the impacts.

Response:

Both the LAX Master Plan EIR and the SPAS Draft EIR assume that LAX Northside will be developed with up to 4.5 million square feet of uses, as provided for in the approved development plan, subject to a limitation on the total number of vehicle trips. As indicated on page 5-22 of the SPAS Draft EIR, formulation of a new reduced land use development project for LAX Northside is currently in process. The LAX Northside Plan Update is intended to create a vibrant, sustainable center of employment, retail, restaurant, office, hotel, research and development, higher education, civic, airport support, recreation, and buffer uses that support the needs of surrounding communities and of LAWA. Potential impacts related to implementation of the LAX Northside Plan Update will be addressed in the LAX Northside Plan Update Draft EIR. However, as a new land use plan has not yet been developed or adopted, the SPAS Draft EIR assumed that the approved land use plan will be implemented. Please see Response to Comment SPAS-PC00130-175 regarding land uses in the Belford area.

SPAS-PC00130-836

Comment:

The new alternatives all contain a new transportation center at Century and Imperial. Changes to traffic flows and pollution impacts should be highlighted along with those from any automated people movers (APM) that would go from that facility to the central terminal area. The stops of the APM can have a significant impact on ground traffic. The locations assumed for stops must be identified in detail.

Response:

It is unclear what the commentor is referring to relative to a "new transportation center at Century and Imperial." Under all of the alternatives that include ground access components (i.e., Alternatives 1, 2, 3, 4, 8, and 9) except for Alternative 4, Manchester Square, located at the intersection of Century and Aviation Boulevards, would be used for airport-related facilities. However, only Alternative 3 would include a Ground Transportation Center in this location. The other alternatives would provide parking (Alternatives 1 and 2) or parking and a CONRAC (Alternatives 8 or 9) in this area. Alternatives 1, 2, 8, and 9 would provide a new transportation center between 98th and 96th Streets, west of Airport Boulevard.

Please see Response to Comment SPAS-PC00130-764 regarding the impacts from a potential APM system connecting airport facilities outside of the CTA with the terminal area. As discussed in this response, the APM systems proposed as a part of Alternatives 3 and 9 have been developed at a program level of planning. Station locations along the routes outside the CTA are identified in the SPAS Draft EIR. As indicated on page 2-22 of the SPAS Draft EIR, under Alternative 3, APM 1 between the ITC and the CTA would have a stop at the CONRAC proposed to be located in the Lot C area; APM 2,

which would connect the GTC and the CTA, would not have any intermediate stops. Under Alternative 9, the APM would include a stop at the ITC as well as at the planned Metro Aviation/Century Station. Alternatives 3 and 9 do not define the final APM system alignment and station locations within the CTA. The alignment and design of the APM line(s) within the CTA will be determined and addressed at the project level, should one of those alternatives be approved. Please see Response to Comment SPAS-PC00130-235 for a discussion of the appropriateness of the programmatic review conducted for the SPAS project.

The analyses of air quality, on-airport transportation, and off-airport transportation impacts under Alternatives 3 and 9 consider all of the components of each alternative, including proposed transportation centers and APMs.

SPAS-PC00130-837

Comment:

Although the Consolidated Rental Car facility location was approved for project analysis by the Stipulated Settlement in the Lot C location, it is our understanding that alternative locations have been considered. The impacts on ground traffic should be assessed separately for each alternative location.

Response:

Please see Response to Comment SPAS-PC00130-765 regarding the fact that the locations of the CONRAC proposed under various SPAS alternatives were accounted for in the SPAS Draft EIR analyses.

SPAS-PC00130-838

Comment:

One alternative discussed modifications to the ingress/egress along the 98th Street bridge for the Central Terminal Area near the present Terminal 1. This proposed solution called for a structure in the area where Park One currently is located. This proposal allows people going to the north terminal, especially Terminal 1, an opportunity for drop off without entering the major CTA traffic loop. The benefits from this potential project should be segregated so that they may be added to any of the alternatives.

Response:

Please see Response to Comment SPAS-PC00130-703 and Response to Comment SPAS-PC00130-809 regarding consideration of alternatives to allow passenger drop-off east of Terminal 1 and traffic to exit out of the CTA northbound via the proposed Sky Way realignment.

SPAS-PC00130-839

Comment:

Each of the new alternatives contains a Midfield Terminal and the addition of gates to the backside of Tom Bradley International Airport. LAWA should specify the locations of the taxiways and taxiway intersections. All ground and air impacts of this set of projects must be included in the analysis of each of the alternatives.

Response:

Please see Response to Comment SPAS-AL00007-44 regarding the relationship of the Midfield Satellite Concourse and Bradley West projects to the analysis of the SPAS alternatives. As indicated in that response, and as discussed in Sections 5.3 and 5.5 of the SPAS Draft EIR, although these projects are not components of SPAS, these and other cumulative projects were assumed in the simulation analysis of future conditions with implementation of the SPAS alternatives. Therefore, the simulation analysis represents future conditions with the airfield and terminal changes associated with each of the SPAS alternatives as well as changes associated with these and other cumulative projects. As the assessment of air quality impacts relied upon data from the simulation analysis, these projects were

included in the analysis of air quality impacts. Similarly, passenger activity for all CTA terminals, including the MSC and TBIT with implementation of the Bradley West Project, was assumed in the Design Day Flight Schedule (DDFS), which was the basis for the on-airport transportation analysis. The off-airport transportation analysis assumed total future passenger activity levels at LAX, including activity associated with the MSC and Bradley West projects.

The locations of taxiways and taxiway intersections for each alternative are provided in Figures 2-1 through 2-9 in Chapter 2 of the SPAS Draft EIR.

SPAS-PC00130-840

Comment:

In examining all alternatives, LAWA must examine the use of, and the impact of, operating LAX in various configurations including Westerly operations, Easterly operations and Over-Ocean operations. Safety impacts of the varied scenarios must be assessed. Furthermore, other operational scenarios using outboard runways for take-offs and inboard runways for landings need to be considered, as well as parallel landings on the north or the south runway complexes.

Response:

The content of this comment is essentially the same as comment SPAS-PC00130-832; please refer to Response to Comment SPAS-PC00130-832.

SPAS-PC00130-841

Comment:

D. Analysis of Alternatives.

1. The Proposed Alternatives.

The NOP identifies two no project alternatives and four alternatives. ARSAC is unalterably opposed to the alternative of moving the runway 24R 340 feet to the north, and strongly supports analysis of the alternative of keeping the existing runways at the present location and implementing operational improvements to enhance safety. Only if safety risks remain after such operational improvements have been implemented can the costs and disruption of runway movement be justified. LAWA has demonstrated the capability of landing Group VI aircraft on both the north and south complexes, albeit with some adjacent taxiway use restrictions. When the South Airfield Project was presented for approval, LAWA indicated that it would be capable of handling the Group VI aircraft and it is our understanding that a ground terminal access route using the south runway 25L has been formally approved for use by the FAA. In the ground air traffic analysis, LAWA should consider the benefits of moving the runways south, and how that would improve the deficient (but legal) taxiways near the terminal gates.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00130-842

Comment:

When analysis is performed on the north and south runway complexes, we want the assumptions for operational efficiency and safety impacts of the Runway Status Lights to include both the proposed Pilot Program, which is promised to be installed in 2009, and a complete system which includes the other runways and taxiway intersections which have not been included.

Response:

As indicated on page 4-502 of the SPAS Draft EIR, the FAA and LAWA are deploying Runway Status Lights (RWSL) technology at LAX, with a Prototype Program (Phase 1) installed and operating since June 2009. The FAA is scheduled to enter construction on Phase 2 of the implementation of RWSL in 2013. As the RWSL system, in general, is still in the testing phases, actual (i.e., real world) operational efficiency and safety impacts of the system have not been published at this time.

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00130-843

Comment:

In addition to the alternatives already under consideration, ARSAC requests that an additional alternative, moving runway 24L 340 feet to the south with the revised terminal configuration described in the attachment to this letter, be analyzed as part of this EIR. This alternative reduces the impacts on Westchester and Playa del Rey, while improving airport efficiency.

Response:

Please see Response to Comment SPAS-PC00130-814 regarding LAWA's review of the ARSAC alternative concept.

SPAS-PC00130-844

Comment:

Besides analyzing alternative runway configurations and diverting flights to other airports, the EIR must consider and provide a quantification of all airfield operational scenarios in evaluating the alternatives-westerly operations, easterly operations and over-ocean operations. The noise, pollution and safety impacts on the surrounding communities differ depending upon the operational state. For example, during easterly operations, aircraft taking off on the north runway complex have cut across parts of Westchester such as Westport Heights that are normally not over flown by aircraft at very low altitudes.

Response:

The SPAS Draft EIR analyzes the impacts of the alternatives on, among other things, hazards and hazardous materials (Section 4.7), air quality (Section 4.2), noise (Section 4.10), and safety (Section 4.7.2). In each of the resource-area subsections, the EIR discusses the baseline conditions affecting the surrounding environment and analyzes whether a given alternative would result in any significant environmental impacts.

For a detailed discussion of the potential resource impacts on surrounding communities, please review the specific subsection relating to that resource-area. Please also see Appendix F-2 of the Preliminary LAX SPAS Report for the quantification of impacts for all airfield operational scenarios.

SPAS-PC00130-845

Comment:

The February 2006 Stipulated Settlement specified in SECTION V. LAX SPECIFIC PLAN AMENDMENT STUDY PROCESS, Item C states a goal of "...minimizing environmental impacts on the surrounding communities, and creating conditions that encourage airlines to go to other airports in the region, particularly those owned and operated by LAWA." In particular we want detailed analysis of the north runway complex impacts to show that they are less than that of the current condition of no runway change or in the worst case, Alternative D that was previously approved.

Response:

Minimizing environmental impacts on surrounding communities, and creating conditions that encourage airlines to go to other airports in the region are some of the goals set forth in Section V(C) of the Stipulated Settlement. This provision also requires the SPAS to identify Specific Plan amendments that plan for the modernization and improvement of LAX in a manner that is designed for a practical capacity of 78.9 million annual passengers while enhancing safety and security.

Alternative 4 represents a scenario whereby the north airfield essentially remains in its current condition, with no improvements other than the federally-mandated runway safety area improvement at the east end of Runway 6R/24L, which does not affect normal daily operations. Alternative 3 reflects the north airfield improvements proposed under LAX Master Plan Alternative D. The impacts of each of these two alternatives can be reviewed and compared to the impacts of each of the other SPAS alternatives, as well as to each other, with the information presented throughout the SPAS Draft EIR.

SPAS-PC00130-846

Comment:

When any of the alternatives are examined for impacts, a key element that must be assessed is the quality of life. Will a runway protection zone require the removal of homes and businesses? The analysis should include all cost factors of eminent domain and loss of values for the surrounding communities that might lose their community serving businesses.

Response:

Regarding impacts on quality of life, eminent domain costs, and impacts on community values, CEQA does not require purely social or economic impacts to be analyzed in an EIR. (State CEQA Guidelines Section 15064(e).) As required by CEQA, the SPAS Draft EIR evaluates physical impacts on the environment associated with over 20 topical issues and how such impacts have the potential to affect residents in surrounding communities.

Regarding RPZs and the potential for acquisition of homes and businesses, please see Response to Comment SPAS-AL00007-26. It is not proposed or certain that acquisition would occur due to changes in RPZs. As discussed in Section 4.7.2.6.1 of the SPAS Draft EIR, there are various potential options for dealing with incompatible structures or land uses within an RPZ including: (1) doing nothing (i.e., for low-risk objects); (2) placing high-visibility markings and lighting on the object to make it highly visible to pilots and indicating such objects on avigation maps; (3) lowering, reducing, or removing the object, and; (4) modifying an approach or departure procedure to allow aircraft to safely navigate around or above an object that penetrates a Part 77 surface. Information on specific options to address safety risks would be developed during project-specific CEQA review should an alternative calling for shifting Runway 6L/24R northward be selected. It is appropriate for a first-tier program level EIR to defer detailed descriptions and impact analysis of individual projects in the program to future project-level CEQA documents. (State CEQA Guidelines Section 15383; Koster v. County of San Joaquin (1996) 47 Cal.App.4th 29, 37.) The most appropriate option(s) would be determined in conjunction with detailed airfield improvement engineering and would be subject to FAA review and concurrence prior to FAA approval of an ALP amendment for such an airfield modification.

SPAS-PC00130-847

Comment:

In terms of ground traffic analysis, petitioners are allowed to add up to15 additional intersections for review, and these intersections may require additional mitigation in several communities. Regardless, the Settlement does not limit the intersections and highways that must be mitigated to accommodate LAX projects.

Response:

The comment, which was originally submitted on the Notice of Preparation for the SPAS Draft EIR, states that the Stipulated Settlement allows petitioners to add up to 15 additional intersections for review and does not limit the locations that must be mitigated to accommodate LAX projects. Section V.G of the Stipulated Settlement also provides that LAWA will propose feasible mitigation measures, if any, to mitigate any potentially significant impact. The LAX Master Plan EIR traffic analysis assessed project impacts at 164 study intersections. Since that analysis was completed the petitioners were provided an opportunity to add study locations and did so. The SPAS Draft EIR off-airport transportation analysis (Section 4.1.2) assessed potential traffic impacts at 200 study intersections and 30 CMP freeway monitoring stations; the analysis includes the additional study locations requested by petitioners. The SPAS Draft EIR also identifies mitigation measures.

SPAS-PC00130-848

Comment:

2. Consideration of Additional Alternatives.

The NOP provides the opportunity for the submittal of additional reasonable alternatives to be studied within the EIR. ARSAC submits two additional proposals to be included in the EIR and the North Runway Complex Safety Study. ARSAC has generated these proposals to increase the range of alternatives that may be considered. The narratives of both proposals are included as attachments. A short summary is below. ARSAC feels that it imperative that no alternative be selected as a preferred alternative until after the North Runway Safety Studies and analysis have been completed and examined. Furthermore, ARSAC requests data from the South Airfield Improvement Program to determine the effectiveness of those improvements, such as the centerline taxiway, in reducing incursions.

Response:

The SPAS Draft EIR includes a full range of airfield improvement alternatives, proposing seven different options that range from moving Runway 6L/24R 350 feet north, to moving Runway 6R/24L 340 feet south, to not moving either runway but making taxiway improvements, to not making any notable airfield improvements other than federally mandated safety improvements, and other options. As further described below and also addressed in Responses to Comments SPAS-PC00130-849 and SPAS-PC00130-850, the major elements in the additional proposals offered by ARSAC are either not feasible, do not respond to the project objectives, have environmental impacts that are similar to or worse than the alternatives addressed in the SPAS Draft EIR, and/or are already reflected in the range of alternatives addressed in the SPAS Draft EIR.

The comment does not indicate any environmental advantages of a three-runway configuration relative to the alternatives evaluated in the SPAS Draft EIR. The three-runway configuration studied in the North Airfield Safety Study is described and evaluated in Section 2.3.2.3 of the SPAS Draft EIR. This section presents several operational problems associated with this alternative and indicates that it would likely result in environmental impacts comparable or greater to the alternatives evaluated in detail in the SPAS Draft EIR. Therefore, this alternative was not evaluated in detail in the SPAS Draft EIR.

The South Airfield Improvement Program, which included the development of a centerfield taxiway, was completed in June 2008. As indicated in Table 4.7.2-7 on page 4-510 of the SPAS Draft EIR, there have been no serious runway incursions (i.e., Category A or Category B) on the south airfield since that time.

SPAS-PC00130-849

Comment:

b. 340 feet south / Airline Alliance Plan.

This plan, presented to LAWA Executive Director Gina Marie Lindsey on May 7, 2008, is similar to Alternative D except that in place of replacing Terminals 1, 2 and 3 with a concourse for widebody aircraft, Low Cost Carrier terminals would be constructed. Airlines that have airline alliances would be

relocated to terminals with their domestic airline partners, or to the Tom Bradley International Terminal for most foreign airlines. The Central Terminal Area (CTA) parking garages would not be torn down in this plan. The Consolidated Rent-A-Car (RAC) facility would be located in Manchester Square and connected to the CTA by an Automated People Mover. An elevated roadway would connect the 405 freeway to the RAC and CTA.

Response:

Please see Response to Comment SPAS-PC00130-814 regarding LAWA's review of the ARSAC alternative concept.

SPAS-PC00130-850

Comment:

3. The Need for Development of a Regional Plan.

ARSAC continues to believe in a regional solution to airport congestion. The Stipulated Settlement provided that "The first regional strategic planning initiative will be prepared by December 31, 2006." Unfortunately, this commitment was not kept. Not only was the Plan only recently submitted to the County of Los Angeles, but it has now been withdrawn. ARSAC is disturbed by LAWA's failure to aggressively pursue development of a Regional Strategic Plan, and asks that members of the SPAC have an opportunity to comment upon the draft plan prior to the time it is finalized and adopted by the Board of Airport Commissioners, and that this effort be treated as a high priority by LAWA.

Regardless of what is done with the Regional Strategic Plan, LAWA should examine in the DEIR the increased utilization of LAWA controlled airports at LA/Ontario International (ONT) and LA/Palmdale Regional Airport (PMD), as opposed to expanding LAX. There is precedent for this kind of study. During the late 1990's, in the LAX Terminal 4 EIR to modernize the American Airlines terminal, a cursory examination was made of shifting some flights to ONT and/or PMD. The failure of the Terminal 4 EIR was that it did not fully examine all of the environmental effects through increased utilization of ONT and PMD, versus LAX. ONT and PMD are large investments for LAWA and they both have the potential for greater economic, operational and environmental value if properly marketed. For example, the "Fly Ontario" marketing campaign did increase the public's awareness of ONT and several new flights were added to ONT, with the notable addition of ExpressJet's west coast hub.

The EIR should analyze all of the environmental benefits to the area surrounding LAX that would occur if some international flights were shifted to ONT. ONT currently has staffed Federal Inspection Facilities (FIS- Immigration, Customs, Agriculture). Additionally, LAWA should analyze the benefits of shifting some cargo flights from LAX to ONT.

LAWA should also consider the impacts of benefits of shifting some domestic flights to PMD, as was identified in the 2001 TriStar Marketing report on PMD and subsequent destination studies. LAWA should also discuss the LAWA/US Air Force Plant 42 Joint Use Agreement (JUA) for PMD, and how the JUA could be revised to accommodate more flights, allow for development of the LAWA owned property, and remove the domestic flight restriction to allow for international traffic at PMD.

LAWA should discuss how a "multi-airport discount rate" system could encourage the shift of flights or the addition of new flights to ONT and PMD. The "Multi-Airport Discount Rate" would give airlines that operate at LAX, ONT and PMD more favorable landing fees and terminal rents than operating solely at LAX. Airlines that operate solely at ONT and/or PMD would get even better rates for not operating to LAX. The "multi-airport discount rate" plan should be available to international carriers, as well as domestic carriers. For international flights, there would have to be parity between those international flights operated by domestic and foreign airlines.

LAWA should examine changing the financing model at LAX (residual vs. compensatory) to allow for cross-subsidization of ONT and PMD to support the "multi-airport discount rate" system.

European and Asian airlines have expressed interest in operating out of ONT. Please discuss how new, smaller, highly efficient widebody aircraft such as the Boeing 787 Dreamliner and the Airbus A350XWB can help make ONT more viable for international flights, while lessening the impact on the environment.

Many foreign airlines have ordered these aircraft. Continental and Northwest are the only U.S. airline customers for the Boeing 787, while US Airways and Hawaiian Airlines are the only U.S. airlines to order the Airbus A350 XWB. Domestic airlines are adding international routes to meet demand for more non-stop services between new cities, and to feed their domestic networks. Also, please discuss how new multi-lateral and bi-lateral agreements, such as the United States-European Union Open Skies Agreement and the new US-Australia Bilateral Air Services Agreement, can provide ONT with more opportunities for international air service development. Discuss LAWA's past, current and future efforts to attract more air service to ONT and PMD.

Finally, LAWA needs to address the issue of Orange County residents using LAX for their air travel needs. It has been estimated that one-third of the passenger traffic through LAX is destined for Orange County, and that LAX handles 90% of Orange County's air cargo. LAWA should discuss the possibility of working with the Walt Disney Company to rename LA/Ontario International Airport to Walt Disney International Airport and then re-package the airport as the gateway airport to the Disneyland Resort, and the primary international gateway airport for the Orange County and Inland Empire regions. In your analysis, please assume that the Right of Way can be obtained for a monorail or high-speed rail between ONT and the Disneyland Resort and/or the Anaheim Transportation Center. This way, ONT will be provided with the necessary critical mass for ground transportation. The rail line could be operated by LAWA, Disney, or in cooperation with the California-Nevada Super Speed Rail Commission.

Response:

Comments regarding LAWA's compliance with the Stipulated Settlement require legal conclusions that are beyond the scope of what is required by CEQA.

Please refer to Topical Response TR-SPAS-REG-1 regarding the fact that LAWA, through the LAX Master Plan, the SPAS process, and other efforts, supports the regionalization of air travel demand in Southern California. As indicated therein, the potential LAX Specific Plan amendment to Section 7.H further supports such regionalization. The subject Topical Response also discusses efforts to shift LAX aviation activity to LA/Ontario International Airport (ONT) and Palmdale Regional Airport (PMD). The commentor's suggestions regarding ways to shift aviation activity from LAX to other airports are noted and are hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration.

The comment presents no facts or evidence showing that greater service at other airports would mitigate significant adverse impacts of the SPAS alternatives. As described in Section 6.2 of the SPAS Draft EIR, shifting LAX aviation activity to other airports could cause significant adverse impacts at those airports.

As it relates to the suggestion that LAWA should consider a "multi-airport discount rate," it is assumed the commentor is suggesting that LAWA provide discounted fees at LAX for air carriers that also offer service at ONT or PMD. Under federal regulation, an airport sponsor is required to set rates, fees, rentals, and other charges without unjust discrimination (49 U.S.C. Sec. 47107). This requirement has been interpreted to mean that an airport sponsor must charge substantially comparable rates, fees, rentals, and other charges to airlines for a similar use of their facilities. Providing discounted rates for certain carriers because they offer service at another LAWA airport could be viewed by the FAA as discriminatory, in that it offers preferential treatment for some "local benefit", similar to providing preferential treatment for carriers that also lease additional maintenance or storage space from an airport sponsor, an action prohibited by the FAA. For these reasons, LAWA will not consider "multi-airport discount rate" in connection with the SPAS process.

As to the comment about the Residual Financial model currently being used at ONT, this comment does not relate to the SPAS process, but it is noted and will be forwarded to decision-makers for consideration apart from SPAS. Changes to the Residual Financial model currently being used at ONT could not be imposed unilaterally by LAWA. A change in the financial model currently implemented by LAWA is subject to negotiation with the air carriers who have service at ONT.

The commentor suggests that certain new and future aircraft, such as the Boeing 787 and the Airbus A350XWB, could serve ONT from distant international locations without incurring the business costs

associated with flying that route with older, wide-body aircraft. This observation has no bearing on SPAS, since increased service at ONT by these aircraft would not supplant the need to accommodate the large, wide-body ADG V and VI aircraft at LAX. The future fleet mix at LAX used in SPAS, detailed in Appendix F-1 of the Preliminary LAX SPAS Report, was developed by experts in the field of aviation forecasting, and reflects that, inclusive of expected changes in aircraft and international flight patterns, the projected 2025 future fleet mix at LAX will contain a significant number of ADG V and VI daily flights at LAX.

Please see Response to Comment SPAS-PC00130-313 regarding Open Skies and Bilateral Agreements.

As it relates to the marketing and renaming of ONT by LAWA, the marketing of ONT is a matter taken seriously by LAWA, and will continue to be developed independent of any decisions on SPAS. LAWA has initiated conversations with the air carriers serving ONT to expand marketing efforts, as documented in the August 2, 2012 letter to Herman J. Hettinger, III.1,2 In addition, Chapter 7 of the Preliminary LAX SPAS Report contains a potential amendment to the LAX Specific Plan that would trigger a new market survey of regional air passengers when LAX reaches 75 MAP that could better inform future marketing efforts for other regional airports, including ONT.

The commentor also suggests that LAWA consider the possibility of a high-speed rail station at ONT connecting to the proposed Anaheim Regional Transportation Intermodal Center (ARTIC), and potentially serving the Inland Empire and Las Vegas. While such a project has been proposed in the past, funding is not identified for the project in the SCAG 2012 Regional Transportation Plan (RTP), which has a horizon year of 2035, beyond the planning horizon of SPAS. The project has also not undergone environmental review, which would likely be required under CEQA and NEPA (if any federal funds were to be used for the project). As a result, the feasibility of the project is speculative, and CEQA does not require analysis of speculative alternatives or impacts. Furthermore, as mentioned above, the SPAS forecast used in the development of this EIR was developed by experts in the field of aviation forecasting, and is inclusive of changes in aviation demand at LAX through 2025.

1. Romo, Jess L., Airport Manager, LA/Ontario International Airport, Los Angeles World Airports, Letter to Herman J. Hettinger, III, Airport Property Manager, United Parcel Services, Re: ONT Initiatives, August 2, 2012.
2. Hettinger, Trey, UPS Properties, Letter to Jess Romo, Airport Manager, LA/Ontario International Airport, Re: ONT AAAC Response to Proposed ONT Initiatives, September 10, 2012.

SPAS-PC00130-851

Comment:

E. Enhancing Airport Security.

Security is another matter that needs to be carefully examined in the EIR. RAND performed two security studies on the LAX Master Plan. The first was done at the request of Congresswoman Jane Harman. The second study was commissioned by the Board of Airport Commissioners (BOAC). To date, the public is unaware of how, if at all, LAWA is implementing the RAND recommendations. Please discuss what, if any, follow up with RAND has been occurred, and the status of implementation of its recommendations.

Response:

Security is not an environmental impact and is, therefore, not required to be discussed in the SPAS Draft EIR under CEQA or any other law. However, a security assessment of the SPAS alternatives is included in Appendix I of the Preliminary LAX SPAS Report to comply with the Stipulated Settlement and Section 7.G(2) of the LAX Specific Plan.

Please see Responses to Comments SPAS-PC00130-424 and SPAS-PC00130-495 above regarding implementation of recommendations in the RAND Corporation's security studies of LAX. In addition to implementing several of the recommendations made by the RAND Corporation, LAWA has implemented numerous recommendations provided by other security experts and agencies including

the Transportation Security Administration, Federal Bureau of Investigation, Department of Homeland Security Office of Critical Infrastructure Protection, international experts, and others. The details regarding the security measures considered and implemented is considered Sensitive Security Information under federal law and is therefore not subject to disclosure.

No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00130-852

Comment:

F. Processing of the EIR.

Although the NOP has been released, ARSAC believes the NASA study should be completed and evaluations conducted by the selected members of the academic community have been published before the Draft EIR is released so that the studies will inform the selection of a preferred alternative. This would also allow LAWA to first have experience with operations at the South Runways before selecting a preferred alternative.

Response:

This comment pertains to the 2008 NOP for the SPAS Draft EIR, which was issued prior to initiation of the North Airfield Safety Study (NASS) conducted by NASA Ames. LAWA, in essence, temporarily suspended preparation of the SPAS Draft EIR while the NASS was being completed, resuming in 2010 with issuance of the Revised NOP. The results of the NASS are summarized in Section 4.7.2 of the SPAS Draft EIR.

SPAS-PC00130-853

Comment:

When the Draft EIR is released, ARSAC requests that it, and all related documents, be provided electronically in searchable format, as well as in hard copies.

Response:

The electronic versions of the SPAS Draft EIR and the Preliminary LAX SPAS Report were provided via disk and on www.laxspas.org. The documents provided were searchable files. A limited number of hard copies of these documents were distributed; ARSAC was among those receiving hard copies of both documents. Hard copies were also made available at six area libraries.

SPAS-PC00130-854

Comment:

To the extent that the new EIR relies upon the 2004 LAX Master Plan Environmental Impact Report, that EIR contained many conflicting comments within its 17,000 pages, and numerous deficiencies that were identified by ARSAC and other petitioners in the lawsuit that resulted the Stipulated Settlement of 2006. To assure greater clarity, and avoid some of the problems that occurred in the past, whenever any of the prior documentation is referenced in the upcoming EIR, we request that specific paragraphs and page number references be included for documents referenced in the DEIR. We also strongly request that the EIR and all supporting documents be provided in a format that is searchable electronically.

Response:

Please see Response to Comment SPAS-PC00130-14 regarding incorporation by reference of information from the LAX Master Plan Final EIR. The electronic versions of the SPAS Draft EIR and the Preliminary LAX SPAS Report provided via disk and on www.laxspas.org are searchable files.

SPAS-PC00130-855

Comment:

Finally, so that the best possible public review and participation will occur, we also ask that the Draft EIR circulation time be increased from 45 to 120 days. Forty-five days for review of an extremely complex and technical document is simply inadequate.

Response:

The commentor's request for an extended public comment period for the SPAS Draft EIR is noted. Please see Response to Comment SPAS-AL00007-59 regarding the length of the public review period for the SPAS Draft EIR.

SPAS-PC00130-856

Comment:

Attachment to ARSAC Comments to SPAC
Environmental Review: Table of NOP Comments:

NOP paragraph
NOP pg ref
Comment
1.0 Project Location
2
Figure 2 does not distinguish the elements of the SAIP. The date of origin of this photo should be identified.

Response:

The comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)). Figure 2 of the 2008 SPAS NOP is based on an aerial photograph taken on July 30, 2007. The SAIP is under construction in the photograph.

SPAS-PC00130-857

Comment:

2.0 Project Background
2
In the City Council hearings 07-0541-S1 8-30-2007 a Specific Plan Amendment to remove the west satellite concourse from the projects requiring maximum scrutiny was approved. The "Midfield Terminal" discussed during these hearings was equated to the "west satellite concourse." Does the approval of this amendment authorize use of only project level EIRs for the Midfield Terminal including the concourse, additional gates on the back of TBIT, and associated taxiways and taxilanes?

Response:

The Midfield Satellite Concourse ("MSC"), referred to as the "West Satellite Concourse" in the LAX Master Plan, was a component of Alternative D and was addressed in the program-level LAX Master Plan EIR. The MSC, including the concourse and gates, associated taxiways, and passenger processing facilities, will be subject to a project-level EIR when the project is proposed for implementation. It should be noted that the additional gates on the west side of TBIT were approved as part of the Bradley West Project, and are currently under construction.

SPAS-PC00130-858

Comment:

3.0 Project Description
4
Clarification: The gate limitation is not 153, but no more than 153 per Section IV C of the Stipulated Settlement.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00130-859

Comment:

SPAS Options
5
What are the northside runway complex airfield restrictions that were resolved by Alternative D? If the north runway complex is not reconfigured, what will be the operational restrictions on NLAs? Which restrictions can be mitigated by changing the locations of taxiways and runway intersections or gate locations rather than moving runways?

Response:

Alternative 3 represents what would reasonably be expected to occur in the foreseeable future if all of the LAX Master Plan ("Alternative D") improvements were implemented as originally envisioned. (See Section 2.3.1.3 of the SPAS Draft EIR.) Section 4.7.2, in particular Table 4.7.2-8, of the SPAS Draft EIR provides detailed information regarding operational restrictions and limitations for New Large Aircraft (NLA) on the existing airfield and under each of the SPAS alternatives.

The alternatives analyzed represent a reasonable range of alternatives designed to address the project objectives, including, among others, providing north airfield improvements that support the safe and efficient movement of aircraft at LAX. For example, Alternative 2 does not propose any runway relocation. Please see the discussion of Alternative 2 for information about what restrictions can be alleviated by development other than runway relocation.

SPAS-PC00130-860

Comment:

340' option, Alt D
5
With the extension of runway 24L 1000' to the east, this 340' S option says takeoffs would be closer to the community all the way back to Sepulveda. What specific sections and paragraphs in the 2004 EIR provided impact analysis? How many flights would be taking off from this newly located east end of the runway? What noise and pollution studies were included in the 2004 EIR in the assessment? What will be the impacts in easterly operations or in over-ocean operations?

Response:

The SPAS Draft EIR provides a comprehensive analysis of impacts specific to each of the nine alternatives considered therein. The SPAS Draft EIR analysis is based on a current baseline from which to measure impacts and evaluates impacts based on the characteristics of each alternative. Although the improvements associated with SPAS Alternative 3 are essentially the same as those

proposed under the LAX Master Plan Alternative D, the analysis of SPAS Alternative 3 is not based on the LAX Master Plan Final EIR's analysis of Alternative D.

Please see Section 1.4.5 in Appendix F-2 of the Preliminary LAX SPAS Report for runway use levels.

The impacts of easterly operations for items such as air quality, noise, etc., are discussed in Chapter 4 of the SPAS Draft EIR.

SPAS-PC00130-861

Comment:

Move 24L 100' South
6
LAWA should identify what relocations and runway extensions they plan to study. Are these decisions being made on the basis of simulations underway with the NASA study? How will the alternatives for this be evaluated and compared for environmental impacts? Will location selections of taxiways be done to improve operational efficiency of NLA? What specific criteria are being used to evaluate the improvements? What will be the impacts in eastern operations or over ocean operations?

Response:

Please see Section 2.3.1 of the SPAS Draft EIR and associated figures regarding the various airfield alternatives being studied under the SPAS effort. Chapter 4 of the SPAS Draft EIR identifies the various environmental impacts related to the SPAS alternatives.

Taxiway improvements incorporated into the various alternatives have been developed to improve operational efficiencies for New Large Aircraft (NLA). As provided in Section 2.2 of the SPAS Draft EIR, an objective of the project is to provide north airfield improvements that support the safe and efficient movement of aircraft at LAX. The alternatives analyzed represents a reasonable range, and include alternatives that relocate runways, propose a centerline taxiway, and relocate and reconstruct taxilanes. Please see Section 2.3.1 of the SPAS Draft EIR for a discussion of the taxiway developments associated with each alternative and Appendix F-2 of the Preliminary LAX SPAS Report for an analysis of the efficiency of each alternative.

Please see Appendix F-2 of the Preliminary LAX SPAS Report which identifies the operational impacts of all operation scenarios including eastern operations or over ocean operations. As identified above, the environmental impacts from all the operational scenarios are included in Chapter 4 of the SPAS Draft EIR.

The thresholds of significance used to evaluate the impacts of each alternative are listed and discussed in each resource areas section. (See Chapter 4 of the SPAS Draft EIR.) Additional aspects of each alternative are discussed throughout the various sections of the EIR.

LAWA is considering a number of factors in identifying and evaluating alternatives to the north airfield improvements called for in the LAX Master Plan. Please see page 2-2 of the SPAS Draft EIR for an list of those attributes that will be used to evaluate the alternatives ability to comply with the objective to provide improvements that support the safe and efficient movement of aircraft.

SPAS-PC00130-862

Comment:

Keep existing locations
6
This option was supposed to include an as yet unidentified taxiway and intersection modifications to improve aircraft movement. When this alternative is evaluated for safety and operational effectiveness, what assumptions will be made about the gate locations? What about taxiway and intersection locations? What will be the impacts in eastern operations or over ocean operations?

Response:

The projected gate positions for Alternatives 2 and 4, which keep Runway 6L/24R and 6R/24L in their existing locations, are depicted in Figures 14 and 28 of Appendix F-2 of the Preliminary LAX SPAS Report.

Additionally, the airfield layout used for modeling can also be found in Appendix F-2 of the Preliminary LAX SPAS Report. Alternative 2 is depicted in Figures 20 and 21. Alternative 4 is depicted in Figures 29 through 33.

These are the configurations that were assumed in Section 4.7.2 of the SPAS Draft EIR, which addresses the safety impacts of the SPAS alternatives. For further information regarding the airport operating configurations analyzed as part of the SPAS Draft EIR, please refer to Response to Comment SPAS-PC00130-832.

SPAS-PC00130-863

Comment:

Move 24R 100' North
6
This 100' N says takeoffs would be closer to the community all the way back to Sepulveda. How many flights would be taking off from this location? Where is the noise and pollution study to justify this? This appears to be one of the deficiencies of the original EIR. What would be the impacts on eastern operations or over ocean operations? This 100' N alternative should include two sub-options: extension of 24R west and no further extension that are both evaluated.

Response:

The future runway use percentages for the SPAS alternative scenarios are presented under each of the alternative sections in Appendix J1-1 of the SPAS Draft EIR. For Alternative 6, which would relocate Runway 6L/24R 100 feet northward, approximately 0.7 percent of the daily departures would take-off from that runway in 2025. Based on the average annual day (AAD) estimates for 2025 conditions, there would be 1,937 daily operations at LAX in 2025, half of which would be departures, which would equate to approximately 8 take-offs per day on Runway 6L/24R.

The SIMMOD data presented in Appendix J1-1 of the SPAS Draft EIR was used for the aircraft noise modeling and aircraft air pollution estimates in the analyses of noise and air quality impacts under each alternative, including Alternative 6. The results of those analyses are presented in Sections 4.10.1 and 4.2, respectively, of the SPAS Draft EIR. The SIMMOD data accounts for eastern operations and over-ocean operations, as described in Appendix J1-1.

The design of Alternative 6 assumes no westerly extension of Runway 6L/24R and it is not necessary to carry a sub-option that assumes a westerly extension. Other alternatives, such as Alternatives 1 and 5, include a westerly extension of the runway, and are sufficient to provide a general basis of comparison for decision-making at the program level of planning. The SPAS alternatives constitute a reasonable range of alternatives, sufficient to allow informed decision-making. (State CEQA Guidelines Section 15126.6(a); City of Maywood v. Los Angeles Unified School District (2012) 208 Cal.App.4th 362, 419.) The SPAS Draft EIR includes sufficient information about each alternative to allow meaningful evaluation, analysis and comparison with the proposed project. (State CEQA Guidelines Section 15126.6(a)). The commentor does not provide any evidence that the proposed "sub-options" offer any substantial environmental advantages and, therefore, no further analysis is required. (City of Maywood v. Los Angeles Unified School District (2012) 208 Cal.App.4th 362, 419.)

SPAS-PC00130-864

Comment:

Move 24R 100' North
7
If terminal demolition of 1,2, 3 is "yellow-lighted," why doesn't LAWA consider the associated taxiways or other CTA activity related to this issue "yellow-lighted" instead of presuming only a project EIR is

required? If changes are to be made, what are they to be and how would it affect the CTA traffic (and any environmental issues related thereto)?

Response:

Section 7.H of the LAX Specific Plan, as amended in 2007 by Ordinance No. 179,148, identifies five specific projects that were later termed "Yellow Light Projects." It is unclear what the commentor means by "why doesn't LAWA consider the associated taxiways or other CTA activity related to this issue "yellow-lighted" instead of presuming only a project EIR is required?" The Yellow-Light Projects are well-defined throughout the Preliminary LAX SPAS Report and SPAS Draft EIR, and the alternatives are designed to address the problems that these projects were intended to solve. The definition of "Yellow Light Projects" in the Stipulated Settlement also identifies the same five projects identified in the LAX Specific Plan. Improvements to taxiways or other CTA activity are not identified in the LAX Specific Plan, as amended, or in the Stipulated Settlement as Yellow Light Projects and there is no reason that LAWA should consider these projects to be Yellow Light Projects. Changes associated with the relocation of Runway 6L/24R 100 feet to the north (i.e., SPAS Alternative 6) are identified in Section 2.3.1.6 of the SPAS Draft EIR. Environmental impacts of this alternative are addressed throughout Chapter 4 of the SPAS Draft EIR, and are summarized in Chapter 1. In particular, effects on CTA traffic are addressed in Section 4.12.1 of the SPAS Draft EIR.

SPAS-PC00130-865

Comment:

Move 24R 340' North
7
Calls for extending 24L. To where will the vehicle holding area be relocated? Has this been included in the environmental reviews including traffic study?

Response:

Please see Response to Comment SPAS-PC00130-802 regarding relocation of the existing commercial vehicle hold lots.

SPAS-PC00130-866

Comment:

Move 24R 340' North
7
This option calls for modifications to taxiways. LAWA should identify what relocations and extensions they plan to study. Will the selection of locations and extensions be made on the basis of simulations underway as part of the NASA study? How would the various alternative taxiway locations be evaluated and analyzed for relative environmental impacts? Will location selections of taxiways be based upon improving operational efficiency of NLA? What specific criteria will be used to evaluate the improvements?

Response:

The types of issues and questions raised in this comment are similar in nature to those posed in comment SPAS-PC00130-861. Please see Response to Comment SPAS-PC00130-861 for citations to the SPAS Draft EIR where those types of issues and questions are addressed.

SPAS-PC00130-867

Comment:

3.1.2 CTA Demolition
7
The NOP states: "Under the LAX Specific Plan and Stipulated Settlement, only the Demolition of Terminals 1-3 is a Yellow-Light Project. If the terminal demolition is yellow-lighted, why aren't the taxiways or other CTA activity related to CTA demolition also treated as yellow-light per the Stipulated

Settlement? If changes are to be made, what are they and how will it affect the CTA traffic (and any environmental issues related thereto)?

Response:

The content of this comment is similar to comment SPAS-PC00130-864; please refer to Response to Comment SPAS-PC00130-864.

SPAS-PC00130-868

Comment:

3.1.3 Ground Transportation Center; Problem to be addressed
8
LAWA has stated that they want to improve CTA traffic flows and in the surrounding community, but has never provided a quantified measure of levels of traffic that are needed to be accommodated in various locations. For instance, how many cars (per hour and at peak periods) much be accommodated along the curbsides within the CTA?
What were the levels of adverse impacts that were to be mitigated by the GTC that was eliminated by the Stipulated Settlement? The aggregate numbers are important so that replacement concepts can be measured and judged against a consistent yardstick. Is it 1000 cars per day and 50 cars during peak hours in the CTA or is it 100 times that?

Response:

The estimated number of vehicles which entered the CTA, traveled on each roadway link and parked at each curbside during the Baseline (2009) Departures and Arrival peak hours are provided in Section 4.12.1.3.13, Tables 4.12.1-8 on page 4-1077 and 4.12.1-12 on page 4-1084. Similarly, the number of vehicles estimated to enter the CTA, travel on each roadway link and park at each curbside during the Future (2025) Departures and Arrival peak hours for Alternatives 1, 2, 4, 8, and 9 are presented in Section 4.12.1.8, Tables 4.12.1-16 on page 4-1107 through 4.12.1-21 on page 4-1117.

Consistent with the terms of the Stipulated Settlement, the Specific Plan Amendment Study (SPAS) evaluates potential alternative designs, technologies, and configurations for the LAX Master Plan Program that would provide solutions to the problems that the "Yellow Light Projects" were designed to address. The GTC is one of the Yellow Light Projects, and as such, is part Alternative 3. Alternative 3 represents implementation of the improvements contemplated in the approved LAX Master Plan. As discussed on page 4-1043 in Section 4.12.1.1, the SPAS Draft EIR does not include an on-airport quantitative analysis of Alternative 3 and comparison with the other proposed alternatives since Alternative 3 proposes to limit CTA traffic to scheduled bus service and authorized vehicles only, while also eliminating private vehicle trips in the CTA. Under these conditions, Alternative 3 is expected to result in improved on-airport transportation conditions in comparison to baseline (2009) conditions; therefore no further on-airport traffic analysis was warranted.

SPAS-PC00130-869

Comment:

How will traffic be segregated and how will any proposed mitigations address the traffic impacts in the CTA as well as in the surrounding community? What alternatives been identified such as van and bus drop offs and pickups in the parking structures or another location? What plans exist for a people mover to accommodate passengers dropped off outside the CTA in an area local to LAX for people to get into the CTA? Please provide detail information about the way in which cars currently enter and leave the terminal areas. Ensure that the directional information is broken down by hours and volume from each of the directions entering the CTA (Sepulveda N, Sepulveda S, 98th street bridge, and Century Boulevard.

Response:

The SPAS Draft EIR is a programmatic document, and therefore specific design details, including traffic segregation in the CTA, are not known or analyzed. There are currently no plans to change the way

traffic is segregated in the CTA (i.e., arrivals and departures), but if any project-level changes are proposed, those changes would be subject to further environmental review.

Please see Section 4.12.1.10.2 of the SPAS Draft EIR for a discussion of the mitigation measures and the effects the mitigation measures would have on on-airport (i.e., CTA) traffic. Similarly, please see Section 4.12.2.7.2 of the SPAS Draft EIR for a discussion of the recommended off-airport traffic mitigation program, the specific mitigation measures, and the effect of implementing the mitigation measures.

As defined and depicted in Chapter 2, Alternatives 1, 2, 3, 8, and 9 each provide facilities which allow specific commercial and public transportation modes and private vehicles to pick up and drop off passengers outside of the CTA. As described in Topical Response TR-SPAS-T-1, Alternatives 1, 2, 8, and 9 would all include ground access facilities at Century and Aviation Boulevards in Manchester Square, as well as a new Intermodal Transportation Facility (ITF) between 96th and 98th Streets, and between approximately Vicksburg Avenue and Airport Boulevard. Under Alternatives 1 and 2, parking would be provided in Manchester Square. Under Alternatives 8 and 9, Manchester Square would be developed with a Consolidated Rent-A-Car (CONRAC) facility as well as parking. The passenger conveyance system proposed in Alternatives 1, 2, and 8 would employ a busing operation on a dedicated, elevated busway to transport passengers between these facilities and the CTA. Within the CTA, the buses would travel in mixed flow traffic.

Under Alternative 9, an Automated People Mover (APM) would be used instead of a busway. Alternative 3 includes a Ground Transportation Center (GTC) in Manchester Square, an Intermodal Transportation Center (ITC) in the area known as Continental City at Aviation Boulevard and Imperial Highway, and a CONRAC in the Lot C area. Alternative 3 includes two separate APM systems: one APM would convey passengers between the ITC, CONRAC, and CTA, while a second APM would transport passengers between the GTC and the CTA. Under Alternative 3 as originally planned as part of the LAX Master Plan (i.e., Alternative D), an elevated pedestrian bridge would link the ITC to the Metro Green Line Aviation/LAX station, which at the time was the closest existing or planned transit station to LAX. With the now-planned transit station at Century and Aviation Boulevards, Alternative 3 would also provide connectivity with the new transit station as well.

Please see Section 4.12.1.3 of the SPAS Draft EIR for a discussion of the on-airport conditions and facilities that existed at the time of the NOP. The volume of traffic entering the CTA during the departures and arrivals level peak hours is presented in Tables 4.12.1-4 and 4.12.1-8 in Section 4.12.1 of the SPAS Draft EIR. Table 4.12.1-4 presents directional traffic volume data in the CTA area for over 100 locations. The data in Table 4.12.1-8 for the departures level roadway segregate traffic volumes by terminal, while on the arrivals level roadway traffic is segregated first by terminal and then by either the inner or outer curbside. Page 4-1178 in Section 4.12.1.10.2 identifies the recommended mitigation program to address on-airport transportation impacts associated with Alternatives 1, 2, 4, 8, and 9. Please refer to Response to Comment SPAS-PC00130-762 regarding traffic volumes entering the CTA.

SPAS-PC00130-870

Comment:

What levels of vehicle types can be accommodated by the no project, existing conditions? LAWA has established programs to reduce the number of vans and busses in the CTA. What assumptions are made about the effectiveness of these programs and what baseline numbers are used in the assessments? What programmatic changes are "in the works" that apply as a baseline condition for the numbers of hotel and car rental courtesy rolling billboard busses that frequently block curbside access for cars?

Response:

The estimated number of vehicles which entered the Central Terminal Area (CTA), traveled on each roadway link and stopped at each curbside during the Baseline (2009) Departures and Arrival peak hours are provided in Table 4.12.1-8 on pages 4-1077 and 4-1078 and Table 4.12.1-12 on pages 4-1084 through 4-1087 in Section 4.12.1 of the SPAS Draft EIR. The assumptions for the Future (2025) With Alternative scenarios are provided in pages 4-1096 through 4-1104 in Section 4.12.1.7 of the SPAS Draft EIR. The number of vehicles estimated to enter the CTA, travel on each roadway link and

stop at each curbside during the Future (2025) Departures and Arrival peak hours for the alternatives are provided in Tables 4.12.1-16 through 4.12.1-21 on pages 4-1107 through 4-1117 in Section 4.12.1 of the SPAS Draft EIR.

The commentor also asks "what programmatic changes are 'in the works' that apply as a baseline condition for the number of hotel and car rental courtesy rolling billboard buses that frequently block curbside access for cars." Please see Responses to Comments SPAS-PC00130-398 and SPAS-PC00130-766 regarding LAWA's trip reduction programs for both rental car and hotel shuttle operators.

SPAS-PC00130-871

Comment:

Close Access to GTC
8
Identify how luggage would be handled. Would the approved tunnel be constructed? Although the Manchester Square GTC was yellow-lighted by the Settlement, the tunnel was not specifically mentioned.
How would safety/security for the tunnel be handled? What would be the mitigations for ground traffic associated with the use of the tunnel? How will disabled and elderly travelers be handled? Adults with excessive baggage or with children? Since the methods for handling people and location/directions of car trips would dramatically change, how is this to be addressed for environmental impacts?

Response:

Please see Response to Comment SPAS-PC00130-501 regarding the GTC and associated facilities, such as the baggage tunnel, included in Alternative 3. Please also see Responses to Comments SPAS-PC00130-235 and SPAS-PC00073-1 for a discussion of the appropriateness of the programmatic review conducted for the SPAS project. As indicated therein, the SPAS alternatives, which include Alternative 3 with the GTC, are only at a program level of planning and consideration. The commentor's specific questions regarding how safety and security would be handled for the baggage tunnel between the GTC and CTA would be addressed at future more detailed levels of planning and design for that alternative, if approved, as would also the specific details regarding the processing of luggage/baggage handling and how the disabled, elderly, and children would be accommodated in traveling between the GTC and the CTA.

With regard to the commentor's question about mitigation for traffic associated with the baggage tunnel between the GTC and the CTA, it is unclear as to what type of traffic impact warranting mitigation is of concern given that the baggage tunnel would be underground and would not likely have any effect on surface traffic other than during construction. A project-level analysis would be conducted for each of the specific improvements, including the baggage tunnel if Alternative 3 is approved, prior to construction or implementation, and would include analysis of traffic impacts and discussion of mitigation measures for any significant impacts identified in the analysis.

The traffic analysis in the SPAS Draft EIR accounts for the changes in trip generation, distribution, and local traffic patterns associated with closure of the CTA to private vehicles under Alternative 3. That unique aspect of Alternative 3 is clearly acknowledged on page 4-1043 of the SPAS Draft EIR in the introduction to the on-airport transportation section (Section 4.12.1), and is also acknowledged in the off-airport transportation section (Section 4.12.2) of the SPAS Draft, including, but not limited to, the discussion on page 4-1207 and in Table 4.12.2-10 (i.e., see relative differences in CTA trip generation for Alternative 3 compared to all other alternatives).

SPAS-PC00130-872

Comment:

Is there an assumption that better traffic flow is facilitated by improved signage over the lanes and along the CTA terminals? How much improvement is expected from signage improvements?

Transportation Center at Manchester Square and Aviation/Imperial and new Terminal 1 drop-off where Park One is located

9
A connection to the APM or a moving sidewalk can provide access to all of the north side terminals. How many and what percentage of people do you expect to be served by this new access? Would this increase total access capacity? By how much?

Response:

The program level on-airport transportation analysis conducted for the SPAS Draft EIR (Section 4.12.1) did not quantify potential improvements in Central Terminal Area (CTA) traffic operations resulting from the installation of improved signage within the CTA because the lack of project-specific details on signage prevents such quantification.

Alternative 9, described and depicted in Chapter 2 of the SPAS Draft EIR, includes an Automated People Mover (APM) connecting Manchester Square with the CTA. The APM would connect the Consolidated Rental Car Facility, public parking, the Los Angeles County Metropolitan Transportation Authority (Metro) light rail station and the Intermodal Transportation Facility (ITF) to the CTA as illustrated in Figure 2-9 in Chapter 2. The estimated number of passengers to be served and the corresponding number of trips to be removed from the CTA roadways if an APM connection as proposed in Alternative 9 are provided in the table below. As shown in Table 4.12.1-14 of the SPAS Draft EIR, the passenger demand at the curbside is greater during the Arrivals level peak hour compared to the Departures level peak hour. Passenger mode splits are provided in Table 4.12.1-15 of the SPAS Draft EIR are provided in the table below and were used to estimate the number of passenger by mode which would be expected to use the APM if available. The number of trips expected to be removed from the CTA with the inclusion of an APM are based on an average occupancy per vehicle mode.

The implementation of an APM system would increase the overall landside access capacity by providing an additional mode for passengers to enter the CTA separate from the existing roadways. This would result in an increase in the overall passenger access capacity for the CTA equal to the access capacity of the APM system. Construction of an APM would be expected to have no impact on the CTA's roadway capacity as it would not change the physical characteristics of the roadways.

Passengers Served and Trips Removed from CTA by APM
SPAS Alternative 9 Future (2025)

Mode	Passengers Served	Percentage by Mode	Trips Removed	Percentage
Rental Car	684	9.50%	90	2.83%
Transit Bus	42	2.5%	11	0.35%
LAX Shuttle	345	1.03%	27	0.85%
Door to Door Shuttle	288	4.00%	70	2.21%
FlyAway	223	3.10%	8	0.25%
Kiss-and-Ride	184	2.55%	135	4.25%
All Modes	1,766	22.68%	354	10.75%

Please see Response to Comment SPAS PC00130-334 for further discussion of the future development of off-site and on-site signage, consistent with the transportation and planning functions of LADOT.

SPAS-PC00130-873

Comment:

3.2 No Action Alternatives
11

Given that there are two different "no project" alternatives-one with all of the yellow-light projects of Alternative D and one based on the existing configuration with several non-Master Plan improvement projects that are underway. The second paragraph segregates the "no project" into two conditions; when all yellow light projects are assumed to have been built and when none are built. How will the EIR assess the overall impacts of these two "baselines" if some yellow-light projects are subsequently built? If the yellow-light projects overlap with other project elements that have been approved and are therefore part of the "other" base how will the other alternatives be assessed in comparison to the baseline? If, for instance, a newly designated intermodal transportation were built at Century/Aviation to accommodate a Green Line extension would all of the impacts of the totality of the baseline projects be used to assess other project impacts in addition to the yellow-project designated ones?

Response:

The comment notes that the 2008 SPAS Draft EIR NOP preliminarily identified two different potential No Project alternatives. These included a No Project/No Development alternative that assumed that none of the Yellow Light Projects, or options thereto, would be implemented. The No Project/No SPAS alternative assumed that all of the Yellow Light Projects would be implemented as originally planned and that none of the new options developed as part of the SPAS process would be implemented.

Subsequently, as described on page 1-18 of the SPAS Draft EIR, only one CEQA No Project alternative was carried forward into the EIR. The CEQA No Project Alternative studied in the SPAS Draft EIR is Alternative 3, and represents what would reasonably be expected to occur in the foreseeable future if the LAX Master Plan (i.e., "Alternative D") and all of the LAX Master Plan improvements, including the Yellow Light Projects, were implemented as originally envisioned. This is analogous to the No Project/No SPAS alternative identified in the 2008 SPAS NOP. The No Project/No Development alternative identified in the 2008 SPAS NOP was also included in the SPAS Draft EIR, but as Alternative 4 rather than as the No Project alternative.

It should be noted that neither Alternative 3 (the No Project alternative) nor Alternative 4 was used as the baseline for the evaluation of impacts in the SPAS Draft EIR. Rather, as indicated on pages 4-4 and 4-5 of the SPAS Draft EIR, the SPAS Draft EIR used a baseline of existing conditions at the time of publication of the SPAS NOP (i.e., October 2010) or, in the case of certain environmental topics, 2009 baseline conditions, consistent with Section 15125(a) of the State CEQA Guidelines.

Also, please see Responses to Comments SPAS-AL00007-3, SPAS-AL00007-7, and SPAS PC00130-749 regarding the CEQA "No Project" Alternative.

SPAS-PC00130-874

Comment:

3.3 Probable Environmental Effects
13
Under aesthetics, the NOP acknowledges excessive lighting is a potential issue. Does this include runway lights if moved north? Are Northside development impacts included? If yes, what version (s) of the Northside development?

Response:

The potential light and glare impacts of the proposed SPAS alternatives, including the potential light and glare impacts on light-sensitive receptors to the north associated with the proposed movement of Runway 6L/24R northward under SPAS Alternatives 1, 5, and 6, is evaluated in Section 4.1 of the SPAS Draft EIR. The analysis includes impacts from runway and taxiway lights. The analysis of cumulative aesthetic and light and glare impacts is provided in Section 5.5.1 of the SPAS Draft EIR. The cumulative impacts analysis in Chapter 5 focuses on the currently-approved development plans for LAX Northside, while acknowledging that a new land use development program is currently being formulated. However, the cumulative analysis of aesthetics and light and glare impacts addresses the cumulative impacts of both the previously-approved LAX Northside development, as well as the potential cumulative effects associated with the LAX Northside Plan Update that is currently under consideration.

As indicated on pages 4-44 and 4-45 in Section 4.1 under Alternative 1, which also applies to Alternatives 5 and 6, the light and glare impacts on the Westchester neighborhood associated with the proposed movement of Runway 6L/24R to the north, including impacts associated with runway lights, would be less than significant for the following reasons: (1) the several hundred feet between the new runway location and the nearest sensitive receptors would function to attenuate the intensity of the relocated runway lights; (2) an earthen berm and opaque perimeter fence intervene between most of the Westchester neighborhood and the airport property, thus blocking direct views from most sensitive receptors; (3) the Westchester Golf Course and a 12-foot-high noise wall atop an 8-foot-high berm buffer the airport from view by residential uses north and immediately east of the golf course; (4) the runway lighting would replace existing runway lighting already located along Runway 6L/24R, and thus would not represent new lighting; (5) the relocated runway lighting would be at ground-level and directed at oncoming aircraft rather than at off-site sensitive receptors; (6) the runway lighting would not include substantial expanses of glass or other surfaces that could generate substantial glare; and (7) the proposed relocated runway lighting would be subject to applicable light and glare requirements of LAX Master Plan Commitments DA-1, Provide and Maintain Airport Buffer Areas, LI-2, Use of Non-Glare Generating Building Materials, and LI-3, Light Controls, and LAMC Section 93.0117, which have been formulated to avoid light spillover and substantial light and glare impacts on sensitive receptors. Impacts to areas north of the airport associated with other sources of light and glare, including terminal improvements, are also addressed in the SPAS Draft EIR and were determined to be less than significant.

The potential light and glare impacts of the proposed relocation of Runway 6L/24R under Alternatives 1, 5, and 6, combined with the light to be generated in the LAX Northside area under the adopted 1984 LAX Northside Plan (and the LAX Northside Plan Update, which is currently underway), are evaluated in Section 5.5.1 of the SPAS Draft EIR. As indicated in the analysis on pages 5-30 and 5-31 of the SPAS Draft EIR, under Alternative 1, which also applies to Alternatives 5 and 6, development under the LAX Northside Plan (and associated update in process) would create a noticeable increase in ambient light and glare in the area. However, development under the LAX Northside Plan would be subject to the height restrictions, setback requirements, and lighting and landscape guidelines and requirements contained in the LAX Northside Plan, LAX Northside Design Plan and Development Guidelines, and the LAX Specific Plan, which have been formulated to avoid land use conflicts, and would also be subject to LAX Master Plan Commitments DA-1, LI-2, and LI-3, which have been formulated to avoid both light spillover onto adjacent light-sensitive uses and substantial light and glare impacts. As further indicated, development under the LAX Northside Plan would create intervening development between the existing residential uses in the Westchester neighborhood and LAX, including Runway 6L/24R, such that many of the Westchester residences which currently have views of the runway lighting would no longer have views of that lighting with development under the LAX Northside Plan. Finally, as indicated, because the existing and relocated runway lighting would not spillover over onto existing adjacent light-sensitive receptors regardless of new development under the LAX Northside Plan, relocated runway lighting under SPAS Alternatives 1, 5, and 6 would not have the potential to add to any light spillover that might occur under the LAX Northside Plan. Thus, cumulative light and glare impacts associated with the proposed relocation of Runway 6L/24R would be less than significant.

SPAS-PC00130-875

Comment:

What new Manchester Square development is assumed? Are there any other projects such as APMs and where would they stop and flow/to from? This could impact local communities with noise, pollution and traffic in various ways depending upon the paths used and the locations of the stops.

Response:

Under Alternatives 1 and 2, Manchester Square would be used for public and employee parking. Under Alternative 3, the GTC would be located within Manchester Square. Under Alternatives 8 and 9, Manchester Square would be used for parking and a CONRAC. In addition to the two APM systems under Alternative 3, Alternative 9 includes an APM linking the ground access facilities in Manchester Square to the CTA, with a stop at the ITC and connectivity with the future Metro transit station. Impacts associated with the APM are not evaluated independently within the SPAS Draft EIR; rather, the impacts of an entire alternative are analyzed comprehensively. Noise, air quality, and traffic impacts

specific to the APM would be evaluated in a project-level CEQA document, if Alternative 3 or Alternative 9 are selected for implementation.

SPAS-PC00130-876

Comment:

This is another concern for neighbors and also for the flora and fauna. Introduction of new species from LAX arrival flights? Although good faith attempts to stop the arrival of foreign plants and animals is made, the locations of the aircraft and the handling of baggage and cargo can impact how an unwanted species can be spread to the surrounding areas outside of LAX.

Response:

The SPAS alternatives would not increase the risk of introducing invasive floral and faunal species from arriving flights to the surrounding areas outside of LAX, nor to sensitive habitat associated with LAX including the Los Angeles/El Segundo Dunes. The SPAS alternatives would not result in an increase in the number of arriving flights at LAX, as increased flights would occur even without implementation of the SPAS alternatives. Rather, the runway/taxiway reconfigurations associated with Alternatives 1 through 3 and 5 through 7 would allow more efficient use of the north runways by larger aircraft. Additionally, the standards for baggage and cargo handling would remain the same as baseline conditions. Some SPAS alternatives include changes in the configuration of Terminals 1, 2, and 3, and construction of a new Terminal 0, at which baggage and cargo would be loaded and unloaded from aircraft; however, baggage and cargo handling activities would be limited to the developed terminal areas. Given that the baggage and cargo handling areas are well-removed from native habitats, it is unlikely that an invasive species could be introduced to undeveloped portions of the airport property directly from baggage and cargo handling operations and then spread to surrounding areas.

SPAS-PC00130-877

Comment:

What about impacts on Riverside Fairy shrimp locations? LAWA was caught filling in Continental City with asphalt-laden dirt about 2003. LA Building & Safety halted the non-permitted filling. Where are all of the areas impacted by the 2003 action? What sensitive species are in surrounding areas? Why did the relocation area for the Riverside Fairy Shrimp change from the former El Toro Marine Corp Air Station to an area in Redondo Beach? Can LAWA simply leave the Riverside Fairy Shrimp in tact at LAX and place some sort of netting or fishing lines over the shrimp habitat so that the shrimp will not have to be moved?

Response:

As discussed on pages 4-189 and 4-190 in Section 4.3 of the SPAS Draft EIR, based on evidence from recent biological surveys, the SPAS Draft EIR assumes that no Riverside fairy shrimp are present within the biological resources study area. Accordingly, the SPAS Draft EIR concludes that no impacts to Riverside fairy shrimp are associated with the SPAS alternatives, and no mitigation is necessary.

Soil containing Riverside fairy shrimp cysts was removed from the LAX Master Plan project area pursuant to two Biological Opinions issued by USFWS in 2004 and 2005. The Riverside fairy shrimp relocation site did not change from the former Marine Corps Air Station (MCAS) El Toro to Redondo Beach. Rather, LAWA is currently considering relocation of the Riverside fairy shrimp to Madrona Marsh in the City of Torrance. The consideration of Madrona Marsh is the result of a study conducted by LAWA subsequent to publication of the LAX Master Plan EIS/EIR which found that the former MCAS El Toro did not contain suitable soils or adequate watershed to support a vernal pool complex. No sensitive floral or faunal species are currently associated with the Continental City site or the surrounding areas, as depicted by Figures 4.3-2 and 4.3-3 of the SPAS Draft EIR. As discussed in Section 4.7 of the Bradley West Project Draft EIR, wet-season surveys conducted in 2009 at potentially suitable seasonal pool habitat at the Continental City site did not detect Riverside fairy shrimp. The Continental City site has been subsequently modified by construction activity associated with the Bradley West Project such that it no longer supports suitable habitat for Riverside fairy shrimp.

In the past, LAWA deposited uncertified fill in Continental City. (Uncertified fill is material that may not meet requirements for fill material, may not have been compacted to meet engineering standards, and was deposited without inspection.) This action was not illegal and did not require a permit, nor was the activity halted by the City of Los Angeles Department of Building and Safety. All of the uncertified fill was subsequently removed and the area is being backfilled with certified fill. It should be noted that certified fill is only required if a site will be used for a future construction project.

SPAS-PC00130-878

Comment:

Where are the earthquake prone areas?

Response:

The potential for the SPAS alternatives to expose people or structures to hazards associated with geology and soils, including seismic-related hazards, was addressed in Section VI of the Initial Study included in the 2010 LAX SPAS EIR Notice of Preparation (NOP), provided in Appendix A of the SPAS Draft EIR. As explained therein, while the site is located within the seismically active southern California region, it is not located within an Alquist-Priolo Special Study Zone. Geotechnical literature indicates that the Charnock Fault, a potentially active fault, may be located near or through eastern portions of LAX property. However, as stated in Section 4.22 of the LAX Master Plan EIR, recent evaluation indicates that the Charnock Fault is considered to have low potential for surface rupture independently or in conjunction with movement on the Newport-Inglewood Fault Zone, which is located approximately three miles east of LAX. The Initial Study also indicates that the LAX site has a very low susceptibility to liquefaction. Therefore, impacts to people or structures resulting from rupture of a known earthquake fault are considered less than significant, and no mitigation measures are required. In accordance with Sections 15063(c)(3)(A) and 15128 of the State CEQA Guidelines, the potential for impacts associated with geology and soils, including seismic-related hazards, was not discussed in detail in the SPAS Draft EIR.

SPAS-PC00130-879

Comment:

What are the amounts and types of pollutants from aircraft? How will these pollutants be mitigated?

Response:

Aircraft pollutant emissions are presented in Attachment 2 of Appendix C, and summarized in Section 4.2.6.3 of the SPAS Draft EIR. Applicable air quality mitigation measures are presented in Section 4.2.5 and 4.2.7 of the SPAS Draft EIR. Table 4.2-14 (pages 4-126 through 4-129) of the SPAS Draft EIR indicates that Alternatives 1, 2, 5, 6, and 7 would have lower aircraft emission than Alternative 4. This result indicates that the airfield improvements under the "build" alternatives would reduce aircraft emissions compared to Alternative 4 which has no substantial change to the existing airfield.

SPAS-PC00130-880

Comment:

What will be done to reduce the greenhouse gases from LAX operations?

Response:

Table 4.6-4 of the SPAS Draft EIR delineates transportation-related air quality mitigation measures that would also serve to reduce GHG emissions associated with LAX operations, and Tables 4.6-7 and 4.6-8 also identify other measures that LAWA is implementing that would serve to reduce GHG emissions from LAX operations. As indicated therein, such other measures, in addition to transportation-related measures, include energy efficiency measures, water conservation and efficiency, and solid waste measures.

SPAS-PC00130-881

Comment:

3.4 Comments and Next Steps
13
45 days circulation for review is inadequate. This should be as much as 120 days so that the maximum time will elapse to obtain South Airfield incursion experience.

The NASA study should also be complete before this comment period begins.

Response:

As indicated in Section 3.4 of the 2008 SPAS Draft EIR NOP (page 13), LAWA established a 90-day review period for the NOP, commencing on March 12, 2008 and closing on June 18, 2008. It should be noted that the LAX North Airfield Safety Study was released in February 2010, with a Final Report in May 2010. While not within the review period of the 2008 NOP, this study was completed prior to the publication of the Revised NOP for the SPAS Draft EIR and prior to the comment period for the SPAS Draft EIR.

SPAS-PC00130-882

Comment:

Figure 1- Project Location None The grayed area shows all of LAX, but also lands that were transferred from the Westchester-Playa del Rey Community Plan to the LAX Plan during Alt D approval. Not all of this is being considered for cumulative impacts during the EIR reviews of the SPAS airport projects. Please delineate which areas are specifically included in the impact studies.

Response:

The grayed area in the figure represents the current airport boundaries (with the exception of properties within the voluntary acquisition area in Manchester Square that are not owned by LAWA, which are also shown in gray). It does not include any land proposed for acquisition as part of the LAX Master Plan but not currently owned by LAWA, including areas within the Westchester Playa del Rey Community Plan Area located south of 96th Street between Sepulveda Boulevard and Airport Boulevard, or LAX Master Plan-related acquisitions within and south of Manchester Square. The airport and non-airport projects considered in the analysis of cumulative impacts are identified in Chapter 5 of the SPAS Draft EIR. As discussed in Section 5.4 of the SPAS Draft EIR, the geographic scope for cumulative impact analysis also varies by environmental topic.

SPAS-PC00130-883

Comment:

Figure 2- Existing Airport
What is the date of this photo? On what date is the existing airport based? This photo does not show the completed the SAIP project, but we assume that it is part of the existing airport.

Response:

Figure 2 of the 2008 SPAS NOP is based on an aerial photograph taken on July 30, 2007. The SAIP is under construction in the photograph. It is unclear what the commentor means by the statement "On what date is the existing airport based?" If the commentor is asking about the baseline year used in the SPAS Draft EIR analysis, please see Response to Comment SPAS-PC00130-52. As indicated in that response, the baseline assumed in the SPAS Draft EIR is generally October 2010, with operational conditions based on 2009. As noted on page 5-17 of the SPAS Draft EIR, the SAIP was completed in 2008, and is therefore part of the airport in the baseline conditions used in the SPAS Draft EIR analysis.

SPAS-PC00130-884

Comment:

Earlier in the document, Paragraph 3.2 identified two different no action alternatives. Please detail what airport elements are part of the two "no action" alternatives and their relationship to the baseline conditions against which new projects are being judged.

Response:

Please see Response to Comment SPAS-PC00130-873 regarding the No Project alternative that was carried forward into the SPAS Draft EIR. As indicated in that response, only one No Project alternative, Alternative 3, was carried into the SPAS Draft EIR. The airport elements that make up this alternative are described in Section 2.3.1.3 of the SPAS Draft EIR. The impacts of Alternative 3 were compared to existing conditions throughout Chapter 4 of the SPAS Draft EIR.

SPAS-PC00130-885

Comment:

Figure 9- Potential Alternative -Runway 6R124L 100' South
Green Line stop is shown along Century instead of in Intermodal Transportation Center. How much traffic of each transport mode is expected? How would the traffic impact the type and quantity of mitigations required?

Response:

Please see Topical Response TR-SPAS-T-1 regarding transit options into LAX.

Under Alternative 3 as originally planned as part of the LAX Master Plan (i.e., Alternative D), an elevated pedestrian bridge would link the ITC to the Metro Green Line Aviation/LAX station, which at the time was the closest existing or planned transit station to LAX. With the now-planned Metro transit station at Century and Aviation Boulevards, Alternative 3 would also provide connectivity with this station as well. Therefore, Alternative 3 plans for connectivity at both Metro stations (see Figure 2-3 of the SPAS Draft EIR).

Section 4.12.1.7.2 of the SPAS Draft EIR, beginning on page 4-1100, provides detailed information on the number of trips by mode accessing the CTA and parking at each curbside. Table 4.12.1-15 on page 4-1103 provides the airport passenger mode of transportation percentages or mode splits for baseline (2009) and future (2025) conditions under Alternatives 1, 2, 4, 8 and 9. Passenger mode splits represent the proportion of total airline passengers using each mode during the peak hours analyzed. Also provided in the bottom portion of the table is information summarizing how passengers would use specific sub-modes for transport between airport facilities and the CTA (i.e., APM and LAX shuttles). Tables 4.12.1-16 and 4.12.1-17 on pages 4-1107 through 4-1110 provide the total number of vehicles dropping off passengers at each terminal on the departures level and the number of vehicles by mode picking up passengers at each individual curbside on the arrivals level for each alternative. Tables 4.12.1-18 and 4.12.1-19 on pages 4-1110 through 4-1115 provide the peak hour volume of vehicles traveling on each roadway link, while Tables 4.12.1-20 and 4.12.1-21 on pages 4-1115 through 4-1117 provide the peak hour vehicle turning movements for the on-airport intersections on both the departures and arrivals level roadways.

Section 4.12.1.9 of the SPAS Draft EIR defines the traffic related impacts to the on-airport curbsides, roadways, and intersections, while Section 4.12.1.10 provides the proposed on-airport traffic related mitigation measures.

SPAS-PC00130-886

Comment:

Figure 11- Runway 100' North

Green Line stop is shown along Century instead of in Intermodal Transportation Center. Although ARSAC supports the extension this is not part of the approved Master Plan or existing condition. Environmental improvements from this project are not part of the baseline and should be included in the assessment accordingly.

Response:

The commentor's support for the Metro Green Line stop along Century Boulevard is noted and is hereby made part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project.

The SPAS Draft EIR assumes that the Metro LAX/Crenshaw Light Rail Transit line will be completed prior to the Future (2025) horizon year. However, as discussed in Section 4.12.2.2.1 under the heading of "CMP Transit System" on page 4-1199 of the SPAS Draft EIR, "options to extend the Metro Green Line to LAX are currently being studied by Metro. However, given that this proposed extension to LAX is in its early environmental planning stage, has not been approved, and if approved and constructed would not be operational until after the SPAS horizon year, it was not included in the 2010 or the 2025 scenarios." LAWA looks forward to working cooperatively with Metro on such a connection; however, given that specific information about such a connection is not currently available, it could not be relied upon to further reduce the alternatives' traffic impacts beyond the mode share/split assumptions already included in the SPAS Draft EIR.

Please see Topical Response TR-SPAS-T-1 regarding transit options into LAX.

SPAS-PC00130-887

Comment:

Figure 12- Runway 340' North
See comment for Figure 11 above.

Response:

The content of this comment is similar to comment SPAS-PC00130-886; please refer to Response to Comment SPAS-PC00130-886.

SPAS-PC00130-888

Comment:

Initial Study and Check List -CEQA Lead Determination
IS-2
Please provide a matrix of which environmental impact studies are being reassessed and which are being rerun and correlate each impact study to the baseline 2004 FEIR paragraph numbers.

Response:

The analytical approach and information sources for each environmental topic addressed in the SPAS Draft EIR are indicated in the Methodology subsection of each section in Chapter 4 of the document, with specific information citations also provided within footnotes throughout the document. Please also see Response to Comment SPAS-PC00130-53 for a discussion of the specific issue areas where it was determined, in accordance with CEQA and the State CEQA Guidelines, that further analysis was not required in the SPAS Draft EIR, and the specific pages of the SPAS Draft EIR which explain the reasons for such determinations. It is not necessary to provide the matrix requested by the commentor. CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commentors. (State CEQA Guidelines Section 15204.)

SPAS-PC00130-889

Comment:

Evaluation 6)

IS-3
The document acknowledges the requirement to document source reference in detail. Anything less makes it difficult to identify what has been done and its validity.

Response:

This comment cites to guidance provided for preparation of a CEQA Initial Study checklist and pertains to the 2008 SPAS Draft EIR NOP. Please see Response to Comment SPAS-PC00130-14 regarding materials incorporated by reference in the SPAS Draft EIR.

SPAS-PC00130-890

Comment:

Environmental factors potentially affected
IS-3
Three additional impact areas should have been checked.

Geology/soils. Proposals to move the runways could be in areas where there are sand dunes and other soil with high liquefaction potential.

Response:

The comment is noted. Please see Response to Comment SPAS-PC00130-913 below regarding potential impacts related to liquefaction.

SPAS-PC00130-891

Comment:

Transportation/Traffic. To accomplish some of the projects in the LAWA 340' north alternative what housing would be impacted as well as the community serving businesses. Please identify all units that are subject to removal by any federal or state law regardless of whether it is believed that these laws would be enforced.

Response:

The commentor appears to be referencing Alternative 5 which would relocate Runway 6L/24R 350 feet to the north.

A discussion of property acquisition and other facilities that would be affected under the SPAS alternatives is provided in Tables 2-3, 2-4, 2-5 and Figures 2-10 and 2-11 in Chapter 2 and Table 4.9-5 in Section 4.9.6 of the SPAS Draft EIR. Specific to Alternative 5, no acquisition is proposed since this alternative focuses on airfield and terminal components only, although acquisition would be required for the ground access components with which this alternatives would be paired. As identified in Section 4.9.6.5 of the SPAS Draft EIR, Alternative 5 would result in the removal of some community-serving uses including an urgent care facility, Travelodge Hotel, and Denny's Restaurant.

Regarding RPZs and the potential for acquisition of homes and businesses, please see Response to Comment SPAS-AL00007-26. Potential impacts associated with changes in the RPZ for the SPAS alternatives are addressed in Section 4.7.2 of the SPAS Draft EIR. As described in Section 4.7.6.5 of the SPAS Draft EIR, under Alternative 5 the 350-foot northward shift of Runway 6L/24R would place portions of two multi-story structures and rooftop utilities within Part 77 surfaces and result in additional businesses in Westchester, near Sepulveda being located within the RPZ, as shown in Figure 4.7.2-15. As indicated in Section 4.7.2.6.1, of the SPAS Draft EIR, there are several options that can be considered relative to addressing potential safety hazards associated with incompatible structures and uses being located within controlled airspace areas; however, a determination as to the most suitable and practical option cannot be made until more detailed levels of planning and engineering on the selected alternative, if any, can be conducted in consultation with the FAA. It would be premature and speculative to say at this time whether incompatible structures or land uses within the RPZs would stay, be modified, or be removed. Such information would be developed during project-specific CEQA review

should an alternative with incompatible structures or uses within an RPZ be selected. It is appropriate for a first-tier program level EIR to defer detailed descriptions and impact analysis of individual projects in the program to future project-level CEQA documents. (State CEQA Guidelines Section 15383; Koster v. County of San Joaquin (1996) 47 Cal.App.4th 29, 37.) As described in Section 4.7.2.6.5 of the SPAS Draft EIR Alternative 5 would result in the RPZ no longer encompassing any homes.

SPAS-PC00130-892

Comment:

Population/Housing. To accomplish some of the projects in the LAWA 340' north alternative housing would be impacted as well as the community serving businesses. Please identify all units that are subject to removal by any federal or state law regardless of whether it is believed that these laws would be enforced.

Response:

The content of this comment is essentially the same as comment SPAS-PC00130-891; please refer to Response to Comment SPAS-PC00130-891.

SPAS-PC00130-893

Comment:

VI. Geology & Soils (a)
IS-6
There is some seismic potential. A plume of the Inglewood/San Andreas faults is near some of the areas where projects have been suggested along Century, for instance. We call on LAWA to review the most current USGS maps to assess earthquake susceptibility. The 340' N alternative, for instance, calls for moving Lincoln Boulevard and burying its connection to Sepulveda. Additionally we call upon LAWA to address the sandy soil conditions toward the Northside development along Westchester/Playa del Rey and western sections of LAX property for impacts from building any tunnels or from impacts from existing tunnels, underground utilities or sewer lines.

Response:

At a program level, the 2010 NOP Initial Study, attached as Appendix A to the SPAS Draft EIR, concludes that impacts of the SPAS alternatives related to seismic risks and soil stability would be less than significant. Please see Topical Response TR-SPAS-LR-1 for a discussion of the Lincoln Boulevard realignment associated with Alternatives 1, 5, and 6. Evaluation of seismic risks associated with the Lincoln Boulevard realignment and sandy soil conditions mentioned in the comment would be conducted during detailed engineering for that project component, if it is a second-tier project proposed for implementation. Project-specific seismicity and soil stability analyses would be presented in project-specific CEQA documents.

SPAS-PC00130-894

Comment:

VII Hazards & Hazardous Matls. (a)
IS-7
Could run off with fuel and rubber off the runways create a hazard?

Response:

Water quality impacts associated with contaminants in runoff are addressed in Section 4.8 of the SPAS Draft EIR. As indicated in that section, increases in pollutant loads associated with the SPAS alternatives would be a significant impact. With implementation of existing recommendations in LAX Master Plan Commitment HWQ-1 and revisions to the Conceptual Drainage Plan required by Mitigation Measure MM-HWQ (SPAS)-1, the water quality impacts associated with the SPAS alternatives, including runoff potentially containing fuel or rubber from the runways, would be less than significant.

SPAS-PC00130-895

Comment:

VII Hazards & Hazardous Matls. (f)
IS-7
The ability to get medical care can be impaired since the Medical Center on Sepulveda could be closed off within the boundaries of LAX if an emergency occurs. Insufficient trauma facilities are available within the local area if a medical emergency occurs. The closest is UCLA that would be impossible to get to during most of the day due to heavy traffic on the 405.

Response:

Please see Responses to Comments SPAS-PC00094-2, SPAS-PC00130-217, and SPAS-PC00130-944 regarding emergency response plans and services.

SPAS-PC00130-896

Comment:

VII Hazards & Hazardous Matls. (g)
IS-7
See comments for element (f) above.

Response:

Please see Responses to Comments SPAS-PC00094-2, SPAS-PC00130-217, and SPAS-PC00130-944 regarding emergency response plans and services.

SPAS-PC00130-897

Comment:

VIII Hydrology & Water Quality (i)
IS-8
There was some question about the 100-year flood plain structures in the last EIR due to the drainage canals being fed with much greater runoff due to all of the local developments surrounding LAX. A new urban run-off facility has been suggested for construction at the northwest corner of the LAX airfield. What effect will this facility have on LAX and water quality issues?

Response:

As noted on page 4-619 of the SPAS Draft EIR, the Dominguez Channel is currently over capacity off-site and downstream from LAX. Additional drainage into the Dominguez Channel resulting from implementation of the SPAS alternatives was identified as a significant but mitigable impact in the SPAS Draft EIR with implementation of Mitigation Measure MM-HWQ (SPAS)-1, Conceptual Drainage Plan Revision and Update. Please see Section 4.8 of the SPAS Draft EIR and Response to Comment SPAS-PC00130-463 for further information regarding this mitigation measure.

The City of Los Angeles Bureau of Sanitation Stormwater Infiltration and Treatment Facility involves development of a 22-acre stormwater infiltration facility north of Westchester Parkway and east of Pershing Drive that would treat stormwater flows from the Argo watershed. This is identified as a cumulative project on page 5-22 of the SPAS Draft EIR. The facility would receive flows from several drains in the Westchester area as well as from the Argo Drain, provide water quality improvement and infiltration for a significant portion of the wet weather flows, and discharge higher flows through County Drain 5421 to Dockweiler State Beach downstream of the Argo Drainage Channel. This cumulative project would have no impact of the ability of the Argo Drainage Channel to carry stormwater flows off the airport and would provide for some water quality improvement for the portion of flow that is diverted from the Argo Drainage Channel to the facility.

SPAS-PC00130-898

Comment:

The sewer lines near and underneath LAX date back to the 1920s. Are these sewers adequate and structurally sound? If not, what hazards do these sewer lines present?

Response:

There are a number of sewer lines near and beneath LAX, including three major outfall sewers that traverse the airport, including the North Central Outfall Sewer (NCOS), the North Outfall Replacement Sewer (NORS), and the Central Outfall Sewer (COS). The NCOS was constructed in 1957, NORS was completed in 1993, and the COS was constructed in 1907 and rehabilitated in the 1940s.1 Responsibility for maintaining these sewers lies with the City's Bureau of Sanitation, Wastewater Engineering Services Division.

Please see Response to Comment SPAS-PC00130-348 and Topical Response TR-SPAS-LR-1 regarding the relationship between sewer lines and the north airfield improvements and Lincoln Boulevard realignment, respectively. As indicated in those responses, none of the outfall sewers that lie beneath LAX would be affected by the SPAS alternatives. As explained on page 4-3 of the SPAS Draft EIR, the SPAS Draft EIR is a programmatic document. If a SPAS alternative is selected for implementation, detailed engineering and project-specific CEQA analysis would be performed to evaluate impacts of project components on utilities, including sewer lines and the adequacy of these lines relative to the proposed improvements. If it is determined during engineering design that any underground utilities do not have sufficient structural strength to withstand the proposed improvements, proven measures would be taken to strengthen the infrastructure or the soils for additional support. Please see Response to Comment SPAS-PC00130-1012 regarding measures that could be used to address these circumstances.

No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

1. City of Los Angeles Department of Public Works, Bureau of Sanitation, Wastewater Engineering Services Division, City of Los Angeles Sewer Odor Control Master Plan, August 2010.

SPAS-PC00130-899

Comment:

XII Population & Housing (a)
IS-9
LAX traffic causes severe impacts on the local communities. Westchester-Playa del Rey and the other surrounding communities have become thoroughfares for people traveling from the South Bay and further south and the LA Westside. LAX traffic exacerbates this. Has the new LA City General Plan traffic increases due to changes in the housing element been taken into consideration?

Response:

The comment asks if future changes in traffic associated with a new City of Los Angeles Housing Element have been considered in the SPAS Draft EIR. The current update to the City of Los Angeles Housing Element is not yet complete and the timeframe for its completion is unknown. Therefore, changes that may result from that process are unknown, and it would have been speculative to evaluate them in the SPAS Draft EIR. The SPAS off-airport transportation analysis employed a travel demand forecasting model in the development of future traffic projections. One element of the model, described in Section 4.12.2.2.3 of the SPAS Draft EIR, is socio-economic data including land use projections, which is consistent with regional growth projections at the time the technical study was initiated.

SPAS-PC00130-900

Comment:

XIV Recreation
IS-9
Holes were removed from the Westchester Golf Course to accommodate previous LAX expansion in the 1970s. Restoration of these holes has been a LAX promised mitigation ever since. When will this be accomplished and what other recreation opportunities will be created for the surrounding communities?

Response:

The Westchester Golf Course is identified in Figure 5-2 and page 5-22 in Chapter 5 of the SPAS Draft EIR as a land development project not related to the SPAS alternatives. As described on page 5-22 of the SPAS Draft EIR, the replacement of the three holes at the Westchester Golf Course was completed in 2010, subsequent to the submittal of ARSAC's comments on the 2008 SPAS NOP.

As indicated in the Initial Study checklist on page IS-10, and discussed on pages A-22 through A-24 of the 2010 NOP included in Appendix A of the SPAS Draft EIR, similar to LAX Master Plan Alternative D, the SPAS alternatives would not contribute to increases in park demand or physically impact/alter any public park or recreation areas (i.e., the Initial Study determined that the SPAS alternatives would have "no impact" on parks or on recreation resources). Therefore, the SPAS alternatives would not result in the need for new/altered parks and, in accordance with CEQA, no mitigation measures, such as development of additional recreational facilities, are required.

SPAS-PC00130-901

Comment:

Attachment A V Cultural Resources (a)
A-4
Under historic elements, other buildings that are impacted such as the Paradise Building, Centinela Adobe, Randy's donuts should also be addressed due to off airport projects that facilitate these projects. Others items such as the LAX Theme Building and the "Sea to Shining Sea" mosaic tile air travel mural in Terminal 3 should also be addressed.

Response:

Historical and archaeological resources identified within the SPAS cultural resources study area are discussed in Section 4.5 of the SPAS Draft EIR. The SPAS alternatives would have no impact on the Paradise Building at the corner of Sepulveda Boulevard and Westchester Parkway, the Centinela Adobe at 7634 Midfield Avenue, or Randy's Donuts at 805 West Manchester Boulevard in Inglewood. Regarding the mosaic mural in the underground tunnel from the concourse to the satellite of Terminal 3 at LAX, please refer to Response to Comment SPAS-PC00201-11.

SPAS-PC00130-902

Comment:

Attachment A V Cultural Resources (b)
A-5
Have any burial sites been identified? What about pottery or other Indian relics?

Response:

As stated on pages 4-360 through 4-363 in Section 4.5.3.3 of the SPAS Draft EIR, a cultural resources records search through the South Central Coastal Information Center was completed that identified eight recorded archaeological resources, seven of which are Native American cultural resources, on LAX property and within the cultural resources study area for SPAS. None of the seven Native American cultural resources is a burial site. Descriptions of the artifacts associated with each of these sites are provided on pages 4-360 through 4-363 of the SPAS Draft EIR. These resources would not be

impacted by any of the SPAS alternatives. In addition, a pedestrian survey of the undeveloped portions of the LAX property potentially affected by the SPAS alternatives was conducted to identify previously unknown archaeological or Native American resources. As stated on page 4-363 in Section 4.5.3.3 of the SPAS Draft EIR, no resources were identified during the pedestrian survey.

SPAS-PC00130-903

Comment:

What about prehistoric bones on the west and north areas in and around LAX due to the high incidence of oil reserves in the area?

Response:

A paleontological resources record search conducted through the Natural History Museum of Los Angeles County was completed in 2009 that identified one fossil locality within or immediately adjacent to the LAX property. The fossil locality produced the fossil remains of a mammoth in the vicinity of the Theme Building approximately 25 feet below the surface during construction excavations. No other paleontological resources have been identified within, or in the immediate vicinity of, LAX.

As indicated on page 4-337 of the SPAS Draft EIR, potential impacts on paleontological resources were addressed in the revised LAX SPAS EIR Notice of Preparation/Initial Study (October 2010), included as Appendix A, Notice of Preparation/Scoping, of the SPAS Draft EIR. As discussed therein, impacts on paleontological resources were evaluated in the LAX Master Plan EIR and, with implementation of mitigation measures required pursuant to that EIR (Mitigation Measures CR-1 and CR-2), impacts would be less than significant. These mitigation measures require conformance with the LAX Master Plan Paleontological Management Treatment Plan (PMTP) during construction activities. Requirements outlined in the PMTP include specific procedures for paleontological monitoring, identifying and assessing the significance of resources, and the recovery and curation of resources when warranted. For example, a paleontological excavation program to remove the resources may be implemented, if deemed necessary. Finally, the PMTP details the reporting requirements to document the paleontological monitoring effort and provides guidance as to the proper curation and archiving of paleontological resources in accordance with industry and federal standards.

SPAS-PC00130-904

Comment:

Prior LAX layouts have included N-S runways such as the one that existed in the area behind Tom Bradley International Terminal. Are any of these old structures historically significant?

Response:

It is not clear what the commentor is referring to relative to a north-south runway behind Tom Bradley International Terminal (TBIT). Taxiways Q and S, which were located to the west of TBIT prior to the construction of the Bradley West Project, were demolished as part of the Bradley West Project construction. In addition, during construction of the South Airfield Improvement Project, a 1,200-foot, 1940s-era abandoned runway was discovered buried underneath the airfield. The abandoned runway was demolished prior to construction of the new Runway 7R/25L. Historical and archaeological resources identified within the SPAS cultural resources study area are discussed in Section 4.5 of the SPAS Draft EIR. Section 4.5 of the SPAS Draft EIR is based in part on more comprehensive information contained in Appendix E of the SPAS Draft EIR. None of the former or existing runways or taxiways at LAX are considered historically significant structures. The runways have been altered and relocated over the years and do not retain integrity or possess significance as historic structures either individually or as contributors to a historic property or district. The 2011-2012 survey also included buildings over 45 years in age that are presently situated on the airport midfield, west of TBIT/Bradley West and between the north and south airfields. As discussed on pages 4-354 through 4-356 in Section 4.5 of the SPAS Draft EIR, listed in Table 4.5-2 on page 4-355, and documented on DPR survey forms in Appendix E, surveyed properties in the airport midfield do not meet CEQA's definition of historical resources under State CEQA Guidelines Section 15064.5; these properties have undergone considerable alterations and/or additions and do not retain sufficient integrity and/or

historical/architectural significance to merit eligibility under any of the applicable federal, state, or local criteria.

SPAS-PC00130-905

Comment:

Are there any historic elements from the Bennett Ranch or previous ranch owners that used the land that is the present day LAX?

Response:

Historical and archaeological resources identified within the LAX SPAS study area are discussed in Section 4.5 of the SPAS Draft EIR. The historic context of the rancho period in the area now occupied by LAX is discussed in the LAX Master Plan EIR Section 106 Report and the LAX Master Plan Supplemental Section 106 Report, and discussed on pages 4-349 through 4-354 in Section 4.5 of the SPAS Draft EIR. The Section 106 Report and Supplemental Section 106 Report for the LAX Master Plan are provided in Appendix I and Appendix S-G of the LAX Master Plan Final EIR, respectively, (see page 9-6 in Chapter 9, References, [i.e., the Final EIR for the LAX Master Plan Improvements, which includes all appendices and technical reports, including Appendix I and Appendix S-G]. As discussed on page 1-105 in Section 1.7 of the SPAS Draft EIR, the LAX Master Plan Final EIR, including Appendix I and Appendix S-G, are available for public review at Los Angeles World Airports, Capital Programming and Planning Division, One World Way, Los Angeles, CA 90045, and are also accessible via the internet at www.ourlax.org). There are no historic elements from previous ranches or ranch uses that exist today within LAX or the SPAS cultural resources study area.

SPAS-PC00130-906

Comment:

Attachment A V Cultural Resources (c) Mitigation CR2
A-6
The NOP says that mitigation reduces the impact to less than significant and therefore nothing else will be done. Please identify which areas are subject to higher potential impact mitigation per the existing paleontology mitigation program.

Response:

Areas that are subject to additional paleontological mitigation are areas in close proximity to previously documented fossil localities and areas where undisturbed (or native) soils exist. Per the LAX Master Plan Paleontological Management Treatment Plan (PMTP),1 this includes the CTA, where a fossil specimen was encountered approximately 25 feet below the surface during construction excavations sometime before 1973.2 The presence or absence of undisturbed soils varies throughout the LAX property and project-specific evaluations to determine the presence or absence of these soils would be conducted on a project-by-project basis per the PMTP.

1. City of Los Angeles, Los Angeles World Airports, Environmental Management Division, Final LAX Master Plan Mitigation Monitoring & Reporting Program, Paleontological Management Treatment Plan, June 2005.
2. City of Los Angeles, Final Environmental Impact Report for Los Angeles International Airport (LAX) Proposed Master Plan Improvements, Table 4.9.2-1, p. 4-843, April 2004.

SPAS-PC00130-907

Comment:

VI Geology and Soils:
A-7

What about the water filtration system that is being proposed for the Northside development area? How could this filtration project interface with the potential building set for the entire Northside development area?

Response:

The water filtration system referred to in the comment appears to be the City of Los Angeles' Bureau of Sanitation Stormwater Infiltration and Treatment Facility. This facility is an independent project subject to its own environmental review process. This project is identified as a cumulative project in Section 5.3.5 of the SPAS Draft EIR, and the cumulative impacts of this project, in conjunction with SPAS and other cumulative projects, are analyzed in Chapter 5. The relationship of this project to the LAX Northside development is not within the scope of the SPAS Draft EIR, but the project will be addressed as a related project in the LAX Northside Plan Update Draft EIR. The Initial Study for the LAX Northside Plan Update identified impacts related to flooding and geology and soils as potentially significant, and these topics will be addressed in the Draft EIR being prepared in conjunction with the update of the LAX Northside development plan.

SPAS-PC00130-908

Comment:

The prior EIR claimed that earthquake susceptibility was not significant, but at an SPAC meeting it was acknowledged that there earthquake fault areas that would impact the tunnel that was approved in Alternative D. Where else would earthquake faults impact building or construction?

Response:

As required by Section 15128 of the State CEQA Guidelines, the SPAS Draft EIR contains a statement indicating the reasons that various possible significant effects of the project were determined not to be significant and were therefore not discussed in detail in the EIR. (See Section 7.4 of the SPAS Draft EIR.) The Initial Study included in the October 2010 LAX SPAS EIR Notice of Preparation, included as Appendix A, includes a discussion of the resource areas that were determined to have no impact or less than significant impact. As indicated on pages A-7 and A-8 of that document, LAX is not located within an Alquist-Priolo Special Study Zone. The Charnock Fault, a potentially active fault that may be located near or through eastern portions of LAX property, is considered to have low potential for surface rupture. Therefore, the NOP concluded that impacts to people or structures are considered less than significant and this topic required no further analysis in the SPAS Draft EIR. In this context, structures include tunnels as well as elevated structures such as the APM or elevated roadways or busways.

SPAS-PC00130-909

Comment:

Soil conditions under the north runway may or may not be significant but more detail is required to ensure against construction or maintenance issues.

Response:

Improvements to the north airfield have been developed at a program level of planning for SPAS, and therefore have been analyzed at a program level in the SPAS Draft EIR. Details regarding soil conditions and other considerations would be determined and addressed at the project level during engineering design, and would be subject to further environmental review under CEQA, at which time feasible mitigation measures to reduce any significant impacts to a less than significant level would be required.

SPAS-PC00130-910

Comment:

VI Geology & Soils (a) ii.
A-8

Seismic ground shaking. During the Northridge quake several back up power systems failed at LAX. Are alternative energy supplies available?

Response:

Regional power outages within the LADWP system result in a loss of power at LAX. LAX has generators that provide emergency back-up power in the event of a regional power outage. The back-up power capacity only supports emergency evacuation and essential systems for life safety. Regional power outages result in an interruption of normal airport operations until such type as primary power can be restored. Non-essential services, such as baggage systems, elevators/escalators/moving walkways, screening systems, passenger boarding bridges, area lighting, and HVAC systems are all off-line until primary power is restored. In the event of a loss of power at the CUP, a back-up generator provides back-up power to all emergency lighting and power circuits, including the Control Room servers, fire alarm, Uninterruptable Power System (UPS), Facility Monitoring and Control System (FMCS), and communication systems.

Regarding the loss of power following the Northridge earthquake, as noted above, during regional power outages, such as occurred following the Northridge earthquake, there is a loss of primary power at LAX. LAWA records do not indicate that back-up power failed during this time period, nor do staff recall any failures of the back-up power supply. While the loss of primary power at LAX is an inconvenience and affects airport operations, there are no environmental impacts associated with a loss of primary power during such events.

No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00130-911

Comment:

What are the evacuation procedures to be followed for the airport in case of an earthquake, and how will this impact the local communities?

Response:

Please see Responses to Comments SPAS-PC00094-2 and SPAS-PC00130-217 regarding emergency response plans.

SPAS-PC00130-912

Comment:

VI Geology & Soils (a) iii.
A-8
Seismic related ground failure. Several major water runoff and sanitation processing lines go under LAX. If any of these are seriously damaged what is the potential for sinkholes or other damage to structures at the surface?

Response:

Please see Topical Response TR-SPAS-LR-1 regarding the depth to outfall sewers that lie beneath LAX and Response to Comment SPAS-PC00130-348 regarding the relationship between sewer lines and the north airfield improvements. As indicated in those responses, none of the outfall sewers that lie beneath LAX would be affected by the SPAS alternatives. Please see Response to Comment SPAS-PC00130-51 regarding sink holes at LAX.

SPAS-PC00130-913

Comment:

Since the LAX area was built on a Coastal plain, what impacts would liquefaction have?

Response:

The potential for the SPAS alternatives to expose people or structures to hazards associated with seismic-related ground failure, including liquefaction, was addressed in Section VI.iii of the Initial Study included in the 2008 LAX SPAS EIR Notice of Preparation (NOP) and in the 2010 NOP Initial Study, provided as Appendix A of the SPAS Draft EIR. As explained therein, the potential for seismic-related ground failure caused by liquefaction at LAX is considered low. As part of the proposed project, all construction would be designed in accordance with the provisions of the Uniform Building Code (UBC) and the City of Los Angeles Building Code (LABC). The Initial Study determined that, since the proposed project would comply with UBC and LABC requirements, potential impacts associated with seismic-related ground failure would be less than significant, and no mitigation measures are required. As such, in accordance with Sections 15063(C)(3)(A) and 15128 of the State CEQA Guidelines, the potential for impacts associated with liquefaction was not discussed in detail in the SPAS Draft EIR.

SPAS-PC00130-914

Comment:

Is there potential for natural gas leakage pathways along fault lines from natural sources since the entire Playa del Rey area was once an oil field? Can gas leakage occur at LAX along a fault line from the Gas Company reservoir that is under the bluff in Playa del Rey and under the wetlands near Playa Vista?

Response:

There are no known natural gas leakage pathways along fault lines near LAX property. Please see Response to Comment SPAS-PC00130-878 regarding faults in the vicinity of LAX.

SPAS-PC00130-915

Comment:

What effect, if any, would the proposed Woodside Energy Natural Gas project have on LAX? Please describe how each of the components may affect LAX - gas line connection in or through the coastal bluff, high pressure lines running underneath Westchester Parkway, distribution facility at 98th Street and Bellanca near the Neutrogena offices, and WallyPark parking garage.

Response:

The Woodside Natural Gas pipeline project referred to in this comment was suspended by the project proponent subsequent to preparation of this comment.1 Resumption of this project is not reasonably foreseeable at this time, therefore, the project was not included in the cumulative analysis in the SPAS Draft EIR.

1. Woodside Petroleum Ltd., Woodside Suspends Oceanway Development, January 16, 2009.

SPAS-PC00130-916

Comment:

VI Geology & Soils (a) iii.
A-9
Even if there are not major seismic hazard areas identified within LAX, what about nearby areas that can impact access to LAX? If normal access to LAX is blocked are there alternative routes that can handle the traffic loads?

Response:

Please see Responses to Comments SPAS-PC00094-2 and SPAS-PC00130-217 regarding emergency response plans.

SPAS-PC00130-917

Comment:

As there was seismic concern about the Manchester Square-CTA tunnel, what about people movers or elevated roadways?

Response:

Please see Response to Comment SPAS-PC00130-908 regarding potential impacts of the SPAS alternatives related to seismic activity.

SPAS-PC00130-918

Comment:

What UBC (Universal Building Code) and LABC (LA Building Code) requirements are applicable? The LAX Specific Plan Sec. 3 "Relationship to the Los Angeles Municipal Code and other Ordinances" negates Site Plan and "Major" Development Project Ordinances (item D).

Response:

As noted in Sections 3.A and 3.B of the LAX Specific Plan, the regulations of the Specific Plan are in addition to those set forth in the planning and zoning provisions of the Los Angeles Municipal Code (LAMC) and any other relevant ordinances, although provisions of the Specific Plan shall prevail if specific regulations in the Specific Plan are different from those in the LAMC or other relevant ordinances. As noted by the commentor, Section 3.D does state that Site Plan Review and "Major" Development Projects approvals shall not apply within the Specific Plan Area. This is because projects will be reviewed at a detailed level through the LAX Plan Compliance Review Process established under the LAX Specific Plan, rendering these other approvals duplicative and unnecessary. The Uniform Building Code (UBC) and Los Angeles Building Code (LABC) will continue to apply to all development at LAX, including projects associated with the SPAS alternatives. The SPAS Draft EIR is a programmatic document. Details regarding which building code requirements would apply to specific construction projects would be determined at detailed levels of planning and engineering design.

SPAS-PC00130-919

Comment:

VI Geology & Soils (c) soil stability
A-10
Is there any plan to add earthen berms on the north and south borders of LAX to reduce the transmittal of low frequency noise?

Response:

Acoustical barriers are only useful for reducing noise impact from aircraft activity on the ground, and their benefits are greatly affected by surface topography and wind conditions. The effectiveness of a barrier depends on the distance of the noise source from the receiver and the distance of each from the barrier itself, as well as the angle between the ends of the berm and the receiver. While noise berms and noise walls can attenuate noise, they would be largely ineffective for attenuation of aircraft overflight noise. The noise levels at LAX are so dominated by the noise of aircraft in flight, the reductions of ground noise single-events by berms is not considered effective for noise abatement. Section 4.10.1.7 of the SPAS Draft EIR discusses various abatement and mitigation techniques of aircraft noise at LAX to reduce the impacts of the SPAS alternatives. Please also see Response to Comment SPAS-PC00170-1.

SPAS-PC00130-920

Comment:

Since we don't know precisely where major sewage and drainage pipes are precisely located, and the soil is very sandy, what is the likelihood of sewer or pipes being disrupted? Have there been any ground issues such as sinkholes at LAX in the past?

Response:

Please see Response to Comment SPAS-PC00130-898 regarding the presence of sewer lines beneath LAX. Please see Response to Comment SPAS-PC00130-348 and Topical Response TR-SPAS-LR-1 regarding the relationship between sewer lines and the north airfield improvements and Lincoln Boulevard realignment, respectively. As indicated in those responses, none of the outfall sewers that lie beneath LAX would be affected by the SPAS alternatives. As explained on page 4-3 of the EIR, the SPAS Draft EIR is a programmatic document. Project-level impacts associated with implementation of individual components would be assessed in future CEQA documents, including impacts associated with utilities such as wastewater lines. Please see Response to Comment SPAS-PC00130-51 regarding sink holes at LAX.

SPAS-PC00130-921

Comment:

VI Geology & Soils general
A-11
Since the size and location of facilities is not delineated in the NOP, what special assessments will be made to determine how stable the ground is in areas of new construction?

Response:

The potential for the SPAS alternatives to expose people or structures to hazards associated with geology and soils was addressed in Section VI of the Initial Study included in the 2008 LAX SPAS EIR Notice of Preparation (NOP) and in the 2010 NOP Initial Study, provided as Appendix A of the SPAS Draft EIR. As explained therein, as part of all SPAS alternatives, all construction would be designed in accordance with the provisions of the Uniform Building Code (UBC) and the City of Los Angeles Building Code (LABC). Since all SPAS alternatives would comply with UBC and LABC requirements, potential impacts associated with geology- and soils-related hazards would be less than significant, and no mitigation measures are required. As such, in accordance with Sections 15063(c)(3)(A) and 15128 of the State CEQA Guidelines, the potential for impacts associated with geology and soils was not discussed in detail in the SPAS Draft EIR. Prior to implementation of any of the components of the SPAS alternatives, project-specific geotechnical studies would be conducted as necessary during detailed engineering design to identify issues associated with soil stability or other geotechnical concerns. Measures to address any project-specific issues that are identified would be incorporated into the project design.

SPAS-PC00130-922

Comment:

Given that there have been issues with sewer drains in the area and that the area has hundreds of formerly used oil wells that had water pumped into them, is there any likelihood that additional problems will arise slowing construction or requiring special measures?

Response:

Please see Topical Response TR-SPAS-LR-1, and Response to Comment SPAS-PC00130-348 regarding sewers located beneath LAX. Please see Response to Comment SPAS-PC00130-113 regarding plugged and abandoned oil wells at LAX. As indicated in that response, although there are no active wells at LAX, there are seven plugged or abandoned wells located within the airport property (see Figure F4.17.2-1 in Section 4.17.2 of the LAX Master Plan Final EIR). Compliance with existing

regulatory requirements pertaining to construction near plugged and abandoned oil wells would ensure that construction near these wells would not cause significant adverse impacts.

SPAS-PC00130-923

Comment:

VII Hazards &
Hazardous Matl.
A-12
Since there are numerous carcinogenic items in use at an airport including aviation fuel, could the repeated spillage and evaporation cause a health hazard? What about fuel that is dumped during emergencies or fuel that is released in flight from major accelerations and landing?

Response:

From the speciation profile developed by the California Air Resources Board for aircraft jet kerosene (Jet A), most of the compounds readily found in Jet A are not carcinogenic. Unlike gasoline, Jet A has relatively low volatility and thus is more likely to be absorbed onto soils while microbial activity tends to reduce the soil concentrations of Jet A over time.

Fuel dumping from aircraft (either while on the ground or airborne) is not allowed at LAX or any U.S. airport, except for emergency situations. There are important regulatory, economic, safety, and environmental reasons for this.

For example, FAA regulations prohibit the dumping of fuel from certificated aircraft. (Please see 14 CFR Part 34 and FAA Advisory Circular 34-1B regarding fuel venting regulations). FAA has promulgated strict guidelines on the location, route, and altitude should fuel dumping become necessary. These precautions are designed to avoid or minimize hazardous conditions in the air and on the ground as well as the potential environmental impact. Additionally, the cost for fuel is one of the largest expenses for airlines and cargo carriers. Therefore, fuel conservation is an important and significant cost-saving measure.

In summary, fuel dumping is extremely rare and only occurs in emergency situations to reduce the landing weight and the risk of fire for the distressed aircraft. Whenever possible, it is done at higher altitudes (i.e., greater than 5,000 feet above ground level) and over the ocean so the fuel can evaporate or disperse before reaching ground level.

Often, the white vapor trails emanating from the wing tips of landing aircraft are mistaken for fuel venting. These trails are actually the runoff of water vapor that has condensed on the wings as the colder aircraft descends into the warmer, more humid atmosphere.

SPAS-PC00130-924

Comment:

What about the potential for terrorism with hazardous materials since LAX is one of the most potent targets on the west coast?

Response:

The commentor provides no substantial evidence in support of its assertion regarding the potential for hazardous materials to be used in association with a terrorist action. Under CEQA, speculation is not substantial evidence, and therefore does not require analysis in an EIR. (Public Resources Code Section 21082.2; State CEQA Guidelines Section 15064(f)(5).) Please note that a security assessment of the SPAS alternatives is included in Appendix I of the Preliminary LAX SPAS Report to comply with the Stipulated Settlement and Section 7.G(2) of the LAX Specific Plan.

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the

adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00130-925

Comment:

VII Hazards & Hazardous Matl. (e)
A-13
There are many impacts to the community if the runways are moved north. There are many hazardous materials transported through the community. We expect transportation routes for hazardous materials to be carefully delineated and monitored. We expect LAWA to review and consider all of the suggestions from the 2004 Rand study as well.

Response:

As noted on page A-12 of the 2010 SPAS NOP, and summarized on page 4-573 of the SPAS Draft EIR, construction and operation of the SPAS alternatives would involve the routine transport of potentially hazardous materials or substances. Compliance with existing federal, state, and local regulations, and with the Procedure for the Management of Contaminated Materials Encountered During Construction, prepared in accordance with LAX Master Plan Commitment HM-2, would reduce the potential for accidental release of a hazardous material or substance to occur and would minimize the impact of an accident should one occur. Therefore, as concluded in the SPAS Draft EIR, none of the SPAS alternatives would create a significant hazard to the public or the environment through the routine transport of hazardous materials and substances.

LAWA has no jurisdiction over the delineation of routes for transporting hazardous materials and substances outside of airport property. Please see Response to Comment SPAS-PC00130-424 regarding the implementation of security issues recommended by the RAND Corporation.

SPAS-PC00130-926

Comment:

VII Hazards & Hazardous Matl. (g)
A-13
A-13 Are there any hazard control plans for LAWA that need to be updated? We are certainly concerned that if any disaster occurs the medical care facility that is most convenient would likely be blocked from community use by closure of Sepulveda Blvd.

Response:

Please see Responses to Comments SPAS-PC00094-2, SPAS-PC00130-217, and SPAS-PC00130-944 regarding emergency response plans and services.

SPAS-PC00130-927

Comment:

VII Hazards & Hazardous Matl. (h)
A-14
Although LAWA noted the lack of concern for wild fires etc. there is still concern that an air accident could cause a major fire due to the amount of fuel held by aircraft. We expect that a valid plan will be identified and any access issues will be resolved. At least one of the plans calls for relocation of Lincoln Blvd that includes a portion of the road inside of a tunnel. A fire in this area could be very disastrous, as would poisonous gas clouds. We are aware of several radioactive containers that have been damaged before or after arrival at LAX. There needs to be very specific plans on how to handle such incidents.

Response:

Safety risks associated with aviation accidents and incidents are analyzed in Section 4.7.2 of the SPAS Draft EIR. The adequacy of fire protection services and emergency response is analyzed in Section

4.11.1 of the SPAS Draft EIR. At a program level, these sections conclude that impacts of the SPAS alternatives would be less than significant. If the Lincoln Boulevard realignment is proposed for implementation, project-specific safety and fire protection analyses would be presented in project-specific CEQA documents.

As noted on page 4-994 in Section 4.11.1 of the SPAS Draft EIR, aircraft rescue and fire fighting is regulated by FAA under FAR Sections 139.315 through 139.319. Emergency response procedures in the event of an aircraft-related incident are described in Section 4.11.1. Fire safety on roadways is governed by state and local regulations, which are summarized on pages 4-995 through 4-997 of the SPAS Draft EIR. In addition, as noted on page 4-997, LAWA has developed the LAX Airport Emergency Plan, which addresses essential emergency-related and deliberate actions to ensure safety and the provision of adequate emergency services for LAX and surrounding communities.

Also, please note that the comment does not present any facts or evidence related to fire risks, poisonous gas clouds, or radioactive container damage.

SPAS-PC00130-928

Comment:

VII Hydrology and Water Quality (a)
A-14
A-14 A master plan for grey water usage should be created to work with Hyperion even though LAWA has a good record in this area.

Response:

LAWA's policies and achievements regarding the use of reclaimed water are outlined in Section 4.13.4 of the SPAS Draft EIR. As indicated on page 4-1382 of that section, LAWA's Sustainability Plan includes targets for increasing the use of reclaimed water in airport facilities. As noted on page 4-1380, LAWA uses reclaimed water to irrigate over 35 percent of its landscaped areas. Approximately 40.2 million gallons, or 123 acre-feet, of water is conserved each year through use of reclaimed water.

No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00130-929

Comment:

As aircraft and support equipment are produced with new exotic materials there can be a potential runoff issue when repairs are initiated or during maintenance.

Response:

The commentor provides no documentation or evidence to support the statement that "new exotic materials" are being used in aircraft and support equipment that would result in some sort of "potential runoff issue when repairs are initiated or during maintenance." LAWA is required to review and update its SWPPP annually. As part of the annual update, any changes in operations that could result in new chemicals or materials being used at any airport facilities are identified. If there were to be new materials in use at an airport facility that could affect water quality, LAWA would determine if the existing source control or treatment control BMPs in the SWPPP are adequate to prevent or minimize the discharge of the new materials in stormwater runoff, and, if necessary, revise practices or add additional BMPs to address the new pollutants.

SPAS-PC00130-930

Comment:

VII Hydrology and Water Quality (c)

A-15
There are independent plans being established currently for projects to supplement drainage filtration by the LA Sanitation Dept. in the north quadrant of LAX and in the Northside Development area.

Another potential issue is damaging of critical sewage and dry/wet water runoff control channels during construction and adversely impacting the gravity feed requirements of that system.

Response:

The drainage filtration project referred to in the comment appears to be the City of Los Angeles Bureau of Sanitation Stromwater Infiltration and Treatment Facility. Please see Responses to Comments SPAS-PC00149-15, SPAS-PC00130-897, and SPAS-PC00130-907 regarding this facility. Design and construction of the SPAS improvements would be undertaken so as not to damage critical wastewater and stormwater pipelines. Please see Topical Response TR-SPAS-LR-1 regarding the relationship between the Lincoln Boulevard realignment and the outfall sewers that are located beneath the airport.

SPAS-PC00130-931

Comment:

IX Land Use and Planning (a)
A-17
If eminent domain is exercised on a significant portion of the business district there could be separation of businesses into less than a critical mass to draw local community support. Also, if the runway protection zones are enforced and homes are taken on the northeast end of LAX, small pockets of remaining homes could be created. This potential must be fully disclosed.

Response:

A discussion of property acquisition that would occur under the SPAS alternatives is provided in Sections 2.3.1.11 and 4.9.6 of the SPAS Draft EIR. Specifically, the property acquisition that would be required under Alternatives 1, 2, 3, 4, 8, and 9 is shown in Figures 2-11, 2-12, 2-13, and 2-14 and listed in Table 2-4 and Table 2-5 in Section 2.3.1.11 of the SPAS Draft EIR. In addition, Table 4.9-5 in Section 4.9.6 of the SPAS Draft EIR presents a comparison of acquisition areas by land use for the applicable SPAS alternatives. As noted in Table 4.9-5, no acquisition is proposed for Alternatives 5, 6, and 7 since these alternatives focus on airfield and terminal components, although acquisition would be required for the ground access components with which these alternatives would be paired. As indicated in these figures and tables, no acquisition is proposed within the Westchester Business District.

Regarding the potential for changes in the RPZ to have an impact on the business district and homes and that eminent domain would be exercised, please see Responses to Comments SPAS-AL00007-26 and SPAS-PC00130-931. No acquisition is proposed within the Westchester Business District, as shown in Figure 2-11 and listed in Table 2-4 in Section 2.3.1.11 of the SPAS Draft EIR.

As indicated in Section 4.7.2.6.1 of the SPAS Draft EIR, there are several options that can be considered relative to addressing potential safety hazards associated with incompatible structures and uses being located within an RPZ; however, a determination as to the most suitable and practical option cannot be made until more detailed levels of planning and engineering on the selected alternative, if any, can be conducted in consultation with the FAA. It would be premature and speculative to say at this time whether incompatible structures or land uses within the RPZs would stay, be modified, or be removed. Information on specific options to address safety risks would be developed during project-specific CEQA review should an alternative with incompatible structures or uses within an RPZ be selected. It is appropriate for a first-tier program level EIR to defer detailed descriptions and impact analysis of individual projects in the program to future project-level CEQA documents. (State CEQA Guidelines Section 15383; Koster v. County of San Joaquin (1996) 47 Cal.App.4th 29, 37.)Section 4.7.2 of the SPAS Draft EIR, specifically pages 4-522 through 4-526 includes an analysis of impacts associated with modification or removal of structures and uses within the RPZ, should that be proposed in the future.

SPAS-PC00130-932

Comment:

IX Land Use and Planning (b)
A-17
There is some question as to how homes will be impacted if the runways move north. Several large apartment complexes and some schools will be much closer to runway activity with attendant noise and pollution as well as safety issues.

Response:

The potential noise, air quality, and safety impacts of the proposed SPAS alternatives were analyzed in Sections 4.2, 4.7.1, 4.7.2, 4.9, 4.10.1, 4.10.2, and 4.10.3 of the SPAS Draft EIR. The commentor is referred to these sections for further details. Please also see Response to Comment SPAS-PC00130-742 for a discussion of impacts on nearby schools.

SPAS-PC00130-933

Comment:

A 1980 study on LAX area school children showed that airport noise affected learning abilities. Newer, more effective methods for mitigating noise have been developed since soundproofing was provided to impacted schools. Does LAWA plan to offer sound proofing upgrades and air conditioning to LAUSD, private, and public schools to those located within the 1992 Noise Impacted Contour or for any who will sustain a 1.5 dB increase in noise? When new noise contours are estimated using updated aircraft mix estimates LAWA should assess the impacts.

Response:

The commentor does not discuss the "newer, more effective methods of mitigating noise." alleged in the comment, nor does the commentor explain how such methods would reduce or avoid a significant environmental impact caused by SPAS. With implementation of the noise insulation program, LAWA has substantially reduced noise levels in indoor areas well below existing conditions at the time of installation. SPAS-related aircraft noise impacts to schools are addressed in Section 4.10.1 of the SPAS Draft EIR (which includes information on the fleet mix as described in Section 4.10.1.6 of the SPAS Draft EIR). Significant aircraft noise impacts resulting from SPAS alternatives would be mitigated through LAX Master Plan Mitigation Measures MM-LU-3 and MM-LU-4, as summarized on pages 4-932 and 4-933 of the SPAS Draft EIR. MM-LU-1 is also applicable to schools (see page 4-686 of the SPAS Draft EIR). Please also see Response to Comment SPAS-PC00130-947.

While LAX Master Plan Mitigation Measures MM-LU-3 and MM-LU-4 would be implemented as LAX Master Plan requirements and are acknowledged in the SPAS Draft EIR, they have hereby been incorporated into Section 4.9.5 of the EIR, and the SPAS Draft EIR has been revised. Please see Chapter 5, Corrections and Additions Related to the SPAS Draft EIR.

SPAS-PC00130-934

Comment:

IX Land Use and Planning
(c)
A-17
Habitat issues remain not only in the formal "Blue Butterfly dunes" area, but also the plains areas that were the site of homes on the Northside development property. There were also some habitats on the east end of LAX that may need to be examined including Continental City.

Response:

Potential impacts to habitat are addressed in Section 4.3 of the SPAS Draft EIR. The biological resources study area addressed by the analysis is depicted in Figure 4.3-1 and is coincident with the

Airport Property Line depicted in the figure. As stated on page 4-164 of the SPAS Draft EIR, the biological resources study area includes all areas within the airport boundary, as well as adjacent areas with biological resources. Biological resources in the vicinity of the airport were also considered; however, areas immediately adjacent to the airport boundaries are fully developed and provide little to no habitat and do not contain biological resources that would be affected by the proposed project or alternatives. The biological resources study area includes the El Segundo blue butterfly habitat in the Los Angeles/El Segundo Dunes and the Dockweiler Beach habitat restoration area recently colonized by this species, the former home sites within LAX Northside, and areas within the east end of LAX including Continental City, which is proposed to be used as Construction Staging Area G under the SPAS alternatives.

SPAS-PC00130-935

Comment:

Street traffic is another major issue. Although LAWA is rerunning the traffic studies with a maximum of 15 additional intersections, it must still address all of the central terminal traffic as well. Further, greater use of mass transit must be evaluated.

Response:

The SPAS Draft EIR addresses on-airport traffic impacts (i.e., within the CTA) and off-airport traffic impacts in Sections 4.12.1 and 4.12.2, respectively. Existing and future (2025) Central Terminal Area (CTA) traffic conditions for each of the SPAS alternatives are assessed in Section 4.12.1 of the SPAS Draft EIR. Section 4.12.1.10 presents the proposed mitigation measures to address significant impacts to the on-airport transportation system from implementation of the SPAS alternatives. Table 4.12.1-15 on page 4-1103 shows that the percentage of airline passengers using transit increases to 2.5 percent.

As described in Chapter 2 of the SPAS Draft EIR, Alternatives 1, 2, 3, 8, and 9 each include one or more new off-airport facilities such as an Intermodal Transportation Facility (ITF), a Ground Transportation Center (GTC), or an Intermodal Transportation Center (ITC) intended to offer passengers alternative locations outside of the CTA to park or be dropped off, and allow them convenient access to the CTA via an Automated People Mover (APM) or consolidated busing operation. As also discussed on page 4-1199 of the SPAS Draft EIR, "options to extend the Metro Green Line to LAX are currently being studied by Metro. However, given that this proposed extension to LAX is in its early environmental planning stage, has not been approved, and if approved and constructed would not be operational until after the SPAS horizon year, it was not included in the 2010 or the 2025 scenarios." For additional discussion of transit improvements within the horizon year of the project, please see page 4-1103 of the SPAS Draft EIR.

SPAS-PC00130-936

Comment:

Open space must be maintained and so must community serving commercial. Wherever the airport has displaced affordable housing it should generate at least that much replacement affordable housing.

Response:

A discussion of potential impacts on open space and community serving commercial that could occur under the SPAS alternatives is provided in Chapter 2 and Section 4.9 of the SPAS Draft EIR. Specifically, as analyzed in Section 4.9.6 of the SPAS Draft EIR, because the SPAS alternatives are located within the boundaries of the LAX Plan, the only open space areas that would be affected are changes to navigational aids within the Los Angeles Airport/El Segundo Dunes Specific Plan area under Alternatives 1, 2, 3, 4, 5, 6, and 7. These impacts were determined to be less than significant, since the navigational aids are consistent with permitted uses within the Open Space designation of the Dunes Specific Plan. In addition, no public or notable open space areas would be acquired or affected under the SPAS alternatives as indicated in Tables 2-3, 2-4, 2-5, and Figures 2-10 and 2-11 in Chapter 2 and Table 4.9-5 in Section 4.9.6 of the SPAS Draft EIR. As also indicated in Tables 2-4 and 4.9-5, no residential acquisition is proposed under any of the alternatives.

Regarding community serving commercial uses, as indicated in Table 4.9-5 in Section 4.9.6 of the SPAS Draft EIR, the majority of properties that would be acquired under the SPAS alternatives are primarily airport-related rather than community serving uses. However, development of the SPAS project would require the removal of some community serving commercial uses located on LAWA property including an urgent care facility, Travelodge Hotel, Burger King Restaurant, and Denny's Restaurant. Relocation of these uses would be a business decision.

Regarding the potential for changes in the RPZ to have an impact on community serving commercial uses and that affordable housing would be displaced, as indicated in Section 4.7.2.6.1 of the SPAS Draft EIR, there are several options that can be considered relative to addressing potential safety hazards associated with incompatible structures and uses being located within an RPZ; however, a determination as to the most suitable and practical option cannot be made until more detailed levels of planning and engineering on the selected alternative, if any, can be conducted in consultation with the FAA. It would be premature and speculative to say at this time whether incompatible structures or land uses within the RPZs would stay, be modified, or be removed. Such information would be developed during project-specific CEQA review should an alternative calling for shifting Runway 6L/24R northward be selected. It is appropriate for a first-tier program level EIR to defer detailed descriptions and impact analysis of individual projects in the program to future project-level CEQA documents. (State CEQA Guidelines Section 15383; Koster v. County of San Joaquin (1996) 47 Cal.App.4th 29, 37.)

In the event that it is determined in the future that acquisition due to changes in RPZs is necessary, impacts would be addressed and mitigated in future project-specific CEQA documents. Section 4.7.2 of the SPAS Draft EIR, specifically pages 4-522 through 4-526 includes an analysis of impacts associated with modification or removal of structures and uses within the RPZ, should that be proposed in the future.

SPAS-PC00130-937

Comment:

XI Noise
A-18
Topography and single noise events should be taken into consideration when determining the areas impacted by noise. Placement of the terminal gates and taxiways, as well as any other relocated or new facilities should take into consideration so that the impacts from aircraft engines are minimized. When calculating noise, the proper aircraft mix should be used and an estimate of the runway uses should be confirmed as well. Although the preferred runway alternative for taking off is inboard, LAWA estimates that 10% are done on the outboard.

Response:

The commentor suggests that "topography and single noise events should be taken into consideration when determining the areas impacted by noise."

As described in Appendix J1-1 of the SPAS Draft EIR, modeled aircraft Community Noise Equivalent Level (CNEL) noise exposure maps are used as planning tools to allow the comparison of different scenarios of operations over a broad geographical area. The CNEL contour is used to develop the baseline conditions and the future (2025) conditions at buildout of the SPAS alternatives, and to delineate areas of significant impact for FAA analyses of noise exposure in California. CNEL predicts the weighted average noise conditions, which measures logarithmic averages of noise for multiple flights by applying noise penalties to evening and night flights. This is the method universally used in describing transportation noise occurring over a sustained period of time. The CNEL metric takes into consideration all single event noise levels to which every portion of the airport environs is exposed on an average day of the year. The use of the CNEL metric normalizes the effect of the noise energy exposure across all users in a manner that allows comparison between different areas exposed to different characteristics of noise. This method of comparing the total noise received at each location appropriately considers the effect of a proposed project and is critical in determining the noise mitigation required to minimize noise impacts.

The U.S. Geological Survey (USGS) terrain data for LAX and the surrounding communities were used as one of the input variables in the aircraft noise modeling for the SPAS alternatives. The FAA's

Integrated Noise Model (INM) uses terrain elevations to adjust observer-to-aircraft distances when computing aircraft noise levels. All the aircraft noise analyses for the SPAS Draft EIR were conducted with the USGS sourced 1/3 arc-second National Elevation Dataset in the GridFloat format. The National Elevation Dataset is available at the USGS website, http://seamless.usgs.gov, which provides a map interface that allows for the terrain data to be downloaded within a defined area of interest.

The commentor also mentions the use of proper fleet mix and runway use. As described in Section 3.1.1.4 of Appendix J1-1 of the SPAS Draft EIR, the baseline (2009) aircraft fleet mix and operations were derived from the FAA Air Traffic Control Tower Counts and LAWA's noise and operations monitoring system data. Table 3 in Appendix J1-1 of the SPAS Draft EIR provides the average annual day operations and fleet mix for the baseline (2009) conditions. The average annual day operations used for aircraft noise modeling in the future alternative scenarios were developed from the 2025 Design Day Flight Schedule (DDFS) developed for the SPAS Draft EIR. Table 8, Appendix J1-1 of the SPAS Draft EIR provides the average annual day operations and fleet mix for the future 2025 conditions.

As described in Section 3.1.1.1 of Appendix J1-1 of the SPAS Draft EIR, the percentage use of the existing runways for the baseline (2009) conditions was based on information provided by LAWA's flight data through analysis of records of flight operations from the FAA Airport Traffic Control Tower radar data at LAX. Based on the data, the majority of the flights departed off the inboard runways and about 5 percent of the flights used the outboard runways for departures in 2009. Table 1 in Appendix J1-1 of the SPAS Draft EIR provides the 2009 conditions runway utilization percentages. Future runway assignments were developed utilizing SIMMOD airfield and airspace simulation model. The future runway use percentages for the Alternative scenarios are presented under each of the alternative section in Appendix J1-1 of the SPAS Draft EIR.

SPAS-PC00130-938

Comment:

The health impacts of noise exposure must also be addressed.

Response:

An overview of the effects of noise on humans, including hearing loss, communication interference, sleep disturbance, physiological responses, and annoyance, is provided in Section 4.10.1.1.3 of the SPAS Draft EIR. In addition to potential effects related to hearing loss and annoyance, as described in Section 4.10.1.2.3, the aircraft noise analysis completed for the SPAS Draft EIR includes an evaluation of the effects of single event aircraft noise relative to the potential for increased aircraft activity (i.e., number of arriving or departing flights) occurring at night to result in increased nighttime awakenings (sleep disturbance), and relative to potential disruption of classrooms and the educational process from overflights of additional aircraft during school hours. The aircraft noise impacts, including single event noise impacts, associated with the SPAS alternatives are discussed in Section 4.10.1.6 of the SPAS Draft EIR.

SPAS-PC00130-939

Comment:

The use of noise canceling equipment is required to the extent feasible, and the most sophisticated equipment available should be identified and analyzed. Which noise canceling speaker systems been considered?

Response:

Please see Section 4.10.1.7 of the SPAS Draft EIR regarding the various abatement and mitigation techniques of aircraft noise analyzed in the SPAS Draft EIR.

Regarding of the use of noise cancelation speaker systems, please see Response to Comment SPAS-PC00050-4, which addresses a similar suggestion.

SPAS-PC00130-940

Comment:

Please provide a contour map of areas subjected to at least 30 airport/aircraft noise events at 65 dB or above in a day, and/or were subjected to at least two 65 dB or greater events from midnight to 7 a.m.

Response:

Section 4.10.1 of the SPAS Draft EIR provides a comprehensive analysis of aircraft noise impacts for a variety of scenarios including daily total aircraft noise exposure levels, presented in terms of Community Noise Equivalent Level (CNEL), and single event noise. The analysis accounts for the various aircraft types, time of operations including evening and nighttime when noise "penalties" are assigned to each event (see Section 4.10.1.1.1 of the SPAS Draft EIR for further explanation), specific runway assignments, and other detailed assumptions as described in Section 4.10.1 and Technical Appendix J1-1 of the SPAS Draft EIR. The aircraft noise analysis contained in the SPAS Draft EIR is sufficient and appropriate for addressing the potential impacts of the SPAS alternatives, and the very particular and non-standard aircraft noise analyses requested by the commentor are unwarranted. CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commentors. (State CEQA Guidelines Section 15204.)

SPAS-PC00130-941

Comment:

XII Population and Housing (c)
A-20
This could be significant depending on the home and business displacements for alternatives that propose moving runways north.

Response:

Regarding the displacement of homes and businesses within the RPZ for alternatives proposing moving runways north, please see Responses to Comments SPAS-AL00007-26 and SPAS-PC00130-931.

SPAS-PC00130-942

Comment:

When LAWA does it's analysis it must assume that Manchester and Belford Square areas are empty and that everything that is constructed there adds to the area traffic.

Response:

The content of this comment is similar to comment SPAS-PC00130-767; please refer to Response to Comment SPAS-PC00130-767. Additionally, please see Section 4.12 of the SPAS Draft EIR for a discussion and analysis of the traffic impacts associated with the SPAS alternatives. The analysis appropriately considers all reasonably foreseeable construction, and accurately describes existing conditions.

SPAS-PC00130-943

Comment:

XIII Public Services (a-c)
A-21
The EIR for the Westchester-Playa del Rey Plan states that a substantial increase in fire and police protection manpower is required to meet current zoning estimates. Much of the community to the north relies on Fire Station 5 for rapid community response. This station deploys both the Manchester Boulevard and Westchester Parkway. This dual access must be maintained.

Response:

It is acknowledged that increases in fire and police protection manpower would be required in association with new development that could occur within the Westchester-Playa del Rey Plan area under current zoning. Alternatives 1 through 9 would not affect the fire and emergency service area of Fire Station 5, which includes LAX and portions of Westchester, Loyola Village, Playa del Rey, and Vista del Mar.

Construction-related impacts related to ground access improvements that include the realignment of Lincoln Boulevard under Alternatives 1, 5, and 6 may have the potential to hamper or delay emergency response along Westchester Parkway. However, as discussed in Section 4.11.1, construction-related impacts such as temporary roadway delays, would be reduced or avoided through LAX Master Plan Commitment C-1, Establishment of a Ground Transportation/Construction Coordination Office. In addition, LAX Master Plan Commitments ST-9, Construction Deliveries, ST-12, Designated Truck Delivery Hours, ST-14, Construction Employee Shift Hours, ST-17, Maintenance of Haul Routes, ST-18, Construction Traffic Management Plan, ST-19, Closure Restrictions of Existing Roadways, ST-21, Construction Employee Parking Locations, and ST-22, Designated Truck Routes, would serve to further reduce potential traffic congestion that would have the potential to hamper or delay emergency response during construction.

Operation of the realignment of Lincoln Boulevard, which would involve relocating a portion of the roadway below grade and/or in a tunnel, would not the affect operation and access of fire protection and emergency services along Manchester Boulevard and Westchester Parkway.

SPAS-PC00130-944

Comment:

For emergency services at LAX there must be a good emergency health care plan in place with capacity to meeting both LAX and community needs.

If an event occurs at LAX that causes airport closure this facility will be unavailable to the surrounding community. The nearest urgent care for local residents is located on Sepulveda north of Century. In view of the closure of several emergency rooms and Daniel Freeman Hospital does the needed capacity still exist? If not, what solution is proposed?

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. As discussed in Response to Comment SPAS-PC00130-217, Section 4.11.1 of the SPAS Draft EIR evaluated whether any of the SPAS alternatives would result in restricted emergency access, increased response times, or extended station response distances beyond the standards maintained by the agencies serving LAX and the surrounding communities. LAX Master Plan Commitments FP-1, LAFD Design Recommendations, and PS-2, Fire and Police Facility Space and Siting Requirements, as well as enforcement of Federal Aviation Regulations and state and local fire code requirements, would ensure maintenance of adequate fire and emergency response times; LAFD staffing, including EMT and paramedic personnel; equipment; facilities; and emergency access. As noted on page 2-55 of the SPAS Draft EIR, the urgent medical care facility on Sepulveda Boulevard would be removed under all of the SPAS alternatives except Alternative 4. The facility could potentially be relocated elsewhere in the airport area. This facility is privately operated; any decision to relocate would be at the discretion of the facility owners. It should be noted that the urgent care facility provides unscheduled, walk-in care outside of a hospital emergency department. Currently, in the event of an emergency at LAX requiring medical attention, emergency response is provided by the Los Angeles Fire Department and affected persons are transported to a nearby hospital, if required. The LAFD does not transport emergency cases to the urgent care facility.

SPAS-PC00130-945

Comment:

Several schools will be subjected to increased noise and pollution.

Response:

The potential noise and pollution impacts of the proposed SPAS alternatives on schools are analyzed in Sections 4.2, 4.7.1, 4.9, 4.10.1, 4.10.2, and 4.10.3 of the SPAS Draft EIR. As further described in these applicable analyses, there would be significant and unavoidable air quality impacts under all of the SPAS alternatives; significant and unavoidable acute non-cancer health hazard impacts under all of the SPAS alternatives; significant and unavoidable interim aircraft noise impact prior to mitigation under Alternatives 1, 2, 3, 4, 5, 6, and 7; less than significant road traffic noise impacts under Alternatives 1, 2, 3, 4, 8, and 9; and significant and unavoidable construction noise impacts under all of the SPAS alternatives. Please also see Response to Comment SPAS-PC00130-742 for further discussion of impacts to sensitive uses along Westchester Parkway.

SPAS-PC00130-946

Comment:

Air pollution especially must be assessed for not only 10 and 2.5 micron size but also smaller (i.e. 0.1 as done in the 2007 CARB study of LAX particle pollution).

Response:

Please refer to Response to Comment SPAS-PC00130-225 for a discussion of ultrafine particles (UFP, also known as PM0.1) and the 2007 UCLA report. Air quality impacts of PM2.5 and PM10 are included in Section 4.2.6 of the SPAS Draft EIR. Impacts of PM2.5 and PM10 were found to be significant for all alternatives.

SPAS-PC00130-947

Comment:

Although several schools have been previously sound proofed during earlier programs, determination should be made if another round of soundproofing is appropriate. Several churches and schools may be subjected to enough noise to cause learning impairment under EPA or other standards (i.e. NIH).

Response:

Impacts associated with schools and places of worship (including churches) were addressed in SPAS DEIR Section 4.10.1.6 of the SPAS Draft EIR. As described in Section 4.9.3.3 of the SPAS Draft EIR, sound insulation is a component of the existing LAWA Aircraft Noise Mitigation Program (ANMP), which will continue to be implemented.

SPAS-PC00130-948

Comment:

XIII Public Services (d)
A-22
Some airport land, such as Nielson Field and the Westchester Golf Course, is currently used for open space. If this use is diminished or if promised elements (i.e. Golf Course) is not restored the negative impacts of this should be analyzed and mitigated.

Response:

None of the SPAS alternatives propose changes to the Carl E. Nielsen Youth Park or the Westchester Golf Course. Please see Response to Comment SPAS-PC00130-900 regarding restoration of the three holes at the Westchester Golf Course, a project that was completed in 2010. For discussion of the alternatives' impacts, please see Chapter 4 of the SPAS Draft EIR.

SPAS-PC00130-949

Comment:

XIII Public Services (e)
A-22
Some other governmental uses should be investigated, as well as new housing opportunities for Manchester Square.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. The comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR; therefore no further response is required. (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

The intent of the referenced section of the 2008 SPAS NOP is to determine if the SPAS alternatives would result in "substantial adverse physical impacts associated with new or physically altered governmental facilities, construction of which could cause significant environmental impacts," not to investigate other governmental uses that could be proposed in lieu of the SPAS improvements. As indicated on page 1-9 of the SPAS Draft EIR, SPAS must focus on potential alternative designs, technologies, and configurations for the LAX Master Plan Program that would provide solutions to the problems that the Yellow Light Projects were designed to address. It is not the purpose of SPAS to investigate other governmental uses or new housing opportunities for Manchester Square. The comment provides no evidence that other governmental uses would (1) achieve the basic objectives of the project and (2) could avoid or substantially lessen one or more of the significant effects. (State CEQA Guidelines Section 15126.6(a).) The SPAS alternatives represent a reasonable range of alternatives that would attain most of the basic objectives of the project, sufficient to allow informed decision-making and public participation. (State CEQA Guidelines Section 15126.6(a).)

SPAS-PC00130-950

Comment:

Certainly the need for additional road access is evident due to the increases of traffic from current levels to the "nominal" 78.9 MAP. Also cargo and other related causes of traffic need to be assessed fully. Traffic should be diverted away from residential communities. Even if there are only moderate increases in traffic from LAX the overall impact may still be substantial due to major increases in present and authorized development zoning changes.

Response:

The comment indicates that increases in passenger and cargo traffic at LAX need to be assessed, as well as "other related causes of traffic," and that traffic should be diverted from residential communities. The use of Los Angeles' travel demand forecasting model in the traffic analysis takes into account the traffic associated with the activities discussed in the comment. As described in Section 4.12.2.2.2 of the SPAS Draft EIR, the model includes growth dynamically and iteratively assigns traffic over the entire roadway network, including both freeways and surface streets. Figure 4.12-2-2 illustrates the model components and process. As described on page 4-1208 in Section 4.12.2.2.3, the 2025 forecasts included growth projected by SCAG for the surrounding region, which was adjusted where necessary to ensure that it accounted for all known development projects in the study area.

SPAS-PC00130-951

Comment:

XV
Transportation/Circulation
A-23

Potential traffic changes in the CTA must be assessed. Are there better ways to direct the traffic from the surrounding areas into LAX? LOS around LAX is marginal on many streets already. LAX modifications such as the location of the cargo support businesses, consolidated rental car facility, integrated transportation near Continental City and more must be included in the assessments. The total costs and fair share allocations of improvements must be addressed.

Response:

The SPAS Draft EIR analyzes both on-airport and off-airport traffic associated with the development of the SPAS alternatives. As discussed in Sections 4.12.1 and 4.12.2, mitigation measures are proposed for those significant impacts identified by the analysis. Importantly, the SPAS Draft EIR analyzes alternatives that are designed to achieve the project objectives, including improving the ground access system at LAX. The type and number of alternatives considered represent a reasonable range of alternatives that will foster informed decision-making by allowing the decision-makers to evaluate the comparative merits of the alternatives. (State CEQA Guidelines Section 15126.6(a).)

Section 4.12.1.6 of the SPAS Draft EIR provides an overview of the key on-airport traffic related elements of the SPAS alternatives, and briefly describes how they were taken into account in the impact analysis. Pages 4-1094 through 4-1096 in Section 4.12.1.6.2 of the SPAS Draft EIR defines a number of non-SPAS improvements within the Central Terminal Area (CTA), which are expected to be implemented by 2025 including the proposed new Terminal 1.5, Terminal 2.5, and the Midfield Satellite Concourse Passenger Processor, which will add needed curbside to the CTA.

While curbside currently exists between Terminals 1 and 2, the site of the proposed new Terminal 1.5, it is severely underutilized on both the arrivals and departures level roadways since there is no terminal building with passenger processing functions adjacent to this section of curbside. The construction of a new Terminal 1.5 will attract vehicles to this underutilized section of curbside, provided needed relief to the curbs at both Terminals 1 and 2. The Midfield Satellite Concourse Passenger Processor will create more than 500 feet of additional curbside on both the arrivals and departures level roadways, new curbside which currently does not exist.

Currently LAX traffic is directed to the major arterial roadways such as Century Boulevard, Sepulveda Boulevard, Aviation Boulevard, La Cienega Boulevard, etc. SPAS Alternatives 1, 2, 3, 8, and 9, described and depicted in Chapter 2 of the SPAS Draft EIR, each include one or more new off-airport facilities such as an Intermodal Transportation Facility (ITF), a Ground Transportation Center (GTC) or an Intermodal Transportation Center (ITC) intended to offer passengers alternative locations outside of the CTA to park or be dropped off, and allow them convenient access the terminal area via an Automated People Mover (APM) or busing operation. In addition, SPAS Alternatives 3, 4, 8, and 9 each include a proposed Consolidated Rental Car Facility (CONRAC) intended to provide a central location for rental car activity and reduce the number of shuttle buses serving the CTA by consolidating each of the individual rental car company shuttle operations into a single operation.

The comment states that "LOS around LAX is marginal on many streets already." Table 4.12.2-11 on pages 4-1219 through 4-1224, of the SPAS Draft EIR presents the level of service analysis results for the Baseline (2010) without Alternative scenario. As shown, and summarized on pages 4-1217 and 4-1218, 30 of the 200 study intersections operate at LOS E or LOS F during at least one analyzed peak hour, including locations lying on Sepulveda Boulevard, La Cienega Boulevard, Prairie Avenue, Imperial Highway and El Segundo Boulevard.

Please see Chapter 8 of the Preliminary LAX SPAS Report for a general discussion of the costs of each alternative. LAWA would be responsible for the costs of the on-airport ground transportation system improvements proposed by LAWA under the various SPAS alternatives such as the CONRAC facility proposed under Alternatives 3, 4, 8, and 9, the ITF proposed under Alternatives 1, 2, 8, and 9, the GTC and ITC proposed under Alternative 3, the elevated busway proposed under Alternatives 1, 2, and 8, and the APM proposed under Alternatives 3 and 9. As described on page 4-1230 of the SPAS Draft EIR, LAWA would contribute funding on a fair share basis for off-airport ground transportation system improvements, such as intersection improvements. However, LAWA's financial contribution for off-airport ground transportation system improvements would be based upon the proportion of, traffic impacts attributable to the implementation of the LAX Master Plan, and would occur at the time the individual future improvements are implemented, subject to federal approval regarding airport revenue

diversion. Additionally, it should be noted that LAWA's funding responsibilities for any off-airport traffic mitigation measures would be limited by constitutional nexus and rough proportionality requirements (State CEQA Guidelines Section 15041(a)).

SPAS-PC00130-952

Comment:

XV Transportation/Circulation
A-24
Locations and stops, methods for supporting baggage handling, etc., must be identified.

Response:

It is unclear what the commentor referred to as "locations and stops."

Regarding "methods for supporting baggage handling, etc..." the SPAS Draft EIR analyses assumed that baggage handling and check-in locations would remain in their current configurations and locations in 2025, with the exception of additional locations at the new Terminal 1.5, as discussed in Section 4.12.1.6.2 on page 4-1095 of the SPAS Draft EIR. This was considered to be a conservative assumption from the perspective of the on-airport traffic analyses.

SPAS-PC00130-953

Comment:

XV Transportation/Circulation
A-24
Movement of the runways will modify the flight tracks of approaching and departing aircraft. This change must be studied to assess impacts on the number and urgency of go-arounds and other noisy, polluting flight maneuvers.

Response:

An aircraft noise impacts analysis was conducted for each of the SPAS alternatives and the results are included in Section 4.10.1 of the SPAS Draft EIR. An air quality analysis was conducted for each of the SPAS alternatives and the results are included in Section 4.2 of the SPAS Draft EIR. These and other related analyses in the SPAS Draft EIR account for the runway movements associated with each alternative.

SPAS-PC00130-954

Comment:

A July 2007 Airline Pilots Association White Paper on incursions notes modest air traffic increases have resulted in major increases in the number of incursions. Air capacity assessments must be identified and quantified for all key factors, not just the first order limiting factor of capacity growth. Although gate capacity is the current capacity limiting factor, if it is resolved several others can become significant. Several factors of concern are, but not limited to, the number of cars entering the CTA, taxiway routes for aircraft to get to gates, and the number of aircraft operations per unit time as the required separation distance in the sky that limits the number of takeoffs and landings. Otherwise, if the limiting factor for capacity is the only factor addressed, as soon as the Settlement limitation on embarkation gates expires, capacity may be dramatically increased without a former EIR review.

Response:

As described in Section 2.2 of the SPAS Draft EIR, LAWA is seeking to provide airfield improvements that support the safe and efficient movement of aircraft at LAX, including reducing the potential for airfield hazards and enhancing the overall safety of airfield operations through runway and taxiway design. There is no evidence that any of the SPAS alternatives would result in air traffic capacity increases. As discussed in Section 1.4 of the SPAS Draft EIR, the majority of operational-related impacts are primarily attributable to future growth in aircraft and passenger activity levels independent

of SPAS. Section 4.7.2, Safety, of the SPAS Draft EIR addresses whether and how the proposed alternatives could affect the potential for aviation incidents and accidents, as defined under NTSB Regulation Part 830, as well as runway incursions, as defined by the Civil Aviation Organization. (See Section 4.7.2.1 of the SPAS Draft EIR.) As further explained on page 4-486 in Section 4.7.2 of the SPAS Draft EIR, "the impacts of an airport's projects on airspace are typically addressed in a separate analysis performed by the FAA following completion of environmental review."

The commentor referred to "air capacity assessments." It is assumed that the commentor meant to refer to "airspace" capacity assessments. In simple terms, an "airspace capacity assessment" is an evaluation of airspace used for aircraft operations to determine the capacity of that airspace based on FAA air traffic procedures. Airspace capacity assessments were not an objective of the SPAS effort. Please Section 2.2 of the SPAS Draft EIR for a discussion of the SPAS objectives.

As explained in Section 6.2 of the Preliminary LAX SPAS Report, the 78.9 MAP activity level forecast relied upon in the EIR reflects that fact that all of the SPAS alternatives include (i) no more than 153 gates and (ii) the amendment of the LAX Specific Plan section 7.H requiring action to encourage further shifts in passenger and airline activity to other regional airports if the annual aviation activity analysis forecasts that the annual passengers for that year at LAX are anticipated to exceed 75 MAP, and, by requiring a Specific Plan Amendment Study if the annual aviation activity analysis forecasts that LAX annual passengers for that year are anticipated to exceed 78.9 MAP. Both this physical gate limit and the proposed amendment to the LAX Specific Plan reflect the fact that the practical capacity of LAX is based on market assumptions, as well as the expected physical characteristics of the various functional elements of the airport and how they are planned and expected to work together, given how the market is likely to respond and use LAX.

Regarding conducting capacity assessment of other related facilities, please see Response to Comment SPAS-AL00008-27. CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commentors. (State CEQA Guidelines Section 15204.)

SPAS-PC00130-955

Comment:

Traffic from parking areas must be assessed after the parking locations are determined. This traffic is a source of noise and pollution, as well as frustrating easy access to the central terminal area.

Response:

Both the on-airport traffic analysis (see pages 4-1046 and 4-1047 in Section 4.12.1.2.1 of the SPAS Draft EIR) and off-airport traffic analysis (see page 4-1209 in Section 4.12.2.2.4 of the SPAS Draft EIR) included vehicles entering or exiting both on-airport and off-airport parking facilities. In the on-airport traffic analysis, these vehicles are included in both the intersection and roadway capacity analyses. Please see Section 4.10.2 of the SPAS Draft EIR for discussion of road traffic noise, and as discussed in Section 4.2.2.1 and 4.2.2.2, the air quality analysis included emissions associated with motor vehicles.

SPAS-PC00130-956

Comment:

Better signage and other types of improvements must also be identified as mitigations for areas around LAX and inside the CTA.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. As indicated in Sections 4.12.1.5 and 4.12.2.5 of the SPAS Draft EIR, a number of LAX Master Plan commitments and mitigation measures related to the on- and off-airport transportation systems are applicable to the SPAS alternatives. As part of LAX Master Plan Commitment ST-18, Construction Traffic Management Plan,

and LAX Master Plan Mitigation Measure MM-ST-2, Modify CTA Signage, additional signage within and adjacent to the airport will be installed during construction to notify the public of detours and to separate construction traffic from non-construction traffic to the extent feasible. In addition, project-specific design specifications for ground transportation and terminal improvements will include new signage/wayfinding to assist the public and to reduce congestion within and adjacent to the airport.

SPAS-PC00130-957

Comment:

XV Transportation/Circulation
A-25
Alternative transportation uses must be closely examined. LAWA should look into how and where the new flyaway programs can be used and how all of the bus movements inside the CTA can be reduced to eliminate or at least reduce traffic jams.

Response:

Throughout 2011, LAWA operated four FlyAway routes between LAX and remote boarding locations at Van Nuys, Union Station, Westwood/UCLA, and Irvine Station. In 2011, the network realized an average daily ridership of 3,790 passengers, reduced vehicle emissions by almost 24 tons per day, and removed 3,221 vehicles trips per day (i.e., approximately 1,175,700 trips over the course of the year), traveling a combined total of 65,505 miles per day on roads approaching LAX.1 The operation of the FlyAway site at the Irvine Transit Center was suspended on August 31, 2012 due to low ridership which was resulting in greater emissions from FlyAway buses traveling the 100-mile round trip between LAX and the Irvine Transit Center several times per day with very few, or often no, passengers than would occur if those few passengers drove directly or utilized a shared-ride van/shuttle service. LAWA staff continues to work on establishing additional FlyAway sites in order to comply with the Stipulated Settlement. The next FlyAway service, connecting LAX with the Metro Exposition light rail line at its Expo/LaBrea station, was approved by the LAWA Board of Airport Commissioners in October 2012 and is expected to begin service in spring 2013. Other potential LAX FlyAway locations which LAWA staff is currently evaluating for service include Santa Monica, Long Beach, Torrance, Hollywood, and Glendale.

In support of the FlyAway program, LAWA provides detailed information on the LAWA website about the FlyAway program and other alternative modes of transportation to and from LAX (lawa.org/welcome_LAX.aspx?id=132) and also provides FlyAway information brochures at transit centers, such as Union Station, and to major employers upon request as part of their transportation demand management/trip reduction programs.

Please see Response to Comment SPAS-PC00130-398 regarding LAWA's trip reduction programs for both rental car and hotel shuttle operators, which serve to reduce bus movements within the CTA. Also, as described in Chapter 2 of the SPAS Draft EIR, Alternatives 1, 2, 3, 8 and 9 each include one or more new off-airport facilities such as an Intermodal Transportation Facility (ITF), a Ground Transportation Center (GTC), or an Intermodal Transportation Center (ITC) intended to offer passengers alternative locations outside of the CTA to be dropped off or picked up, and allow them convenient access to the CTA via an Automated People Mover (APM) or consolidated busing operation. These elements of the SPAS alternatives are intended to reduce traffic volumes and potential congestion within the CTA. An analysis of potential impacts to on-airport traffic are discussed in Section 4.12.1 of the SPAS Draft EIR.

1. City of Los Angeles, Los Angeles World Airports, LAX Master Plan Mitigation Monitoring and Reporting Program (MMRP), 2011 Annual Progress Report, October 2012.

SPAS-PC00130-958

Comment:

There are many new potential airside issues. Taxiway locations (especially around the terminal gates) have been noted by LAWA and the FAA to restrict aircraft movement that reduces operational efficiency and adds pollution and noise. Studies must address the movement of taxiways, taxiway/runway

intersections, and gate locations to determine more efficient ways to handle ground aircraft movement to reduce noise and pollution promulgated into the surrounding communities.

Response:

As discussed on pages 1-10 and 1-11 in Section 1.2.1 of the SPAS Draft EIR, one of the objectives associated with the completion of the SPAS process is to provide north airfield improvements that support the safe and efficient movement of aircraft at LAX. This includes adding improvements that are consistent with FAA design standards and providing sufficient areas at the ends of the runways for holding arriving flights and sequencing departing aircraft, among others.

Section 2.3.1. identifies, for each alternative, the modifications to taxiways, taxiway/runway intersections, and terminals/gates to allow for more efficient ways to handle ground aircraft movements. As identified in Section 2.2 of the SPAS Draft EIR, LAWA sought to identify and apply ways to avoid, reduce, or minimize environmental impacts on surrounding communities. Section 4.2 of the SPAS Draft EIR identifies the impact these modifications would have to air quality and Section 4.10 of the SPAS Draft EIR identifies the impact these modifications would have related to noise. Additionally, Table 4.7.2-16 in Section 4.7.2 provides a summary of how each alternative relates to safety and efficiency enhancements to the north airfield.

SPAS-PC00130-959

Comment:

XVI Utilities
A-25
Utility systems should be assessed to determine where additional capacity is required and where back-up systems are required.

Response:

The SPAS Draft EIR addresses the adequacy of electricity and water supplies, and wastewater treatment capacity, in Sections 4.13.1, 4.13.4, and 4.13.3, respectively. As noted in those sections, supplies and capacity are sufficient to accommodate the SPAS improvements and impacts to these utilities would be less than significant.

The SPAS Draft EIR is a programmatic document. Utility systems that would be affected by the SPAS alternatives have not been determined at this level of planning. Project-level impacts associated with implementation of individual SPAS components will be assessed in future CEQA documents, including impacts associated with utility systems. Please see Responses to Comments SPAS-PC00130-235 and SPAS-PC00130-142 for a discussion of the appropriateness of the programmatic review conducted for the SPAS Project.

SPAS-PC00130-960

Comment:

XVI Utilities
A-26
Although sufficient solid waste capacity is presumed, there are many opportunities for reducing the generation of solid waste. If we continue the same methods of disposal to Sunshine Canyon and other remote landfills, and there is a substantial increase in waste, we will be adding much pollution and noise due to the long haul disposals.

Response:

Please see Responses to Comments SPAS-PC00130-210 and SPAS-PC00130-144 regarding recycling operations at LAX and Sunshine Canyon landfill capacity. Evaluation of air quality and noise impacts associated with the regional transportation of solid waste is beyond the scope of the SPAS Draft EIR.

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00130-961

Comment:

XVII Mandatory findings of Significance
A-27
The cumulative effects of increased traffic will increase pollution and has serious adverse economic impacts in terms of reduced productivity along with adverse health impacts.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please note that conclusions in this comment are not supported by any facts or evidence.

As indicated in Section 4.12.1 of the SPAS Draft EIR, on-airport traffic impacts related to curbsides and to departures and arrivals level roadways would be less than significant for Alternatives 1, 2, 4, 8, and 9. All of these alternatives would, however, result in a significant and unavoidable impact related to the volume to capacity level at one intersection within the CTA. Alternatives 1, 2, 8, and 9 would also result in significant and unavoidable construction-related impacts to the on-airport transportation system. No on-airport traffic impacts would occur under Alternative 3 because, under that scenario, the CTA would be closed to private vehicles. Alternatives 5, 6, and 7 focus on airfield and terminal improvements that, in themselves, would not affect on-airport traffic, but would be coupled with the ground transportation improvements proposed under Alternatives 1, 2, 8, or 9, the impacts of which are summarized above. As described on pages 5-127 and 5-128 in Chapter 5 of the SPAS Draft EIR, cumulative impacts to on-airport transportation are incorporated into the analysis provided in Section 4.12.1, the results of which are described above.

Relative to off-airport traffic impacts, as addressed in Section 4.12.2 of the SPAS Draft EIR, the majority of the 200 intersections evaluated within the SPAS off-airport transportation study area would not be significantly impacted under Alternatives 1, 2, 3, 4, 8, and 9; however, significant impacts to some off-airport intersections and/or Congestion Management Plan (CMP) facilities would occur under each of these alternatives. The total number of significantly-impacted intersections and/or CMP facilities would vary slightly among those alternatives. Alternatives 5, 6, and 7 focus on airfield and terminal improvements that, in themselves, would not affect off-airport traffic, but would be coupled with the ground transportation improvements proposed under Alternatives 1, 2, 8, or 9, the impacts of which are summarized above. As described on page 5-128 in Chapter 5 of the SPAS Draft EIR, cumulative impacts to off-airport transportation are incorporated into the analysis provided in Section 4.12.2, the results of which are described above.

Regarding air pollution, as indicated in Section 4.2 of the SPAS Draft EIR, even after mitigation, construction activities would result in significant and unavoidable air quality impacts under all of the alternatives. Specifically, under all of the alternatives except for Alternative 4, construction emissions of carbon monoxide (CO), volatile organic compounds (VOC), oxides of nitrogen (NOx), particulate matter with an equivalent aerodynamic diameter of 10 micrometers (PM10), and particulate matter with an equivalent aerodynamic diameter of 2.5 micrometers (PM2.5) would be significant and unavoidable. Under Alternative 4, significant and unavoidable construction emissions would occur for NOx and PM10. Under all of the alternatives, even after mitigation, construction-related concentrations of nitrogen dioxide (NO2) and PM10 would be significant and unavoidable. As described on page 7-1 in Chapter 7 of the SPAS Draft EIR, the SPAS alternatives would result in a cumulatively considerable contribution to significant cumulative construction-related air quality impacts, based on significant construction-related project impacts summarized above.

Operation of the airport would also result in significant and unavoidable impacts to air quality. Even after mitigation, operational emissions of sulfur dioxide (SO2), PM10, and PM2.5 would be significant

and unavoidable under all of the alternatives. Operational concentrations of NO2, PM10, and PM2.5 would also be significant and unavoidable under all of the alternatives. As described on page 7-1 in Chapter 7 of the SPAS Draft EIR, the SPAS alternatives would result in a cumulatively considerable contribution to significant cumulative operational air quality impacts, based on significant operational project impacts summarized above.

As indicated in Section 4.7.1 of the SPAS Draft EIR, incremental cancer risks and incremental chronic non-cancer health hazards within the study area under all the alternatives would be less than significant for all receptor types (i.e., child resident, school child, adult resident, adult worker). Additionally, under all the alternatives, health effects to on-airport workers would be less than significant. Incremental acute non-cancer health hazards at small areas at or near the LAX fence-line under all the alternatives would be slightly above the threshold of significance and are considered to be significant and unavoidable for all analyzed receptor types (i.e., residents, recreational users, school child, off-site adult workers). The primary toxic air contaminant of concern contributing to this impact is associated with emissions of acrolein from aircraft operations, which would occur in 2025 even in the absence of SPAS. It should be noted that, with the exception of Alternative 3, acute non-cancer health hazard impacts in 2025 would be lower under the SPAS alternatives than if no airfield improvements were implemented. Moreover, these significant impacts would occur at or near the fence-line; it is expected that actual impacts in the community would be less than significant. As described on page 7-1 in Chapter 7 of the SPAS Draft EIR, Alternatives 1, 3, 4, 8, and 9 would result in a cumulatively considerable contribution to acute non-cancer hazards.

Please see Response to Comment SPAS-PC00130-730 regarding the treatment of economic impacts in an EIR.

SPAS-PC00130-962

Comment:

Petitioners' Overview of Guiding Principles for Environmental Analysis:
LAX Specific Plan Amendment Study EIR

Submitted by Petitioners: City of El Segundo, City of Inglewood, City of Culver City, County of Los Angeles, and Alliance for a Regional Solution to Airport Congestion (ARSAC).

Background: In January of 2005, Petitioners filed lawsuits challenging the approval of the LAX Master Plan Program and the associated Environmental Impact Report (EIR) prepared by Los Angeles World Airports (LAWA) under the California Environmental Quality Act (CEQA). These suits were resolved by a 2006 Stipulated Settlement between LAWA and Petitioners. In response to the Notice of Preparation (NOP) recently released by LAWA for the Specific Plan Amendment Study (SPAS) Draft EIR, Petitioners now jointly submit this overview of principles that should guide LAWA in that environmental review process. Petitioners will also submit detailed individual comments.

Response:

The comment is noted. Please see Responses to Comments SPAS-PC00130-963 through SPAS-PC00130-968 below.

SPAS-PC00130-963

Comment:

LAWA's Obligation to Avoid and Reduce Impacts to Surrounding Communities. As LAWA proceeds with refinement and analysis of options as part of the SPAS process, it must continually recognize its obligation to avoid and mitigate impacts to the communities that surround LAX. Options under consideration must be evaluated and ranked based on how they would impact the environment, public health and safety in surrounding communities (e.g., noise, air quality, traffic). All alternatives should be subject to a full and fair evaluation in the SPAS DEIR and LAWA should remain open to options that would avoid or mitigate impacts to its neighbors, taking care not to prematurely select a preferred alternative.

Response:

The content of this comment is identical to comment SPAS-AL00007-54; please refer to Response to Comment SPAS-AL00007-54.

SPAS-PC00130-964

Comment:

Continued Consultation with Surrounding Communities. The alternatives described in the SPAS NOP were developed and selected by LAWA during a lengthy consultation process with Petitioners. That consultation process grew out of the 2006 Stipulated Settlement, which states, in relevant part, that "An LAX Specific Plan Amendment Process Advisory Committee shall be created consisting of representatives of the City of Los Angeles, County of Los Angeles, El Segundo, Inglewood, Culver City, and ARSAC. LAWA shall consult with the Committee during each significant step of the LAX Specific Plan Amendment Process." Petitioners wish to recognize LAWA's compliance to date with this provision of the Stipulated Settlement. LAWA must now ensure that it continues to consult with Petitioners as the EIR process proceeds and the SPAS alternatives are developed in more detail. In particular, LAWA should take care to consult with Petitioners regarding the details and analysis of the alternatives supported by any Petitioner.

Response:

The content of this comment is identical to comment SPAS-AL00007-55; please refer to Response to Comment SPAS-AL00007-55.

SPAS-PC00130-965

Comment:

Extension of Gate Constraint. LAWA, FAA and the Petitioners all agree that limiting the number of gates at LAX will promote efficient passenger operations and encourage other airports in the Los Angeles basin to increase capacity to serve aviation demand. Accordingly, the long term success of the regional approach to serving aviation demand depends on maintaining appropriate gate constraints at LAX. The 2006 Stipulated Settlement between LAWA and the Petitioners limits the number of permissible gates at LAX to 163 and, commencing in 2010, requires LAWA to begin reducing the number of operating gates at LAX to 153. This settlement provision is operative through December 31, 2020. As part of the SPAS process, LAWA must analyze the continuation of the LAX gate constraints beyond 2020, as well as the possible enhancement of those constraints at a level that will efficiently serve up to 78.9 million annual passengers at LAX, while encouraging growth elsewhere in the region, including at the other airports owned and operated by LAWA.

Response:

The content of this comment is identical to comment SPAS-AL00007-56; please refer to Response to Comment SPAS-AL00007-56.

SPAS-PC00130-966

Comment:

Airfield Balance. In the NOP, LAWA indicates that under the LAX Master Plan, one of its goals is to "provide a better balance in operations between the North Airfield and the South Airfield." Petitioners support this goal and urge LAWA to conduct a full analysis of whether and to what extent each of the proposed SPAS alternatives would help achieve better airfield balance. Petitioners agree that total flight operation balance can lead to less operational crowding, which is good for all.

Response:

The content of this comment is identical to comment SPAS-AL00007-57; please refer to Response to Comment SPAS-AL00007-57.

SPAS-PC00130-967

Comment:

Regional Approach. Petitioners strongly support a regional approach to accommodating passenger and cargo aviation demand throughout Southern California. Because the area around LAX is fully developed, and because we must reduce vehicle miles traveled to improve air quality, decrease greenhouse gases, and increase productivity, a regional solution to serving aviation demand is essential. The regional approach, which is fully supported by the Southern California Association of Governments, must be a key component of everything LAWA does, including in the SPAS process. LAWA should vigorously pursue accommodating aviation demand at Palmdale and Ontario, and work aggressively with other airport operators and local governments to advance the regional approach.

Response:

Please refer to Topical Response TR-SPAS-REG-1 regarding the fact that LAWA, through the LAX Master Plan, the SPAS process, and multiple other efforts, supports the regionalization of air travel demand in Southern California. Regarding the traffic, air quality, and greenhouse gas impacts associated with regionalization, please refer to Section 6.2 of the SPAS Draft EIR.

SPAS-PC00130-968

Comment:

DEIR Public Review Period. The NOP indicates that LAWA intends to provide just 45 days for public review and comment on the Draft SPAS EIR. In light of the complexity of this project and LAWA's tendency to produce lengthy CEQA documents, Petitioners anticipate that 45 days will not be sufficient

Response:

The content of this comment is identical to comment SPAS-AL00007-59; please refer to Response to Comment SPAS-AL00007-59.

SPAS-PC00130-969

Comment:

ATTACHMENT 3 to ARSAC LAX Master Plan NOP Comment Letter, 6-17-08

One Safe Single North Runway Proposal

Background: The Stipulated Settlement Agreement provided for a re-examination of Yellow Light projects such as the north runway complex by the Specific Plan Advisory Committee and to come up-with other efficient and community friendly alternatives. The One Safe Single North Runway proposal aims to address safety, efficiency and being community friendly.

Runway incursions continue to be cited as a reason for making improvement to the north airfield complex at LAX. Despite numerous requests, one idea that has not and should be included and fully studied in the NASA north airfield safety study and in the LAX Master Plan NOP and EIR/EIS is this "One Safe Single North Runway." This proposal can provide safety and keep LAX within the desired 78.9 Million Annual Passenger (MAP) limit.

The only runway designs in the world that have been most effective in preventing runway incursions are designs where aircraft do not have to cross one runway to get to another. Munich Franz Josef Strauss Airport (MUC) in Germany was designed with one runway on each side of the terminal complex as a way to prevent runway incursions. Since MUC opened in 1992, there has been only one runway incursion (2006). MUC handled 34 MAP in 2007.

London Heathrow Airport (LHR) in the United Kingdom, the world's busiest international airport, has a similar runway layout with one runway on each side of the terminal complex. LHR has traffic signals

operated by two tower controllers, at each runway to permit aircraft to enter the runways. LHR has not had incursion problems. At LHR, one runway is used for take-offs and one runway is used for landings. This is known as Single Mode Operation. In 2007, LHR handled 68 MAP.

London Gatwick Airport (LGW) is a single runway airport that operates in Multi-Mode Operation. In 2007, LGW handled 35 MAP. According to its operator, BAA, "Gatwick is the busiest single-runway airport in the world, the second largest airport in the UK and the sixth busiest international airport in the world." Clearly, a single runway airfield can be successful!

Requirements for all concepts:
- Runway 24 Right closed and either covered with fill dirt or removed
- Enhanced runway/taxiway lighting, striping and signage on Runway 24 Left
- ASDE-X and Runway Status Lights on Runway 24 Left
- Noise contours cannot increase in Westchester/Playa del Rey
- No taking of land in Westchester/Playa del Rey
- No northward runway movement and no placement of taxiways north of runway

Concept 1:
- Use Runway 24 Left in its existing configuration.

Concept 2: "Super Runway"
- Rebuild Runway 24 Left in its current location to a new 200-foot wide runway and 10,000 feet in length. The runway would be extended up to 1,000 to the east. The associated taxiways near Terminals 1, 2 and 3 and the Tom Bradley International Terminal would be rebuilt as required. Movement toward the center of the two existing runways facilitates the least expensive upgrades to the present inadequate, congestion producing taxiways and taxilanes adjacent to the terminals.

Response:

Please refer to Response to Comment SPAS-PC00130-800 regarding the reasons why the SPAS Draft EIR did not evaluate in detail the alternative of eliminating one runway in the north airfield.

SPAS-PC00130-970

Comment:

Response:

The content of this comment consists of a copy of ARSAC's comment letter on the 2008 NOP for the SPAS Draft EIR. ARSAC's 2008 NOP comment letter is item 7 of ARSAC's LAX SPAS Draft EIR comments package (see Attachment 5 of this Final EIR). ARSAC's 2008 NOP comment letter is also included in ARSAC's comments on the SPAS Draft EIR as an attachment to their 2010 NOP comment letter. (ARSAC's 2010 NOP comment letter has been designated in the SPAS Final EIR as SPAS-PC00130-729 through SPAS-PC00130-818. The 2008 NOP comment letter that is attached to the 2010 NOP comment letter has been designated SPAS-PC00130-819 through SPAS-PC00130-969.) The two versions of the 2008 NOP comment letter are nearly identical to one another. There is only one difference between the version of ARSAC's 2008 NOP comment letter in this subject comment and the version included as an attachment to ARSAC's comment letter on the 2010 NOP. Attachment 4 of the original 2008 NOP comment letter was a Power Point presentation titled "340' south/airline alliance realignment proposal," dated June 17, 2008. In the version of the 2008 NOP comment letter that was attached to ARSAC's 2010 NOP comment letter, this attachment was replaced with a Power Point presentation titled "ARSAC Concepts for the LAX Specific Plan Amendment Study--North Airfield, Terminal 1, 2, & 3; Consolidated Rent-a-car Facility, Automated People Mover and Elevated Roadways," dated November 28, 1010. Please see Responses to Comments SPAS-PC00130-819 through SPAS-PC00130-969 above for responses to ARSAC's comment letter on the 2008 NOP for the SPAS Draft EIR. Please note that responses to the alternatives suggested in the two attachments are provided in Responses to Comments SPAS-PC00130-736, 800, 814, 815, 816, 843, 848, 849, and 969 above.

SPAS-PC00130-971

Comment:

Included in this attachment a 2007 LAX Town hall presentation by Denny Schneider and David Voss which questions some of the assumptions made by LAWA early on and promulgated into the report and DEIR which we feel are invalid. When is LAWA going to address these?

Opposition to LAWA's North Runway
Complex Expansion Proposal
Denny Schneider, President
Alliance for a Regional Solution to Airport Congestion
David Voss, Former Airport Commissioner
Chair - Airport Relations Cmte.,
Neighborhood Council of Westchester Playa del Rey
Chair LAX Coastal Chamber of Commerce, Airport
Policy Cmte.

Moving North Runway Closer to
Westchester is Unnecessary

1) LAWA's PROPOSAL HARMS WESTCHESTER/PDR AND VIOLATES SETTLEMENT DEAL
2) RUNWAY SEPARATION IS UNNECESSARY
3) LAWA's HIDDEN AGENDA: "LOAD BALANCING"

Response:

The comment is noted. Please see Responses to Comments SPAS-PC00130-972 through SPAS-PC00130-988 below.

SPAS-PC00130-972

Comment:

Community Under Assault over 25 years
- 1983 - CTA Second level added -capacity about 40 million annual passengers (MAP) - 1 million annual tons (MAT) cargo.
- 1994 New Master Plan update started.
- 1994-2005 Small, incremental growth projects enacted gate additions, taxiway updates, terminal remodels.
- 2005 Alternative D passed - flawed Plan and flawed EIRs.
- 2005 Legal Challenge Settlement creates Specific Plan Amendment Committee for cooperation in development of new Master Plan.

Response:

LAWA disagrees with the commentor's characterization of events described in this comment. Nevertheless, the comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00130-973

Comment:

1) HARMS WESTCHESTER/PLAYA DEL REY
The Three Pillars:
- No "Ring Road" or design that pushes traffic into community

- No Further damage to business district or additional homes
- No Western terminal with traffic access from west

- No new study of noise contours from moving runway North and making them longer

1) HARMS WESTCHESTER/PLAYA DEL REY

Settlement Broken: LAWA's proposal violates the settlement by going beyond the Alt. D worst case scenario - Requires new EIR!

consistent with previous local and federal approvals, identify Specific Plan amendments that plan for the modernization and improvement of LAX in a manner that is designed for a practical capacity of 78.9 million annual passengers while enhancing safety and security, minimizing environmental impacts on the surrounding communities, and creating conditions that encourage airlines to go to other airports in the region, particularly those owned and operated by LAWA.

Response:

Comments regarding LAWA's compliance with the Stipulated Settlement require legal conclusions that are beyond the scope of what is required by CEQA. The comments alleging generalized harm to Westchester and Playa del Rey are noted and are hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00130-974

Comment:

1) HARMS WESTCHESTER/PLAYA DEL REY
RPZ tears out the heart of the Westchester Business District

Response:

The main point in this comment is similar to the concerns expressed in comment SPAS-PC00130-253; please refer to Response to Comment SPAS-PC00130-253.

SPAS-PC00130-975

Comment:

2) RUNWAY SEPARATION IS NOT NEEDED
a. Airport improvements can be made that are not airfield facility dominated

Reduce air traffic and time bunching-regionalize. (Added flights increases pollution and noise ensuring more health impacts for our area.)
More Complete Staffing of Tower. Controllers Union has called for more staff and less hours.
Runway Status Lights and other collision avoidance systems.
In-Cockpit Voice Warning System.
Better air traffic control system equipment.
Better taxiway and runway signage

Response:

The contents of this comment are similar to the concerns expressed in comment SPAS-PC00096-5; please refer to Response to Comment SPAS-PC00096-5.

SPAS-PC00130-976

Comment:

2) RUNWAY SEPARATION IS NOT NEEDED
a. Runway "Incursions" Not Solved by Centerline Taxiway

Stats of other airports are presently worse than our North runway experience without changes.
An incursion is two aircraft or aircraft and another entity coming too close on ground.
Types of Incursions range from imminent danger "A" to minor infraction of rules with low likelihood of any collision "D."
LAX North runway accident in 1990s (or other examples raised by LAWA) were controller/pilot errors that would not have been averted by runway changes.

2007 Incidents Mischaracterized: Only prove that South Runways are NOT safer and do not support centerline taxiway on North

End Around Solution

Response:

The inclusion of a centerline taxiway will improve safety and minimize the risk of incursions on the north airfield complex. As described in Section 4.7.2 of the SPAS Draft EIR, there were studies done to address safety of the north airfield. All of those studies concluded, among other things, that, in conjunction with additional improvements, the addition of a centerfield parallel taxiway would reduce the risk of incursions on the north airfield complex.

Additionally, the current north airfield configuration requires non-standard operating procedures, which are not optimal for safety and increase aircraft delay. (Section 2.2 of the SPAS Draft EIR and Chapter 2 of the Preliminary LAX SPAS Report.) The SPAS alternatives, which seek to promote safety and efficiency through changes to the north airfield, are evaluated throughout the EIR. Specifically, the ability of the alternatives to improve efficiency and safety are discussed in Section 4.7.2 of the SPAS Draft EIR. Increased separation of the runways is also needed to comply with the standards in FAA Advisory Circular 15/5300-13A.

Regarding the number of incursions on the south airfield, Section 4.7.2.3 on pages 4-510 and 4-511 of the SPAS Draft EIR discusses how even though data indicates that the number of Category C incursions on the south airfield increased following completion of the South Airfield Improvement Project (SAIP) compared to prior years; the comparative change is the result of the definition change by the Federal Aviation Administration (FAA) and is not a reflection of actual events.

Additionally, please see Responses to Comments SPAS-PC00130-160 regarding the runway incursions on the south airfield.

SPAS-PC00130-977

Comment:

2) RUNWAY SEPARATION IS NOT NEEDED

b. Health and Safety Improvements other than Moving Runways North

Reduce air traffic and time bunching-regionalize. (Added flights increases pollution and noise ensuring more health impacts for our area.)
More Complete Staffing of Tower. Controllers Union has called for more staff and less hours.
Runway Status Lights and other collision avoidance systems.
In-Cockpit Voice Warning System.

Response:

The contents of this comment are similar to the concerns expressed in comment SPAS-PC00096-5; please refer to Response to Comment SPAS-PC00096-5.

SPAS-PC00130-978

Comment:

LAWA Released 5 north runway "studies" at the end of last week

- Safety Risk Assessment (Washington Consulting)
- Special Peer Review
- Airline Pilots Assn comments
-Northfield Assessment (URS)
- LAX North Airfield Alternatives (Internat'l Aviation Mgmt Grp)

Do the Studies Answer the Basic Question of
Is the north complex safe? And if not, area
set of alternatives identified?

NO

Safety Assessments

- Assumptions and questions not all relevant to basic question.
- All push for "operational efficiency" and capacity enhancement rather than addressing if current conditions are unsafe.
- None address inadequate taxiways along terminals and all dismiss going south.
- Don't consider "End Around"
- All dismiss impacts on local community as irrelevant.
- Where is OUR NASA Study???

Response:

The comment was provided in an attachment to ARSAC's comments on the 2008 NOP. With the subsequent completion of the SPAS Draft EIR, seven independent assessments of north airfield safety were completed, are summarized in Section 4.7.2 of the SPAS Draft EIR, and are included in the appendices of the Preliminary LAX SPAS Report (see Appendices H-1 through H-7). Included within the subject studies is the North Airfield Safety Study (NASS) completed by NASA-Ames.

SPAS-PC00130-979

Comment:

"Safety Risk Assessment" - WCG, Inc.

- Found that the "The hazards and risks associated with the current LAX North Airfield configuration ...have been mitigated to an acceptable level of risk based on present day usage...
- Substantial portion of assessment is on south complex.
- Assumptions Section states "The proposed North Airfield Runway configuration specifically facilitates these concerns."

Safety Risk Assessment "Remote"

- Identified risks are deemed at worst "remote" with 8 of 10 extremely remote or extremely improbable.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00130-980

Comment:

"Special Peer Review"

- REVIEW DONE IN ONE DAY
- GIVEN ONLY ONE ALTERNATIVE TO CONSIDER!
- BIASED INDUSTRY GROUP

- Assumes safety, operational, and efficiency problems...that required significant redesign to solve...
- LAWA provided assumptions that includes larger operational loads and balancing requirement.
- Operational safety was only one of three major elements upon which to base conclusions.
- No mention of inadequate taxiway size or spacing

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00130-981

Comment:

ALPA Review

- "Expect virtually every B747-400 to be replaced with an A-380 [Group VI] ... in the next ten years." - NOT CREDIBLE
- "Severe operational penalties, restrictions, and human factors issues will occur if the south field is used for Group VI aircraft operations"
- "Because of South Side problems, Group VI aircraft must be accomplished on the North Side"
- "Human factors errors will likely increase"
- Suggests 623' increase separation for max efficiency did not discuss south separation.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00130-982

Comment:

"URS - North Airfield Assessment"
- Never states that existing cannot operate safely
- Expressly notes many airports including LAX are given waivers from FAA "standards"
- Never considers moving south due to cost of moving terminals

- Recommends largest possible movement for operational factors.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00130-983

Comment:

IAMG "North Airfield Alternatives"

- Never says that current airfield is unsafe
- Calls for wider spacing for operational efficiency
- Enhanced Technologies: ASDE-X airfield surface detection equipment as "part" of any solution.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00130-984

Comment:

Advantages of Moving South
- Efficiency in Operation
  - The Unified Plan minimizes the distances between connecting flights
  - New linear design of terminals 1, 2 and 3 eliminates the need for towing on the north side
  - Flexibility in gate design reduces idling while waiting for gates
  - Allows for extending and widening 24L to balance aircraft loads on runways

- Safety on the Airfield
  - Runways separated by additional 100 ft would allow for a desired centerline taxiway
  - Fixes the substandard taxiways on the North Airfield - this reduces controller activity and provides the controllers with a greater margin of error

- Modernized Facilities / Improved Customer Service
  - Consolidates TSA and FIS activities
  - Only the Unified Plan addresses the dilapidated terminals in the CTA
  - The Unified Plan minimizes the distances between connecting flights

Advantages of Moving South

- Accommodate the A380 and other NLAs
  - The Unified Plan proposes back-siding TBIT - this is a green light project that can be implemented today - allows quicker build-out of NLA gates
  - The Unified Plan never requires the use of remote gates to service NLAs
  - The Unified Plan reconfigures terminals 1, 2 and 3, which provides more flexibility in handling the NLAs

- Minimize Impacts to Community and Environment
  - Only the Unified Plan proposal moves the noise and pollution away from the community

- Does not destroy additional local businesses
- New linear design of terminals 1, 2 and 3 eliminates the need for towing on the north side, thereby reducing pollution
- Flexibility in gate design reduces idling while waiting for gates

Response:

Please see Response to Comment SPAS-PC00130-814 regarding LAWA's review of the ARSAC alternative concept. As described therein, the southward movement of Runway 6R/24L and associated replacement of the Terminals 1, 2, and 3 with a linear concourse would engender certain operational inefficiencies relative to an imbalance in the gating of large aircraft between the north concourses of the CTA and the south concourses, which, in turn would result in greater air quality impacts due to aircraft having to taxi farther distances. Also, as described therein, aircraft noise impacts related to the total number of homes newly exposed to 65 CNEL or to a 1.5 CNEL increase would generally be greater in moving Runway 6R/24L southward than in moving Runway 6L/24R northward, due to more intensely developed areas east of the airport being more impacted by aircraft noise associated with a southward movement of the runway.

Relative to airfield safety associated with moving Runway 6R/24L 100 feet southward, the safety and efficiency benefits of such a runway move would be the same as those of SPAS Alternative 7, as addressed in Section 4.7.2 of the SPAS Draft EIR.

While the commentor indicates that advantages associated with moving Runway 6R/24L southward also include never requiring the use of remote gates to service NLAs and does not destroy additional local businesses, it should be noted that SPAS Alternatives 1, 5, and 6, which move Runway 6L/24R northward, would do the same.

SPAS-PC00130-985

Comment:

3) LOAD BALANCING

Assumptions all include "Load Balancing" as a goal
El Segundo and LAWA want airport operations changed so that more of the very large aircraft traffic/noise is shifted from the South side of the airport to the North side of the airport.

On page 11 in LAWA's "Concept Development Goals" #3 is "Balance long-haul departing aircraft operations between North and South Airfield."

Load balancing in layman's terms means moving more take offs and landings - and in particular "Long Haul Heavy Aircraft Departures" - from the South Airfield, to the North Airfield. Despite the fact that on p.17 they point out that currently "existing North and South Airfields are generally in balance based on Total Operations" on p.18 they point out that 75%-80% of the Long Haul Heavy Aircraft Departures occur on the South runway complex. This is because the South runways are longer.

There is no safety need for "Load Balancing"

Response:

The content of this comment is similar to comment SPAS-AL00007-57; please refer to Response to Comment SPAS-AL00007-57. Specifically, please refer to the portion of Response to Comment SPAS-AL00007-57 that discusses how the operation of large aircraft (i.e., ADG V and VI) is expected to increase markedly by year 2025. (See Table 8 and Table 12 of Appendix F-1 of the Preliminary LAX SPAS Report.) Therefore, if the north airfield complex where not updated to handle such large aircraft, the number of large aircraft taxiing to the south complex will increase by the year 2025.

SPAS-PC00130-986

Comment:

Conclusion

- Modernize LAX - YES
- Improve Mass Transit!
- Reject Expansion/Building for own sake
- Perform proper reviews! Determine inexpensive LAX fixes that can be done and get on with it...
- If LAWA or FAA feels strongly about unsafe north runway conditions then CLOSE THE RUNWAYS IMMEDIATELY until changes are enacted or revert to a one runway configuration.

Response:

All of the SPAS alternatives reflect modernization of LAX, and with the exception of Alternative 4, all of the alternatives provide for improved airport access to mass transit. The alternatives do not expand LAX and the bases for seeking improvements to LAX are reflected by the project objectives presented in Section 2.2 of the SPAS Draft EIR. LAWA has completed very complete and comprehensive reviews of all the SPAS alternatives, as presented in the SPAS Draft EIR and the Preliminary LAX SPAS Report, including fiscal considerations. Neither the FAA or LAWA would allow the unsafe operation of runways at LAX; the objective of the proposed airfield improvements is to improve the safety and efficiency of the north airfield, as explained in Section 2.2 of the SPAS Draft EIR. Regarding the suggestion to revert to a one runway configuration in the north airfield, please see Response to Comment SPAS-PC00130-800.

SPAS-PC00130-987

Comment:

Runways Not Shown to be Unsafe

- North runway complex incursion rate history is superior to similar airport complexes that have already been "fixed."
- Neither LAWA nor the FAA can identify any north complex incursion that would have been averted by runway separation that could not be addressed by less expensive measures.

Response:

Section 4.7.2 of the Draft EIR addresses airfield safety issues associated with each of the SPAS alternatives that involve airfield improvements (i.e., Alternatives 1 through 7). Please refer to Response to Comment SPAS-PC00096-5 for a discussion of the safety improvements analyzed in the SPAS Draft EIR.

SPAS-PC00130-988

Comment:

Is North Runway Complex "safe?"

When the FAA felt that the south runway complex was unsafe they were vocal calling for changes. On the north side the FAA is unwilling to mandate changes, but says they will "evaluate any LAWA proposals presented."
NTSB and LAWA says "One incident is too many!" but no runway can be ABSOLUTELY SAFE; what is the incremental improvement of a runway movement cost over lower cost alternative improvements?
No Separation/taxiway improvement data has ever been presented.
FAA NASA Aames 2002-4 south runway simulation studies do not correlate to north side; no north simulations have been planned.
Many factors impact safety...i.e. North / South sides are both dual, parallel runways, but 80% of incidents occur on South!

5-6 "Peer" reviews were promised, but not delivered. None will be formal analysis, but will be full of "educated opinion."
Runway protection zone issue on north.

Response:

The comment was provided in an attachment to ARSAC's comments on the 2008 NOP. With the subsequent completion of the SPAS Draft EIR, seven independent assessments of north airfield safety were completed, are summarized in Section 4.7.2 of the SPAS Draft EIR, and are included in the appendices of the Preliminary LAX SPAS Report (see Appendices H-1 through H-7). Section 4.7.2 also addresses RPZ issues associated with the north airfield.

SPAS-PC00130-989

Comment:

Released LAX Specific Plan Amendment Draft Environmental Impact Report (DEIR) is an Affront to Angelinos' Common Sense*

The DEIR and Specific Plan Amendment Report released today cost millions to prepare but fails to fix the most basic airport services that visitors to the City of Los Angeles and region deserve. The LAX state of disrepair is embarrassing and must be fixed NOW.

ARSAC President Denny Schneider stated, "Our crumbling LAX needs more than a makeover of fresh paint. The LAX Plan will be neither convenient nor safer yet will cost billions to implement. LAWA ignored solutions to the poor tourist and traveler service."

Mr. Schneider continued, "LAWA has lost its fiscal sanity. They capitulated to special business interests by including costly, unnecessary, runway construction instead of critically needed landside infrastructure changes and repairs. Their cost estimates are as big a joke as the ones in 2004 when they approved a plan cost that has grown from $12 Billion to well over $100 Billion. "

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. The SPAS alternatives include a number of new and modified facilities at LAX, including airfield, terminal, and ground access improvements. These improvements are substantially more than a "makeover of fresh paint." Please see Response to Comment SPAS-PC00149-2 regarding a summary of the project objectives associated with the north airfield improvements, as well as the conclusions of NASS relative to the safety enhancements associated with reconfiguration of the north airfield. With the exception of Alternative 4, all of the SPAS alternatives provide for improvements to terminals and ground access infrastructure, as well as changes to the north airfield. The commentor provides no evidence for the claim that costs associated with the approved LAX Master Plan have grown to over $100 billion.

Also, please note that the comment presents personal opinions about the SPAS alternatives that are not supported by facts or evidence.

SPAS-PC00130-990

Comment:

Read FAST. Only five years behind in their draft release schedule, LAWA is allowing the public 75 days to fully assess and vet the approximately 6000 pages of documents.

Please see our attachment for additional details.

ARSAC is a grass roots organization formed in 1995. ARSAC's mission is to establish a powerful, unified voice of elected officials and business and community leaders promoting a regional solution to the future commercial aviation demands of the entire Southern California region.

Response:

This comment is noted. Regarding the release date of the SPAS Draft EIR, LAWA determined, in consultation with the SPAS Advisory Committee, that it would wait until the LAX North Airfield Safety Study (NASS) was complete prior to finalizing the SPAS alternatives and completing the SPAS Draft EIR. The NASS was released in February 2010, with a Final Report in May 2010. Following completion of the NASS, LAWA released a Revised NOP for the SPAS Draft EIR in October 2010 and commenced preparation of the SPAS Draft EIR.

Please see Response to Comment SPAS-AL00007-59 regarding the length of the public comment period for the SPAS Draft EIR. Please see Responses to Comments SPAS-PC00130-992 through SPAS-PC00130-1014 for responses to comments raised in the attachment referred to in this comment.

SPAS-PC00130-991

Comment:

*The release date of this News Release is one day ahead of the DEIR based on our knowledge of LAWA intent to release their documents on Friday, July 27. We expect that LAWA will have released preliminary information copies to you. We have not seen the draft EIR nor been briefed on project details or the assumptions used to analyze alternatives. These comments are based upon what we have been told and promised by LAWA prior to the release.

Response:

The comment that the press release was published one day prior to the release of the SPAS Draft EIR is noted. The SPAS Draft EIR was released on July 27, 2012. Electronic copies of the SPAS Drat EIR were available to the public at www.laxspas.org on that date. Electronic and hard copies of the SPAS Draft EIR and Preliminary LAX SPAS Report were also provided directly to ARSAC on this release date. LAWA met with the Advisory Committee on June 28, 2012, approximately one month prior to release of the SPAS Draft EIR. ARSAC was in attendance at this meeting. At the meeting, LAWA outlined the methodologies and key assumptions used in the SPAS Draft EIR, presented the preliminary analytical results, and reviewed the plans for public outreach related to the release of the SPAS Draft EIR. Project details pertaining to the nine SPAS alternatives evaluated in the SPAS Draft EIR were presented to ARSAC at an Advisory Committee meeting held on March 12, 2012. Power Point presentations from both the June 28, 2012 and the March 12, 2012 Advisory Committee meetings are provided in Appendix D-2 of the Preliminary LAX SPAS Report.

SPAS-PC00130-992

Comment:

ARSAC Alliance for a Regional Solution to Airport Congestion
Attachment to July 26 New Release

1. LAX NEEDS REPAIRS FAR MORE THAN IT NEEDS EXPANSION NORTH. NO EXPANSION SHOULD EVEN BE CONSIDERED BEFORE BASIC IMPROVEMENTS TO PASSENGER BOARDING AND CARGO HANDLING ALONG WITH TRAFFIC AND ACCESS IS FULLY ACCOMPLISHED .

Every issue comes down to priorities and money. There will never be enough to do everything that LAWA wants to do. The Tom Bradley Terminal Improvements is one of the biggest LA projects ever done, yet is only a drop in the proverbial bucket in terms of what is really needed to fix and modernize LAX. Runways are not the capacity constraint and safety is already high.

There are ways to facilitate further improvements at more reasonable expense, not by proposing runway movements.

LAX WORK MUST BE DELAYED NO LONGER. CTA and infrastructure projects provide twice the number of construction jobs as runway projects and eight times more economic impact for the local economy. THEY MUST TAKE PRIORITY.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Response to Comment SPAS-PC00130-725 regarding the economic benefits of terminal improvements versus runway improvements and Response to Comment SPAS-PC00130-168 regarding runway safety. Also, please note that cost estimates and employment impacts are purely economic impacts not required to be analyzed under CEQA. (State CEQA Guidelines Section 15064(e).)

SPAS-PC00130-993

Comment:

There is no safety problem on the north. Destruction of a business corridor and impacting more residents is unjustified. Few incursions, historically, even occur on the north. Only during construction of the South Airfield Improvement Project (SAIP) in 2008, when most air traffic was redirected to the north airfield complex, did the number of incursions increase. When runway safety was raised as an issue, LAWA commissioned a multimillion dollar Northside Safety Review. LAWA selected a panel of top academic experts and funded NASA simulations. The experts concluded that runway safety is not a justification for spending billions of dollars.

Response:

Please refer to Response to Comment SPAS-PC00130-168 regarding the North Airfield Safety Study and the opinion of the academic panel.

SPAS-PC00130-994

Comment:

Sound mitigation and other actions were taken in the past to reduce airport impacts. Hundreds of thousands of people along the flight path would be affected by runway movements, not only those adjacent to LAX. Even those not "impacted" by legal terms will be subjected to sleepless nights and pollution by any changes.

Response:

Please see Response to Comment SPAS-PC00008-1 regarding existing programs to address high levels of aircraft noise.

A discussion of project impacts resulting from aircraft noise under Alternatives 1 through 7 is provided in Sections 4.9.6 and 4.10.1.6 of the SPAS Draft EIR, including discussion of sleep disturbance. The commentor is also referred to Section 4.2 of the SPAS Draft EIR for discussion of air quality impacts.

SPAS-PC00130-995

Comment:

Expansion proponents used incursion experience as their basis to call for increasing runway spacing and a center line taxiway to accommodate the newer, larger aircraft. The small number of newer, larger aircraft (projected to be 12-14 per day within the next seven years) is but a small fraction of far less than one percent of the total daily aircraft operations. This is poor justification to spend billions of dollars when these aircraft are already being handled safely.

Response:

As indicated in Table 12 in Appendix F-1 of the LAX Preliminary LAX SPAS Report, the number of ADG VI (i.e., New Large Aircraft such as the Airbus A380) operations is projected to increase to 39 per day by 2025. Accommodating ADG VI aircraft in a safe and efficient manner is only one of several reasons why LAWA is considering improvements to the north airfield. Please see Response to Comment SPAS-PC00130-328 for a review of several other reasons, as presented in Section 2.2 of the SPAS Draft EIR. Also, please see Section 4.7.2.3 of the SPAS Draft EIR for a discussion of previous north airfield safety studies and the safety improvements precipitated by the inclusion of a centerfield taxiway.

SPAS-PC00130-996

Comment:

Runway safety can always be better even if already "extremely safe." ARSAC has been calling for implementation of economically justifiable safety improvements for LAX. We were the driving force encouraging Mayor Villaraigosa to implement the decades long "FAA experiment" conducted at other airports to include runway status lights (RSL) at LAX. RSL are traffic signals at runway/taxiway intersections to alert pilots of impending danger. The initial RSL installation three years ago did not include all critical intersections. We look forward to the promised completion this year of the system to cover all intersections.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00130-997

Comment:

Many billion dollars of capital projects are necessary for maintenance and improvements to the landside, passenger experience at LAX.

The action/project priorities listed below will cost billions of dollars to accomplish and must precede any runway movements. Each enhances LAX safety, efficiency and/or passenger service:

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00130-998

Comment:

- Visibility from the tower is critical to safety. Non-visible areas remain a serious issue. The 1991 north runway air disaster occurred at a blind runway intersection when one controller gave take off instructions to a small aircraft at a midfield runway intersection while a second controller authorized a larger aircraft to land on that same runway at the same time. Increased runway separation has no impact on this kind of incident. The disaster was addressed by building the existing tower to replace the old tower (which is now the administration building) so that the full runway became visible. New Tom Bradley International Terminal construction and other new projects have created new "non-visibility" locations on the airfield. A new tower is in order but it is not even on LAWA's list. SFO is adding a new tower to support FAA NextGen satellite based control and better ground aircraft tracking. LAWA is silent on this issue.

Response:

Please see Responses to Comments SPAS-PC00130-362 and SPAS-PC00130-577 regarding ATCT line-of-sight.

SPAS-PC00130-999

Comment:

- The upper roadway in the CTA is a cantilevered bridge, built for the 1984 Olympics. It is defective and a safety risk. CalTrans inspectors have repeatedly reported since 2003 to LAWA that the expansion joints are failured and issues of creeping rust have existed for the last decade. This should have been already addressed, but is finally gaining LAWA attention.
- The passenger bridges from the parking lots to the terminals have severe rust and are in need of structural reconstruction. The parking lots also have signs of water seepage that needs resolution.

Response:

This comment addresses alleged issues with existing conditions and does not comment on the analysis provided in the SPAS Draft EIR. The upper-level roadway within the CTA has operated safely since its construction almost 30 years ago and is regularly inspected to maintain appropriate safety levels. The commentor provides no evidence or documentation to support the claim that "it is defective and a safety risk." The commentor also provides no evidence or documentation that the passenger bridges from the parking lots to the terminals have severe rust and are in need of structural reconstruction.

Caltrans' staff from the Structure Maintenance & Investigations section inspect the CTA upper level roadway and bridges every two years. Caltrans presented reports to LAWA on May 7, 2008 and on June 7, 2010 describing the conditions of the upper level roadway and bridges in the CTA, along with recommendations to improve these facilities. Using the Caltrans' recommendations presented in these reports, LAWA staff developed the "Request For Proposals for Design Services for the Second Level Roadway Joint and Deck Repairs at Los Angeles International Airport," which was released on April 28, 2011. Through this procurement process, a consultant team was chosen to design improvements to the expansion joints, bearing pads and wearing surface of the upper level roadway. As of this writing, 100% project design plans for this non-SPAS project were under review by LAWA staff. Construction is scheduled to begin in 2013. This planned improvement project within the CTA is included in the SPAS Draft EIR cumulative impacts analysis, as specifically identified on page 5-21 of the SPAS Draft EIR, although it is now proposed to begin in 2013 instead of 2014.

In addition to the project referenced above, LAWA's ongoing maintenance program provides inspection, assessment, and repair, if/as appropriate, of facilities throughout LAX including, but not limited to, roadway expansion joints, passenger bridges from parking lots to terminals, and parking lots.

It should be noted, however, that is not known what the commentor is referring to as "creeping rust" and, contrary to the commentor's statement, there is no such issue identified in the aforementioned Caltrans inspection reports.

SPAS-PC00130-1000

Comment:

- Terminal restrooms are frequently flooding from numerous plumbing problems.
- Terminal roofs should not be leaking after a rain storm.
- Passenger gate bridges to access aircraft have collapsed while passengers were boarding.
- The parking structures also need to be rebuilt to eliminate water issues and improve access.

Response:

This comment addresses alleged issues with existing conditions and does not comment on the analysis provided in the SPAS Draft EIR. Therefore, no further response is required. However, the commentor is incorrect in, and provides no evidence for, the claim that "Terminal restrooms are frequently flooding from numerous plumbing problems."

LAWA agrees that terminal roofs should not be leaking after a rain storm, and seeks to repair such leaks when and where they occur.

There has been one incident where a passenger boarding bridge at LAX failed while passengers were boarding; specifically, two passengers were injured on August 25, 2011 when the boarding bridge flooring on a piece of equipment maintained by an airline collapsed. LAWA is implementing a $22 million passenger boarding bridge replacement program at LAX to address any outstanding issues relating to LAWA-managed boarding bridges.

There are no "water issues" or access issues that warrant the rebuilding of the parking structures at LAX, nor has the commentor provided any substantial evidence to support the assertion that water issues exist.

SPAS-PC00130-1001

Comment:

- The 2004 RAND Study and subsequent security consultants recommended blast glass for terminal windows, but LAWA has failed to install them.

Response:

Please see Response to Comment SPAS-PC00130-424 regarding blast-resistant glass.

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00130-1002

Comment:

- Improve the staffing of the control tower with additional, highly experienced controllers.
- Three years ago LAWA suggested changing north complex taxiway configurations to improve runway safety. ARSAC went further and suggested numerous other field taxiway improvements. All these should be done immediately to improve ground efficiency and safety.
- Implement better field signage and marking, pilot training, and ground radar improvements to improve safety.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please refer to Response to Comment SPAS-PC00096-5 for a discussion of the safety improvements analyzed in the SPAS Draft EIR. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00130-1003

Comment:

- Rescheduling flights to other than peak hours is another safety improvement endorsed by ARSAC. Safe spacing between aircraft has become difficult to maintain during peak hours as the number of operations per hour increases. This change would reduce overcrowding of the skies over adjacent airport communities and lower the risks of air collisions.

Response:

Regarding the "rescheduling of flights to other than peak hours," LAWA has no control over airline flight schedules. The scheduling of flights depends upon many considerations outside of LAWA's control, such as airline scheduling practices, hubbing practices, airline network capacity, etc.

The suggestion that during peak hours spacing between aircraft is reduced is not an accurate statement. Air traffic controllers abide by airspace procedures and provide the proper spacing between all flights. During peak time, spacing between aircraft on approach or departing does not change. Delays on the ground for departure and in the air for arrival might occur at peak time, but safe spacing between aircraft is maintained regardless.

It is unclear to which "change" the commentor is referring when writing "This change would reduce overcrowding of the skies (…)". If the commentor is referring to "rescheduling of flights", although rescheduling flight to and from LAX might alleviate congestion, LAWA has no control over flight scheduling as discussed above.

SPAS-PC00130-1004

Comment:

- LAWA is taking good designs and, in an effort to reduce construction costs, "scaling back" or eliminating critical design project elements. In the Central Utilities Plant, for instance, the design initially called for easy access trenches for wiring and pipe guide ways. They were never built in an effort to reduce current costs and to meet the construction time schedules. When a problem occurs full lengths of pipes or wires must be unearthed to discover where the problem has occurred before repairs are made. This should be readdressed and done before moving runways.

Response:

This comment pertains to the Central Utility Plant Replacement Project (CUP-RP) and is not related to SPAS or the SPAS Draft EIR. The preliminary design for the CUP-RP carried both a Utilidor as a component of the originally proposed project and a Direct Burial Alternative, with the advantages and disadvantages of each described in the CUP-RP Final EIR. As noted on page 2-30 of that document, while the Utilidor would have incurred less long-term maintenance cost due to the ease of accessing utility lines within a concrete tunnel, compared to the Direct Burial Alternative, the Utilidor would have had substantially higher overall costs and greater construction impacts due to more extensive excavation. LAWA identified the Direct Burial Alternative as the environmentally superior alternative and this construction technique was included in the project that was approved by BOAC. Although long-term maintenance costs will be greater with the Direct Burial Alternative, it will still substantially reduce current maintenance costs and will also minimize long-term maintenance costs through the incorporation of design technologies. With the installation of the these technologies, the maintenance costs associated with the Direct Burial Alternative will be considerably reduced compared to a more standard installation and, overall, the Direct Burial Alternative will be far less costly than the Utilidor would have been.

Contrary to the commentor's indication that "full lengths of pipes or wiring must be unearthed to discover where the problem has occurred before repairs are made," there a numerous means for identifying the location of pipeline problems, such as ground-penetrating radar and fiber optic camera systems. Moreover, with the installation of new piping, problems, if any, will typically be limited to joint areas, which are being precisely mapped during installation.

SPAS-PC00130-1005

Comment:

- Traffic accessibility into and around the airport is currently at level F during major parts of the day. The current 62 Million of Annual Passengers (MAP) is nowhere near the already approved 78.9 MAP or the much greater MAP levels desired by LAWA. Major changes in traffic access must be made before moving any runway.

Response:

As indicated in Table 4.12.2-11 in the SPAS Draft EIR, only 11 of the 200 intersections that were evaluated around the airport operated at LOS F during either the morning (AM) peak commute hour, the mid-day airport peak hour, or the afternoon (PM) peak commute hour for baseline conditions. Those intersections are as follows:

- Overland Avenue & Culver Boulevard in Culver City (AM Peak Hour)
- Hawthorne Boulevard & El Segundo Boulevard in Hawthorne (PM Peak Hour)
- Inglewood Avenue & Imperial Highway in Hawthorne (PM Peak Hour)
- Sepulveda Boulevard & Imperial Highway in El Segundo and City of Los Angeles (PM Peak Hour)
- La Brea Avenue/Overhill Drive & Stocker Street in Los Angeles County (PM Peak Hour)
- La Cienega Boulevard & Stocker Street in Los Angeles County (AM and PM Peak Hours)
- Sepulveda Boulevard & Rosecrans Avenue in El Segundo/Manhattan Beach (PM Peak Hour)
- Walgrove Avenue & Washington Boulevard in Culver City (PM Peak Hour)
- Sepulveda Boulevard & Manhattan Beach Boulevard in Manhattan Beach (PM Peak Hour)
- La Cienega Boulevard & Jefferson Boulevard in City of Los Angeles (PM Peak Hour)
- Aviation Boulevard & Artesia Boulevard in Redondo Beach/Manhattan Beach (AM and PM Peak Hours)

Within the CTA, according to Tables 4.12.1-10 and 4.12.1-12, all intersections operate at LOS B or better and all roadway links operate better than LOS F with the exception of the Terminal 2 outer curb, west of the exit to the inner curb, TBIT outer curb, south of the entrance from the inner curb, and Terminal 4 outer curb, after the entrance from the inner curb.

The commentor provides no support for the statement that LAWA desires a MAP level higher than 78.9 MAP. The SPAS is intended to identify modifications and improvements to LAX that are designed for a practical capacity of 78.9 MAP and creating conditions that encourage airlines to go to other airports in the region, particularly those owned and operated by LAWA. (Section 1.1.2 of the SPAS Draft EIR.)

The SPAS is designed to, among other things, improve the ground access system at LAX to better accommodate airport-related traffic. (Section 2.2 of the SPAS Draft EIR.) A specific listing of the project objectives, as they relate to traffic improvements, is provided in Section 2.2 of the SPAS Draft EIR. Please see Section 2.3.1 of the SPAS Draft EIR for a discussion of the specific ground transportation modifications and improvements proposed under each alternative. These improvements include, among other things, dedicated busways and automated people movers.

The traffic analyses for on-airport and off-airport transportation systems presented in Sections 4.12.1 and 4.12.2, respectively, of the SPAS Draft EIR address future (2025) traffic conditions at 78.9 MAP. As described in Section 4.12.1, significant impacts to on-airport intersections and roadways in 2025 would be limited to one intersection and between one and five roadway links, depending on alternative. Relative to off-airport traffic impacts in 2025, as indicated in Section 4.12.2, as amended by corrections and additions to the SPAS Draft EIR identified in Chapter 5 of this Part of the Final EIR, between 37 and 42 of the 200 intersections analyzed would have unavoidable significant impacts.

SPAS-PC00130-1006

Comment:

- Getting mass transit into LAX remains a mystery to LAWA. Their prime solution is a bus! Adding more busses to the already congested horse shoe Central Terminal Area will make it nearly impossible to get close to the terminal curbs.

Response:

Please see Topical Response TR-SPAS-T-1 regarding transit options into LAX. Please see Response to Comment SPAS-PC00130-139 for a discussion of future mode splits and how they are affected by the proposed alternatives.

SPAS-PC00130-1007

Comment:

- The 2004 approved consolidated rental car facility for which LAWA has collected fees from every vehicle rental contract since 2008 remains unplanned. LAWA is now opposing construction indefinitely leaving tourists and business visitors to experience the current extreme delays and confusion.

Response:

Please see Response to Comment SPAS-PC00130-443. As discussed in that response, LAWA has continued to consider and analyze the inclusion of a CONRAC at LAX. The SPAS alternatives are designed to improve the ground access facilities at LAX, through the inclusion of various improvements. (Section 2.2 of the SPAS Draft EIR.) The SPAS process, including the formulation of concept options for overall ground transportation system improvements, provided the basis for further evaluation of the need for, and the location of, a CONRAC at LAX.

SPAS-PC00130-1008

Comment:

- The difficulty getting to connecting flights from terminal to terminal with luggage, wheel chairs, strollers, or children continues to remain unresolved by LAWA Plans.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code 21091(d); State CEQA Guidelines Section 15204(a)).

Potential issues related to connecting between terminals, with luggage, wheelchairs, strollers and children are issues that ongoing improvement projects at LAX take into consideration. These are potential issues that LAWA strives to solve. These are not issues that would be created as a result of the SPAS alternatives, and the SPAS Draft EIR is not required to provide solutions to these specific potential issues. However, as described in Section 1.2.1 of the SPAS Draft EIR, one of the objectives of the SPAS project is to improvement ground access inside the Central Terminal Area (CTA) and among terminals. Such improvements, described on pages 1-11 and 1-12, would contribute to solving some of the potential connection issues among terminals.

Additionally, all SPAS-related construction projects that affect normal operation of ground transportation would be required to submit a Construction Traffic Management Plan (CTMP) under LAX Master Plan Commitment ST-18. The CTMP could include measures such as pedestrian re-routing to avoid or reduce construction-related impacts to the on-airport transportation system. (See Section 4.12.1.9.4.1 of the SPAS Draft EIR.)

SPAS-PC00130-1009

Comment:

- Security check in and baggage handling must also be improved before runway movements are considered.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Security is not an environmental impact and, therefore, is not required to be discussed in the SPAS Draft EIR under CEQA or any other law. However, a Security Assessment of the SPAS alternatives is included in Appendix I of the Preliminary LAX SPAS Report to comply with the Stipulated Settlement and Section 7.G(2) of the LAX Specific Plan. Summaries of the findings of the Security Assessment relative to each alternative are provided in Section 6.3 of the Preliminary LAX SPAS Report. Please see Response to Comment SPAS-PC00130-75 regarding the incorporation of security measures into the design of the SPAS alternatives. Please see Responses to Comments SPAS-PC00130-424 and SPAS-PC00130-152 regarding the implementation of security issues recommended by the RAND Corporation.

SPAS-PC00130-1010

Comment:

The LAWA alternatives prioritize international (25%) passenger experience over the domestic (75%) passengers. Improvements for all passengers must be addressed.

Response:

The commentor suggests that "the LAWA alternatives prioritize international (25%) passenger experience over the domestic (75%) passengers," without providing specific references to the SPAS Draft EIR to support this statement.

Contrary to the commentor's suggestion, the SPAS improvements analyzed throughout the SPAS Draft EIR would benefit not only all LAX passengers regardless of origin or destination, but also visitors, employees, and vendors that use and access LAX facilities every day.

As discussed in Section 1.2.1 of the SPAS Draft EIR, these improvements include improvements to:
- LAX terminals and concourses with new facilities being planned and existing facilities being improved (such as the Midfield Satellite Concourse, Terminal 0, and Terminal 3) which all would accommodate both domestic and international passengers;
- Ground access system within the Central Terminal Area (CTA) serving all terminals;
- Safety of the north airfield aircraft operations which would benefit all passengers regardless of origin or destination transported on aircraft assigned to the north airfield;
- Safety and security at LAX which would apply to all passengers, regardless of origin or destination.

SPAS-PC00130-1011

Comment:

2. LAWA MUST SUPPORT ALL OF ITS AIRPORTS TO ENSURE FUTURE REGIONAL CAPACITY INSTEAD OF PUSHING TRAVELLERS TO LAX.

LAWA understood regionalization in the past. In the 1988 LAX Master Plan EIR LAWA highlighted reasons for procuring Palmdale and Ontario airports. They knew LAX could never meet total future regional demand and that a backup set of airports was necessary. LAX percentages of the total regional MAP continues to increase. LAWA has not even prepared a valid master plan for either Ontario airport or Palmdale airport. Ontario has become an underutilized, abused step child of LAWA with emptied terminals, while Palmdale airport has zero commercial flights. LAWA demonstrated its Palmdale commitment by returning its operating license to the federal government.

"Regionalization" no longer exists. LAX now handles over 75% of all air commerce and traffic in the Southern California region. The FAA has projected up to a million operations at LAX by 2030 with virtually no growth of any other Southern California airport.

LAWA is withholding marketing and other support from their other operated airports to further a claim that further LAX expansion is needed. We expect that regionalization is not included in the DEIR as a way to improve traffic and other current LAX passenger bottlenecks.

LAWA is severely delinquent in meeting their "regionalization" responsibilities restated in the 2006 Stipulated Settlement. LAX is located in an area where the 405 freeway is gridlocked daily.

Ontario wants local control, but LAWA continues to resist. ARSAC supports local control because LAWA has done so little in support of ONT and regionalization. The Ontario proponents who want local control have estimated that 1.6 million vehicles are unnecessarily being forced into the 405 freeway gridlock because flights are unavailable in Ontario. This will only get worse as time goes on if corrective action is not taken. This hurts all Angelenos by making movements along the freeways much longer-a direct cost to all businesses relying on goods movement or employees who must visit other facilities.

In the year 2000 LAX handled 67.3 MAP and ONT 6.7 MAP for a total of 74 MAP. In 2011 with less total air traffic of 66.4 MAP, LAX handled a greater percentage (61.9 vs 4.5 MAP) of total traffic at the

expense of ONT. LAWA recently changed their marketing contract with LA Inc. to exclude ONT. This year passenger traffic is projected to be even more greatly concentrated at LAX.

Response:

Comments regarding LAWA's compliance with the Stipulated Settlement require legal conclusions that are beyond the scope of what is required by CEQA. The commentor provides no facts or evidence to support the claim that an estimated "1.6 million vehicles are unnecessarily being forced into the 405 freeway gridlock because flights are unavailable in Ontario. This will only get worse as time goes on if corrective action is not taken."

Please refer to Topical Response TR-SPAS-REG-1 regarding the fact that LAWA, through the LAX Master Plan, the SPAS process, and other efforts, supports the regionalization of air travel demand in Southern California. As indicated therein, the LAX Specific Plan amendment proposed as part of SPAS further supports such regionalization. The subject Topical Response also discusses the status of LAWA's management initiatives and marketing efforts for the LA/Ontario International Airport.

SPAS-PC00130-1012

Comment:

3. LAWA IS EXERCISING FISCAL INSANITY BY PRIORITIZING EXPENDING $BILLIONS TO EXPAND RUNWAYS WITH LITTLE BENEFIT LEAVING INSUFFICIENT FUNDS TO REPAIR, MODERNIZE, AND MAINTAIN CRITICAL LAX FACILITIES.

Air gridlock occurred in 2001 when LAX handled 800,000 operations in the year. In 2011 there was about 600,000 operations. Increased runway separation will be of little benefit for a very long time. The Northside Safety Study estimated only nominal improvements. The costs and risks of moving runways north is unjustified. This effort can become Los Angeles' equivalent of the Boston "Big Dig" because risks of construction have been understated by LAWA to make them look more palatable.

We have heard that the estimated costs for the 2004 LAX Master Plan Alternative D have projected increases of ten fold since approval. We suspect equivalent optimism has permiated LAWA's cost estimates for the current alternatives.

Runway expansion is greatly complicated by LAX proximity to developments and the major infrastructure going under the airport. Moving the runways will be outrageously expensive:

- Runway movement north will necessitate redesigning Lincoln Boulevard to below grade (into a tunnel) and fully revising the intersection at Sepulveda Boulevard. This impacts major traffic flow as it is one of the few north-south corridors to supplement the gridlocked 405 freeway.
- Runway movement north will necessitate mitigating unstable substrata surrounding the decommissioned six-lane, 740' long, "Manchester Tunnel" built in the 1960s. The original CalTrans plan was to build a north-south freeway corridor tunnel entirely under LAX to link Westchester with El Segundo and the South Bay. The tunnel project, however, had to be abandoned because it was destabilizing the one north runway. Sink holes were problematic. The remainder of the decommissioned tunnel extends under the current north runway, 24R, from Lincoln Boulevard to 50' of the interior north runway, 24L. Any runway movement north will require reevaluation and mitigation of an unknown water source which caused flooding and subsequent abandonment of the tunnel project. We do know that construction of the tunnel required an artesian well to reduce the water table level. When LAWA inspected the tunnel about two years ago standing water was inside despite six years of drought. Construction can cause water movements and cause destabilization in new, surrounding areas. LAWA has refused to reenter the tunnel subsequent to the high rain seasons. The unknown water source must be found and re-evaluated to determine if it can be redirected and/or if this presents a new fresh water source for LA City. Once opened for construction, the tunnel will be destabilized. This would possibly necessitate closure of both north runways until mitigations are completed over an indeterminate time period.
- Currently beneath the north runways are three major sewer lines connecting the entire City and Valley Regions to the Hyperion Sewage Treatment Plant just southwest of LAX. One of these sewers is located near the intersection where Lincoln and Sepulveda are to reconnected. The LAWA proposed below grade roadway will necessitate moving this sewer at a major cost.

- Additional underground utilities and crude oil pipes linking active oil fields to refineries in El Segundo may require movement as well.
- Any runway movement north will cause major demise of the commercial corridor north of LAX eliminating hundreds of businesses and thousands of jobs when the economy is already fragile. The previous business destruction required more than twenty years of revitalization efforts. This will deprive Los Angeles of much needed tax revenue.

Response:

Please see Response to Comment SPAS-PC00130-730 regarding the treatment of economic conditions in an EIR. As noted in that response, CEQA does not require an analysis of cost or project funding. (State CEQA Guidelines Section 15131; Pub. Resources Code Section 21068.) The comment pertaining to gridlock at the airport is not supported by facts or evidence. As indicated in Table 4.7.2-16 in Section 4.7.2 of the SPAS Draft EIR, improvements to the north airfield would result in enhancements to safety and efficiency. Please also see Response to Comment SPAS-PC00149-2 for a summary of the project objectives associated with the north airfield improvements, as well as the conclusions of NASS relative to the safety enhancements associated with reconfiguration of the north airfield. The commentor provides no substantiation for the claim that costs associated with the approved LAX Master Plan have increased by tenfold since approval. The comments pertaining to the cost estimates for the other SPAS alternatives are similarly not supported by facts or evidence. The estimated costs to complete the remaining projects associated with the approved LAX Master Plan (i.e., Alternative 3), as well as the estimated costs associated with the other SPAS alternatives, are presented in Chapter 8 of the Preliminary LAX SPAS Report, with details provided in Appendix G.

Please see Topical Response TR-SPAS-LR-1 regarding the realignment of Lincoln Boulevard. As indicated in the topical response, realignment of Lincoln Boulevard would not require substantial alterations to the intersection of Lincoln and Sepulveda Boulevards, although a minor modification to the right turn movement from southbound Sepulveda Boulevard to westbound Lincoln Boulevard may be required.

The north airfield abandoned tunnel segment (referred to by the commentor as the Manchester Tunnel, and sometimes referred to as the Lincoln Tunnel) is not, nor has it ever been, an actual tunnel. Rather, in 1969 or 1970, a concrete structure was placed beneath the runway to allow for implementation of a future tunnel that would extend Lincoln Boulevard beneath the north airfield. The northerly limits of the tunnel begin approximately 280 feet north of the northern edge of Runway 6L/24R, at the service road that lies to the north of Runway 6L/24R and south of the Argo Drainage Channel. The segment runs perpendicular to the runway and extends south to a point approximately 270 feet north of the northern edge of Runway 6R/24L. The tunnel is approximately 722 feet in length. The tunnel consists of two separate tubes, each approximately 49 feet wide and with an interior height of 29 feet. The roof of the tunnel is not integrated into the airfield pavement above but, rather, rests approximately 15 feet below grade. The tunnel is concrete lined on its sides and top; the floor of the tunnel is dirt. The tunnel is not vented.

In 2010, LAWA entered the tunnel to perform an evaluation. Water was found at the base of the steel supports in the tunnel segment. The floor of one of the tunnels was found to be dry; the floor of the second tunnel had some muddy soil. Given the humidity of the tunnel, the source of the water may be condensation, as the natural moisture in the soil has no means to exit the sealed, unventilated space. Alternately, the source of water could be subsurface intrusion from beneath the tunnel or dripping from the ceiling from a drainage issue above the tunnel. There were no signs of erosion that would be associated with flowing water. In a boring drilled when the tunnel segment was installed, the depth to groundwater was 59 feet. No evidence was found of any contamination or any hazardous materials in the tunnel segment during the investigation.

The inspection conducted in 2010 found the tunnel to be in good condition. The tunnel is stable and presents no short- or long-term hazards to the airfield. At no time has the tunnel been found to be destabilizing the runway and no distress has been observed to date. Moreover, it is incorrect to say that the tunnel was abandoned due to problems with flooding or stability or for any other reason. As stated above, the structure is not an actual tunnel but, rather, was constructed in anticipation of a future underground roadway extension which never occurred. There have never been any sink holes associated with the north airfield tunnel segment. (See Response to Comment SPAS-PC00130-51

regarding sink holes at LAX.) There is no reason for further inspection of the tunnel segment; LAWA has not refused to re-enter the tunnel, as stated by the commentor. Detailed engineering design has not yet been completed for the north airfield improvements. Therefore, no engineering details have been developed concerning the tunnel segment and whether or not it would require any modification with implementation of the SPAS alternatives.

Similarly, it has not been determined if work on the tunnel segment, if required, would necessitate any runway closures. Further engineering analysis would be performed in the subsequent phase to evaluate the adequacy of the existing tunnel to handle the aircraft loading. If it is determined during engineering design that segments of the tunnel do not have sufficient structural strength to withstand the weight of a fully-loaded aircraft, measures would be taken to strengthen the tunnel or the soils for additional support. One such measure would involve reinforcing the overlying soils above the box culvert with a ground improvement method to provide additional support for the aircraft loading. If it were determined that the tunnel segment was required to be filled, it would be filled with engineered material, not with sand. With the use of engineered fill, and the presence of the concrete-lined top and walls, the tunnel segment would not have the potential to create a sink hole.

The comment that "construction of the tunnel required an artesian well to reduce the water table level" is an erroneous statement. An artesian well is defined as a confined aquifer containing groundwater under positive pressure, which causes the water level in a well to rise and, in some cases, flow to the surface naturally. An artesian well is not constructed in order to reduce the water table. Moreover, as noted above, borings taken prior to construction of the tunnel segment showed that the water table was 59 feet below the surface, much deeper than the depth of construction of the tunnel segment, and recent investigations showed no evidence of shallow groundwater beneath the tunnel.

Please see Response to Comment SPAS-PC00130-348 regarding the relationship between sewer lines and the north airfield improvements. As indicated in that response, none of the outfall sewers that lie beneath LAX would be affected by the SPAS alternatives. Please see Topical Response TR-SPAS-LR-1 regarding oil pipelines in the vicinity of LAX.

As noted in Response to Comment SPAS-PC00130-931, no acquisition is proposed within the Westchester Business District. Therefore, there would be no impacts to tax revenues associated with dislocated businesses within Westchester. Moreover, "[e]conomic or social effects of a project shall not be treated as significant effects on the environment." (State CEQA Guidelines Section 15131.)

SPAS-PC00130-1013

Comment:

Finally, ARSAC has raised numerous issues over the past six years and in our Notice of Preparation comments. LAWA has conducted numerous outreach meetings, but has generally failed to act or cure any of the issues raised.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Responses to Comments SPAS-PC00130-730 through SPAS-PC00130-969, which address each separate comment provided in ARSAC's comment letters on the 2008 and 2010 NOPs for the SPAS Draft EIR. The comments in both NOP comment letters were fully considered during preparation of the SPAS Draft EIR. Responses to all of the comments raised by ARSAC in its comment package on the SPAS Draft EIR are provided in Responses to Comments SPAS-PC00130-1 through SPAS-PC00130-1051.

SPAS-PC00130-1014

Comment:

Aside from the destruction of a viable business corridor which pays taxes to the City. The number one LAWA failure is to address gridlocked airport access and needed Central Terminal improvements which could jeopardize tourism. Airport construction costs are financed by LAWA and ultimate the airlines and travelers, but money for infrastructure projects such as expanded roadways around LAX which are not

exclusively used by LAX traffic, must come from the City general fund. General fund money consumed reduces projects throughout the rest of LA and the region. Similarly, some CalTrans, LADWP, LA Sanitation and other required work will not be covered by LAWA and be cause for rate increases and more "fees."

Response:

It is not clear what viable business corridor is being referenced by the commentor. Please see Response to Comment SPAS-PC00130-931 regarding acquisition associated with the SPAS alternatives. Although some businesses along 98th Street would be acquired under the SPAS alternatives, as well as some businesses along the Aviation Boulevard corridor under Alternative 3, no acquisition is proposed within the Westchester Business District.

Regarding the comment that LAWA should address gridlocked airport access, existing on or near airport gridlock is not a significant environmental impact that would be caused by any of the SPAS alternatives. The SPAS alternatives include a number of ground access facilities to address traffic in and around the airport, including a redesigned entry road, new curbside in front of a new Terminal 0, the ITF, additional parking outside the CTA, connectivity with the future Metro transit station, a dedicated transportation corridor from the parking facilities and ITF to the CTA and, in some alternatives, a CONRAC. Improvements within the CTA were addressed in the LAX Master Plan and include a new passenger processor associated with the future MSC and improvements to the north terminals. LAWA is also undertaking a number of non-Master Plan projects within the CTA, as identified in Sections 5.3.2 and 5.3.3 of the SPAS Draft EIR, including south terminal improvements, in-line baggage screening, the "New Face" of the CTA, and other projects.

Comments regarding funding and economic questions need not be discussed because economic effects of a project shall not be treated as significant effects on the environment. (State CEQA Guidelines Section 15131(a).) Because a lead agency need only respond to comments that raise significant environmental issues, no further response is required. (State CEQA Guidelines Section 15204.)

SPAS-PC00130-1015

Comment:

Comments presented for incorporation into the LAX Master Plan Update EIR Notice of Preparation (NOP)

Dear Ms. Lindsey,

We appreciate the opportunity to provide some preliminary comments to the impending NOP. We desire that the NOP comment period be extended to at least sixty days. Although we do not know the exact timing of the NOP release, we note that the holiday season is almost upon us and want to ensure that full attention can be maintained by the public and all stakeholders. This is not your normal environmental review process so we suggest that as part of the NOP process there be several public scoping meetings to better define the alternatives prior to the evaluations.

Response:

The request for an extension of the 2010 SPAS Draft EIR Revised NOP comment period to 60 days is noted. The Revised NOP was circulated for a 46-day review period, commencing on October 14, 2010 and closing on November 29, 2010 consistent with the requirements of State CEQA Guidelines Section 15082. Although the review period included the Thanksgiving holiday, the close of the comment period was well in advance of the winter holidays. Two public scoping meetings were held during the review period for the Revised NOP, including meetings on November 3, 2010, and November 6, 2010.

SPAS-PC00130-1016

Comment:

The Stipulated Settlement of 2006 was conceived to create a process of cooperation resulting in projects to which all parties agreed. The Specific Plan Amendment Study (SPAS) process that will be used to update the approved LAX Master Plan Alternative D is a major element of that agreement. Throughout the negotiations and subsequently ARSAC has championed a safe, secure, and convenient LAX. Projects upon which there was general agreement were to be started almost immediately under a less rigorous review by the LAX Specific Plan than the "yellow light" projects which had serious negative impacts on the surrounding community. ARSAC is disappointed that the agreeable projects have not progressed as quickly as anticipated.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. As discussed in Section 5.3.1 of the SPAS Draft EIR, subsequent to approval of the LAX Master Plan, LAWA has undertaken a series of major capital improvements to implement LAX Master Plan projects. These include the South Airfield Improvement Program, completed in 2008, which relocated Runway 7R/25L to the south and added a centerfield taxiway in the south airfield; the Crossfield Taxiway Project, completed in 2010, which added a new north-south taxiway (Taxiway R) to improve aircraft access between the north and south runway complexes, extended Taxilane D to the west, and built a new, state-of-the-art fire station/aircraft rescue and fire fighting facility (ARFF); and the Bradley West Project, currently under construction, which will replace the existing concourses at TBIT with new, improved concourses, add new aircraft gates along the west side of TBIT, including gates specifically designed to accommodate ADG VI aircraft such as the Airbus A380 and Boeing 747-8, expand the central core of TBIT with modern facilities and passenger amenities associated with ticketing, baggage check/claim, security screening, and concessions to better serve existing and future international passengers, and relocate the two north-south taxiways/taxilanes that lie to the west of TBIT. LAWA is currently in the planning stages for the Midfield Satellite Concourse Program, which will construct a new concourse and gates west of TBIT, along with new passenger processing facilities in the CTA, and has conducted preliminary planning for improvements to the north terminals, consistent with the LAX Master Plan approvals.

SPAS-PC00130-1017

Comment:

The Settlement objective is to find mutually acceptable alternatives addressing the issues corrected by the "yellow light" projects while keeping capacity to current levels. Equal in demanding a safe, secure, and convenient airport we have steadfastly repeated strong opposition alternative changes which would impose increased noise and other environmental impacts on the airport neighbors or result in greater removal of homes or businesses. During the Settlement Process moving the runway complex north or extend west was never considered because it was a condition that was found to be unacceptable in the past. It will be important to quantify the effects on noise and pollution on the west end for all operational conditions-eastern and western operations-especially the impacts that can be caused by early turns, go-arounds, and when both runways are used for take-offs or landings.

Response:

The aircraft noise impacts analysis provided in Section 4.10.1 of the SPAS Draft EIR and air quality impacts analysis in Section 4.2 address impacts associated with aircraft operations under each SPAS alternative. The analyses are based on reasonable and appropriate operational assumptions for future airspace operating procedures, as described in Appendix F-2 of the Preliminary LAX SPAS Report. Please also see Response to Comment PC00112-1 regarding early turns. Comments regarding LAWA's compliance with the Stipulated Settlement require legal conclusions that are beyond the scope of what is required by CEQA. The purpose and focus of the SPAS process are identified in Section V of the Stipulated Settlement.

SPAS-PC00130-1018

Comment:

The planned schedule for the SPAS has been seriously delayed by LAWA actions to raise alternatives which were known to be unacceptable to airport neighbors. Using a rationale of "airport safety improvement" LAWA demanded runway changes that would have devastated one-third to one-half of the Westchester Business District and removed and/or increased impacts on Los Angeles and Inglewood homes and businesses.

Response:

Comments regarding LAWA's compliance with the Stipulated Settlement require legal conclusions that are beyond the scope of what is required by CEQA. The most notable action LAWA took that resulted in a 2.5+ year extension in preparing the SPAS Draft EIR was the Board of Airport Commissioners' (BOAC's) agreeing to the 2007 request by City Council, as initiated by Councilman Rosendahl, that an additional airfield safety study be undertaken, completed, and reviewed prior to release of the NOP for the LAX Master Plan Restudy (i.e., SPAS). The resultant North Airfield Safety Study was completed in May 2010 and LAWA subsequently published a Revised NOP in October 2010, replacing the original NOP that was published in March 2008.

The assertion that LAWA has "demanded runway changes that would have devastated one-third to one-half of the Westchester Business District and removed and/or increased impacts on Los Angeles and Inglewood homes and businesse." is untrue. The commentor provides no factual support or evidence to support the assertion that any of the proposed "runway changes" would adversely affect one-third to one-half of the Westchester Business District or increase impacts on homes and businesses in Los Angeles and Inglewood.

The SPAS Draft EIR addresses a broad range of airfield improvement alternatives with various options for runway improvements. As indicated in Section 2.3.1.11 of the SPAS Draft EIR, none of the alternatives propose or require acquisition of any homes or businesses in Westchester; the only property acquisitions needed under certain alternatives affect parcels immediately east of the airport, which are occupied primarily by airport-related businesses. Chapter 4 of the SPAS Draft EIR addresses the impacts associated with each alternative, including those to the communities adjacent to LAX. In many cases, the impacts specific to each community vary depending on the alternative considered; however, it should be noted that for certain issues such as aircraft noise and airfield-related air pollution, the impacts associated with future conditions where no airfield improvements are implemented, as would be the case under Alternative 4, would be greater (i.e., worse) than the impacts that would occur with the proposed airfield improvements. See Response to Comment SPAS-PC00149-2 for further discussion.

SPAS-PC00130-1019

Comment:

LAWA unilaterally commissioned safety studies designed to support moving runways north. A subsequent uproar was supported by elected officials of Los Angeles and surrounding communities at all levels who denounced the thinly veiled expansion plan and a promise that expansion north would not be tolerated unless it was clearly shown to be a major safety issue. A million dollar plus NASA/Acclaimed Academic Panel review of safety was then performed on the North runway complex to resolve the issue. Those favoring expansion denounced the review results which stated unequivocally that safety will not justify the runway movement north.

Response:

Please refer to Response to Comment SPAS-PC00130-168 regarding the North Airfield Safety Study and the opinion of the academic panel.

SPAS-PC00130-1020

Comment:

We have been told that even more onerous runway options will be included by LAWA into the impending NOP. We are disappointed that even greater movement north and west have been proposed and remain adamantly opposed to them.

Given that it is still a LAWA decision of what alternatives to include, several key elements/issues are identified below which should be included in the upcoming Notice of Preparation.

1. The methodology and criteria by which each alternative is assessed must be fully defined in advance of discarding any alternative from full evaluation. We propose that all options be fully assessed/analyzed. Per the Stipulated Settlement assessment of options must be judged to see how they address the issues that the "yellow light" projects were to have fixed. These issues should be identified and quantified.

Response:

The commentor requested certain information on alternatives to be included in the NOP. However, such information is not required to be included in an NOP. (See State CEQA Guidelines Section 15082(a)(1).)

The SPAS Draft EIR does present the information requested by the commentor. It includes and addresses a broad range of options embodied in nine alternatives. The formulation and refinement of the preliminary concepts leading to the nine alternatives addressed in the SPAS Draft EIR analysis are summarized in Chapters 2 through 5 of the Preliminary LAX SPAS Report.

SPAS-PC00130-1021

Comment:

2. ARSAC opposes any proposed movement of a runway north or west because it causes greater impacts (and effects-less than a "legal" impact) in accordance Section V, C (p9) of the settlement. If LAWA insists on evaluating project options such as the 100', 200', 300' or 400' north as they have indicated that they intend to do, they must separate efficiency assessments for each option allocating the improvements between the improvements due to restoring the taxiways/taxilanes/gate configurations to fully compliant widths and separation distances, and then fully assess those new options against the comparable option runway north option for efficiency, noise, and other environmental impacts.

Response:

The commentor's opposition to movement of a runway north or west is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. The commentor provides no evidence supporting a conclusion that alternatives moving a runway north or west would cause greater impacts or effects, and at any rate Section(V)C of the Stipulated Settlement does not prohibit evaluation of such alternatives (or any other alternatives) in the EIR.

The SPAS Draft EIR includes a broad range of airfield improvement options, embodied in seven airfield improvement alternatives, including variations on runway moves, taxiway/taxilane configurations, and gating plans. Airport simulation modeling (SIMMOD) was conducted to delineate aircraft movement characteristics for various options, which, in turn, was used to determine aircraft noise impacts and airfield-related air quality impacts associated with each alternative. Also, please see Response to Comment SPAS-PC00130-749 for a discussion of how the Preliminary LAX SPAS Report addresses "efficiency" issues.

SPAS-PC00130-1022

Comment:

3. ARSAC thanks LAWA for its recent inclusion of a north runway 24L movement 100' S and expects it to be fully assessed.

Response:

The SPAS Draft EIR provides a comprehensive analysis of the airfield improvement concept that moves Runway 6R/24L 100 feet south, which is SPAS Alternative 7.

SPAS-PC00130-1023

Comment:

4. All new data must be utilized as so much of the old EIR is outdated and was conflicting. Tiering on changes of this magnitude is unrealistic and unwarranted.

Response:

Data representative of current baseline conditions and impacts analyses specific to each SPAS alternative were used in development of the SPAS Draft EIR. The source and basis of such information and analyses are described in the Methodology subsection of each environmental topic section in Chapter 4 of the SPAS Draft EIR. Please also refer to Response to Comment SPAS-AL00007-41 regarding how the SPAS Draft EIR did not tier off of the 2004 LAX Master Plan Final EIR.

SPAS-PC00130-1024

Comment:

5. Detailed build assumptions must be spelled out for each of the assumptions; i.e. two midfield taxiways or one?, gate locations of TBIT and/or midfield taxiway?, location of ends of runways and any changes to taxiways, all technological improvements assumed and the extent of implementation (ie full runway status lights at ALL intersections). If partial completions are contemplated before the 2020 date then options must be separated to account for incomplete "baseline" changes. This includes FAA tower operational organization and staffing levels.

Response:

Characteristics of each of the SPAS alternatives are identified in Chapter 2 of the SPAS Draft EIR. The assumptions regarding terminals, gates, and airfield configurations are included in Appendix F-2 of the Preliminary LAX SPAS Report.

The SPAS Draft EIR analyzed impacts at a programmatic level; thus, it is reasonable to assess the baseline and build-out year as was done because specific details about individual project construction schedules are not available at this time. Interim year evaluations would be conducted for the project level EIRs as each specific project is undertaken. An EIR should be prepared with a sufficient degree of analysis to provide decision-makers with information which enables them to make a decision which intelligently takes account of environmental consequences. (State CEQA Guidelines Section 15151.) Here, it would be infeasible to evaluate future development or actions on an interim year basis because the details of such actions are not sufficiently well-defined. (See Environmental Protection Info. Ctr. v. Department of Forestry & Fire Protection (2008) 44 Cal.4th 459, 503.)

SPAS-PC00130-1025

Comment:

6. Details of how the assessments will be conducted should be provided for public evaluation as well.

Response:

Each environmental topic section (i.e., Aesthetics, Air Quality, Biological Resources, etc.) in Chapter 4 of the SPAS Draft EIR includes a methodology subsection that explains the analytical approach and assumptions. For sections that involve very technical analyses, such as in the modeling of aircraft noise, additional detailed information regarding approach and assumptions is provided in the technical appendices referenced in each such section.

SPAS-PC00130-1026

Comment:

7. Flight mixes must be assessed, details enumerated, and projection sources documented. During environmental assessments will any of the environmentally friendly fuel alternatives be assumed? What about more efficient engines?

Response:

Please see Response to Comment SPAS-PC00130-770 regarding details of the assumed fleet mixes in the 2009 and 2025 Design Day Flight Schedules (DDFS).

Regarding the projections of aircraft types, please refer to Appendix F-1 of the Preliminary LAX SPAS Report. Assumptions used to develop the 2025 DDFS fleet mix are listed in Section 4.1 on page 22 of Appendix F-1, with the methodology and results discussed in Section 4.2, starting on page 23.

Regarding the assumption of environmentally friendly fuel alternatives and more efficient engines in the fleet mix, as described in Sections 4.1 and 4.2 of the Appendix F-1 of the Preliminary LAX SPAS Report, older and less fuel-efficient aircraft were assumed to be retired by 2025. Newer, more fuel-efficient aircraft such as the Boeing 787 and the Airbus 380 were added in the 2025 DDFS fleet mix. Please also refer to Section 4.13.1 on page 4-1330 in the SPAS Draft EIR regarding a discussion of the airlines' objectives to operate fuel-efficient aircraft fleets.

SPAS-PC00130-1027

Comment:

8. When noise is assessed, modeling should include theoretical assessments showing flight frequency impacts out to 60 DNL (CNEL) using models similar to that from Wyle which includes topographical impacts. What assumptions are made about controlled landing and takeoff approach changes since new nav aid systems are not being developed by the FAA AND separate contractors for airlines. How is the new GPS/satellite control FAA plans (NextGen) integrated into the assessments? What airspace realignments are assumed?

Response:

The aircraft noise impact analysis discussed in Section 4.10.1 of the SPAS Draft EIR included the mapping of CNEL noise contours ranging from 60 CNEL to 75 CNEL for the 2009 baseline case and the various alternatives. The aircraft noise analyses were conducted using the Federal Aviation Administration's Integrated Noise Model (INM), which is the accepted state-of-the-art modeling program for determining the total effect of aircraft noise exposure at and around airports. In order for the INM to generate CNEL aircraft noise exposure contours, the following inputs to the model are required: runway layout geometry; annual temperature and humidity; aircraft operations by time of day and aircraft type; runway use information by aircraft type; location and use of flight tracks; and aircraft arrival and departure profiles. Terrain elevation data obtained from the United States Geological Survey (USGS) were also included in the INM noise analyses as explained in Responses to Comments SPAS-PC00130-209 and SPAS-PC00130-937. The aircraft noise modeling input data and assumptions are described in Appendix J1-1 of the SPAS Draft EIR. In addition to CNEL contours, which research has determined to be correlated with reported annoyance caused by noise, other noise metrics were used to assess other potential noise impacts, including awakenings and speech disruption in the classroom. These additional metrics are discussed in details in Section 4.10.1 of the SPAS Draft EIR.

Please refer to Response to Comment SPAS-PC00130-301 regarding information on the FAA's Southern California Optimization of Airspace and Procedures in the Metroplex (OAPM) project.

SPAS-PC00130-1028

Comment:

9. How will aircraft routing on the ground be determined? What air approaches are assumed (i.e. use of preferential runways-landing outboard, takeoff inboard) and what impacts are expected based on ATC staffing or reallocation of tower responsibilities? Is the preferential runway usage assumed? What percentage and time of day is assumed for other configurations of take offs/landings since time of day impacts the amount of air quality impacts due to several factors including wind directional flow. What safety measures are assumed (i.e. full runway status lights, ground radar tracking systems, FAROS, etc.)?

Response:

Please see Appendix F-2 of the Preliminary LAX SPAS Report for information on aircraft routing on the ground, aircraft routing in the air, preferential runway usage, and runway configurations.

Air Traffic Control Tower (ATCT) staffing and tower responsibilities is the responsibility of the Federal Aviation Administration (FAA) and is beyond the scope of the SPAS Draft EIR.

No safety measures (runway status lights, ground tracking radar systems or Final Approach Runway Occupancy Signals - FAROS) were assumed for the SPAS analysis. Safety measures for individual runways, such as runway status lights, will be determined on a project level basis once the selection of an alternative has been made. However, LAX currently utilizes an ASDE-X ground surveillance radar for tracking aircraft and vehicle movements on the airfield.

SPAS-PC00130-1029

Comment:

10. What are the assumed placement of new ground access roadways and their impacts on traffic?

Response:

As described and depicted in Section 2.3.1 of the SPAS Draft EIR, Alternatives 1, 2, 8, and 9 propose the realignment of the existing Sky Way connection to the Central Terminal Area (CTA) to the east. This is proposed to accommodate Terminal 0 and results in the closure of the current Park One public parking lot. Access from southbound Sepulveda Boulevard and 96th Street would remain unchanged except that the intersection of Sky Way and World Way North (on both the arrivals and departures level roadways) would be shifted east towards Sepulveda Boulevard as illustrated in Figure 2-1 on page 2-11 of the SPAS Draft EIR. This shift will provide additional distance for vehicles entering the CTA to move to their desired lane prior to the Terminal 1 curbsides.

As described and depicted in Section 2.3.1 of the SPAS Draft EIR, Alternatives 1, 2, and 8 propose the construction of an elevated busway connecting Manchester Square, the new Crenshaw/LAX light rail station and the ITF to the CTA. The buses proposed by LAWA to operate on the elevated busway are non-articulated buses similar to the existing LAX shuttles. While the total number of LAWA-operated shuttles accessing the CTA would increase under Alternatives 1, 2 and 8, the total number of commercial vehicles accessing the CTA would effectively decrease. This is because, buses serving new off-airport facilities like the Intermodal Transportation Facility (ITF) under Alternatives 1, 2, and 8 and the Consolidated Rental Car Facility (CONRAC) under Alternative 8, as well as some other commercial modes and about 5 percent of the private vehicles currently accessing the CTA, would no longer access the CTA when the elevated busway is in place. Instead, the passengers would be dropped off or picked up at the off-airport facilities where passengers would be consolidated into groups and boarded onto high capacity LAWA-operated buses that would be used to transport passengers into the CTA. These buses would have higher capacities and operate with higher average passenger loads than would the commercial vehicles that would otherwise access the CTA. Consequently, the use of

the consolidated busing operation would result in a net decrease in the number of commercial vehicles accessing the CTA.

Between Manchester Square and the CTA, the elevated busway is proposed to be constructed primarily within the 98th Street corridor. Columns would be constructed on new raised median islands in the center of the street. While eastbound and westbound through traffic is not expected to be impacted by these columns, there may need to be prohibitions on some left turns to and from driveways along 98th Street, depending on the specific locations of the columns. This would be determined during project-level design of the elevated busway, if an alternative including the elevated busway is selected for implementation.

SPAS-PC00130-1030

Comment:

11. What growth factors are assumed for the area in general and LAX traffic for autos, buses, vans, taxis? How is cargo growth to be assessed and new vehicles associated with it?

Response:

The comment asks how traffic growth was projected for LAX-generated passenger and cargo trips and for regional development. Section 4.12.2.2.4 provides an explanation of the process used to estimate future trips generated by activities at LAX. Specific growth factors for passengers, employees, and cargo during each analyzed time period are presented in Table 4.12.2-9. As discussed at page 4-1211 in the SPAS Draft EIR, future cargo traffic was assumed to increase in proportion to the growth in annual cargo tonnage between Baseline (2010) Without Alternative conditions and Future (2025) conditions. Vehicle trip generation estimates for the Existing (2010) Baseline and Future (2025) Alternatives are presented in Table 4.12.2-10, (this table includes trip generation by cargo facilities) and additional detail on the location of traffic generators within LAX is provided in Appendix K2-8.

SPAS-PC00130-1031

Comment:

12. What is the planned usage of all LAWA properties not specifically identified or traffic attributed and impacts on environmental assessments (i.e. we are told Belford Square use is not specified)? If a usage has not "planned" then a range of usages should be assessed and combined with the other usages to assess total impacts.

Response:

In a comment originally submitted September 15, 2010 on the 2010 Notice of Preparation, the commentor asked for additional detail regarding land uses on all LAWA properties and recommends a methodology for analyzing impacts where future uses are unknown. The SPAS Draft EIR uses appropriate methodologies to analyze impacts associated with the SPAS alternatives.

Please see Response to Comment SPAS-PC00130-175 regarding land uses in the Belford area.

SPAS-PC00130-1032

Comment:

13. Since this is a unique set of changes and conditions for the modification of a Master Plan, additional study information beyond a normal EIR should be provided for each runway/taxiway/taxilane/gate configuration. LAWA should study and report: 1. Safety 2.Security 3. Pollution 4. Aircraft compatibility (Group IV, V and/or VI) 5. Capacity and 6. Cost and scheduling of implementation. Safety should include both aircraft and restoration of landside structures which need to be repaired.

Response:

The nature, scope, and level of analysis provided in the SPAS Draft EIR are based on the specific characteristics of the SPAS alternatives and meet the requirements of CEQA. (See State CEQA Guidelines Sections 15146, 15151; Napa Citizens for Honest Government v. Napa County Bd. of Supervisors (2001) 91 Cal.App.4th 342, 369.) Additional data and analyses developed by LAWA in conjunction with the formulation and evaluation of the SPAS alternatives address the types of information requests indicated by the commentor. Specifically: (1) safety is addressed in Section 4.7.2 of the SPAS Draft EIR and is also considered in Chapter 6 of the Preliminary LAX SPAS Report; (2) security considerations associated with each alternative are addressed in Chapter 6 of the Preliminary LAX SPAS Report; (3) pollution is addressed throughout Chapter 4 of the SPAS Draft EIR, including in Section 4.2 for air quality, Section 4.8 for hydrology and water quality, and Section 4.10 for noise; (4) aircraft compatibility, in terms of aircraft size (ADG IV, V, VI) is accounted for throughout both documents, including Section 4.7.2 of the SPAS Draft EIR relative to each alternative's compatibility with FAA airfield design standards for different aircraft size groups; (5) capacity is accounted for through each alternatives being designed in accordance with the Stipulated Settlement's requirement that the proposed improvements are planned in a manner that is designed for a practical capacity of 78.9 MAP and provide for no more than 153 passenger gates; and (6) cost is addressed in Chapter 8 of the Preliminary LAX SPAS Report.

Relative to scheduling of implementation, as stated on page 2-8 of the SPAS Draft EIR, the nine SPAS alternatives addressed within the SPAS Draft EIR were formulated at a programmatic level of conceptual planning, and no design or engineering plans, or construction phasing plans or schedules, are available for any of the alternatives. In general, however, it is anticipated that all of the improvements proposed under each alternative would be completed by 2025, with construction beginning in 2015.

Relative to the commentor's suggestion that safety include both aircraft and restoration of landside structures, the former is addressed in Section 4.7.2 of the SPAS Draft EIR and the latter would be assessed in conjunction with the formulation of detailed design and engineering plans for SPAS improvements that are integrated with existing landside structures.

SPAS-PC00130-1033

Comment:

14. We also encourage LAWA to consider other alternatives that are "out of the normal box" to achieve results. Each of the LAWA plans includes a center line taxiway that the FAA claims some benefits, but we note it also adds some new modes for incursions as well. The Academic Panel conducting the NORSAC safety study, for instance, added a single, longer runway in place of 24L to achieve Group VI status. Their findings noted that there was only nominal loss of capacity from this option and removed the highest source of risk-runway crossings. LAWA and the FAA demonstrated the capability to operate on three runways throughout the period of the South Airfield Improvement Program (SAIP) construction.

Response:

Please refer to Response to Comment SPAS-PC00130-800 regarding the problems and infeasibility of eliminating one runway in the north airfield.

The comment does not fully or accurately reflect the conclusions of the academic panel relative to the operational characteristics of a three-runway system (i.e., one runway in the north airfield and two runways in the south airfield). As stated in Section 17.5 of the North Airfield Safety Study (NASS), "The capacity results for the three-runway configuration were less encouraging: the reduction in arrivals and departures observed at FFC [Future Flight Central] could have adverse direct and indirect consequences. Given that mixed operations would occur on the North Airfield (i.e., landings and takeoffs on the same runway), arranging for departures in the face of frequent arrivals would be challenging. It is also true that unexpected conditions -- such as the temporary shutdown of a runway -- can cause considerably more disruption when there are only three runways rather than four. The AP [Academic Panel] fears, therefore, that the capacity limitations in the three-runway case would be unduly constraining in peak conditions, which would prevail for nine hours of the day under the 2020 forecast." As further stated in the main conclusions of the NASS, specifically Section 17.7, "Moving to a

three-runway configuration could cause major difficulties, in terms of flight schedule reliability and congestion, even under visual flight conditions."

SPAS-PC00130-1034

Comment:

November 9, 2006

Specific Plan Amendment procedural improvement questions and suggestions that are presented for discussion purposes rather than as position stances:

Committee Operation

LAWA has been presenting their proposals at the meeting and we are supposed to respond on the spot. Discussion topic handouts should be distributed before our meeting.

Response:

The questions and suggestions presented by ARSAC concerning meetings of the SPAS Advisory Committee are noted. The Advisory Committee meeting process is described in Chapter 4 of the Preliminary LAX SPAS Report. As noted in that section, between March 2006 and June 2012, LAWA held 24 Advisory Committee meetings. Materials from these meetings are provided in Appendix D-2 of the Preliminary LAX SPAS Report. LAWA distributed materials to committee members in advance where possible. When it was not possible, discussion topics spanned more than one meeting, if warranted. No further response is required because these comments do not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00130-1035

Comment:

Public expectation is that the green light items were to go forward and the yellow not. What specific, quantified parameters are not met by the green light projects? What "quick fixes" and procedural changes can address these instead of major construction projects?

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. The comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR; therefore no further response is required. (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)). Nevertheless, the response below is provided for informational purposes.

Please see Response to Comment SPAS-PC00130-394 regarding LAWA's progress towards implementation of non-Yellow Light LAX Master Plan projects. It is not the purpose of the SPAS Draft EIR to evaluate the LAX Master Plan non-Yellow Light projects or to determine if there are procedural changes that could address the problems these projects were designed to address in lieu of implementing the approved projects.

The project objectives of the SPAS, as discussed in Section 2.2 of the SPAS Draft EIR, provide information about the problems and issues the alternatives were designed to address. The SPAS alternatives represent a reasonable range of alternatives that would attain most of the basic objectives of the project, sufficient to allow informed decision-making and public participation. (State CEQA Guidelines Section 15126.6(a).) The commentor does not provide any evidence of "quick fixes" that would offer substantial environmental advantages and, therefore, no further analysis is required. (City of Maywood v. Los Angeles Unified School District (2012) 208 Cal.App.4th 362, 419.)

SPAS-PC00130-1036

Comment:

We need to go back to ground zero and first establish acceptance of specific, measurable objectives. In the case of "yellow light functionality review" we need concrete goals. If there is inadequate CTA traffic capacity, for instance, what is it now and what must it be in each location around the circle? How much curb space is necessary versus what exists now? Where are the anticipated difficulties with air quality? Approximately how much is produced per aircraft? Where are the traffic bottlenecks creating auto/van air quality issues? For traffic gridlock issues how many cars must get to certain locations and what "quick fixes" can be done to reduce these impacts?

Response:

Section 2.2 of the SPAS Draft EIR presents the SPAS project objectives. The impacts analyses presented throughout Chapter 4 of the SPAS Draft EIR provide quantitative and qualitative evaluations of the performance of each alternative, including on-airport traffic and curbside performance within the CTA (Section 4.12.1), off-airport traffic impacts (Section 4.12.2), and air quality impacts associated with airfield operations and motor vehicle travel (Section 4.2). For those impacts determined to be significant, the analyses also identify feasible mitigation measures.

See also Table 1-2 in Chapter 1 of the SPAS Draft EIR which presents an evaluation of the relationship between each project objective and each SPAS alternative. Table 1-3 of the SPAS Draft EIR also provides elements of comparison on how alternatives meet the SPAS Draft EIR objectives.

CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commentors. (State CEQA Guidelines Section 15204.) An EIR must be prepared with a sufficient degree of analysis to provide decision-makers with information which enables them to make a decision which intelligently takes account of environmental consequences. (State CEQA Guidelines Section 15151.) Here, the SPAS Draft EIR analyzes, in significant detail, the environmental impacts of the proposed alternatives, and presents the information in a manner sufficient to facilitate informed decision-making.

SPAS-PC00130-1037

Comment:

It's time to present full up options that includes all aspects of a Plan rather than piece mealing. Each part has an impact on the others.

Response:

The SPAS Draft EIR includes nine alternatives, including four "fully-integrated" alternatives that address airfield, terminal, and ground transportation improvements (Alternatives 1 through 4), three alternatives that focus on airfield and related terminal improvements (Alternative 5 through 7) and two alternatives that focus on ground transportation system improvements (Alternatives 8 and 9). Each of the focused alternatives (Alternatives 5 through 9) can be paired with certain other alternatives to provide a full complement of airfield, terminal, and ground transportation system improvements similar to the fully-integrated alternatives. A comprehensive impacts analysis of each alternative is presented in Chapter 4, Environmental Impact Analysis, of the SPAS Draft EIR.

SPAS-PC00130-1038

Comment:

Public Outreach
There is no trust established with the public yet because of past history. When ideas are "floated" people think that they will be rammed down their throats. Ideas that are not truly anticipated to be implemented should be identified as so even if you want to evaluate them for support of a "range of options." Information must be presented prior to the meetings.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Response to Comment SPAS-PC00130-1034 regarding the Advisory Committee meeting process. In addition to Advisory Committee meetings, LAWA undertook an extensive public participation program in 2006, the outset of the SPAS process, to solicit public input from interested stakeholders. Please see Response to Comment SPAS-PC00130-731 for details regarding these meetings. The public meetings were interactive and included an open dialog with members of the public concerning SPAS-related planning issues. At the Community Advisory meetings and the public meetings, operational objectives were identified and input on solutions sought. No further response is required because these comments do not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00130-1039

Comment:

State openly what is NOT on the table and what the LAWA objectives are in terms of operations. People hear all of the proposals and do not believe that the plans are not laying the groundwork for another future expansion.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Responses to Comments SPAS-PC00130-1038 and SPAS-PC00130-731 regarding the nature of the Advisory Committee meetings and SPAS community meetings. No further response is required because these comments do not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00130-1040

Comment:

During the meetings the questions must be answered for individuals with actual factual materials and/or where the answers can be found. After the meetings post the answers to these questions and allow for follow up. If you don't know the answer, just say so! Don't make them up as you go along.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Responses to Comments SPAS-PC00130-1038 and SPAS-PC00130-731 regarding the nature of the Advisory Committee meetings and SPAS community meetings. No further response is required because these comments do not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00130-1041

Comment:

Re: Runway Safety on the North

Arm waiving that we need better and "one is too many" won't cut it when trying to convince most people that major construction and future noise and other environmental impacts will be imposed upon them.

What specifically needs to be addressed? What are the specific human factors that must be addressed for safety? What physical factors? What mechanical factors?

Response:

Please refer to Section 4.7.2 of the SPAS Draft EIR which identifies all the safety factors that were evaluated as part of the SPAS analyses. Please also see Responses to Comments SPAS-PC00130-1042 through SPAS-PC00130-1049 below.

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00130-1042

Comment:

What technologies are available? Distinguish between facilities "improvements" and procedural factors? Ie traffic load, pilot familiarity and marking of runways, controller workload, impacts of various aircraft types?

Response:

The types of airfield safety system improvements that are at LAX are summarized on pages 4-501 and 4-502 of the SPAS Draft EIR. Please refer to Response to Comment SPAS-PC00096-5 for a discussion of the safety improvements analyzed in the SPAS Draft EIR. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00130-1043

Comment:

What is NOT in place at LAX that would improve safety? Ie AMAS and collision avoidance systems, status light systems, etc?

Response:

The FAA and LAWA have worked together in recent years to deploy new technologies and enhanced training to improve airfield safety at LAX. Pages 4-501 and 4-502 of the SPAS Draft EIR, provides a summary of these recent and ongoing improvements, including the installation of runway status lights. Please refer to Response to Comment SPAS-PC00096-5 for a discussion of the safety improvements analyzed in the SPAS Draft EIR.

No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00130-1044

Comment:

What can be done about spacing of aircraft coming here to avoid bunching?

Response:

The volume of aircraft arriving at LAX at any given time is dependent upon numerous variables that are beyond the control of LAWA or the FAA. These would include airline schedules at other airports, weather, a variety of operational delays, etc. Regardless of the number of aircraft approaching and

arriving at LAX, they are all handled by the FAA air traffic controllers who provide the proper spacing for a safe operation.

No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00130-1045

Comment:

If history is our best predictor... What makes our runway on the north unsafe?

Response:

Please see pages 4-502 through 4-506 in Section 4.7.2 of the SPAS Draft EIR for a summary of studies addressing the safety of the north airfield, In particular, please see Table 4.7.2-5 on page 4-504 for a list of hazards associated with aircraft operating on the existing north airfield identified in the 2007 North Airfield Safety Risk Assessment. Further, the February 2010 Los Angeles International Airport North Airfield Safety Study identifies the facilities and operations that pose a safety risk on the north airfield.

SPAS-PC00130-1046

Comment:

Over the past many years there has been two accidents on the north. What where their specific causes and how would have, if at all, separating or lengthening the runways fix this? What are the specific causes of incursions that are being avoided? Ie hold bar errors? Lost way on airport? Lost track of aircraft? Etc...

Response:

Based on the data acquired from the National Transportation Safety Board, and as shown in Table 4.7.2.6 on page 4-509 of the SPAS Draft EIR, although aircraft accidents have occurred in flight, at the west helipads, or on the south airfield, no accidents or fatal injuries have occurred on the north airfield in the past 10 years (see far right column "Location").

Regarding the number of incursions on the south airfield, pages 4-510 and 4-511 in Section 4.7.2.3 of the SPAS Draft EIR discuss how even though data indicates that the number of Category C incursions on the south airfield increased following completion of the South Airfield Improvement Project (SAIP) compared to prior years, the comparative change is the result of the definition change by the Federal Aviation Administration (FAA) and is not a reflection of actual events.

Additionally, please see Response to Comment SPAS-PC00130-160 regarding the reduction in incursions on the south airfield following the completion of the South Airfield Improvement Project.

SPAS-PC00130-1047

Comment:

How does the incursion experience at LAX differ with that of comparable sites? I understand that LAX has less on the north than comparables. If this is not sufficient, what kinds of issues are of greatest concern and how should they be addressed?

Response:

Aircraft incursions are influenced by a number of factors including, but not limited to, the airfield design and operational characteristics specific any given airport. The commentor gives no indication as to what constitutes "comparable sites" and provides no basis or citation for the claim that "LAX has less [incursions] on the north than comparables." As such, it is not possible to address the comment directly. However, the Los Angeles International Airport North Airfield Safety Study does note the

following on pages 157 and 158 in Section 17.4.3 of Appendix H-6 of the Preliminary LAX SPAS Report.

"Because such a proposal would essentially replicate on the North Airfield what has already been done on the South Airfield, the AP put considerable weight on evidence about whether incursions have dropped on the South since its reconfiguration. While only about 18 months of data are at hand about safety under the new arrangements, they suggest that the changes have reduced incursion risk on the South by about 40 percent. The apparent reason for the improvement is the new centerline taxiway, which causes landing planes to slow down before crossing the takeoff runway and which gives controllers greater flexibility in deciding when and where planes landing on Runway 25-L should cross Runway 25-R."

Additionally, please see Response to Comment SPAS-PC00130-160 regarding the reduction in incursions on the south airfield following the completion of the South Airfield Improvement Project.

SPAS-PC00130-1048

Comment:

Explain why the south side has four times as many incursions as the north.

Response:

Table 4.7.2-7 of the SPAS Draft EIR details the number and category of runway incursions at LAX from 2001 through 2011. Based on the data provided, over a ten year period, the south airfield had 72 runway incursions to the 31 on the north airfield. However, the benefits of a centerfield taxiway can be seen by comparing the south airfield runway incursion data pre- and post- South Airfield Improvement Project (SAIP) (completed in 2008).

In regards to the number of incursions on the south airfield, pages 4-510 and 4-511 in Section 4.7.2.3 of the SPAS Draft EIR discuss how, even though data indicates that the number of Category C incursions on the south airfield increased following completion of the SAIP compared to prior years; the comparative change is the result of the definition change by the Federal Aviation Administration (FAA) and is not a reflection of actual events.

Additionally, please see Response to Comment SPAS-PC00130-160 regarding the reduction in incursions on the south airfield following the completion of the South Airfield Improvement Project.

SPAS-PC00130-1049

Comment:

A recent article in the Breeze stated over 50% of the runways in the US fail to have complete RPZ. What waivers has given by the FAA for the north side? What would have to be changed to make them fully compliant?

Response:

Per FAA Advisory Circular 150/5300-13 on page 70, Runway Protection Zones (RPZs) are located at the end of each runway and are defined by a set dimension regardless of what is located in that area. Therefore, all runways have a complete or proper sized RPZ. It is assumed that the commentor is referring to a Runway Safety Area (RSA) because many RSAs at airports in the U.S. do not meet RSA standards. The FAA does not issue waivers for non-compliant RSAs and has an ongoing program to identify and improve RSAs around the country. The options for improving the RSAs at LAX and bringing them into compliance are summarized in Section 4.7.2 of the SPAS Draft EIR.

SPAS-PC00130-1050

Comment:

LAWA Community Stakeholder Public Safety Initiative

Arnie Corlin

November 22, 2010

Community members, Business owners and LAWA must acknowledge public safety as a key component to improve their community's quality of life and the return on their investments.

LAWA has not sufficiently recognized this and should become a better community partner in order to help control terrorism and other criminal threats at and around LAWA properties.

For law enforcement and government to create efficient and more successful results, a true community partnership is essential. Our Senior Lead Officers who have traditionally been our educators for crime and nuisance issues are not in the community like residents, businesses and LAWA 24/7. Senior Leads also have numerous other assignments making it important to acknowledge and involve more community stakeholder's participation.

Additionally, LAPD does not have the proper resources necessary nor should they be the sole provider to create that partnership for an entity as large and self sufficient as LAWA.

Another obstacle to these successes is that law enforcement typically tries to sell rather than market public safety education. Marketing would engage more stakeholders and improves the ability from just knowing about issues to an elevated understanding of issues. Similar to what is done in Israel.

While programs such as iWatch have good bullet points, most participants tend to forget or fail to pass on important information to others once instructors are gone.

Whether it is one's investment property, their own well being or that of other community stakeholders, it is just as essential to re-enforce the safety from their boundaries going outward as well as from within a given perimeter.

To date LAX has been far too focused on re-enforcing within their perimeter and insufficiently looking outward. Minimal to no partnership of the businesses and other community members has been created. This lack of partnership from LAX may needlessly increase the risk of some criminal behavior and allow the opportunity for it to move closer to or enter LAX property.

An example is the manner with which some cameras have been installed on the exterior clearly shows the lack of identity of perimeter control and boundaries. Even with new tracking software in development, none currently developed would have much value with the manner those cameras have been installed.

I have talked to numerous business and community members who have told me there has been no effort to identify and make use of existing cameras. Installing new resources without identifying and coordinating those that exist is a waste of government resources. Doing so might have allowed others with higher value field of views to be put into place at a lower cost.

Not doing so is a poor risk management model.

Another asset not sufficiently used is that some of the best and most organized Neighborhood Watch Groups and communications in the city exist around LAX. This could and should be a great resource immediately available with minimal expense. Numerous businesses on the perimeter have also told me there is not sufficient communications as to threats or other issues at or around LAX.

All of these stakeholders in many cases would be much more able to identify abnormal behavior than even local law enforcement. It could also be done in a much more rapid manner at a far lower cost.

An LAX or Federally funded component for community stakeholder training and coordination should be immediately required whether or not any LAX improvements are agreed upon.

To enhance the value of funding spent on such a program, this could be identified and implemented as a national model.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Security is not an environmental impact and is, therefore, not required to be discussed in the SPAS Draft EIR under CEQA or any other law. However, a security assessment of the SPAS alternatives is included in Appendix I of the Preliminary LAX SPAS Report to comply with the Stipulated Settlement and Section 7.G(2) of the LAX Specific Plan. Portions of this comment present personal opinions about public safety that are unsupported by facts, and therefore, do not constitute substantial evidence under CEQA. Contrary to the statement by the commentor, LAWA takes public safety and security very seriously, including terrorism and other criminal threats at LAX. As indicated on page 4-1022 in Section 4.11.2 of the SPAS Draft EIR, LAWAPD engages in criminal enforcement, traffic control, ground transportation regulations and airfield safety enforcement, and specialized units that deal with cargo theft and emergency response. LAWAPD is also involved with intelligence and planning to limit the possibility of any major disruption, including terrorism, to airport operations and passenger safety. LAWAPD's Chief of Police reports to the Deputy Executive Director for Homeland Security and Law Enforcement who reports directly to LAWA's Executive Director. Currently, LAWAPD has a staff of approximately 450 police officers with an additional 650 civilian employees, including civilian traffic and security officers. LAWAPD is not the sole provider of law enforcement services at LAX. As noted in the SPAS Draft EIR, LAWAPD shares law enforcement responsibilities with LAPD. The suggestion that LAX- or federally-funded community stakeholder training and coordination should be required is noted. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00130-1051

Comment:

Reference: Notice of Preparation of Draft EIR for the Proposed Interim Taxiways Safety Improvement Project (ITSIP) No. EIR-10-019-AD dtd June 4, 2010

ARSAC, the Alliance for a Regional Solution to Airport Congestion, understands that this project consists of several taxiway relocations between the north complex runways 24L and 24R which are to reduce the possibility of collision from an incursion.

LAWA has acknowledged that this was never studied in the Master Plan EIR and that this is a fully stand-alone project and is being proposed in the interest of a more rapid path to runway safety improvement. In concept we support this effort but have identified the following issues which should be fully addressed in the draft project EIR.

1. Specify and evaluate the locations where processing of removed taxiway materials are collected, stored, and processed along with the environmental controls to prevent toxic fugitive dust.
2. Specify truck routes for construction purposes as well as parking locations for construction workers.
3. Noise impact evaluations should take topography into consideration. What traffic levels are assumed and what flight mix? NOP Attachment 1 from 2009 is a start, but what is projected when the airport is more fully utilized?
4. Ensure that the assessment will evaluate how (and/or whether) mid-runway takeoffs will impact noise and air quality issues as well as safety.
5. Ensure that the project is evaluated in the context of both what taxiways (and taxilanes) will exist at the start of this project as well as projects currently proposed and those authorized by the Alternative D Master Plan. Examples include the taxilanes between the new TBIT and Midfield Concourse, Midfield taxiway R (and S not yet authorized).
6. Please confirm that all construction mitigation and control systems used for the South Airfield Improvement Project are utilized for this project.

Specific comments to the CEQA Check List:

1. I.D What additional lighting will be added for construction transportation north of 24R? Can this be significant?

2. III.D What controls will stop the distribution of contaminated ground particles during construction?
3. III.E Are any sewer lines or other water system pipes impacted during construction? What smells and contamination is anticipated from this?
4. VI.A Item iii is very general about aquifers and sand compactness. Is there a map of the ground water in this area near the north runway complex? Of special interest is the eastern half.
5. XII.A Include noise from construction vehicle traffic.

We look forward to continuing to work with you. We have attached an appendix of safety related information to aid in your understanding of this complex issue.

Response:

The comment pertains to the NOP for the LAX Interim Taxiways Safety Improvement Project and requests detailed project-level information, including construction-related information, specific to that project. That project is no longer being advanced on its own and preparation of a project-level EIR is no longer occurring. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00131 Commins, Sharon Mar Vista Community Council 10/10/2012

SPAS-PC00131-1

Comment:

At its regular monthly meeting October 9, 2012, the Mar Vista Community Council unanimously passed the following motion regarding alternatives presented in the LAX SPAS DEIR:

The Mar Vista Community Council encourages the Los Angeles World Airport (LAWA) to adopt the plan in their LAX SPAS DEIR which ensures the most rapid completion of LAX modernization. Alternative 2 which requires no relocation of the North Runway and Alternative 9 which is a Consolidated Rental Car Facility in Manchester Square supported by some form of rail mass transit which allows for connection into the Westchester business district should be the preferred alternatives. Such a plan, according to DEIR evaluations, addresses the necessary airfield operational efficiency and safety concerns, presents the least intrusive impacts on local communities, and, at the same time, provides the lowest construction cost and construction risks.

Response:

The commentor's support for Alternatives 2 and 9 is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Chapter 2 of this Final EIR regarding the LAWA Staff-Recommended Alternative, which couples the airfield and terminal improvements associated with Alternative 1 with the ground access components associated with Alternative 9, including a discussion of the rationale behind the selection of these alternatives over the other alternatives evaluated in the SPAS Draft EIR. Regarding enhancements to the safety and efficiency of the airfield under each alternative, please see Table 4.7.2-16 on pages 4-569 and 4-570 in Section 4.7.2 of the SPAS Draft EIR and see Topical Response TR-SPAS-T-1 regarding transit options into LAX. Please see Response to Comment SPAS-PC00115-1 regarding the commentor's assertion that Alternatives 2 and 9 would present the least intrusive impact on local communities and provide the lowest construction cost and construction risk.

SPAS-PC00132	**Paz, Sergio**	**Los Angeles International Airport Area Advisory Committee**	**10/9/2012**

SPAS-PC00132-1

Comment:

The Los Angeles International Airport Area Advisory Committee (LAXAAC), a committee of residents of the communities surrounding Los Angeles International Airport (LAX), is writing with comments relating to the recent Draft Environmental Impact Report (DEIR) or the proposed Specific Plan Amendment Study at LAX (the SPAS).

Our initial concern with the DEIR is its massive size and complexity with the number of proposed alternatives discussed, coupled with the failure of LAWA to designate a preferred alternative, particularly in light of the extremely limited time allowed for the public to review these documents. You have indicated that LAWA may yet select a preferred alternative, which would be unfair in that it effectively would give the public even less time to evaluate that alternative thoroughly. We ask that when LAWA decides upon a proposed alternative, that the public be given additional time to address that proposal.

Response:

Please see Responses to Comments SPAS-AL00007-6, SPAS-AL00008-3, and SPAS-AL00008-26 for an explanation of why the analysis of nine alternatives in the SPAS Draft EIR instead of a single proposed project was consistent with CEQA's requirements and facilitated public review of the alternatives. Subsequent to publication of the SPAS Draft EIR, LAWA staff recommended an alternative that couples the airfield and terminal improvements associated with Alternative 1 with the ground access components associated with Alternative 9. The environmental impacts and recommended mitigation measures associated with the LAWA Staff-Recommended Alternative are identified in Chapter 2 of this Final EIR.

Regarding public review of the preferred alternative, this Final EIR presents the LAWA Staff-Recommended Alternative, and this recommendation will be considered by the decision-makers when they deliberate, in a public process with public input, on whether to approve a particular SPAS alternative.

SPAS-PC00132-2

Comment:

Preferred Alternatives 7 and 9:

Our committee favors a combination of Alternatives 7 and 9, which we believe would modernize the airport and improve both airfield operations and ground transportation without unduly impacting the surrounding communities.

Response:

The commentor's support for Alternatives 7 and 9 is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Chapter 2 of this Final EIR regarding the LAWA Staff-Recommended Alternative, which couples the airfield and terminal improvements associated with Alternative 1 with the ground access components associated with Alternative 9, including a discussion of the rationale behind the selection of these alternatives over the other alternatives evaluated in the SPAS Draft EIR.

SPAS-PC00132-3

Comment:

Alternative 7 proposes a 100 foot southward movement for Runway 6R/24L, increasing runway separation from 700 to 800 feet, and adding a center-line taxiway. We believe that the center-line taxiway would enhance safety on the North Airfield, because recent experience on the South Airfield and at other airports with added center-line taxiways suggests that incursions will be reduced.

Data available on a Federal Aviation Administration (FAA) website confirm that there was a significant reduction in the number of incursions on the South Airfield after the addition of the center-line taxiway. A comparison between the five-year periods between 2003-2007 and 2008-August 2012 before and after the south center-line taxiway shows that the incursion average on the South Airfield was reduced significantly while the incursions on the North Airfield stayed about the same. (See http://www.asias.faa.gov/portal/page/portal/asias_pages/asias_home/datainfo). Other data on the FAA website show that incursion severity has diminished since the center-line taxiway was installed. These data are consistent with that from other major airports in the country. The incursions on the North Airfield generally have been somewhat more severe than on the South Airfield after the center-line taxiway but less severe than they were on the South Airfield prior to the taxiway. Accordingly, we believe that the inclusion of a center-line taxiway on the North Airfield could significantly reduce the frequency of incursions.

We believe that less than optimal taxiway positions may have played a role in the incursions that have occurred on the North Airfield. We support the lengthening of Runway 24-L towards the east to a minimum length of 11,500 feet from the current 10,286 feet included in Alternative 7 because it would measurably improve North and South Airfield safety. The 2010 North Runway Safety Study (NASS) conducted by an academic panel under the auspices of the North Airfield Safety Advisory Committee noted on page 143 that incursion or collision risk could he minimized by balancing operations between the North and South Airfield complexes. The imbalance occurs because the heavy Groups IV and V aircraft that depart from the North terminals currently must taxi counter-flow on the North all the way around to the South complex to depart, and vice versa for landing. The NASS recognized that the net result of this imbalance is a quadrupling of the incursion risk with this traffic. This means more opportunities for incidents on the North and South complexes, additional fuel cost and time for the departing aircraft and additional pollution for the local environment from aircraft exhaust.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00132-4

Comment:

In addition, we note that the DEIR fails to explore all other safety measures that could be taken to reduce incursions. Therefore, please address the following items in the final EIR to determine whether they would be adequate to address any remaining perceived safety issues:

- Improved communications between tower and cockpit,
- Fully staffed tower and TRACON offices,
- Most modern and efficient equipment installed in the tower,
- GPS ground-tracking system installed,
- More space between aircraft, and
- Adherence to the LAX preferential runway noise abatement plan.

Response:

The content of this comment is essentially the same as comment SPAS-PC00096-5; please refer to Response to Comment SPAS-PC00096-5.

SPAS-PC00132-5

Comment:

We propose the combination of Alternative 7 with Alternative 9 because we believe that the Consolidated Rental Car Center (CONRAC) project in Alternative 7 combined with the Automated People Mover (APM) from Alternative 9, would take rental car shuttles off the road, improve traffic, and provide a great convenience to the traveling public.

Response:

The commentor's support for Alternatives 7 and 9 is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Chapter 2 of this Final EIR regarding the LAWA Staff-Recommended Alternative, which couples the airfield and terminal improvements associated with Alternative 1 with the ground access components associated with Alternative 9, including a discussion of the rationale behind the selection of these alternatives over the other alternatives evaluated in the SPAS Draft EIR. As indicated on page 1-17 of the SPAS Draft EIR, components of Alternatives 1, 2, 5, 6, 7, 8, and 9 are interchangeable such that airfield and terminal improvements from one alternative could be implemented in association with the ground access improvements proposed under another alternative. Alternative 9 includes a CONRAC in Manchester Square as well as an APM. Alternative 7 focuses on airfield improvements which, in turn, affect terminal improvements. Alternative 7 does not include any ground access improvements, including a CONRAC.

SPAS-PC00132-6

Comment:

We favor the Alternative 9 proposal of an Intermodal Transportation Facility (ITF) to be constructed between 96th and 98th Streets and between Vicksburg Avenue and Airport Boulevard. The ITF would include space for passenger parking and a remote passenger pick-up drop off to provide drivers the option of not entering the CTA.

The construction of a CONRAC with an APM to transport rental car passengers between it and the CTA would significantly improve passenger convenience and reduce traffic congestion in the vicinity of the airport as well as in the CTA. Instead of congesting several streets around the airport with rental vehicles, passengers would go to one facility to obtain or return their rental cars, where there would be more than 8200 spaces for vehicles. Departing passengers could drop off rental cars and take the APM directly from the CONRAC into the airport, while arriving passengers who need a rental vehicle could take the APM directly to the CONRAC. Combined with the CONRAC and the ITF, the APM likely would significantly reduce the number of private vehicles accessing the CTA.

Response:

The commentor's support for Alternative 9 is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Chapter 2 of this Final EIR regarding the LAWA Staff-Recommended Alternative, which couples the airfield and terminal improvements associated with Alternative 1 with the ground access components associated with Alternative 9.

SPAS-PC00132-7

Comment:

The APM, which would be located on a new elevated tramway, would be superior to the bus system proposed in Alternative 8. Under Alternative 8, rental car shuttles would arrive in the CTA from the CONRAC via the elevated bus way (4.12.1 at p. 4-1093). This system has the potential to severely

impact traffic between Manchester Square and the CTA, along the 98th Street corridor, as well as in the CTA, where it would merge with mixed-flow traffic on the upper level roadway.

Response:

The commentor's support for a ground transportation alternative that would include an APM (i.e., Alternative 9) is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Chapter 2 of this Final EIR regarding the LAWA Staff-Recommended Alternative, which couples the airfield and terminal improvements associated with Alternative 1 with the ground access components associated with Alternative 9. As described and depicted in Chapter 2 of the SPAS Draft EIR, Alternatives 1, 2, 3, 8, and 9 each include direct dedicated connectivity between the CTA and Manchester Square. Alternative 8 assumes dedicated LAWA-operated shuttle operations would connect facilities at or adjacent to Manchester Square, including the CONRAC facility, parking, and Metro passengers, to the CTA via an elevated busway. This elevated busway would ensure LAWA shuttles traveling from Manchester Square to the CTA via the 98th Street corridor would not operate on the surface streets and therefore would not negatively impact off-airport traffic. These shuttles would merge with mixed-flow traffic along the inbound portion of the realigned Sky Way entrance roadway to the CTA. They would continue to operate in mixed-flow traffic within the CTA and on off-airport streets until they reach the ITF, at which point they would reenter the elevated busway en route to Manchester Square. This route, depicted by the dashed red line labeled as Transit Access (Mixed Flow), is illustrated in Figure 2-8 of the SPAS Draft EIR.

The buses proposed by LAWA to operate on the evaluated busway are non-articulated buses similar to the existing LAX shuttles. While the total number of LAX shuttles accessing the CTA would increase under this proposal, the total number of commercial vehicles accessing the CTA would effectively decrease. This is because buses serving new facilities outside of the CTA, including the ITF and CONRAC, as well as some of the other commercial modes and about 5 percent of the private vehicles currently accessing the CTA would no longer access the CTA when the elevated busway is in place. Instead, the passengers would be dropped off or picked up at the ITF or the ground transportation facilities in Manchester Square, and passengers would be consolidated into groups and boarded onto LAWA-operated buses that would be used to transport passengers into the CTA. These buses would have higher capacities and operate with higher average passenger loads than would the commercial vehicles that would otherwise access the CTA. Consequently, the use of the consolidated busing operation would result in a net decrease in the number of commercial vehicles accessing the CTA.

Alternative 9 assume an elevated Automated People Mover (APM) system, with stops at the ITF and in the airport's CTA, would replace the elevated busway connection and LAWA busing operations as described above, thereby eliminating those buses associated with the elevated busway in Alternative 8 from the traffic flow.

The impacts to traffic within the CTA associated with the dedicated busway in Alternative 8 and the APM system in Alternative 9 are addressed in Section 4.12.1 of the SPAS Draft EIR. As indicated in that section, none of the SPAS alternatives would severely impact traffic within the CTA. However, as indicated in the summary of impacts provided in Section 4.12.1.9.5 of the SPAS Draft EIR, and in Table 4.12.1-43, alternatives with a dedicated busway (i.e., Alternatives 1, 2, and 8) would affect more roadway links (three roadway links) than would Alternative 9 with an APM (one roadway link).

The impacts to off-airport transportation associated with the Alternatives 8 and 9 are addressed in Section 4.12.2 of the SPAS Draft EIR. The dedicated busway under Alternative 8 would result in a small difference in the trip generation estimates between Alternatives 8 and 9 (approximately 350 or fewer trips per hour). As noted above, the westbound route of the busway would not operate on surface streets; therefore, there would be no impacts along the 98th Street Corridor in this direction of travel. As indicated in Section 4.12.2, there are two intersections along the portion of the eastbound route of the dedicated busway that would be in mixed flow traffic outside of the CTA: Intersection 38 (Sepulveda and Century Boulevards) and Intersection 143 (Vicksburg Avenue and 96th Street). Impacts of Alternatives 8 and 9 compared to Baseline (2010) conditions are summarized in Table 4.12.2-13 of the SPAS Draft EIR. As indicated in that table, neither alternative would have a significant impact on either of these two intersections under this scenario. Impacts in the Future (2025) scenario are summarized in Table 4.12.2-19 of the SPAS Draft EIR. As indicated in that table, both alternatives would have a

significant impact on Intersections 38 and 143 in the p.m. peak, which would be fully mitigated by Mitigation Measures MM-ST (SPAS)-15 and MM-ST (SPAS)-32, respectively.

SPAS-PC00132-8

Comment:

We expect that the APM in Alternative 9 would prove to be less cumbersome for travelers than would the elevated bus way proposed in Alternative 8, for the simple reason that stepping onto an APM with luggage is easier than getting onto a bus with luggage. Passengers with baggage and children would find the APM more convenient also because they would have fewer steps to walk when they arrived at their terminal than they would have with the bus system. The elevated tramway also would be far more passenger friendly in other respects, as it would be faster and more efficient, with less complicated routing and higher capacity. Train systems have been effectively used in other cities such as New York, San Francisco, and Atlanta, but no major airport currently uses a dedicated bus way.

Response:

The commentor's support for Alternative 9 is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Chapter 2 of this Final EIR regarding the LAWA Staff-Recommended Alternative, which couples the airfield and terminal improvements associated with Alternative 1 with the ground access components associated with Alternative 9.

It should be noted that the APM systems proposed as a part of Alternatives 3 and 9 have been developed at a program level of planning. Should one of these alternatives with an APM be approved, further design and analysis would be undertaken to establish the capacities, alignments, easements, and technological considerations to best serve the passenger needs of the airport. The dedicated busway would end and buses would mix with other vehicles to circulate around the CTA, with stops at each terminal within the CTA.

SPAS-PC00132-9

Comment:

We are concerned, however, about the numerous details missing from the DEIR regarding the APM in Alternative 9. For example, we think it imperative that the APM move around the CTA in a continuous loop, and not dead-end at Terminal 7, as it appears to do in Figure 2.9 (2.3.1.9.4 at p. 2-43). If it were to dead-end at Terminal 7, arriving passengers at any terminal would have to travel back through all the other terminals on the APM to go to the CONRAC. This would be especially inconvenient for passengers who are arriving at Terminals 5 through 7, and would defeat the purposes of saving time and improving convenience for passengers. Given that the APM would not be the exclusive means to access the CTA, it will need to be more convenient than private vehicles or the traveling public will not use it. Please explain how it would operate.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. The SPAS alternatives were designed and discussed at a programmatic level, and specific design components will be formulated and discussed in future project-level review. Please see Response to Comment SPAS-PC00130-764 regarding the programmatic level of planning associated with the APM. As noted therein, the design and station locations of the APM line(s) within the CTA would be determined and addressed at the project level, should an alternative that includes an APM be approved.

The comment does not suggest or provide any evidence that a non-continuous track would result in significant environmental impacts. As discussed in Section 4.12.1 of the SPAS Draft EIR, including Table 4.12.1-15 which presents the passenger mode splits used to estimate traffic for each alternative in 2025, the APM in Alternative 9 is likely to account for a significant portion of passenger traffic coming to LAX. The SPAS Draft EIR made reasonable assumptions in deriving these estimates, as described in Section 4.12.1 of the SPAS Draft EIR.

SPAS-PC00132-10

Comment:

We also are concerned about the apparent lack of participation in this process by the Los Angeles Metropolitan Transportation Authority (Metro). Collaboration between Metro and LAWA on any link between a new light-rail extension and the CTA is essential. Currently, Metro is considering several options for extending the Green Line into LAX, in addition to Alternatives 8 and 9, such as extending an elevated Green Line into the CTA or bringing the Green Line into the CTA underground. Why are these proposals, which might offer significant advantages in terms of the volume of passengers carried to the airport, not addressed in the DEIR? Further, LAWA has made only vague references in the SPAS public hearings to the Metro processes on the Green Line and Crenshaw Line. Because Metro would need to use public funds unrelated to the airport for any construction of a light rail line outside airport boundaries, cooperation between LAWA and Metro is mandatory. Please explain how LAWA would work with Metro in this regard.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Topical Response TR-SPAS-T-1 regarding coordination efforts between LAWA and Metro to provide transit options to LAX, including the relationship between the SPAS alternatives and SPAS Draft EIR to transit connection options being considered by Metro.

SPAS-PC00132-11

Comment:

Alternatives 2 and 4

We prefer Alternative 7 over Alternative 2 because Alternative 7 allows for the inclusion of a center-line taxiway, as discussed above. We would not otherwise oppose Alternative 2, which has been designated the "environmentally superior alternative" (1.5 at p. 1-103), if it were to be combined with Alternative 9. We support the airfield improvements in Alternative 2, which does not relocate Runway6L/24R or Runway 6R/24L, but lengthens Runway 6R/ 24L, and modifies and improves taxiways. The DEIR shows that larger aircraft (Groups V and VI) can be acceptably handled by these modifications to the airfield with no additional runway spacing (see Table 4.7 2-8, at p. 4-514-515). The NASS unanimously concluded that the North Runway Complex is extremely safe, even at projected fleet mix and traffic levels (4.7.2. at p. 4-505). Alternative 2 would also be an affordable option, in that, among other things, it would have the least impact on road traffic noise (4.10.2.6.1 at p. 4-942) and would not require modifications to Lincoln Boulevard or the Argo Drainage Channel that would be required under other options.

Response:

The commentor's support for Alternative 7 over Alternative 2, as well as support for the combination of Alternatives 2 and 9, is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Chapter 2 of this Final EIR regarding the LAWA Staff-Recommended Alternative, which couples the airfield and terminal improvements associated with Alternative 1 with the ground access components associated with Alternative 9, including a discussion of the rationale behind the selection of these alternatives over the other alternatives evaluated in the SPAS Draft EIR. Please see Response to Comment SPAS-PC00089-1 for an explanation of why Alternative 2 coupled with the ground access components of Alternative 9 is not the environmentally superior alternative. Regarding enhancements to airfield safety and efficiency under Alternatives 2 and 7, please see Table 4.7.2-16 on pages 4-569 and 4-570 in Section 4.7.2 of the SPAS Draft EIR. Please also see Responses to Comments SPAS-PC00130-3 and SPAS-PC00089-1 regarding efficiency associated with Alternative 2 compared to other airfield alternatives. Please see Response to Comment SPAS-PC00149-2 regarding the conclusions of NASS relative to the safety enhancements associated with reconfiguration of the north airfield. Please see Response to Comment SPAS-PC00183-2 regarding road traffic noise impacts associated with

Alternative 2. The commentor correctly notes that there would be no modifications to Lincoln Boulevard or the Argo Drainage Channel under Alternative 2. Please see Response to Comment SPAS-PC00130-730 regarding the treatment of economic impacts in an EIR. As noted in that response, CEQA does not require an analysis of cost or project funding. (State CEQA Guidelines Section 15131; Pub. Resources Code Section 21068.) However, Chapter 8 of the Preliminary LAX SPAS Report provides estimated costs and an approximation of funding sources for the SPAS alternatives and demonstrates how each alternative would be funded.

SPAS-PC00132-12

Comment:

Alternative 4 would accomplish less than Alternative 2, and for that reason is less desirable. Alternative 4, the option that represents what would happen if all non-yellow light improvements identified in the Alt. D Master Plan were implemented, proposes the same extension of Runway 6R/24L and Taxiway E as Alternative 2, coupled with a CONRAC and new parking lot. However, it would not meet design standards for ADG V and VI aircraft or reduce the need for FAA waivers, and thus does not accomplish as many of LAWA's goals as either Alternatives 7 or 2.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00132-13

Comment:

Alternatives 1, 5 and 6 (moving the runway north):

We oppose these alternatives because of their proposals to move Runway 6L/24R north (Alternative 1: 260 feet north, Alternative 5: 350 feet north, Alternative 6: 100 feet north). It already has been demonstrated that further runway separation is unnecessary for safety (see the NASS, 4.7.2. at p. 4-505). In negating the safety rationale for revisiting the separation distance of Runways 24-L and 24-R, the academic panel also negated any legitimate argument that the communities surrounding LAX must suffer the adverse impacts of runway movement due to safety concerns.

Response:

The content of this comment is identical to comment SPAS-PC00096-8; please refer to Response to Comment SPAS-PC00096-8.

SPAS-PC00132-14

Comment:

Given that the DEIR predicts an increase in the size of the noise contour over surrounding communities from these runway movements (4.10.1.6.1 at p. 4-829 (Alt. 1); 4.10.1.6.5. at p. 4-881-2 (Alt. 5); 4.10.1.6.6 at p. 4-897 (Alt. 6)), we oppose them because it appears that the primary reason to expand LAX in these ways would be to increase the capacity of the airport.

Response:

The content of the comment is similar to comment SPAS-PC00096-9; please refer to Response to Comment SPAS- PC00096-9.

SPAS-PC00132-15

Comment:

Please explain how the impacts associated with the change of uses within the Runway Protection Zones (RPZ) can be considered "less than significant" (1, p. 1-77) when it is clear that Westchester businesses not currently located within an RPZ would be located within it and may need to be destroyed (see, for example, 4.7.2, p. 4-516). This includes much of the Westchester Central Business District along Sepulveda Boulevard south of La Tijera Boulevard. LAWA appears to assume that the airport would have to purchase very little of the existing Westchester business district even through much of it would fall into the RPZ because it assumes that pilots will land mid-runway on Runway 24R. However, there is no guarantee that pilots will land mid-runway or that the FAA will agree that telling them to do so is an adequate protection for the businesses that will be within the RPZ. It is our understanding that the FAA will no longer "grandfather" existing structures, but instead will insist that they be cleared not only from the Runway Safety Area (RSA) but also from the RPZ. The DEIR recognizes these as incompatible uses under FAA design recommendations (4.7.2. at p. 4-522), and recognizes that FAA may require that these structures be removed.

Response:

The contents of this comment are similar to the concerns expressed in comment SPAS-PC00130-253; please refer to Response to Comment SPAS-PC00130-253.

SPAS-PC00132-16

Comment:

In addition, LAWA and the City of Los Angeles also are likely to incur a substantial financial burden under any of these three alternatives. We expect that the cost estimates in the DEIR are vastly understated. Do the cost estimates included in the DEIR for this alternative include the cost of purchasing the very profitable properties that likely would need to be purchased at great expense to LAWA and Los Angeles? How was the market value determined for this analysis?

Response:

The economic and social effects of a project are not significant effects on the environment, and thus are not required to be discussed in the SPAS Draft EIR. (State CEQA Guidelines Section 15131(a).) Nevertheless, the costs and funding sources of the alternatives are discussed in Section 8 of the Preliminary LAX SPAS Report. Please see Response to Comment SPAS-AL00007-28 regarding the potential for property acquisition and changes in the RPZ to have an impact on the Westchester Business District. As noted in this response, no acquisition is proposed within the Westchester Business District.

SPAS-PC00132-17

Comment:

In addition, moving the runway north would require very expensive modifications to the Argo Drainage Channel, the Manchester Tunnel and Lincoln Boulevard. In addition, sewer lines may have to be moved. Where does the DEIR analyze these impacts of each of these alternatives?

Response:

This content of this comment is similar to Comment SPAS-PC00096-13; please refer to Response to Comment SPAS-PC00096-13.

SPAS-PC00132-18

Comment:

We do not see an adequate discussion in the DEIR of the following questions:

- What businesses in the Westchester Business District would need to be relocated, and what buildings demolished?

Response:

Please see Responses to Comments SPAS-AL00007-26 and SPAS-PC00130-931 regarding potential impacts on businesses in the Westchester Business District.

SPAS-PC00132-19

Comment:

- What would be the cost of such demolition/relocation? Realistic costs for all proposals should be included that take into account negotiations and potential litigation and include realistic time schedules to accommodate these procedures.

Response:

This content of this comment is similar to Comment SPAS-PC00096-14; please refer to Response to Comment SPAS-PC00096-14.

SPAS-PC00132-20

Comment:

- What would be the loss to the City of Los Angeles from the loss of this tax base and purchasing capability of dislocated businesses and residences?

Response:

This content of this comment is similar to Comment SPAS-PC00096-15; please refer to Response to Comment SPAS-PC00096-15.

SPAS-PC00132-21

Comment:

- What would it cost to soundproof the homes, schools, and businesses impacted by the new noise contours?

Response:

The content of this comment is identical to comment SPAS-PC00096-17; please refer to Response to Comment SPAS-PC00096-17.

SPAS-PC00132-22

Comment:

- Under each alternative, what would be the cost of filling in the tunnels under the North Airfield and addressing the seepage problems that cause sink holes due to the natural aquifer, and what would be a reasonably determined time schedule to accomplish these tasks?

Response:

This content of this comment is similar to Comment SPAS-PC00096-18; please refer to Response to Comment SPAS-PC00096-18.

SPAS-PC00132-23

Comment:

- Under each alternative, what would be the costs for relocating/realigning/reinforcing Lincoln and Sepulveda Boulevards, including the Sepulveda Tunnel? Because these endeavors would involve other agencies (e.g., the California Department of Transportation) what would be a realistic time schedule to achieve them?

Response:

This content of this comment is similar to Comment SPAS-PC00096-19; please refer to Response to Comment SPAS-PC00096-19.

SPAS-PC00132-24

Comment:

- What would be the scheduling of the implementation of each proposal and how could the costs be expected to increase during the implementation?

Response:

Please see Response to Comment SPAS-PC00130-41 regarding phasing. Please see Response to Comment SPAS-PC00130-730 regarding the treatment of economic conditions in an EIR, including costs of proposed improvements. As noted in that response, CEQA does not require an analysis of cost or project funding. (CEQA Guidelines Section 15131; Pub. Resources Code Section 21068.) Nevertheless, rough-order-of-magnitude cost estimates were prepared for all of the components of all of the SPAS alternatives evaluated in the SPAS Draft EIR (see Chapter 8 and Appendix G of the Preliminary LAX SPAS Report). The methodology for considering escalation of costs in the cost estimates is described in Section 8.5 of the Preliminary LAX SPAS Report.

SPAS-PC00132-25

Comment:

- Who would pay for the costs associated with the various proposals for reconfiguration?

Response:

Please see Response to Comment SPAS-PC00096-2 regarding funding sources for SPAS improvements.

SPAS-PC00132-26

Comment:

Alternative 3 (moving the runway south 340 feet):

We oppose Alternative 3 because it unnecessarily proposes to move Run 6R/24L 340 feet south, at significant expense, including demolition of three terminals and extensive central terminal construction, because, as discussed above, the separation of the North runways by this amount of distance is simply unnecessary for either airfield safety or efficiency. The DEIR states that Alternative 3 will increase runway separation from 700 to 1040 feet. These changes would not affect the existing abilities relative to simultaneous arrivals and departures (4.7.2.6.7 at p. 4-563), and in fact, this runway movement may adversely impact operations on the south runway (p. 4-533 fn 406).

Just as with the three Alternatives proposing to move the runway north, the DEIR does not have an adequate cost analysis for the displacement of the newly included businesses that would be located within the Alternative 3 RPZ.

Response:

The content of this comment is similar to comment SPAS-PC00096-21; please refer to Response to Comment SPAS-PC00096-21.

SPAS-PC00132-27

Comment:

The DEIR's discussion of each of the alternative proposals is incomplete because the DEIR does not calculate the unavoidable environmental impacts for each of the alternatives from construction activities, which it attributes to the conceptual nature of the projects (see 4.2.2.1 at p. 4-86). This is another reason why we should be given an additional opportunity to comment upon the environmental impacts of whatever becomes the LAWA staff's preferred alternative. In addition, we expect LAWA would take all precautions with the selected alternative for some offset of such construction impacts by requiring the operating directives mandated for other recent construction projects to mitigate air pollution, noise, dust and disturbance for neighboring communities. Methods and procedures to ensure strict enforcement with these directives must be included in the final EIR.

Response:

The SPAS Draft EIR discloses construction impacts of the alternatives at a program-level of detail. For example, page 4-86 of the SPAS Draft EIR, cited by the commentor, explains the methodology used to develop program-level estimates of construction air pollutant emissions. It is infeasible to further quantify construction impacts because specific construction schedules and phasing programs for individual projects components have not been developed. Should a SPAS alternative be selected for implementation, project-level CEQA documents would present detailed design and construction plans and disclose detailed project-specific construction impacts and mitigation measures. It is appropriate for a first-tier program level EIR to defer detailed descriptions and impact analysis of individual projects in the program to future project-level CEQA documents. (State CEQA Guidelines Section 15383; Koster v. County of San Joaquin (1996) 47 Cal.App.4th 29, 37.)

Also, please see Topical Response TR-SPAS-LR-1 regarding the fact that the SPAS Draft EIR is a program-level document prepared pursuant to the State CEQA Guidelines and the subsequent preparation of a project-level CEQA documents, which address in greater detail construction-related impacts, is appropriate and consistent with CEQA requirements.

Finally, LAX Master Plan commitments and mitigation measures for construction impacts applicable to the SPAS alternatives are delineated throughout Chapter 4 of the SPAS Draft EIR, including, but not limited to, Section 4.2 for air quality and dust and Section 4.10.3 for construction noise. The monitoring and enforcement of those commitments and measures would be detailed in the Mitigation Monitoring and Reporting Program (MMRP) that would be adopted by the Board of Airport Commissioners (BOAC) if they approve one of the SPAS alternatives.

SPAS-PC00132-28

Comment:

We also are very concerned that the expressed Project Objectives for the SPAS (Exec. Summary Section 1.2.1) do not include the goal of regionalization of Southern California air traffic, which we had understood to be a goal of the current mayor of Los Angeles. Please explain why regionalization was not included as a Project Objective. We firmly believe that only an aggressive regional approach to air transportation will mitigate the safety concerns, noise, congestion and air pollution currently impacting the communities surrounding LAX. Only if the air traffic burden can be spread throughout the Southern California region, will we continue to see the economic benefits of a vibrant transportation system without unduly impacting one portion of the Southern California community. Accordingly, we believe that regionalization should have been included in the list of Project Objectives, and the DEIR should have included a discussion of how each alternative will help to accomplish that objective.

Finally, we understand the need to modernize LAX. Given that funding sources are limited, it makes sense for LAWA to invest in infrastructure that will enhance the travel experience, such as improving the

tipper roadway, the signage, the elevators, and restrooms. And, to the extent that creating jobs is an objective of any of these projects, such modernization projects will accomplish that.

Response:

Please refer to Topical Response TR-SPAS-REG-1 regarding the fact that LAWA, through the LAX Master Plan, the SPAS process, and other efforts, supports the regionalization of air travel demand in Southern California, and the reasons that regionalization was not included as a project objective for SPAS.

SPAS-PC00132-29

Comment:

Because we believe that the airport should be modernized, but not expanded, we do not think that LAWA should undertake any alternative that would be prohibitively expensive. We believe it would make more sense to devote funds to developing facilities elsewhere that can relieve some of the burden of regional air transportation from this portion of Southern California. Given the possibilities of a major earthquake near LAX or a terrorist attack on what is admittedly Southern California's prime target, the economy of this region needs to have other airport facilities.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please refer to Topical Response TR-SPAS-REG-1 regarding the fact that LAWA, through the LAX Master Plan, the SPAS process, and other efforts, supports the regionalization of air travel demand in Southern California. As indicated therein, the potential LAX Specific Plan amendment to Section 7.H further supports such regionalization. The subject Topical Response also discusses LA/Ontario International Airport and Palmdale Regional Airport. As also described therein, there are six major airports, not just LAX, serving the Southern California region.

SPAS-PC00132-30

Comment:

We hope that LAWA, the Board of Airport Commissioners and the City Council all recognize that these Alternatives are in fact all piecemeal or "Band-aid" solutions that in the long term will result in Los Angeles having the magnificent airport that we all desire. If Los Angeles is truly to have a world-class airport, the city must realize that LAX is not the location for it, because LAX is so constrained geographically. Los Angeles must start to develop an airport where there is space for such an airport, and also build mass transit from downtown directly to that site.

Please let us know if you have any questions regarding our position on these matters.

Response:

The content of this comment is similar to that of comment SPAS-PC00096-24; please see Response to Comment SPAS-PC00096-24.

SPAS-PC00133 Melton, Audrey Iredale Mineral Cosmetics, Ltd. 10/10/2012

SPAS-PC00133-1

Comment:

As a long time resident of Westchester, I fully support "Alternative 2" (modernization with NO runway movement) and "Alternative 9" addressing transportation.

We all want a world class airport, but we object to moving any runway that would grossly impact our community with noise, pollution, and the loss of any more of our business district.

Please take into account any plan that would disrupt the lives of people and property values in one of the best communities in the city of Los Angeles. Be a good neighbor.

Response:

The commentor's support for Alternatives 2 and 9 is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Chapter 2 of this Final EIR regarding the LAWA Staff-Recommended Alternative, which couples the airfield and terminal improvements associated with Alternative 1 with the ground access components associated with Alternative 9, including a discussion of the rationale behind the selection of these alternatives over the other alternatives evaluated in the SPAS Draft EIR.

The SPAS Draft EIR addresses impacts associated with aircraft noise, road traffic noise, construction traffic and equipment noise, and transit noise and vibration in Sections 4.10.1, 4.10.2, 4.10.3, and 4.10.4 respectively. The impacts associated with each of these categories of noise are summarized below.

As indicated in Section 4.10.1 of the SPAS Draft EIR, Alternatives 1 through 7 would result in some residential uses and non-residential noise-sensitive facilities being newly exposed to noise levels of 65 CNEL or higher or increases of 1.5 CNEL or higher within the 65 CNEL or higher noise contours. With implementation of LAX Master Plan mitigation measures, these impacts would be less than significant. However, interim impacts prior to the completion of mitigation, impacts on residential uses with outdoor habitable areas, and impacts on parks would remain significant and unavoidable. Alternatives 8 and 9 focus on ground access improvements that, in themselves, would not result in aircraft noise exposure but would be coupled with the airfield improvements proposed under Alternatives 1, 2, 5, 6, or 7, the impacts of which are summarized above. None of the alternatives would result in a significant impact relative to sleep awakenings. Under Alternatives 1 through 7, significant impacts would occur with an additional school being newly exposed to the 55 dBA Lmax. Each alternative would also result in significant impacts due to sustained interruption of classroom teaching at newly exposed schools through interior noise levels in excess of 35 dBA Leq(h). Implementation of LAX Master Plan mitigation measures would ultimately reduce impacts to these schools to a level that is less than significant. However, interim impacts prior to completion of mitigation measures would remain significant and unavoidable.

Concerning road traffic noise, as indicated in Section 4.10.2 of the SPAS Draft EIR, impacts related to ground access improvements proposed under Alternatives 1, 2, 3, 4, 8, and 9 would be less than significant as the incremental changes in road traffic noise levels under each of these alternatives would be less than a 3 dBA increase in CNEL. Alternatives 5, 6, and 7 do not include ground access improvements and would therefore not affect road traffic noise levels at off-site noise-sensitive uses.

Regarding construction traffic and equipment noise, as indicated in Section 4.10.3 of the SPAS Draft EIR, due to the periodic nature and limited incremental increase on area roadways, none of the alternatives would result in significant impacts related to construction traffic noise. However, all of the alternatives would result in significant impacts from construction equipment noise with the potential to effect sensitive receptors such as residential and school uses. The sources of those impacts differ by alternative, but can be generally characterized as temporary impacts associated with airfield improvements, ground access system improvements, and construction staging areas. While LAX Master Plan commitments and mitigation measures would reduce construction equipment noise impacts associated with all of the SPAS alternatives, it cannot be definitively concluded that all construction equipment noise impacts would be reduced to levels that are less than significant and these impacts are considered to be significant and unavoidable.

Relative to transit noise and vibration, as indicated in Section 4.10.4 of the SPAS Draft EIR Alternatives 1, 2, and 8 would result in significant but mitigable transit noise impacts at noise-sensitive receptors (hotels) associated with the elevated/dedicated busway system. Transit noise impacts under Alternative 3 related to the two APMs would be less than significant with implementation of mitigation already required under the LAX Master Plan. Under Alternative 9, transit noise impacts related to

operation of the APM operations would be less than significant. Alternative 4 does not propose an elevated/dedicated busway system or APM system; as such, this alternative would not result in any transit-related noise impacts. Alternatives 5, 6, and 7 focus on airfield and terminal improvements that, in themselves, would not have transit noise impacts, but would be coupled with the ground transportation improvements proposed under Alternatives 1, 2, 8, or 9, the impacts of which are summarized above.

Transit-related ground-borne vibration would be less than significant for Alternatives 1, 2, 3, 8, and 9. Alternatives 4, 5, 6, and 7 do not propose an elevated/dedicated busway system or APM system and would not result in any transit-related vibration impacts.

The SPAS Draft EIR addresses air quality impacts associated with the SPAS alternatives in Section 4.2. As indicated therein, even after mitigation, construction activities would result in significant and unavoidable air quality impacts under all of the alternatives. Specifically, under all of the alternatives except for Alternative 4, construction emissions of carbon monoxide (CO), volatile organic compounds (VOC), oxides of nitrogen (NOx), particulate matter with an equivalent aerodynamic diameter of 10 micrometers (PM10), and particulate matter with an equivalent aerodynamic diameter of 2.5 micrometers (PM2.5) would be significant and unavoidable. Under Alternative 4, significant and unavoidable construction emissions would occur for NOx and PM10. Under all of the alternatives, even after mitigation, construction-related concentrations of nitrogen dioxide (NO2) and PM10 would be significant and unavoidable.

Operation of the airport would also result in significant and unavoidable impacts to air quality. Even after mitigation, operational emissions of sulfur dioxide (SO2), PM10, and PM2.5 would be significant and unavoidable under all of the alternatives. Operational concentrations of NO2, PM10, and PM2.5 would also be significant and unavoidable under all of the alternatives.

As noted in Response to Comment SPAS-PC00130-931, no acquisition is proposed within the Westchester Business District. In addition, please see Response to Comment SPAS-PC00189-4 regarding impacts to property values.

SPAS-PC00134 Melton, Greg None Provided 10/10/2012

SPAS-PC00134-1

Comment:

As a long time resident of Westchester, I fully support "Alternative 2" (modernization with NO runway movement) and "Alternative 9" addressing transportation.

We all want a world class airport, but we object to moving any runway that would grossly impact our community with noise, pollution, and the loss of any more of our business district.

Please take into account any plan that would disrupt the lives of people and property values in one of the best communities in the city of Los Angeles. Be a good neighbor.

Response:

The content of this comment is identical to comment SPAS-PC00133-1; please refer to Response to Comment SPAS-PC00133-1.

SPAS-PC00135 Citrin, Judy None Provided 10/10/2012

SPAS-PC00135-1

Comment:

I sent in some comments a few days ago, and I have some specific questions to add. I also neglected to complete my address which is written below.

1. What is the reason that LAWA wants to move the North runway? If it is safety, exactly what difference will it make?

Response:

LAWA is considering several options for improvements to the north airfield, some of which include relocation of the north runway -- Runway 6L/24R. Specifically, SPAS Alternatives 1, 5, and 6 propose moving the subject runway northward by either 260 feet, 350 feet, or 100 feet, respectively. Alternatives 3 and 7 proposing moving the adjacent runway -- Runway 6R/24L southward by either 340 feet or 100 feet, respectively, while Alternatives 2 and 4 would not relocate either runway. The reasons why LAWA wants to make improvements to the north airfield are described in Section 2.2 of the SPAS Draft EIR, which provides an overview of the problems associated with the current outdated design of the airfield and describes the objectives LAWA seeks in improving the airfield. Section 4.7.2 of the SPAS Draft EIR addresses the safety considerations associated with each alternative, and Table 4.7.2-16 summarizes the differences in safety and efficiency enhancements to the north airfield operations between the alternatives.

SPAS-PC00135-2

Comment:

2. What is the advantage of having a taxiway between the runways?

Response:

As specified in Section 4.7.2.6 of the Draft EIR, a centerfield taxiway, coupled with increased runway separation, would reduce the potential for a runway collision or incursion and enhance safety, particularly as related to future operations involving a greater number of large aircraft. A centerfield taxiway also provides more time and options for Federal Aviation Administration (FAA) air traffic controllers to manage aircraft exiting the outboard runway; more time and distance for the pilot of an arriving aircraft to exit the outboard runway, slow down and hold before crossing the inboard runway; and reduces the potential for incursions and other hazards.

SPAS-PC00135-3

Comment:

3. Are the number of A380s limited because of current north runway configuration, and how are south runways used for A380s?

Response:

The number of A380 operations is not restricted due to the north airfield runway configuration. However, as described in Section 2.2 of the SPAS Draft EIR, the north airfield is not fully designed for the largest aircraft types currently in service (Aircraft Design Group (ADG) VI). While the number of large aircraft is not limited, the north airfield configuration requires non-standard operating procedures, which are not optimal for safety and increase aircraft delay. As discussed in Section 4.7.2 of the SPAS Draft EIR, because the north airfield does not meet the Federal Aviation Administration's (FAA) separation standards for ADG VI aircraft, restrictions limiting simultaneous takeoff and landing, as well as taxiing, are in place in order to ensure an acceptable level of safety while these aircraft operate. As

such, the north airfield does not operate in an efficient manner during ADG VI operations. Although the south airfield does not meet the FAA's standards for ADG VI aircraft and has its own set of restrictions, the A380 currently operates safely on the south airfield, but not in an efficient manner due to those restrictions.

SPAS-PC00135-4

Comment:

4. Exactly what will be the difference in noise to residents on the approach for landings and takeoffs if the North Runway is moved 100, 260 or 350 ft? I live in the Osage area--what difference will it make to me?

Response:

A discussion of project impacts resulting from aircraft noise under Alternative 1 (relocate Runway 6L/24R 260 feet north), Alternative 5 (relocate Runway 6L/24R 350 feet north), and Alternative 6 (relocate Runway 6L/24R 100 feet north) as well at Alternatives 2, 3, 4, and 7 is provided in Sections 4.9.6 and 4.10.1.6 of the SPAS Draft EIR.

Regarding noise levels at the commentor's property (located at 5422 West 82nd Street in the community of Westchester), as analyzed in Sections 4.9.6 and 4.10.1.6 of the SPAS Draft EIR, under all of the alternatives the referenced property would not be newly exposed to high noise levels within the 65 CNEL noise contour nor experience an increased probability of nighttime awakening. Therefore, impacts at the commentor's property would be less than significant.

SPAS-PC00136 Bergelson, Gordon None Provided 10/9/2012

SPAS-PC00136-1

Comment:

I endorse the motion was passed at the monthly meeting of the CD11 Transportation Advisory Committee on 10/8/2012 by a vote of 7-0-0:

MOTION-Support of LAX SPAS DEIR Alternatives 2 and 9
The CD11 Transportation Advisory Committee encourages the Los Angeles World Airport (LAWA) to adopt the plan in their LAX SPAS DEIR which ensures the most rapid completion of LAX modernization. Alternative 2 which requires no relocation of the North Runway and Alternative 9 which is a Consolidated Rental Car Facility in Manchester Square supported by some form of rail mass transit which allows for connection into the Westchester business district should be the preferred alternatives. Such a plan, according to DEIR evaluations, addresses the necessary airfield operational efficiency and safety concerns, presents the least intrusive impacts on local communities, and, at the same time, provides the lowest construction cost and construction risks.

Response:

The commentor's support for Alternatives 2 and 9 is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Chapter 2 of this Final EIR regarding the LAWA Staff-Recommended Alternative, which couples the airfield and terminal improvements associated with Alternative 1 with the ground access components associated with Alternative 9, including a discussion of the rationale behind the selection of these alternatives over the other alternatives evaluated in the SPAS Draft EIR. Please see Topical Response TR-SPAS-T-1 regarding transit options into LAX. Regarding enhancements to the safety and efficiency of the airfield under each alternative, please see Table 4.7.2-16 on pages 4-569 and 4-570 in Section 4.7.2 of the SPAS Draft EIR. Please also see Response to Comment SPAS-PC00089-1 regarding efficiency associated with Alternative 2 compared to other airfield alternatives. Please see Response to Comment SPAS-PC00115-1 regarding the commentor's assertion that

Alternatives 2 and 9 would present the least intrusive impact on local communities and provide the lowest construction cost and construction risk.

SPAS-PC00137 Mayeron, Candace None Provided 10/9/2012

SPAS-PC00137-1

Comment:

Please add my name to those protesting moving or adding runways on the north side.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00138 Wayne, Alan B None Provided 10/9/2012

SPAS-PC00138-1

Comment:

There is no question that Los Angeles International Airport (LAX) is one of the top two or three economic drivers for the City, the County, and the Southern California region. But that position continues to be undermined by a small, short-sighted, vocal group of airport neighbors who have managed to hold hostage the airport's plans to upgrade the facility's operational efficiency, safety, and competitiveness.

Simply, it is time to put an end to these roadblocks---hurdles that hub airports across the U.S. have either not experienced or solved to essentially eclipse LAX in constructing state-of-the-art airports for the 21st century. Seattle, San Francisco, Denver, Dallas/Ft. Worth, Phoenix, Las Vegas, and Vancouver, B.C. are cases in point and are overshadowing LAX.

While the modernization of the Bradley International Terminal is a long overdue move to begin the comeback of LAX, much more must be done. Reconfiguring the 1960s era out-of-date north airfield complex to effectively and safely handle the next generation of large aircraft (A380, Boeing 787, Boeing 747-800), addressing the aging domestic terminal (circa 1961) where some 80 per cent of the traffic is handled, improving ground access, and passenger processing, and constructing a single car rental facility are uppermost.

I retired in late 2006 as Regional Director of Governmental and Public Affairs for United Airlines after some 27 years based at LAX, and I should point out that these submitted comments only reflect my personal viewpoint as an interested observer.. I am not privy to United's position on the LAX Specific Plan Study (SPAS) Draft Environmental Impact Report (EIR) or the other carriers and am not involved with any of them and have not discussed it with them. However, I have continued to follow industry developments and serve as a member of the Board of Directors of the Aero Club of Southern California and the Flight Path Learning Center and Museum at LAX.

But I can offer a historical perspective. In the 2003/2004 timeframe United and many international carriers supported the Alternative D Master Plan advanced by then Mayor Jim Hahn. As the largest carrier at LAX, United recognized the benefits of the plan that had many forward-thinking elements aimed at modernizing LAX, including a remote passenger check-in facility and a central terminal processing facility. The City Council passed the plan, 12-3 in December 2004, thanks to a coalition

composed of business, labor, airlines and related vendors and led by the Los Angeles Chamber of Commerce and the L. A. County Federation of Labor.

Six months later Councilman Antonio Villaraigosa, one of the three "noe" votes, defeated Mayor Hahn in the mayoral race. In subsequent months key elements of the plan were shelved and various accommodations were reached with the neighborhood dissidents. But the important elements approved by the Council in Alternative D remain on the table, ripening if you will, and dealing with surface transportation improvements, new terminal construction, and the separation of the north runways... and awaiting approval. That process is underway as the alternative actions are reviewed to solve the problems at LAX against the backdrop of not only making it competitive, but also responding to the tremendous need for quality jobs to be injected into the local economy.

As L.A. Chamber president Gary Toebben has stated, enough is enough. This process has gone on for some 20 years and LAX has fallen behind and the constraints have resulted in an airport that trails other hub facilities, particularly those in the West.

It is time to fix LAX.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00139 Redner, Jim theRednerGroup 10/9/2012

SPAS-PC00139-1

Comment:

We have reviewed the nine alternatives currently being suggested for LAX. Based on where we lives (85th Place, between Georgetown and McConnell), across Manchester from the golf course.

As it is, the flights coming in and out are fairly loud and depending on the direction of the wind, we can smell jet fuel. The idea that runways may move up to 350/300 ft closer to where we live is very troubling. The movement will negatively impact our lives with unwanted and potentially harmful pollution (noise and air). If this movement were to occur, it will have undesired repercussions.

With that in mind, we support Alternative 2 and Alternative 9. The improvement of transportation in and out of LAX would help elevate current congestion. Alternative 9 would improve the airport, helping to make it a top destination which it is current not.

Response:

The commentor's support for Alternative 2 and Alternative 9 is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Chapter 2 of this Final EIR regarding the LAWA Staff-Recommended Alternative, which couples the airfield and terminal improvements associated with Alternative 1 with the ground access components associated with Alternative 9.

The SPAS Draft EIR addresses impacts associated with aircraft noise, road traffic noise, and construction traffic and equipment noise in Sections 4.10.1, 4.10.2, and 4.10.3, respectively. The impacts associated with each of these categories of noise are summarized below.

As indicated in Section 4.10.1 of the SPAS Draft EIR, Alternatives 1 through 7 would result in some residential uses and non-residential noise-sensitive facilities being newly exposed to noise levels of 65 CNEL or higher or increases of 1.5 CNEL or higher within the 65 CNEL or higher noise contours. With

implementation of LAX Master Plan mitigation measures, these impacts would be less than significant. However, interim impacts prior to the completion of mitigation, impacts on residential uses with outdoor habitable areas, and impacts on parks would remain significant and unavoidable. Alternatives 8 and 9 focus on ground access improvements that, in themselves, would not result in aircraft noise exposure but would be coupled with the airfield improvements proposed under Alternatives 1, 2, 5, 6, or 7, the impacts of which are summarized above. None of the alternatives would result in a significant impact relative to sleep awakenings.

Concerning road traffic noise, as indicated in Section 4.10.2 of the SPAS Draft EIR, impacts related to ground access improvements proposed under Alternatives 1, 2, 3, 4, 8, and 9 would be less than significant as the incremental changes in road traffic noise levels under each of these alternatives would be less than a 3 dBA increase in CNEL. Alternatives 5, 6, and 7 do not include ground access improvements and would therefore not affect road traffic noise levels at off-site noise-sensitive uses.

Regarding construction traffic and equipment noise, as indicated in Section 4.10.3 of the SPAS Draft EIR, due to the periodic nature and limited incremental increase on area roadways, none of the alternatives would result in significant impacts related to construction traffic noise. However, all of the alternatives would result in significant impacts from construction equipment noise with the potential to effect sensitive receptors such as residential and school uses. The sources of those impacts differ by alternative, but can be generally characterized as temporary impacts associated with airfield improvements, ground access system improvements, and construction staging areas. While LAX Master Plan commitments and mitigation measures would reduce construction equipment noise impacts associated with all of the SPAS alternatives, it cannot be definitively concluded that all construction equipment noise impacts would be reduced to levels that are less than significant and these impacts are considered to be significant and unavoidable.

The SPAS Draft EIR addresses air quality impacts associated with the SPAS alternatives, including Alternatives 1, 5, and 6 which propose a northward relocation of Runway 6L/24R, in Sections 4.2. As indicated therein, even after mitigation, construction activities would result in significant and unavoidable air quality impacts under all of the alternatives. Specifically, under all of the alternatives except for Alternative 4, construction emissions of carbon monoxide (CO), volatile organic compounds (VOC), oxides of nitrogen (NOx), particulate matter with an equivalent aerodynamic diameter of 10 micrometers (PM10), and particulate matter with an equivalent aerodynamic diameter of 2.5 micrometers (PM2.5) would be significant and unavoidable. Under Alternative 4, significant and unavoidable construction emissions would occur for NOx and PM10. Under all of the alternatives, even after mitigation, construction-related concentrations of nitrogen dioxide (NO2) and PM10 would be significant and unavoidable.

Operation of the airport would also result in significant and unavoidable impacts to air quality. Even after mitigation, operational emissions of sulfur dioxide (SO2), PM10, and PM2.5 would be significant and unavoidable under all of the alternatives. Operational concentrations of NO2, PM10, and PM2.5 would also be significant and unavoidable under all of the alternatives.

Regarding human health, as indicated in Section 4.7.1 of the SPAS Draft EIR, incremental cancer risks and incremental chronic non-cancer health hazards within the study area under all the alternatives would be less than significant for all receptor types (i.e., child resident, school child, adult resident, adult worker). Additionally, under all the alternatives, health effects to on-airport workers would be less than significant. Incremental acute non-cancer health hazards at small areas at or near the LAX fence-line under all the alternatives would be slightly above the threshold of significance and are considered to be significant and unavoidable for all analyzed receptor types (i.e., residents, recreational users, school child, and off-site adult workers). The primary toxic air contaminant of concern contributing to this impact is associated with emissions of acrolein from aircraft operations, which would occur in 2025 even in the absence of SPAS. It should be noted that, with the exception of Alternative 3, acute non-cancer health hazard impacts in 2025 would be lower under the SPAS alternatives than if no airfield improvements were implemented. Moreover, these significant impacts would occur at or near the fence-line; it is expected that actual impacts in the community would be less than significant.

SPAS-PC00140 Austin, Richard None Provided 10/9/2012

SPAS-PC00140-1

Comment:

I"m a resident living in Playa Del Rey, for the past 18 years, I am totally against any plans calling for a move of the runway NORTH BY 300ft.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00140-2

Comment:

I waited 10 years for the LAX project to "sound proof " our homes. A total rip off of taxpayers money, the sound of airplanes taking off has not improved our quality of life the nose is constant, our skylights leak, due to poor workmanship, which the LAX authorities continue to ignore.

Response:

Please refer to pages 4-664 through 4-667 in Section 4.9.3.3 of the SPAS Draft EIR, for a description of the Aircraft Noise Mitigation Program (ANMP) established to provide soundproofing to eligible properties within the noise impact area (i.e., exposed to 65 or higher noise levels), pursuant to the land use compatibility requirements of the California Airport Noise Standards (California Code of Regulations, Title 21, Subchapter 6, Section 5000 et seq.). As described on page 4-666 of the SPAS Draft EIR, priority for soundproofing is typically given to those homes within the noise impact area that are experiencing the highest noise levels.

Regarding leaking skylights, and other purported deficiencies, these are addressed by LAWA's Residential Soundproofing Division (for properties in the City of Los Angeles). LAWA's sound insulation contracts provide homeowners with a one year warranty on installation and a ten year warranty on most of the materials installed. If a homeowner contacts the Residential Soundproofing Division with a complaint about a defect in either the material or the installation, staff verifies if that complaint is covered under the warranties, and if so, the homeowner is directed to the appropriate party. Homeowners are informed of these warranties when they enroll in the program, and copies of the warranties, with contact information, are given to the homeowners at the time the work is completed. When a complaint is outside of the warranty period, the homeowner is provided with information on how to correct the issue. LAWA is aware, however, that homeowners in condominium complexes often mistake problems resulting from lack of regular maintenance with issues resulting from soundproofing installation. These inquiries continue to be addressed by LAWA staff on a case by case basis.

Regarding constant noise, to ensure that interior noise levels have been reduced to 45 CNEL or less after soundproofing (in conformance with Title 21), post-construction noise tests are conducted on a random sampling of homes to verify the efficacy of sound insulation. To date, all post-testing has confirmed that interior noise levels meet this requirement.

SPAS-PC00140-3

Comment:

I park my vehicle on the street, Tuscany Ave, after 7 days exposed to the pollution in the air coming from LAX, I can write my name on the vehicle body work!!!

JUST WHAT ARE WE BREATHING IN!!!!!

Response:

The content of this comment is similar to comment SPAS-PC00043-2; please refer to Response to Comment SPAS-PC00043-2.

SPAS-PC00141 Austin, Mary None Provided 10/9/2012

SPAS-PC00141-1

Comment:

I"m a resident living in Playa Del Rey, for the past 19 years, I am totally against any plans calling for a move of the runway NORTH BY 300ft.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00141-2

Comment:

I waited more than 12 Years for the LAX project to "Sound Proof " our home. A total rip off of taxpayers money, the sound of airplanes taking off has not improved our quality of life the nose is constant, our skylights leak, due to poor workmanship, which the LAX authorities continue to ignore. One of our so called Sound Proofing Window facing the Airport has cracked fantastic workmanship.

Moving the runway closer by 300 ft. will this result in all my window to crack.....

Response:

The content of this comment is similar to comment SPAS-PC00140-2; please refer to Response to Comment SPAS-PC00140-2. LAWA is not aware of instances of "window cracking" caused by aircraft noise in the vicinity of LAX nor did the commentor provide evidence of such occurrences. Please see Response to Comment SPAS-PC00038-3 regarding vibration impacts associated with aircraft operations.

SPAS-PC00141-3

Comment:

I park my vehicle on the street, Tuscany Ave, after 7 days exposed to the pollution in the air coming from LAX, I can write my name on the vehicle body work!!!

JUST WHAT ARE WE BREATHING IN!!!!!

Response:

The content of this comment is identical to comment SPAS-PC00140-3 and similar to comment SPAS-PC00043-2; please refer to Response to Comment SPAS-PC00043-2.

SPAS-PC00142 Curran, Joyce None Provided 10/9/2012

SPAS-PC00142-1

Comment:

I have attended one of the public meetings and will be greatly impacted by which Alternative is chosen. I fully support Alternatives and 9.

Response:

The commentor's support for Alternatives 2 and 9 is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Chapter 2 of this Final EIR regarding the LAWA Staff-Recommended Alternative, which couples the airfield and terminal improvements associated with Alternative 1 with the ground access components associated with Alternative 9, including a discussion of the rationale behind the selection of these alternatives over the other alternatives evaluated in the SPAS Draft EIR.

SPAS-PC00143 Davison, Mike None Provided 10/9/2012

SPAS-PC00143-1

Comment:

I support SPAS Alternatives 2 and 9, although with some reservations. I am very much opposed to moving runway 24R north. The 2010 NASA study affirmed that the north airfield is already safe. Taxiway improvements and runway status lights will further improve safety and efficiency.

Response:

The commentor's support for Alternatives 2 and 9 is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Chapter 2 of this Final EIR regarding the LAWA Staff-Recommended Alternative, which couples the airfield and terminal improvements associated with Alternative 1 with the ground access components associated with Alternative 9, including a discussion of the rationale behind the selection of these alternatives over the other alternatives evaluated in the SPAS Draft EIR. Please see Response to Comment SPAS-PC00130-68 regarding conclusions of the NASS relative to north airfield safety.

SPAS-PC00143-2

Comment:

Proponents of moving the runway say the north airfield must "shut down" when an A380 lands. Since it is never said for how long, I must conclude that "shut down" is an exaggeration. In any case, because only five A380s are landing at LAX today, and because Gina Maria Lindsey said (at last month's World Route Development Strategy Summit in Abu Dhabi) that "few airlines are using the A380 for its full capacity," it seems ill-advised to spend billions to move a runway to accommodate five below-capacity planes a day.

Response:

As indicated in Section 2.2 of the SPAS Draft EIR and described more fully in Section 4.7.2.3 of the SPAS Draft EIR, the existing outdated design of the LAX airfield does not meet FAA design standards for Aircraft Design Group (ADG) VI aircraft, such as the Airbus A380; consequently, existing operations of the A380 at LAX are subject to a number of special operating procedures and requirements through waivers and modifications of standards. While the north airfield is not "shut down" when an A380 lands,

it does create a number constraints and inefficiencies in maintaining airfield operations. That is one of the airfield problems that the SPAS is attempting to address, as discussed in the project objectives presented in Section 2.2.

A passenger forecast activity forecast was prepared to evaluate the passenger and aircraft activity that may occur at LAX from the Baseline Year 2009 through the Plan Year 2025. For additional information on the forecast, see Section 1 in Appendix F-1 of the Preliminary LAX SPAS Report. The assumed numbers of ADG VI aircraft (which includes the Airbus 380) are included in Tables 8 and 12 of Appendix F-1. As indicated in Table 12, it is projected that the number of daily operations of ADG VI aircraft at LAX will increase to 39 for future (2025) activity levels.

SPAS-PC00143-3

Comment:

In addition, moving runway 24R north would require rerouting and burying Lincoln Boulevard, covering the Argo trench, and likely major rerouting of sewer lines and other infrastructure. Besides being prohibitively expensive certainly not worth it for five planes a day out of what, 800 or so? -- this work would snarl traffic for years. Traffic around LAX is already bad due in part to the lack of north-south streets in the area; it's also bad because Ontario Airport is underutilized, forcing passengers and freight originating closer to Ontario to travel across town to LAX.

Response:

Please see Topical Response TR-SPAS-LR-1 for a discussion of the Lincoln Boulevard realignment associated with Alternatives 1, 5, and 6. Please see Section 4.12.2 and Appendix K2 of the SPAS Draft EIR for a discussion of off-airport traffic. Relative to off-airport traffic impacts, as addressed in Section 4.12.2 of the Draft EIR, the majority of the 200 intersections evaluated within the SPAS off-airport transportation study area would not be significantly impacted under Alternatives 1, 2, 3, 4, 8, and 9; however, significant impacts to some off-airport intersections and/or Congestion Management Plan (CMP) facilities would occur under each of these alternatives. The total number of significantly-impacted intersections and/or CMP facilities would vary slightly among those alternatives. Alternatives 5, 6, and 7 focus on airfield and terminal improvements that, in themselves, would not affect off-airport traffic, but would be coupled with the ground transportation improvements proposed under Alternatives 1, 2, 8, or 9, the impacts of which are summarized above. Please see Topical Response TR-SPAS-REG-1 concerning LA/Ontario International Airport.

Lastly, please note that this comment presents personal opinions about traffic impacts that are unsupported by facts or evidence.

SPAS-PC00143-4

Comment:

I also firmly believe that either the Metro Green Line or an automated people mover must be brought into the CTA. NOT A BUSWAY! Rail transportation into the CTA is an absolute, non-negotiable requirement to make LAX a world-class airport. The current proliferation of buses in the CTA is bad enough; having the largest buses terminate instead at the proposed Intermodal Transportation Facility would make the CTA more drivable.

Response:

The commentor's support for an APM into the CTA (i.e., Alternative 9) or the extension of the Metro Green Line into the CTA is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Chapter 2 of this Final EIR regarding the LAWA Staff-Recommended Alternative, which couples the airfield and terminal improvements associated with Alternative 1 with the ground access components associated with Alternative 9, including a discussion of the rationale behind the selection of the these alternatives over the other alternatives evaluated in the SPAS Draft EIR. Also, please see Topical Response TR-SPAS-T-1 regarding transit options into LAX, including the Airport Metro Connector Project, which is evaluating options for extending transit to the airport.

Under Alternatives 1, 2, and 8, consolidated buses would connect passengers between the CTA and the Intermodal Transportation Facility (ITF), as discussed on page 4-1091 (Alternatives 1 and 2) and on page 4-1092 (Alternative 8) in Section 4.12.1.6.1 of the SPAS Draft EIR, which would reduce the number of commercial vehicles accessing the CTA.

SPAS-PC00143-5

Comment:

One aspect of Alternative 2 that I am opposed to is the construction of Terminal 0 east of Terminal 1. SPAS section 4.12.01, page 57, states, "While it is presently assumed that all Terminal 0 passengers will be processed at Terminal 1 or 1.5, changes in security processing or other processing requirements may necessitate those functions be incorporated into Terminal 0." Entering Terminal 1.5 and then walking all the way back to Terminal 0 is not my idea of a world-class airport! If passenger processing is subsequently moved - or shoehorned -- into Terminal 0, then I foresee major traffic backups on the modified Sky Way entrance.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project.

As it relates to the on-airport transportation analyses, and as a program-level document, the SPAS Draft EIR assumed that Terminal 0 passenger processing would take place at the adjacent Terminals 1 and 1.5, as discussed on page 4-1099 in Section 4.12.1.7.1 of the SPAS Draft EIR.

The potential hosting of passenger processing at Terminal 0 itself would be analyzed in the project-specific Terminal 0 development analyses and CEQA document, should a SPAS alternative including Terminal 0 be selected to move forward.

SPAS-PC00143-6

Comment:

I am opposed to expanding LAX, already the sixth busiest in the world, especially moving runway 24R north. Rather, LAX needs to be modernized with new taxiways and runway lights, rail transportation into the CTA, a consolidated rental car facility at Manchester Square, and renovation of terminals and other facilities that are, as Gina Marie Lindsey was quoted in the 6/14/12 New York Times, "falling apart." In addition, better use needs to be made of Ontario Airport, which will reduce congestion and pollution not only near LAX but across the Los Angeles Basin.

Response:

The commentor opposition to expanding LAX is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project.

As indicated in Section 2.3 of the SPAS Draft EIR, Alternatives 1, 2, 3, 5, 6, and 7 include taxiway improvements, which would include taxiway lighting. As discussed in Topical Response TR-SPAS-T-1, all of the SPAS alternatives, except for Alternative 4, include ground transportation improvements that would be integrated with the future Metro Crenshaw/LAX Transit Corridor and Station, which would enhance the use of public transit to and from LAX and, in turn, reduce airport-related vehicle trips. Additionally, those alternatives, again with the exception of Alternative 4, include the development of an elevated/dedicated busway or APM system to help reduce airport-related traffic impacts in and near the CTA. Alternatives 3, 4, 8, and 9 include development of a proposed CONRAC, which would include a single consolidated shuttle system to replace the number of individual rental car company shuttles that currently operate at the airport. This is also intended and designed to reduce local impacts from airport-related traffic. Regarding the use of LA/Ontario International Airport, please see Topical Response TR-SPAS-REG-1.

SPAS-PC00144 Smith, Garrett None Provided 10/9/2012

SPAS-PC00144-1

Comment:

Our family and our community has always worked to be understanding good neighbors of LAWA and expected the same respect in return. We support your efforts to make our airport a world class gateway for our guests. Without objection we supported the new Tom Bradley terminal. We are very proud of the progress and look forward to its grand opening.

While it's impossible for me to have reviewed and comprehend the 11,000 plus pages of the draft EIR especially with the limited review and comment period, I will make my best effort to comment on a few observations and concerns.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. To clarify, the text of the SPAS Draft EIR is approximately 1,800 pages in length, not 11,000 plus pages as suggested by the commentor. Printed appendices total approximately 3,000 pages, much of which consists of model output data sheets. Appendix K2-6, which includes intersection level of service worksheets, is provided in electronic format only and is approximately 3,000 pages in length. Please see Response to Comment SPAS-AL00007-59 regarding the length of the public review period for the SPAS Draft EIR. Please also see Responses to Comments SPAS-PC00144-2 through SPAS-PC00144-5 below.

SPAS-PC00144-2

Comment:

A world class airport starts with getting passengers in and out. A transportation system designed to connect passengers with terminals, Metro facilities, consolidated Rental Car Facility, hotels and trains. Transportation is step one. Affordability of a transportation solution is not even a question, it must be done first. This is why I encourage LAWA to adapt Alternative 9 as the first phase of modernization of LAX.

I support the modernization of terminals 1, 2 and 3 even building terminal zero at Park One if necessary. What has taken LAWA so long to remodel these terminals? This is a no brainer. These projects would create more jobs, permanent jobs with living wages and would not have a negative impact on our community. Without question I am in favor of any CTA improvement. Let's get started immediately.

Response:

The commentor's support for Alternatives 9 and for CTA improvements (i.e., terminal components Alternatives 1, 2, 5, 6, and 7) is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Chapter 2 of this Final EIR regarding the LAWA Staff-Recommended Alternative, which couples the airfield and terminal improvements associated with Alternative 1 with the ground access components associated with Alternative 9. Please see Topical Response TR-SPAS-T-1 regarding transit options into LAX. Please see Response to Comment SPAS-PC00130-41 regarding phasing of project improvements.

SPAS-PC00144-3

Comment:

We are 100% in support of safety especially when it comes to our airport. Nothing in this EIR will make us any safer. Out of 11,000 pages I could not find the NASA study, although I was told it was there. The

NASA study, which we spent millions of dollars to conduct, clearly said NO MEASURABLE improvement of safety would be increased by moving the runway north. Runway safety lights should be adequate for pilots to avoid intrusions and near misses.

Response:

The North Airfield Safety Study (NASS) completed by NASA Ames is summarized in Section 4.7.2 of the SPAS Draft EIR (see pages 4-505 and 4-506), is referenced in Section 5.3.1 of the Preliminary LAX SPAS Report (see page 5-76), and is provided in its entirety as Appendix H-6 of the Preliminary LAX SPAS Report.

Please see Response to Comment SPAS-PC00130-168 relative to the development and conclusions of the NASS, and the opinion of the academic panel.

Runway status lights are being installed at LAX; however, there are many other aspects of airfield safety beyond those addressed by such a system. Section 4.7.2 of the SPAS Draft EIR addresses airfield safety.

SPAS-PC00144-4

Comment:

Moving the north runway even one foot north is unacceptable. Now can moving the noise, pollution, vibration, air traffic, light and glare of airport operations be beneficial to our community. The community of Westchester/Playa del Rey cannot give up any more of our business district to LAX, it is unacceptable and unnecessary. Moving the north runway to accommodate any Airbus or other large plane is completely intolerable and to expensive especially since the south runways are perfectly capable to handle these landings and takeoffs. There is only one acceptable Alternative and that is number 2.

Response:

The commentor's support for Alternative 2 is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Chapter 2 of this Final EIR regarding the LAWA Staff-Recommended Alternative, which couples the airfield and terminal improvements associated with Alternative 1 with the ground access components associated with Alternative 9, including a discussion of the rationale behind the selection of these alternatives over the other alternatives evaluated in the SPAS Draft EIR. As noted in Response to Comment SPAS-PC00130-931, no acquisition is proposed within the Westchester Business District.

As identified in Section 1.2.1 of the SPAS Draft EIR, an objective of the SPAS effort is to "provide north airfield improvements that support the safe and efficient movement of aircraft at LAX". This section also identifies that one of the problems associated with the outdated airfield is that "the primary north airfield departure runway (6R/24L) is too short for certain larger aircraft (e.g., fully-loaded Boeing 747-400) on long-haul flights, requiring those aircraft to taxi to the south airfield, resulting in less efficient operations and disproportionate environmental impacts." As discussed and depicted in Section 2.3.1 of the SPAS Draft EIR, each of the SPAS airfield alternatives (Alternatives 1 through 7) includes an extension to Runway 6R/24L to help balance long-haul departures between the north and south airfields. Please also refer to Response to Comment PC00130-511 for additional discussion regarding airfield balance.

SPAS-PC00144-5

Comment:

If any northerly movement of the runway is approved, then any negative impacts must be mitigated including traffic, sound proofing, pollution, vibration, light and glare for our Westchester, Playa del Rey, Inglewood, south Los Angeles communities. There should be NO additional negative impact on our neighbors and business district No loss of income to individuals and small businesses like myself who's customer base is in the Downtown Westchester Business District. Not one more decibel, not one more molecule of pollution and not one more inch of our community.

I strongly encourage you to get busy modernizing our airport, get busy connecting LAX with a great transportation system and leave the north runway alone.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project.

Table 1-6 in Chapter 1 of the SPAS Draft EIR presents the existing LAX Master Plan commitments and mitigation measures, as well as proposed SPAS-specific mitigation measures, that would reduce or avoid environmental impacts, including traffic, noise, air quality, and light and glare impacts. Pursuant to Public Resources Code Section 21081.6(a), LAWA would adopt a mitigation monitoring and reporting program (MMRP) in connection with the approval of any of the SPAS alternatives. The MMRP would define what agency is responsible for each adopted mitigation measure and commitment, when that measure or commitment would be implemented, and what criteria would be used to determine whether the measure or commitment is being implemented and is effective. The MMRP is a means to ensure compliance with mitigation measures and commitments during project implementation.

Regarding analysis of property acquisition impacts on the Westchester Business District associated with the Runway Protection Zone (RPZ), please see Responses to Comments SPAS-AL00007-26 and SPAS-PC00130-931. No acquisition is proposed within the Westchester Business District, as shown in Figure 2-11 and listed in Table 2-4 in Section 2.3.1.11 of the SPAS Draft EIR.

Please see Topical Response TR-SPAS-T-1 regarding transit into LAX.

SPAS-PC00145 Marcellus, Terry A None Provided 10/10/2012

SPAS-PC00145-1

Comment:

I was in attendance at the Westchester High School auditorium townhall meeting. I and my wife Janis live at 8829 Stanmoor Dr., L.A. 90045 and we totally support Alternative 2 (no runway move but improve taxiways and terminal) combined with Alternative 9 (include a ConRAC and and mass transit access to LAX - no bus). We believe that ARSAC's solutions totally reflect our community's position and aspirations. The mayor's office, Councilman Rosendahl, Maxine Waters and many business organizations support Alternatives 2 & 9 as well. We strongly implore LAWA and the FAA to work with us in implementing the two aforementioned alternatives in the DEIR. Thank you for your cooperation and understanding.

Response:

The commentor's support for Alternatives 2 and 9 is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Chapter 2 of this Final EIR regarding the LAWA Staff-Recommended Alternative, which couples the airfield and terminal improvements associated with Alternative 1 with the ground access components associated with Alternative 9, including a discussion of the rationale behind the selection of these alternatives over the other alternatives evaluated in the SPAS Draft EIR. Please see Topical Response TR-SPAS-T-1 regarding transit options into LAX.

SPAS-PC00146 Edwards, Demetra L Wood, Smith, Henning & Berman LLP 10/9/2012

SPAS-PC00146-1

Comment:

We have reviewed the nine alternatives currently being suggested for LAX. Based on where we live (6851 W. 85th Place, between Georgetown and McConnell and approximately one block from Manchester), we are extremely concerned with the alternatives suggested for expansion of LAX toward our neighborhood.

Specifically, as it is, the flights coming in and out are quite loud and depending on the direction of the wind, we can smell jet fuel. The idea that runways may move up to 350/300 feet closer to where we live is very troubling both from an environmental standpoint and health standpoint. The movement will negatively impact our lives with a nuisance, particularly unwanted and potentially harmful pollution (noise and air). If this movement were to occur, it will have undesired repercussions and ramifications for the citizens of Westchester.

Response:

The content of this comment is similar to comment SPAS-PC00139-1; please refer to Response to Comment SPAS-PC00139-1.

SPAS-PC00146-2

Comment:

With that in mind, we support Alternative 2 and Alternative 9. The improvement of transportation in and out of LAX would help elevate current congestion. In particular, Alternative 9 would improve the airport, helping to make it a top destination which it is currently not.

Response:

The commentor's support for Alternatives 2 and 9 is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Chapter 2 of this Final EIR regarding the LAWA Staff-Recommended Alternative, which couples the airfield and terminal improvements associated with Alternative 1 with the ground access components associated with Alternative 9, including a discussion of the rationale behind the selection of these alternatives over the other alternatives evaluated in the SPAS Draft EIR.

SPAS-PC00146-3

Comment:

Thank you for your consideration. Please feel free to contact me should you have any questions or wish to further discuss the concerns of the community.

Response:

The comment is noted.

SPAS-PC00147 Hench, Cyndi Neighborhood Council of Westchester Playa 10/10/2012

SPAS-PC00147-1

Comment:

The Neighborhood Council of Westchester/Playa supports a modern and revitalized LAX. After considering the Specific Plan Amendment Study Draft Environmental Impact Report ("SPAS" or "Study") that details the possible options for improvements at LAX we are excited to support a combination of Alternative 2 and Alternative 9 for the following reasons:

- Combining Alternative 2 and 9 fulfills SPAS goal to have airfield, terminal and transportation improvements.
- Alternatives 2 and 9 are the most affordable design options to ensure that LAX capacity needs are met to protect the economy and tourism.
- Independent evaluators have shown these alternatives to allow for safe operation of all aircraft at LAX.
- The analysis presented in the Study shows that Alternative 2 is superior to all others in airport operational efficiency.
- The analysis also shows that Alternatives 2 is clearly the environmentally superior alternative to the others when air quality and environmental impacts are considered.
- These alternatives will bring $10.5 billion dollars in investment to LAX and the City of Los Angeles.
- The combination of Alternative 2 and 9 provides permanent long-term job opportunities by creating a state-of-the-art passenger facility and transportation system that requires ongoing maintenance and support thus strengthening the Southern California economy.
- Funding for these upgrades will make this the largest project in Los Angeles history. Knowing that funding sources are limited, we encourage LAWA to invest in the infrastructure that will improve the passenger experience and address the transportation issues that surround LAX.

As the first line of welcome to travelers to Los Angeles, the Neighborhood Council of Westchester/Playa is excited to see improvements made to LAX that will modernize and revitalize the nation's #1 origination-destination and third busiest airport in the country. We believe that these alternatives will invest in Los Angeles' economy and build an airport that we can be proud of - that maintains and increases safety, efficiency, and community.

Response:

The content of this comment is similar to comment SPAS-PC00089-1; please refer to Response to Comment SPAS-PC00089-1.

SPAS-PC00148 Morrison, Nancy-Gene None Provided 10/10/2012

SPAS-PC00148-1

Comment:

Safety

My major concerns are safety issues.

How will LAX/LAWA maintain safety for the community surrounding and using LAX?

How will agencies communicate safety information and be notified of malfunctions?

How will the public be informed of malfunctions and safety of using the Sepulveda tunnel when the sign reads, "Danger fire in tunnel Do not enter"?

Who is responsible for inaccurate information and protecting public safety?

On Monday, August 27, 2012 at approximately 1:30 PM, due to a malfunctioning sign on the Sepulveda Tunnel south bound, the sign on the tunnel read "Danger fire in tunnel Do not enter". I phoned 911 as traffic roared through the tunnel and was connected in the following order to:

Los Angeles Police Department
Los Angeles Fire Department
LAX Fire Department-who wanted to know where the Fire was in the Tunnel
LAX Police Department- who were aware of the malfunctioning sign.

LAX Fire Department was never notified of the malfunctioning sign, the agency to be the first responder to any fire at LAX. LAX PD, told me the sign was malfunctioning and that no agency involved was able to turn the sign off. There was no presence of LAX PD, that it was all right to go through the tunnel in spite of the sign.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. The SPAS Draft EIR addresses safety impacts of the SPAS project in Section 4.7.2 and addresses impacts to fire protection and law enforcement in Sections 4.11.1 and 4.11.2, respectively. The questions in the comment regarding the potential for malfunctions in the signage for the Sepulveda tunnel do not relate to the SPAS project and are beyond the scope of the SPAS EIR. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00148-2

Comment:

What will you do to improve communication between your own airport agencies and protect the public by giving accurate information out?

LAX is located in an active geological area on the Pacific "Rim of Fire" on and close to known earthquake faults.

How will LAX/LAWA respond to an earthquake effecting use and safety at LAX?

Response:

LAWA maintains a comprehensive and effective public safety and communication program, and continually seeks ways to improve it. In 2011, LAWA completed a $14 million emergency response center at LAX to improve coordination and communication in responding to emergencies at LAX. Additionally, LAWA appointed in August 2012 a Director of Emergency Preparedness, Operations and Emergency Response to further develop and coordinate emergency preparedness and response plans at all LAWA airports.

Regarding earthquake risks at LAX, the 2010 Revised NOP and Initial Study for the SPAS Draft EIR explained why these risks for the SPAS alternatives are less than significant. Please also see Response to Comment SPAS-PC00130-878 for a discussion of the seismic-related hazards at LAX.

LAWA's existing emergency response plans include earthquakes. Additionally, the City of Los Angeles Emergency Management Department provides for emergency response plans on a citywide basis.1

1. http://emergency.lacity.org/index.htm.

SPAS-PC00148-3

Comment:

What are the plans for switching operations to Ontario and Palmdale, both of which are operated by LAWA?

It is unwise to "put all your eggs in one basket", i.e. only using LAX for this densely populated large metropolitan area. A regional plan is need for emergencies.

Response:

Please see Topical Response TR-SPAS-REG-1 regarding the status of LA/Ontario International Airport and Palmdale Regional Airport, as well as regionalism of air travel demand within Southern California. As described therein, there are six major airports, not just LAX, serving the region.

SPAS-PC00148-4

Comment:

Why is there NO earthquake preparedness information readily seen by travelers at LAX?

Where are travelers to go if an earthquake occurs while at LAX?

What if any earthquake preparedness do you have for the traveling public?

In the new Denver Colorado airport, tornado shelter information signs are readily seen frequently through out the airport. I believe earthquakes are more frequent, often very small, at LAX than tornados in Denver Colorado.

Response:

The comment, which raises issues about the dissemination of public preparedness information at LAX, is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. The comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR; therefore no further response is required. (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)). Nevertheless, please see Response to Comment SPAS-PC00148-2 regarding earthquakes and emergency preparedness/response planning at LAX.

SPAS-PC00148-5

Comment:

There is excellent train service, well marked within the airports at Washington Dulles, Denver and San Francisco. Train service is needed to LAX and between terminals within LAX.

Response:

Please see Topical Response TR-SPAS-T-1 regarding transit options into LAX. As discussed therein, an Automated People Mover (APM) is a part of Alternatives 3 and 9 to provide "train service" to and within LAX. The SPAS alternatives recognize, at a program level, the need for multiple APM station stops within the Central Terminal Area (CTA) to limit passenger walking distance. Details on the final number and locations of APM stations with the CTA would be analyzed during detailed engineering and project-specific CEQA review should a SPAS alternative be selected for implementation.

SPAS-PC00148-6

Comment:

I join with the Neighborhood Council of Westchester/Playa in urging the adoption of

Alternative 2, plus Alternative 9 with a realistic train service plan that includes all the terminals, No centerline taxiway.

Response:

The commentor's support for Alternatives 2 and 9 is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Chapter 2 of this Final EIR regarding the LAWA Staff-Recommended Alternative, which couples the airfield and terminal improvements associated with Alternative 1 with the ground access components associated with Alternative 9, including a discussion of the rationale behind the selection of these alternatives over the other alternatives evaluated in the SPAS Draft EIR. Please see Topical Response TR-SPAS-T-1 regarding transit options into LAX.

SPAS-PC00149 Davis, Christina LAX Coastal Area Chamber of Commerce 10/10/2012

SPAS-PC00149-1

Comment:

The LAX Coastal Area Chamber of Commerce has completed its review of the Draft Environmental Impact Report ("DEIR") for the Specific Plan Amendment Study ("SPAS") process and finds that it supports the vast majority of the referenced projects including the completion of the Bradley West Project, the Midfield Satellite Concourse, the new Airport Response Coordination Center, the "New Face" of the Central Terminal Area Improvements/Enhancements, the Network Power Station Upgrade, a new centralized Public Safety Facility, the Consolidated Rental Car Facility (CONRAC), Automated People Mover, parking lot rehabilitation and more. Cumulatively these "landside" projects are the ones that address the aging infrastructure of LAX and give us a facility that will compete for travelers over the next thirty years. These projects are also the most labor intensive and will create the most immediate jobs to jumpstart our economy.

In the past, the LAX Coastal Area Chamber of Commerce actively supported Alternative D, which was adopted by the Los Angeles City Council subject to the "SPAS" process, "Alt D" would have brought us three new terminals and reduced environmental impacts on the community. We strongly supported the new West Satellite Concourse to ensure that the new Group VI aircraft including the A380 and newest 747 would not fly over Los Angeles in preference for competing destinations. We believe strongly in all aspects of the proposals to renovate our terminals and improve the passenger experience at LAX which J.D. Power found "falls way short of meeting customer expectations ranking 68 of 76 global airports in overall airport satisfaction." We were next to last in major US airports in 2010. Indeed, we applaud LAWA's recent focus where it counts: $4 Billion spent on modernization of the passenger experience at the renovated Bradley International Terminal to treat our overseas visitors to a world class experience when they arrive.

However, there is one single project we cannot support - the reconfiguration and relocation of the north airfield runways both because the proposals having nothing to do with economic competitiveness and there is no factual basis for moving the north runways on the basis of safety either today or at any time between now and 2028.

The question must be where and when is it best to invest finite airport dollars to most effectively ensure that LAX is competitive in the 21st century? As business people we must prioritize our spending on capital improvements and so must our airport. It no more makes sense to focus our time and resources on runway configuration than it does to put a cast on your arm when it was your leg that was broken. The "landside" projects which the Chamber supports directly address LAX' deficiencies as identified by J.D. Power. But, not once in the sixty plus page report by J.D. Power did it ever even mention runway configuration as a factor in improving LAX' position at the bottom of airports worldwide.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required

because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00149-2

Comment:

Why are Runways Even on the Drawing Board?
At the outset of these comments we feel compelled to put into perspective how we have come to be here today. The general public and policy makers alike were both told that there was a compelling safety reason that necessitated reconfiguring the North runways at LAX. Dissatisfied with the "highly suspect"1 peer reviews that were produced many in the same weekend, the LA City Council took the unprecedented step of delaying this DEIR for two years so that we could get a true unbiased and thorough study done to determine whether safety was truly an issue. Without a safety need, runways would not move. The NASA Study definitively concluded there was simply no safety reason for moving the runways.

It is a universally accepted fact that it is impossible to move these runways further North and make them longer without having an unavoidable environmental impact on the communities to the North - most significantly in the form of increased noise and as a consequence of growth, traffic.

Yet, a Coalition has been formed to ignore the facts and press forward anyway. But without safety as a reason for moving the runway, no policy maker can reasonably conclude that is makes good public policy to subject its population to severe environmental impacts.

Amazingly, of the 1800+ pages of the DEIR only 6 pages are given to summarizing what are described as seven independent assessments. Of these, the only actual comprehensive study done over a period of two years and at an expense of two million dollars and at the express behest of the Los Angeles City Council is given nothing more than a summary (inaccurate at that) and a total of two paragraphs and 16 lines of text.

For the policy maker reviewing this document, this should be a giant red flag as it amounts to a massive and intentional failure to disclose relevant information critical to the core reason that the policy maker is being asked to consider alternative with substantial impacts many of which cannot be mitigated. And to the extent the policy maker reading this is a member of the Los Angeles City Council, the DEIR flies right in the face of what the City Council asked for in demanding the NASA Study take place; to wit, the complete NASA Study and it's Addendum are nowhere to be found in the DEIR.

Ironically, scant days before the findings of the NASA Study were released, most of the key players now pushing for the runways to move North (including the Los Angeles Area Chamber of Commerce, Los Angeles Economic Development Corporation (LAEDC), Central City Association (CCA) and Valley Industry and Commerce Association (VICA)) released a joint communique to the press2 insisting that this study was the one we should all accept as the dispositive final word on the subject. We call on all the signatories to the February 17, 2010 communique to honor their word. They said that the NASA Study "should be the final study that LAWA and the City of Los Angeles conducts to ascertain how to maximize passenger safety at the LAX North Airfield" and that we should all "embrace the results of the study." We agree.

We also call on Mayor Villaraigosa to stand by the statements in his letter dated February 19, 2010 after the NASA Study came out.3 He wrote that:

"Barring other findings that would indicate safety issues, we are not moving the runway."

There have been no "other findings." As the Coalition members above suggested, the NASA Study was the final study. There has been NO STUDY which has contradicted the NASA Study findings that the North runways are safe since it's completion in February 2010 - in fact there have been no further safety studies at all. As Mayor Villaraigosa added:

"the report concludes definitively that the north runways are 'extremely safe under the current configuration' and that is very good news for the millions of travelers who use LAX every year."

Since there is no present safety rationale, the LAX Coastal Area Chamber of Commerce logically declines to support any runway reconfiguration proposal until such time as there is a simple proven need to move the runways. That day has not yet arrived.

1 Los Angeles City Council Resolution number 07-1782 Adopted on June 20, 2007 (attached as Exhibit C).
2 See attached Exhibit "A".
3 See attached Exhibit "B".

Response:

The commentor presents no evidence that the SPAS Draft EIR's summary of the NASS is inaccurate.

SPAS-PC00149-3

Comment:

CRITICAL PROBLEMS WITH THE DEIR

I) The Proposals in the DEIR Violate the Settlement Agreement
II) There is No Justification for Moving Any Runway Before 2028 at the Earliest
III) NASA Study Addendum Not Even Referenced
IV) NASA Study is the Only Comprehensive Safety Study
V) Failure to Comply with City Council Motion
VI) Other DEIR Deficiencies (Traffic Mitigation/ARGO Ditch/Scoping relocation of Lincoln/
VII) Support for the Consolidated Rental Car Facility (CONRAC)

Response:

The comment is noted. Please see Responses to Comments SPAS-PC00149-4 through SPAS-PC00149-17 below.

SPAS-PC00149-4

Comment:

I. The Proposals in the DEIR Violate the Settlement Agreement

We share the view of Los Angeles County Supervisor Don Knabe who observed that the proposals for study " ... goes against the spirit of the settlement agreement."

Likewise, the Los Angeles City Council has stated that expanding LAX for reasons other than safety

"...would be a clear violation of the 2005 Stipulated Settlement Agreement between LAWA and its neighbors."4

More specifically, we note that the SPAS Study was supposed to provide that Alternative Projects "...provide a comparable level of mitigation to that described for the Yellow Light Projects..."5 Indeed, the Stipulated Settlement also expressly requires "minimizing environmental impacts on the surrounding communities"6 as part of its terms.

During the public outreach process, LAWA itself told the public that the LAX Specific Plan Amendment Study called for by the Settlement Agreement requires that:

"Potential environmental impacts that could result from replacement of the Yellow Light projects with the Alternative Projects, and potential mitigation measures that could provide a comparable level of mitigation to that described for the Yellow Light Projects in the LAX Master Plan Program EIR."7

In summary, LAWA has said one thing while doing another. LAWA has represented to the public that the only allowable alternatives which can even be considered are those which would have no more impact that the Yellow Light Projects. By contrast, LAWA has treated the SPAS process as though it calls for an completely unconstrained blank sheet or de novo review. Most egregiously this now includes the addition of a proposal for runway separation far in excess of the south movement and extension of 24L approved by the Master Plan. We submit that the all of the proposals to move Runway 24R both north and west violate these express provisions of the Stipulated Settlement and therefore exceed the scope of what should properly be considered by the NOP and the DEIR. Their inclusion renders the document fatally flawed.

4 Los Angeles City Council Resolution number 07-1782 Adopted on June 20, 2007. Attached hereto as Exhibit "C".
5 Stipulated Settlement Section V.D.3. @ p.9
6 Stipulated Settlement Section V.C. @ p.9
7 See http://www.laxmasterplan.org/pdf/N_Airfield_-_Land_Use_112206.pdf p.6 PowerPoint slide attached as Exhibit "D". (Emphasis in original)

Response:

The SPAS Draft EIR includes and analyzes a broad range of airfield improvement alternatives, all of which include numerous LAX Master Plan commitments, LAX Master Plan mitigation measures, and SPAS mitigation measures to minimize impacts on surrounding communities. Table 1-6 in the SPAS Draft EIR lists those commitments and measures for each alternative, which are described in greater detail in Chapter 4 of the document.

With regard to commentor's indication that "all of the proposals to move Runway 24R both north and west violate these express provisions of the Stipulated Settlement" relative to what was otherwise approved in the LAX Master Plan, to move Runway 6R/24L 340 feet south, comments regarding LAWA's compliance with the Stipulated Settlement require legal conclusions that are beyond the scope of what is required by CEQA. However, it should be noted that SPAS Alternatives 1, 5 and 6, all of which move Runway 6L/24R both north and west would, in general, result in less air quality and noise impacts than would occur under Alternative 3, which would move Runway 6R/24L 340 feet south. These differences in impacts are evident in SPAS Draft EIR Tables 4.2-10 through 4.2-15 for air quality and Tables 4.10.1-55 and 4.10.1-56 for aircraft noise. For other environmental topics, the environmental impacts of Alternatives 1, 5, and 6 are generally comparable to those of Alternative 3. Additionally, the westerly shift in Runway 6L/24R proposed under Alternatives 1, 5, and 6 would move the existing RPZ out from existing residences located east of the runway. As such, alternatives which move Runway 6L/24R to the north and west would result in similar or less impacts and essentially a better level of mitigation than would otherwise occur under the LAX Master Plan.

In response to the comment that "LAWA has represented to the public that the only allowable alternatives which can even be considered are those which would have no more impact that the Yellow Light Projects. By contrast, LAWA has treated the SPAS process as though it calls for an completely unconstrained blank sheet or de novo review"; the comment provides no evidence of any statement by LAWA consistent with that alleged in the comment. Again, comments regarding LAWA's compliance with the Stipulated Settlement require legal conclusions that are beyond the scope of what is required by CEQA.

SPAS-PC00149-5

Comment:

II. There is no Safety8 Justification for Moving any Runway Before 2028 at the Earliest

The NASA safety study9 concludes with this sentence:

"All things considered, the Panel cannot construct a compelling argument for reconfiguring the North Airfield on safety grounds alone." P .164

"After much analysis, the AP [Academic Panel] unanimously concluded that the existing North Airfield will be extremely safe even under traffic levels projected for 2020, estimating that:

...at 2020 traffic levels, fatal runway collisions on the existing North Airfield would occur on average approximately once every 200 years." Study P157

...according to the current FAA Terminal Area Forecast (TAF) projections LAX will not reach the level of daily operations projected in the LAWA year 2020 demand scenario until the year 2028.10

It is important to note that these findings were based on the projected flight mix at LAX which will be reached in 2028. There is no study which addresses runway safety at a date later than this or at any increased utilization of LAX in the future. Therefore, the conclusion that the north runways need not be reconfigured can only be said to apply up to that date.

Despite these clear and unequivocal findings, the DEIR misleads the reader with respect to both the relative significance of the "independent assessments" completed to date and the conclusions of the most important one of these - the NASA Study. It purports to summarize the findings of the two years of research, simulations and innumerable meetings with stakeholders as directed by the City Council Resolution to a grand total of five bullet points. As a result there are those who have either failed to actually review the source materials or who choose to recklessly cherry pick facts out of context to say moving the runway makes us 55% safer11 and that if we don't do something "there will be blood on our hands." What the 55% advocates didn't tell you when using this percentage number is that the chances are so small to begin with that the number is statistically irrelevant!12

The NASA Study Addendum directly addressed the notion of percentage improvements by saying that:

"As noted earlier, we believe that this "fact" is not informative, and neither does FAA. We never suggested that a centerline taxiway would have no safety benefits: we assume that the 40% reduction in relevant incursions observed at LAX-South would also occur on LAX-North. The issue is: what is the baseline level of risk that would be reduced by 40%?"13

"The AP [academic panel] estimates that, at 2020 traffic levels, fatal runway collisions would occur on the North Airfield at an expected rate of one every 200 years, and that such fatal collisions would cause approximately one death for every 150 million LAX passengers."

Cutting in half the risk means simply that the chances of a fatal runway collision drop from once every 200 years to once every 300 years. Odds are we may not even be using planes at all 200 or 300 years from now! "That number [1/150,000,000] is small compared to the risks that citizens face every day."

"We would summarize our conclusions about mortality risk in the baseline case [i.e no change in runway configuration] as follows:
- The runway-collision risk to LAX air travelers would be extremely low in absolute terms, even at 2020 traffic levels.
- The risk would be very low relative to the other mortality risks that face residents of Los Angeles."

What are the other mortality risks we face every day? The risk of dying on the north runways at LAX is so small it wouldn't even make a dot on the attached chart prepared by the National Safety Council.14 By comparison, it is already 700 times more likely you'll die from being stuck by lightning than because of an accident at LAX. And the odds are 150,000 times more likely someone will die by committing suicide than to die in a runway accident at LAX.

By comparison, the odds are:

1 in 126 of dying by poisoning.
1 in 6609 of being shot to death
1 in 29,196 of dying from a cataclysmic storm
1 in 79,842 of dying from a bee sting!
1 in 97,807 of dying in an earthquake
1 in 111,779 of being executed
1 in 134,000 of being struck by lightning

1 in 150,000,000 chance of dying on the runway at LAX even if we don't move the runways at all.

As the NASA Study concludes:

"The statistic "one in 150 million" is obviously small in absolute terms. It is also extremely small relative to other accident risks that Los Angeles residents and others face: for example, an American baby born today has approximately a 1 in 100 chance of eventually dying in an automobile accident."

8 As a side note, as business organizations it would be unfair to ignore the data provided in the study showing that there is a $5.7 million dollar annual projected savings to the airlines stemming from a 17 second average reduction in taxi times. (Final Report, p.122) But of course at $500 million and up it would take a hundred years to recoup the investment.

This isn't to say that the day will not come when we need to improve the operational efficiency of LAX, but based on the addendum to the NASA Study, we will not even reach the number of flights they assumed until 2028! And, looking at capacity, the study noted that:

"It is noteworthy that, in 2000, when daily operations at LAX were only about 5% below the level projected for 2020, the airport fared quite well."

Furthermore, the DEIR unequivocally states that "Based on the activity level selected for the analysis, none of the alternatives is expected to result in significant operating efficiency gains." Appendix F-2, p.107

9 The entire NASA Study and its Addendum answering and rebutting questions raised by the FAA letter dated April 2, 2010 are attached hereto as Exhibits "E" and "F".
10 Addendum to Final Report, May 15, 2010, p.13.
11 The study uses alternately refers to the risk reduction as 50% and 55% in its findings. The NASA Study concluded that "Compared to the Baseline case, the risk of a fatal runway collision would drop approximately 50% if the existing North Airfield were replaced by the 340' North configuration with a centerline taxiway." p.110.
12 We note also that according to the NASA Study, 40% improvement comes from moving only 100 feet - and that creates just as many jobs. Comparing a runway movement of only 100 feet to 340 feet, the NASA Study found a statistical reduction of 0.5 lives per decade:
"Thus, instead of five lives lost per decade, the estimated number would drop to an average of 2.5. (Compared to 100' North, deaths per decade would drop from three to 2.5.)" p.110.
13 Addendum to Final Report, May 15, 2010, Paragraph 7, p.19.
14 Attached as Exhibit "G".

Response:

As indicated on page 4-505 of the SPAS Draft EIR, the academic panel's review of the technical work completed for the NASS had several main conclusions including, but not limited to: the LAX north airfield is extremely safe under the current configuration for the projected 2020 activity forecast; and, certain improvements to, and reconfiguration of, the north airfield would substantially increase airfield safety (i.e., reduce the risk of a fatal runway collision). The academic panel also concluded that, based on safety grounds alone, it would be hard to argue for reconfiguring the north airfield (i.e., given that the baseline level of risk is so low, reducing the risk of a fatal runway collision by a substantial level is of "limited practical importance"). The academic panel's opinion, which represents a subjective value judgment on the importance of reducing the risk of a fatal runway collision, is not shared by the Federal Aviation Administration, the federal agency responsible for the safety of civil aviation.

Similar to the academic panel's use of statistics and presenting the reduced risk of a fatal runway collision afforded by certain airfield improvement in terms of the existing baseline level of risk, the commentor presents several statistics of the odds of a fatality from events other than a runway collision. That information is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project.

SPAS-PC00149-6

Comment:

III. NASA Study Addendum Not Even Referenced

The DEIR also presents an FAA letter written without any simulation or empirical study but then completely omitted reference to the Addendum to the NASA Study that addressed and completely debunked the FAA and other comments. This again misleads the reader of the DEIR by omitting information which impacts the ability of the policy maker to evaluate the choices presented.

In addition to directly refuting claims raised, new and important information presented in the Addendum focused also on the myth that the centerline taxiway built for the south runways at LAX was inherently safer than not having one as on the north. The Addendum noted the following:

- Air Traffic Controllers "judged the existing north configuration without a centerline taxiway as about equally safe as the south airfield with such a taxiway."15

- The south airfield still has more incursions than the north even with the centerline taxiway and additional runway separation! "Indeed, since the centerline taxiway was opened on June 24, 2008, the LAX incursion pattern [was 12 south and 6 north]."

In fact since the Addendum came out, the statistics taken from the DEIR itself show that since the south airfield was reconfigured, for calendar years 2009, 2010 and 2011 combined there have been 25 incursions on the south runways and 11 on the north. In the last three years of data there has been not one single incursion on runway 24R - which is the very runway it is proposed be moved and lengthened. And none of the north runway incursions have been graded as categories A or B meaning that they were all minor incidents that did not rise to a significant safety risk.16

The Addendum put it this way:

"We do not mean to be critical, but the critique suffers an inconsistency. It cannot depict the new LAX South airfield as a paragon of safety and yet claim that the North-which appears just as safe as the South now-poses an unacceptable risk to LAX passengers. If LAX North is really "not good enough," then it follows that neither is LAX South." p.9

It went on to the following conclusions:

"...we would suggest that it is time to stop describing LAX as a high-risk airport. Both the North and South airfields more than "hold their own" against other major US airports."

"If the FAA critique had presented valid criticisms of our analysis, then we would have hastened to make full corrections: never would concerns about "saving face" have meant anything to us compared to the imperative of saving lives. But we were charged with the task of estimating the absolute level of risk for the LAX North Airfield, and were encouraged by all parties to do nothing but tell the truth. This we have done, and this we will continue to do."

15 "It is also instructive to consider the responses of air traffic controllers who took part in the NASA-Ames simulation. The controllers were asked to compare the LAX-North baseline configuration with the new South Airfield with its centerline taxiway. On a scale from 1 to 7, in which 1 meant "LAX North much safer" and 7 meant "LAX South much safer," the controllers gave an average response of 4.2. In short, they judged the existing north configuration without a centerline taxiway as about equally safe as the south airfield with such a taxiway." Addendum p.9.
16 Appendix G2 Safety c p.19.

Response:

The subject Addendum is included within the Final LAX North Airfield Safety Study (NASS) Report of May 11, 2010, which is cited in Footnote 398 on page 4-505 of the SPAS Draft EIR and is provided in its entirety as Appendix H-6 of the Preliminary LAX SPAS Report. While the Addendum includes the

academic panel's responses to the FAA comments, it did not change the conclusions of the Preliminary NASS Report. Those final conclusions of the NASS are presented in the SPAS Draft EIR.

Regarding the comment about the LAX incursions summary presented in Table 4.7.2-7 of the SPAS Draft EIR, it is important to note that, as described in the text immediately below the table (page 4-510), that Categories A and B incursions represent the most serious kinds of incursions, whereas Categories C and D incursions are low-risk surface incidents with ample time and/or distance to avoid a collision. The 36 incursions noted in the comment as occurring in the calendar years 2009, 2010, and 2011 were all Categories C and D incursions. The commentor is correct in noting that none of the north runway incursions during that period have been graded as Categories A or B; however, that is also the case relative to the south runway incursions. Between 2001 and 2007, there were five serious incursions (Categories A or B) on the south airfield, but subsequent to completion of the south airfield improvements, which included the addition of a centerfield parallel taxiway, there have been no serious incursions on the south runways.

SPAS-PC00149-7

Comment:

IV. NASA Study is the Only Comprehensive Safety Study

The NASA Study was so important in comparison to all the other "independent assessments" that preceded it that the Los Angeles City Council voted unanimously to halt the EIR process in its tracks for two entire years so that we would have the benefit of its findings before choosing to move forward with any north runway reconfiguration.

But, the DEIR misleads the reader by suggesting that there were "seven independent assessments" and presents them in merely six pages with the clear implication that they should all be given equal weight by the policy maker assessing the risks affecting the alternatives presented. Of these seven, only one - the NASA Study - was an actual complete study worthy of use to evaluate the alternatives. Mayor Villaraigosa who wrote that:

"I would like to thank the academic panel and NASA-Ames for conducting the most comprehensive airfield safety study ever done for Los Angeles International Airport (LAX). By dedicating approximately 21 months to extensive computer simulation and analysis, these experts have carefully considered all aspects of runway safety on the north Airfield in an unprecedented level of detail." 2/19/10 Statement on Release of North Airfield Safety Study.

Historical perspective is in order to understand that the NASA Study came to fruition because the prior five "independent assessments" as they are referred to by the DEIR were considered,

"highly suspect peer review studies. The studies, conducted in a cursory manner by airline insiders, came to no clear conclusions, and strayed from safety issues to focus on "operational efficiency," which many consider to be code for 'expansion.' LAWA's efforts have convinced practically none of the airport neighbors, who consider the studies to be biased, skewed, focused on the wrong issues, and therefore inconclusive. Additionally, it is concluded in the Motion that objective and thorough analysis, conducted by an independent agency that has credibility with airport neighbors and their elected officials, is imperative."

That language is taken from the Los Angeles City Council's own resolution calling for an "objective and thorough analysis, conducted by an independent agency."

In 2008, the Board of Airport Commissioners voted to move forward with a DEIR for the North Runways. In an unprecedented act, the City Council put the EIR on hold requesting that: "...BOAC direct that the study be conducted, completed and reviewed before the release of the Notice of Preparation (NOP) for the LAX Master Plan Restudy; and that the study's findings be incorporated into the NOP and environmental documents."17

By comparison, of the first five "independent assessments" preceding the NASA Study most of them were done on the same weekend in May of 2007 when industry insiders gathered to produce a few

quickly slapped together papers without any simulation or oversight whatever. These papers were so completely discredited that the City Council directed BOAC to do a real study of the same type done before deciding on configuration of LAX' South Runways - run by NASA and involving real pilots, air traffic controllers and using the state of the art NASA Ames FutureFlight simulation facility to evaluate each proposed design.

The bottom line is the NASA Study represents the gold standard and the DEIR fails to either adequately disclose its findings or provide accurate context for the reader to understand its relative significance to the other "independent assessments" which it is lumped in with even though it is the only actual study completed by any group on the subject.

17 Los Angeles City Council Resolution number 07-1782 Adopted on June 20, 2007.

Response:

The City Council action of June 2007 was to support Councilman Rosendahl's motion to: (1) request the LAWA Board of Airport Commissioners (BOAC) hire an independent firm or organization to conduct a comprehensive and objective study and analysis of north airfield safety issues; (2) request that the BOAC direct the study to be conducted, completed, and reviewed before the release of the Notice of Preparation (NOP) for the LAX Master Plan Restudy; (3) request that the BOAC direct the study to examine certain issues related to airfield safety; and, (4) request that the BOAC form a North Runway Safety Advisory Committee. The LAWA BOAC subsequently considered and agreed to all those requests, and the North Airfield Safety Study (NASS) was completed accordingly.

The project addressed in the SPAS Draft EIR is the SPAS, including the range of alternatives addressed therein. (See Section 1.2 of the SPAS Draft EIR.) The NASS does not address the SPAS project; its purpose was to "inform decision makers on the scope and severity of operation safety problems of the north airfield and a range of potential solutions." (See Section 4.7.2 of the SPAS Draft EIR for additional discussion of the NASS.) Note also that the NASS represents a subjective value judgment on the importance of reducing the risk of a fatal runway collision, which is not shared by the FAA, the federal agency responsible for the safety of civil aviation.

The results of the NASS and five other safety studies related to the north airfield are summarized in Section 4.7.2 of the SPAS Draft EIR, with citations to the complete reports provided as footnotes in that section, and copies of the six study reports provided as Appendices H-1 through H-6 of the Preliminary LAX SPAS Report. These studies provide the public and decision-makers with extensive information to review and consider relative to airfield safety on the north airfield. All six studies were prepared by highly qualified entities and individuals with substantial expertise related to the subject matter. In addition to the six professors who comprised the academic panel for the NASS, the individuals with direct involvement in the other safety studies included professional airline pilots, current and former managers of major international airports, professional airport planners, and aviation safety program managers, planners, and specialists. The individuals with lead involvement in the studies each have decades of experience in commercial aviation, safety, and airport planning.

The ultimate determination of whether to select one of the SPAS alternatives and the rationale for such a determination is left to the decision-makers. This comment will be provided to them for their review prior to making a decision.

SPAS-PC00149-8

Comment:

V. Failure to Comply with City Council Motion

We object to the NOP on the grounds that LAWA has failed to comply with the mandate of the Los Angeles City Council when it created the North Runway Safety Advisory Committee; to wit, "the study's findings be incorporated into the NOP and environmental documents." The conclusions of that study are critical to the policy makers having a true understanding of the need or lack thereof of reconfiguring the north airfield. Put simply, failure to include this critical document as explicitly required by the Los Angeles City Council resolution renders the document defective on its face.

Response:

LAWA issued the original Notice of Preparation (NOP) for the SPAS Draft EIR in March 2008 and, following completion of the LAX North Airfield Safety Study (NASS) in spring 2010, issued a Revised NOP in October 2010. The LAX NASS is specifically noted on page 4 of the NOP. The NASS is also referenced and summarized on page 4-505 in Section 4.7.2 of the SPAS Draft EIR and provided in its entirety as Appendix H-6 of the Preliminary LAX SPAS Report.

SPAS-PC00149-9

Comment:

VI) Other DEIR Deficiencies

Scoping/Timing: The DEIR fails to adequately disclose the timing and sequencing of the various construction projects anticipated at LAX.18 Admitting that the proposal simply lacks sufficient specificity is not an excuse under CEQA. As such environmental impacts during construction cannot be adequately reviewed and may materially understate the cumulative impact of multiple projects proceeding concurrently.

18 The DEIR admits to the deficiency; to wit: "There is not sufficient information at this conceptual level of planning to estimate the construction schedules, construction traffic trip generation, or trip distribution associated with the various development projects, including the SPAS alternatives. Notwithstanding, it is considered unlikely that the nature, location, and timing of the various construction projects would coincide such that traffic volumes on the nearby arterial roadways and highways would double or triple, thereby resulting in significant construction traffic noise impacts. Even using very conservative assumptions regarding construction-related traffic generation and distribution for a recent major development project at LAX (i.e., the Bradley West Project), the traffic volumes on nearby arterial roadways and freeways did not double or triple. It would be speculative at this conceptual level of planning to estimate the nature, timing, and construction traffic characteristics of major improvements projects particular to each of the SPAS alternatives along with the nature, timing, and construction traffic characteristics of other development projects that may occur between now and 2025, such that a specific combination of projects would result in a doubling or tripling of traffic on specific roadways in the airport vicinity. Regarding increases in road traffic noise associated with regional growth anticipated to occur by 2025, please see the discussion under the heading of Road Traffic Noise above.
DEIR p.1-94.

Response:

As indicated on page 2-57 of the SPAS Draft EIR, the nine SPAS alternatives were formulated at a conceptual level only and there are no specific planning, design, or engineering studies or construction plans for any of the alternatives. Chapter 4 of the SPAS Draft EIR discloses construction impacts of the alternatives at a program-level of detail. Should a SPAS alternative be selected for implementation, project-level CEQA documents would present detailed design and construction plans and disclose detailed project-specific construction impacts and mitigation measures?

Deferring project-level detailed descriptions of construction plans and impacts to second-tier CEQA documents is not a "deficiency" in a program-level EIR such as the SPAS Draft EIR. Rather, under CEQA, it is appropriate for a first-tier program level EIR to defer detailed descriptions and impact analysis of individual projects in the program to future project-level CEQA documents. (State CEQA Guidelines Section 15383; Koster v. County of San Joaquin (1996) 47 Cal.App.4th 29, 37.) Please also see Topical Response TR-SPAS-LR-1 regarding the fact that the SPAS Draft EIR is a program-level document prepared pursuant to the State CEQA Guidelines and the subsequent preparation of project-level CEQA documents, which address in greater detail construction-related impacts, is appropriate and consistent with CEQA requirements.

Lastly, the statement that cumulative impacts of the SPAS alternatives may be understated if multiple projects proceed concurrently is speculative, and not supported by facts or evidence indicating such concurrent construction is reasonably foreseeable.

SPAS-PC00149-10

Comment:

We also disagree with the premise that it would require a doubling or tripling of traffic to constitute a "threshold of significance."19

19 "...construction-related traffic would not result in a doubling or tripling of traffic volumes on nearby roadways, as would be needed to occur in order to exceed the threshold of significance; therefore, these impacts would be less than significant."
DEIR p.4-964.

Response:

The commentor provides no basis for why the LAX Coastal Area Chamber of Commerce disagrees with the subject statement from Section 4.10.3, Construction Traffic and Equipment Noise analysis, of the SPAS Draft EIR and, moreover, provides no evidence for how or why the statement is inaccurate.

The statement in Footnote 609 on page 4-964 of the SPAS Draft EIR indicating that a doubling or tripling of traffic volumes on nearby roadways would be needed to occur in order to exceed the noise threshold of significance is based on: (1) the significance threshold in Section 4.10.3.4 of the SPAS Draft EIR; and (2) scientific principles of noise generation, including traffic noise, and of the attenuation of sound over distance. As stated on page 4-952 of the SPAS Draft EIR, a significant construction traffic noise impact would occur if implementation of a SPAS alternative would result in the "ambient noise level measured at the property line of affected uses to increase by 3 dBA or more in CNEL." This thresholds is considered very conservative because "humans find a change in sound level of 3 dB is just noticeable…" (SPAS Draft EIR page 4-780).

As stated on page 4-945 of the SPAS Draft EIR, "Acoustic energy is additive in nature. For example the sound energy of two identical vehicles is twice as great as that for one vehicle, and so on; however, the relationship for sound pressure level (SPL), measured in decibels, is logarithmic, not arithmetic. For example, when the energy is doubled, the SPL increases by 3 dB. Therefore, while the energy is doubled when the volume of traffic is doubled, the SPL would increase from, say, 60 to 63 dBA." Based on this well-known and well-established scientific principle of sound generation, a minimum of at least a doubling the existing daily (24-hour) traffic volumes along a roadway would be required to result in an increase of 3 dBA or more in CNEL along that roadway. This 3 dB increase reflects the doubling of traffic volumes alone and does not take into account intervening ground conditions or structures/topography between the noise source (road) and the noise receptor (homes or other sensitive uses). Should the ground surface between the source and the receptor be characterized as "soft," such as in the case of being vegetated, an additional 1.5 dB of noise reduction per doubling of distance from the receptor would occur.1 If there is natural topography, a structure or a noise wall/barrier in the intervening area between the noise source and receptor, additional noise reduction would occur. For example a noise wall that breaks the line-of-sight between the noise source and the receptor provides approximately 5 dB of noise reduction.2 The 3 dB increase noted above also does not account for the likelihood that a doubling of traffic on a roadway would result in a reduction in average speeds on the roadway. A reduction in average speeds would be accompanied by a reduction in vehicle noise levels. As noted above, a doubling of traffic would result in a 3 dBA increase in roadway noise. A tripling of traffic would result in a 4.77 dB increase in roadway noise. In light of the above, the statement that a doubling or tripling of traffic volumes on nearby roadways would be needed to occur in order to exceed the threshold of significance related to construction traffic noise is reasonable and appropriate and is supported by substantial evidence.

1. U.S. Department of Transportation, Federal Highway Administration, Noise Barrier Design Handbook, Available: www.fhwa.dot.gov/environment/noise/noise_barriers/design_construction/design/design03.cfm#sec3.3.2, accessed December 5, 2012.
2. U.S. Department of Transportation, Federal Highway Administration, Noise Barrier Design - Visual Quality, Available:

www.fhwa.dot.gov/environment/noise/noise_barriers/design_construction/keepdown.cfm, accessed December 5, 2012.

SPAS-PC00149-11

Comment:

Additionally, the timing of projects designed to increase passenger capacity of LAX (runway movement) are not provided relative to the construction of those projects that would by design handle the anticipated extra passengers commensurate with the increased capacity. Put simply, any project increasing capacity should be delayed until all mitigation projects are first completed. Landside projects must be finished first.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Phasing of SPAS projects would be determined based on a number of factors, including operational needs, facility requirements, construction sequencing, financing, and other factors. Runway improvements would not increase the capacity of the airport but, rather, would improve safety and operational efficiency. Table 4.7.2-16 in Section 4.7.2 of the SPAS Draft EIR provides a summary of how each alternative relates to safety and efficiency enhancements to the north airfield. Please also see Response to Comment SPAS-AL00007-4.

SPAS-PC00149-12

Comment:

Property Condemnation: The DEIR is silent on this issue. It is our understanding that without certain waivers by the FAA relating to the Runway Protection Zone (RPZ) and other property setbacks, that there may be a substantial impact on the Westchester business district including the potential for inverse condemnation proceedings.

Response:

The contents of this comment are similar to the concerns expressed in comment SPAS-AL00007-26; please refer to Response to Comment SPAS-AL00007-26.

SPAS-PC00149-13

Comment:

Aircraft Noise: "Significant and unavoidable." Every single proposal has this label and no wonder given that more than 14,000 individuals and over 4000 homes will be directly impacted by noise in excess of 65 CNEL - reducing property values for their owners and quality of life for those who live in the community.20

20 DEIR p.1-84.

Response:

A discussion of project impacts resulting from aircraft noise under Alternatives 1 through 7 is provided in Sections 4.9.6 and 4.10.1.6 of the SPAS Draft EIR.

The numbers referenced by the commentor appear to be from Table 1-17 on page 1-84 of the SPAS Draft EIR. This table is referring to the change in the 65 CNEL contour area and the corresponding population and dwelling units within this area compared to 2009 baseline conditions and 2025 No Additional Improvement Conditions (i.e., Alternative 4). Under Alternatives 1 through 7, there would be an increase of between 12,861 and 14,404 residents and between 4,315 and 4,603 dwelling units within the 65 CNEL or higher noise contours compared to 2009 baseline conditions. However, when compared to 2025 No Additional Improvement, there would be between 1,543 and 365 residents under Alternatives 1, 2, 3, 5, 6, and 7 no longer exposed to noise levels of 65 CNEL or higher due to the

movement of the contour away from more densely populated areas, as further described in Response to Comment SPAS-PC00149-2.

The population and dwelling units that would be impacted by exposure to high noise levels (either through new exposure to noise levels of 65 CNEL or higher or increases of 1.5 CNEL or higher within the 65 CNEL or higher noise contours) are presented in Table 1-16 on page 1-83 of the SPAS Draft EIR. As shown on this table, the population that would be newly exposed to noise levels of 65 CNEL would range from 13,259 to 14,691 residents and between 4,809 to 5,151 dwelling units. The population and dwelling units that would be experience a noise increase of 1.5 CNEL or higher within the 65 CNEL or higher contours would range from 12,705 to 19,482 residents and between 4,879 to 7,325 dwelling units.

Regarding property value impacts, CEQA does not require property value impacts or other purely social or economic impacts to be analyzed in an EIR (CEQA Guidelines Section 15064(e)).

Please see Response to Comment SPAS-PC00189-4 for further discussion about impacts on property values. CEQA does not require that impacts on quality of life be assessed, and interpretation of effects on quality of life would likely be subjective and highly variable. The SPAS Draft EIR does however evaluate physical impacts on the environment associated with over 20 topical issues and how such impacts affect residents in surrounding communities.

SPAS-PC00149-14

Comment:

Traffic Mitigation: The entire DEIR is deficient in failing to provide alternatives for mitigation of substantial traffic impacts described in the report. It is no surprise that traffic on the West side of Los Angeles is generally speaking a disaster. Many of the major intersections in a radius of several miles surrounding LAX are already significantly degraded. While the DEIR discloses that no mater which proposal is adopted, more than 40 major intersections will suffer significant impact relative to future conditions "with no feasible mitigation available."21

21 DEIR p.1-49.

Response:

The commentor claims that the SPAS Draft EIR is deficient because it does not provide alternatives for mitigation of traffic impacts, but does not specify any additional mitigation measures or alternatives. As described in Section 4.12.2.7 of the SPAS Draft EIR, specific mitigation measures are identified to address the significant traffic impacts under each alternative. The commentor correctly states that each of the alternatives would result in significant and unavoidable traffic impacts at numerous locations following mitigation when compared to the Future (2025) Without Alternative conditions. As described on page 4-1199 of the SPAS Draft EIR, the Future (2025) Without Alternative conditions hold airport-related traffic at 2010 baseline levels and do not include traffic associated with the natural growth at LAX; the effect of that growth is analyzed together with the effects of the physical changes proposed under each alternative.

SPAS-PC00149-15

Comment:

ARGO Drainage Channel: The DEIR fundamentally fails to address or analyze the impact of relocating runway 24R northward on this significant storm water collector system. Plans currently call for the community to have the benefit of soccer fields and a recreation park as part of the Northside sanitation project which is directly fed by this system. No analysis is presented nor contact made with the United States Corps of Engineers who have oversight of this project.22

22 DEIR pp.44 and 98.

Response:

The SPAS Draft EIR acknowledges that the Argo Drainage Channel would be converted to a concrete box culvert under Alternatives 1, 5, and 6, and evaluates the impacts to hydrology and water quality associated with the conversion in Section 4.8 of the SPAS Draft EIR. Please see Response to Comment SPAS-PC00130-169 regarding the function of the system following construction of the box culvert. As indicated in that response, following construction of the box culvert, the system would function as it does currently. Flows would enter the culvert at the eastern end of the airport, and would be conveyed through the culvert to an existing concrete box drain and ultimately through the Argo outfall to the Santa Monica Bay. If it were implemented, the Bureau of Sanitation Stormwater Infiltration and Treatment Facility would divert flows from the Argo Drainage Channel into an underground rainwater storage tank. Flows could be diverted from the channel even if it were converted to a box culvert. Future uses within LAX Northside would not be affected.

The U.S. Army Corps of Engineers (USACOE) does not have oversight over the Argo Drainage Channel, although USACOE has regulatory authority over jurisdictional areas (i.e., waters of the U.S.) associated with the channel and mitigation for impacts. The commentor's footnote citation to the SPAS Draft EIR as the basis for their statement is unverifiable, as there are no such pages (i.e., "pp. 44 and 98.") within the subject document. Please see Responses to Comments SPAS-PC00130-201 and SPAS-PC00130-258 regarding USACOE jurisdiction.

SPAS-PC00149-16

Comment:

Relocation of Lincoln Boulevard: Again the DEIR provides inadequate information for the evaluation of the impact of the runway on the location of Lincoln Blvd. and also for the environmental impacts caused during construction of this heavily used north/south commuter artery in forcing the relocation of traffic onto alternative routes in the local community.

Response:

Please see Topical Response TR-SPAS-LR-1 for a discussion of the Lincoln Boulevard realignment associated with Alternatives 1, 5, and 6.

SPAS-PC00149-17

Comment:

CONCLUSION

We would remind the reader that it was the FAA itself who in 2005 proclaimed that it "considers the airport safe to use today."23 Since then two million dollars and two years were spent on a comprehensive study looking out into the future on 2028 and finding that:

"All things considered, the Panel cannot construct a compelling argument for reconfiguring the North Airfield on safety grounds alone."

As such, the LAX Coastal Area Chamber of Commerce cannot endorse any proposed plan for the realignment or extension of runways on the north airfield at LAX and expresses it's substantial concern that the Draft Environmental Impact Report presented in compliance with CEQA requirements fails to meet the standards set forth therein as a matter of law.

23 FAA Record of Decision for LAX Master Plan Improvements, May 20, 2005, p.41

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Please refer to Response to Comment PC00130-168 regarding the North Airfield Safety Study (NASS) and the opinion of the academic panel involved in that study. The opinion of the academic panel is not shared by the Federal Aviation Administration, the federal agency responsible for the safety of civil aviation. Additional discussion of the NASS and several other safety studies completed for the north airfield is provided in Section 4.7.2 of the SPAS Draft EIR.

The reconfiguration of the north airfield is not based solely on safety, although safety is an important consideration. As described in Section 1.2.1 of the SPAS Draft EIR, SPAS is also designed to provide north airfield improvements that support efficiency. For example, the current north airfield configuration requires non-standard operating procedures, which are not optimal for safety and increase aircraft delay. (See page 1-10 of the SPAS Draft EIR.)

SPAS-PC00150 Marcellus, Terry None Provided 10/10/2012

SPAS-PC00150-1

Comment:

The undersigned has already commented on the SPAS Report and the Draft Environmental Impact Report in the media and as a speaker at the September 27, 2012 Town Hall sponsored by the Neighborhood Council of Westchester Playa. Those comments were in large part to express support for Alternative 2 of the DEIR which would improve airfield efficiency but which would not move the northernmost runway, would not expand outward the perimeter fence of LAX, would not dig up Sepulveda Boulevard, and would not reroute and tunnel Lincoln Boulevard.

As a life-long resident of Westchester, my views are informed by my extensive knowledge of both the history of LAX and the communities adjacent to it. I view it as sheer political and financial folly to even consider a multi-billion dollar runway project that will achieve no significant benefits in either airfield efficiency or safety.

These comments on the DEIR however are not based on my local knowledge or community affiliations. Rather they are written from the perspective of nearly 40 years as an attorney at law and member of the California Bar Association with experience in CEQA/NEPA compliance and infrastructure development.

Knowing to a certainty that protracted litigation will result from a decision to expand LAX and reroute and tunnel Lincoln Blvd., at this time I offer comments on just two issues.

Response:

The comment is noted. Please see Responses to Comments SPAS-PC00150-2 through SPAS-PC00150-4 below.

SPAS-PC00150-2

Comment:

WITHIN ITS FIRST FEW PAGES THE DEIR VIOLATES THE TERMS OF THE SETTLEMENT AGREEMENT AND SHOWS ITSELF TO BE A BAIT AND SWITCH ON THE PLAINTIFFS IN THE LITIGATION AND THE PUBLIC.

Article V, section C of the Settlement Agreement, a binding legal document which was the genesis of the DEIR and the SPAS Report, states:

Upon the completion of the initial phase, LAWA will prepare a proposed LAX Specific Plan Amendment Study and prepare all necessary environmental documents. LAWA will make a good faith effort to complete the LAX Specific Plan Amendment Study Process within 24 months of the commencement date of this second phase. The LAX Specific Plan Amendment Study will, consistent with previous local and federal approvals, identify Specific Plan amendments that plan for the modernization and improvement of LAX in a manner that is designed for a practical capacity of 78.9 million annual

passengers while enhancing safety and security, minimizing environmental impacts on the surrounding communities, and creating conditions that encourage airlines to go to other airports in the region, particularly those owned and operated by LAWA. (Emphasis added).

"Creating conditions that encourage airlines to go to other airports in the region, particularly those owned and operated by LAWA." These words constitute the heart and soul of the Settlement Agreement. Without this specific assurance there would have been no settlement. They are the words relied upon by the community as six years, not 24 months passed, and as doubts grew that the SPAS report would indeed enhance safety and security or minimize environmental impacts on the surrounding communities.

Achieving a regional solution to air traffic in Southern California is the key to equalizing both the benefits and the burdens airports bring to communities. It is vitally important for our region in the event of a natural or man-made disaster impacted LAX. And on 28-lined legal paper, in clear words, it is what LAWA agreed in Court to do.

How did LAWA comply with these terms of the Settlement Agreement? What did LAWA do to fulfill its promise?

In the draft EIR, in clear contempt for the Settlement Agreement and the process which brought it about, LAWA declares its "Project Goal" 3 to be the following:

"Maintain LAX's Position as the Premier International Gateway in Supporting and Advancing the Economic Growth and Vitality of the Los Angeles Region."

What a remarkable transformation of priorities and goals. From a solemn commitment to regionalization of air traffic and constrained growth at LAX, to hucksters hype of a growth agenda at LAX. From a serious recognition of a region's transportation needs, to a chamber of commerce promo.

CEQA/NEPA documents must be consistent with their purpose and need and with the project described. The goal of the entire SPAS effort was to fulfill the requirements of the Settlement Agreement. LAWA has failed to do so. Nowhere in the DEIR or SPAS Report is there discussion of the region's overall air traffic circumstances. There is no discussion of the potential of LAWA-owned Palmdale airport, auspicious located at the hub of future rail transportation lines. There is no discussion of the potential and the reality of Ontario airport which has actually lost a major portion of its traffic in the six years LAWA has spent preparing the SPAS Report and DEIR.

Of the three major areas studied by SPAS, ground transportation, terminal modernization and airfield reconfiguration, the failure of the SPAS document to follow its court-ordered mandate calls into question most directly those airfield changes which would require expanding the fence line of LAX and rerouting Lincoln Blvd. The need to provide public transit to the airport and to modernize the terminals is a reality.

At page 1-2 of the DEIR, LAWA devotes two sentences to the Stipulated Settlement, the document which is the foundation of the entire SPAS effort. While LAWA can devote page after page to a self service discussion of LAX as an economic engine, it introduces the Stipulated Settlement with the back of its hand and an attitude that it is of little current significance. The Court may feel otherwise.

LAWA needs to avoid additional litigation by eliminating the SPAS alternatives that would move the northern runway, concentrate its efforts on ground transportation and terminal modernization thereby creating thousands of long term jobs, and follow the Court order to encourage growth at other airports, particularly those owned by LAWA.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project.

Comments regarding LAWA's compliance with the Stipulated Settlement require legal conclusions that are beyond the scope of what is required by CEQA. However, there is no conflict between regionalization of air travel demand and, at the same time, maintaining LAX's position as the premiere

international gateway for the region, as called for in Project Objective 3. Please refer to Topical Response TR-SPAS-REG-1 regarding the fact that LAWA, through the LAX Master Plan, the SPAS process, and other efforts, supports the regionalization of air travel demand in Southern California. As also described therein, the LAX Specific Plan amendment proposed as part of SPAS further supports such regionalization. The Topical Response also discusses the status of LA/Ontario and Palmdale airports.

SPAS-PC00150-3

Comment:

THE DEIR FAILS TO ACCURATELY STATE THE ENVIRONMENTAL IMPACT OF MOVING THE NORTHERN RUNWAY, EXPANDING THE PERIMETER FENCE OF LAX, DIGGING UP SEPULVEDA BLVD AND REROUTING LINCOLN BLVD.

For many reasons moving the northern runway, expanding the LAX fence outwards, digging up Sepulveda Blvd., and rerouting and tunneling Lincoln Blvd will be a massive public works project. The DEIR consistently fails to recognize or intentionally minimizes the environmental impact both during and after construction of such a project. Each of the major elements of such a project would have significant environmental impacts. Taken together the elements constitute a program that would have environmental impacts far greater than those recognized in the DEIR.

Major project elements include:

- Moving runway 24R/6L. Years ago when LAWA moved the southernmost runway it had a construction cost in excess of half a billion dollars. It uncovered an old runway of which LAWA had no record or knowledge. The proposed move of runway 24R/6L would be between twice as far up to six times as far as the southern runway move.
- Conversion of the Argo Drainage Channel to a box culvert. The Argo Drainage Channel is under the control of the Army Corp of Engineers, and is one of the most important flood control facilities in the region. Taken alone, this project would merit study of the most rigorous level.
- Expanding the perimeter fence of LAX. The last time the perimeter fence of LAX was expanded outwards the communities of Westchester and Playa del Rey lost over 4,000 homes and a significant portion of its business district.
- Excavation of Sepulveda Blvd. and rerouting Lincoln Blvd. The intersection of Sepulveda and Lincoln is one of the busiest and most important intersections in the county of Los Angeles. For LAX traffic, it is the last intersection before which travelers from the north enter the airport. For non-LAX regional traffic it is the only major link between the South Bay and the Westside of Los Angeles. At a time when LAWA has been consistently unaware and surprised about what it finds under its own property which it has owned and operated for decades, this project element will take LAWA far outside its own campus and into an area crisscrossed with crisscrossed with major sewer outfall, oil and gas, fiber optic, and wet and dry utility structures.

The DEIR consistently conceals or uses minimizing language to describe the environmental impact of the Lincoln Blvd. program. In many portions of the DEIR reference is made to the runway move without even mentioning these major project elements.

Just as the DEIR ignores, downplays, and minimizes the terms of the Stipulated Settlement, so also the DEIR ignores, downplays and minimizes the environmental impact both during and after construction of the runway move and Lincoln Blvd. realignment.

DEIR tactics used to minimize the environmental impact of the runway move and Lincoln Blvd. realignment include:

- Simply omitting the fact that the Argo Drainage Channel work, the perimeter fence expansion and the Lincoln and Sepulveda work are necessary in order to move the runway.
- Referring to these very large projects with minimizing language such as mere "modifications".
- Referring to these very large projects as "improvements", a description that is highly debatable and not the job of staff to determine.

Examples of the use of these deceptive tactics are many.

- The realignment of Lincoln is treated as if it were a mere curb-and-gutter job where work can be done in non-peak hours and traffic can be managed by single lane closures. In fact more than a mile of Lincoln Blvd. will be altered and the heavily used intersection of Lincoln and Sepulveda will be completely dug up.
- The extensive work on Sepulveda Blvd. is barely mentioned. In fact Sepulveda Blvd. has for decades been the route under which oil from the Baldwin Hills oilfields is transported to the refineries in the South Bay.
- The heavy impact both during and after construction in terms of noise, vibration, visual impairment, air pollution, and light and glare in the areas immediately adjacent to the airport is obscured by using statistics for the region as a whole. Unbelievably, LAWA makes the assertion that the impact of noise will be reduced by the project.

Response:

The commenter does not provide factual support of substantial evidence for the assertion that the environmental assessment and conclusions reached in the SPAS Draft EIR are inaccurate. Please see Topical Response TR-SPAS-LR-1 for a discussion of the Lincoln Boulevard realignment associated with Alternatives 1, 5, and 6. The environmental impacts of relocating runways within the north airfield, including related projects such as constructing a box culvert in the Argo Drainage Channel and relocating Lincoln Boulevard, are addressed throughout the SPAS Draft EIR. Contrary to the statement by the commentor, the SPAS alternatives would not involve "digging up Sepulveda Boulevard" or "extensive work on Sepulveda Boulevard." As noted in the topical response, the realignment of Lincoln Boulevard would start northwest of the intersection of Lincoln Boulevard and Sepulveda Boulevard. The intersection of Lincoln Boulevard and Sepulveda Boulevard itself would remain in its current configuration; a minor modification to the right turn movement from southbound Sepulveda Boulevard to westbound Lincoln Boulevard may be required. As further noted in the topical response, the SPAS Draft EIR is a programmatic document. Project-level impacts associated with implementation of individual components, including Lincoln Boulevard, will be assessed in future CEQA documents, if Alternatives 1, 5, or 6 are selected for implementation. Specific construction-related impacts to Sepulveda Boulevard would be determined during project-level planning and design.

Please see Response to Comment SPAS-PC00130-904 regarding the abandoned runway that was excavated during construction of the South Airfield Improvement Project.

The SPAS Draft EIR does not omit information about the Argo Drainage Channel. For instance, page 1-14 of the SPAS Draft EIR states that a defining characteristic of the various alternatives is the extent to which the Argo Drainage Channel would have to be modified. Moreover, the Argo Drainage Channel is not under control of the U.S. Army Corps of Engineers (USACOE), although USACOE has regulatory authority over jurisdictional areas associated with the Argo Drainage Channel and mitigation for impacts. Please see Response to Comment SPAS-PC00130-201. Please also see Topical Response TR-SPAS-LR-1 regarding the need for individual SPAS components to undergo project-level environmental analysis prior to implementation.

Please see Topical Response TR-SPAS-LR-1 regarding relocation of the perimeter fence associated with the realignment of Lincoln Boulevard. As noted in the topical response, relocation of the perimeter fence would occur entirely within airport property and would not affect any homes or businesses.

Any impacts associated with noise, transportation, aesthetics, air pollution, and other environmental categories, are discussed throughout the SPAS Draft EIR. Again, commenter does not provide any evidence or facts supporting the contention that the findings are erroneous or were deceptive or intentionally mischaracterized. Please see Response to Comment SPAS-PC00149-2 regarding the SPAS Draft EIR findings relative to aircraft noise impacts on surrounding communities.

SPAS-PC00150-4

Comment:

On the first page of the DEIR it is pointed out that it is a Program Level Environmental Impact Report prepared pursuant to the California Environmental Quality Act. As a result, before a single shovel of dirt

can be tossed (by electeds in hard hats undoubtedly), a full program level Environmental Impact Statement under the National Environmental Protection Act must be prepared and a Record of Decision from the federal government must be obtained.

Approval of these two program level documents is just the opening act to the effort required and the battles that await preparation of a project level EIR/EIS for the runway move, the expansion of the perimeter fence and the realignment and tunneling of Lincoln Blvd. LAWA will then be dealing directly and in infinite detail with such agencies as Caltrans, the Army Corp of Engineers, the Los Angeles Department of Transportation and many, many others. And at the end of this trail lies the Los Angeles Superior Court. Years of expense and uncertainty for both LAWA and the citizens of Los Angeles County lie ahead.

Future passenger traffic at LAX is highly uncertain in view of modest growth and the recent passenger friendly improvements completed at other airports in California. The fate of New Large Aircraft such as the A-380 is questionable at best in view of the clearly emerging preference of airlines for using (and filling) smaller two engine aircraft. Amid these uncertainties, the need to improve ground transportation to LAX and the monetary value of modernizing Terminals 1, 2 and 3 is perfectly clear.

LAWA has one great advantage as it considers moving runway 24R/6L northward. It owns outright the property between the current airfield and Westchester Parkway. That land is not going away. No one else can develop it in conflict with LAWA's future use of the property. It will be as available 20 years from now as it is today.

Money is not hanging off of the rose bushes in the garden next to the Administration Building. LAWA is already engaged in a spending program in excess of $3 billion. At some point the airlines will resist ever higher landing fees at an airport disfavored by the traveling public.

LAWA can safely meet today's air travel demand with its current airfield. LAWA should withdraw from consideration the DEIR alternatives that would move the northern runway. LAWA has received great praise and no community opposition for solving problems at the Tom Bradley International Terminal and the Central Utility Plant. LAWA should continue working to solve today's problems today, and deal with tomorrow's problems tomorrow because tomorrow's problems may never occur.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. The SPAS Draft EIR acknowledges that, depending on the outcome of the SPAS process, FAA would have to complete environmental review of SPAS pursuant to NEPA and issue a Record of Decision (see page 2-75 of Section 2.4.1 of the SPAS Draft EIR). Furthermore, on page 2-74, the SPAS Draft EIR notes that, depending on the outcome of the SPAS process, additional project-level CEQA review may be required for implementation of the improvements associated with the selected SPAS alternative. Other actions and permits anticipated to be required for the project are identified in Section 2.4 of the SPAS Draft EIR, including actions by the U.S. Army Corps of Engineers, Caltrans, and other agencies.

Regarding passenger traffic forecasts, the assumptions in the SPAS Draft EIR are based on a passenger activity forecast and design day flight schedule (DDFS) that was prepared by experts in the field. Development of the LAX Passenger Forecast and DDFS is documented in Appendix F-1 of the Preliminary LAX SPAS Report. Page 1 of Appendix F-1 acknowledges the uncertainty in the forecast, stating that "[b]ecause future conditions are by definition unknown, future activity results may be different from those predicted in the forecast results. Development of DDFSs carries the further uncertainty of airlines responses to changes in operating costs and demand. Therefore, the 2025 DDFS developed from the LAX Passenger Forecast represents a range of possible, but not necessarily actual, future aircraft activity levels." These uncertainties are further spelled out in Section 2.1 of Appendix F-1. The methodology for developing the future fleet mix assumed in the LAX Passenger Forecast and DDFS is explained on page 23 in Section 4.2 of Appendix F-1. Please also see Response to Comment SPAS-PC00130-643 regarding the fleet mix assumptions.

Please see Response to Comment SPAS-PC00096-2 regarding funding for the SPAS improvements.

LAWA is in agreement with the comment that "LAWA can safely meet today's air travel demand with its current airfield." The SPAS Draft EIR does not indicate that current air travel demand cannot be met safely with the current airfield. In fact, page 4-485 of the SPAS Draft EIR states that "[a]viation today is one of the safest forms of public transportation, particularly in the U.S." However, the SPAS Draft EIR identifies a number of safety issues related to the current design of the north airfield, and evaluates the extent to which safety objectives would be met under each alternative. Please also see Response to Comment SPAS-PC00149-2 regarding safety associated with the north airfield as well as a summary of the project objectives other than safety associated with the north airfield improvements.

SPAS-PC00151 Eggers, Craig None Provided 10/10/2012

SPAS-PC00151-1

Comment:

Attached are my comments, questions and thoughts concerning the SPAS EIR, along with other supporting documents.

Please acknowledge receipt of this email.

Response:

The comment is noted. Please see Responses to Comments SPAS-PC00151-2 through SPAS-PC00151-5 below.

SPAS-PC00151-2

Comment:

As a 30-year resident of Westchester Playa del Rey, I support a modern and revitalized LAX. After considering the Specific Plan Amendment Study Draft Environmental Impact Report ("SPAS" or "Study") that details the possible options for improvements at LAX we are excited to support a combination of Alternative 2 and Alternative 9 for the following reasons:

- Combining Alternative 2 and 9 fulfills SPAS goal to have airfield, terminal and transportation improvements.
- Alternatives 2 and 9 are the most affordable design options to ensure that LAX capacity needs are met to protect the economy and tourism.
- Independent evaluators have shown these alternatives to allow for safe operation of all aircraft at LAX.
- The analysis presented in the Study shows that Alternative 2 is superior to all others in airport operational efficiency.
- The analysis also shows that Alternatives 2 is clearly the environmentally superior alternative to the others when air quality and environmental impacts are considered.
- These alternatives will bring $10.5 billion dollars in investment to LAX and the City of Los Angeles.
- The combination of Alternative 2 and 9 provides permanent long-term job opportunities by creating a state-of-the-art passenger facility and transportation system that requires ongoing maintenance and support thus strengthening the Southern California economy.
- Funding for these upgrades will make this the largest project in Los Angeles history.

Knowing that funding sources are limited, we encourage LAWA to invest in the infrastructure that will improve the passenger experience and address the transportation issues that surround LAX. As the first line of welcome to travelers to Los Angeles, I am excited to see improvements made to LAX that will modernize and revitalize the nation's #1 origination-destination and third busiest airport in country. We believe that these alternatives will invest in Los Angeles' economy and build an airport that we can be proud of - that maintains and increases safety, efficiency, and community.

Response:

The content of this comment is similar to comment SPAS-PC00089-1; please refer to Response to Comment SPAS-PC00089-1.

SPAS-PC00151-3

Comment:

Below are a series of summaries and questions that I consider germane to the EIR process and ask that all points raised be addressed in your study results.

Response:

The comment is noted. Please see Responses to Comments SPAS-PC00151-4 and SPAS-PC00151-5 below.

SPAS-PC00151-4

Comment:

Sadly but truly it can be said that one need go no further than Page 1-1 to discern key failings of the Report. Paragraph One, Sentence One of the Report presages LAWA's failure to understanding its place in the city, the county, the region and the world. The sentence reads:

"This Specific Plan Amendment Study (SPAS) Report identifies potential amendments to the LAX Specific Plan that plan for the modernization and improvement of Los Angeles International Airport (LAX) in a manner that is designed for a practical capacity of 78.9 million annual passengers while enhancing safety and security, minimizing environmental impacts on the surrounding communities, and creating conditions that encourage airlines to go to other airports in the region, particularly those owned and operated by Los Angeles World Airports (LAWA)."

This white paper will assess whether the Lincoln Blvd. realignment and tunnel project is consistent with LAWA's mandate to "minimize environmental impacts on the surrounding community," but with respect to "enhancing safety and security," LAWA's documents fail to give a full and complete disclosure of the finding by the distinguished NASA safety panel that LAX is a safe airport in its current airfield configuration.

Similarly, neither the SPAS Report nor the DEIR include a discussion of what LAWA has done to "encourage airlines to go to other airports in the region, particularly those owned and operated by ... LAWA," i.e. Ontario. One would have to google "Free Ontario Airport" to understand LAX's failings at that facility. Indeed, after years of failure to create a viable airport in Palmdale, the SPAS Report and DEIR fail to recognize and discuss its very strategic and advantageous location to the ever-growing rail network in Southern California. Within the next few years the Palmdale Airport will be at the hub of Metrolink commuter rail service, the Desert Express high speed rail line servicing Las Vegas, and the California High Speed Rail running into the California Central Valley. Ontario Airport is similarly well-placed with the Foothill Light Rail Line having a planned station at the airport.

PROGRAM LEVEL VS PROJECT LEVEL EIR ANALYSIS
RE: THE LINCOLN BLVD. TUNNEL PROJECT

INTRODUCTION AND SUMMARY

The SPAS Report and DEIR recently released by LAWA purports to be a Program Level EIR, not a Project Level EIR, despite the fact that numerous specific projects are identified including an automated people mover, consolidated rental car facility, movement of taxiways and runways on the airfield and modernization of terminals.

This white paper is written to examine one of the projects specifically identified in the documents in the context of the Program versus Project Level EIR debate. It is being written to assist members of the community and the community's legal team to locate and understand detail relevant to the issue which is buried within thousands of pages of technical writing.

The specific project considered herein is the realignment of Lincoln Boulevard to accommodate the move northward of the outboard runway of LAX. This project will in effect swing Lincoln Boulevard, California State Route 1, on a wider arc around the airfield, bringing it much closer to homes, businesses, churches, schools and other sensitive uses in the Westchester community. It will also require that Lincoln be depressed below grade into a tunnel of a length which will depend on the extent of the runway move.

This white paper does not undertake to study all aspects of the runway move. A similar white paper could be written about the implications of converting the Argo Trench to a box culvert or the elimination of the old tunnel which still exists under the north airfield.

Three of the alternatives proposed by LAWA would involve extending the perimeter fence of LAX hundreds of feet into the community and realigning and tunneling Lincoln Boulevard, California State Route 1. All would involve realigning and tunneling Lincoln Blvd.

Alt 1 relocates runway 6L/24R, the outboard runway of the north airfield, 260 feet to the north; Alt 5 relocates this runway 350 feet to the north; and Alt 6 relocates this runway 100 feet to the north. Each of these alternatives require that 6080 feet of Lincoln Blvd. be realigned and each would require that it be depressed into a tunnel. In the case Alt 1, the tunnel would be 252 linear feet; Alt 5 would require a 765 foot tunnel; and Alt 6 would require a 540 foot tunnel.

In contrast to Alts 1, 5 and 6, Alternative 2 would not require moving the LAX perimeter fence or realigning and tunneling Lincoln Blvd.

The subject of Program Level versus Project Level EIRs is dealt with the California's CEQA Guidelines. Under the regulations stated therein, a Program Level EIR may be used to adopt a general plan for the conceptual planning of a district or area. It is designed to provide some level of analysis of "future and unspecified development" (CEQA Guideline 15146(b).

In summary, this white paper demonstrates that the realignment and tunneling of Lincoln Blvd. is a specific, tangible, identified project, not a "future and unspecified" project. A high level of technical analysis has been performed on the project, far more than the "conceptual planning" sanctioned by the Guidelines for a Program Level EIR.

The DEIR and SPAS Report analyze the Lincoln Blvd. project in significant detail including its alignment, linear length tunneling and sloping, and its cost. Doing so reveals that a "project", not a "program" is being proposed. Having opened the door of technical analysis, LAWA is obligated to perform the analysis completely and accurately. LAWA cannot escape the effects of faulty, incomplete, misleading and inaccurate analysis by claiming only a "program level" analysis is required.

Simply stated, LAWA cannot have its cake and eat it too. It cannot disclose innocuous or general details and conceal specific details which reveal serious flaws. It cannot calculate and state the costs of a project without including all of the costs. And it cannot identify some of the impacts of the project without revealing all of the impacts.

One does not need to be a civil engineer to discern that if LAWA is able to calculate the exact length of the tunnel required for the realigned Lincoln Blvd., then it must know Lincoln's proposed path including how much closer it will be to residences, businesses, schools, churches and other sensitive uses. It must also know how deep below surface level the tunnel must be placed including the extensive web of oil and gas pipelines, outfall sewers, water, electrical, fiber optic and other subsurface facilities which will have to be identified, located, and relocated as a result of the project. None of these factors are addressed in the DEIR or SPAS Report.

Having clearly revealed that it has taken the Lincoln Boulevard realignment project past conceptual planning and into preliminary engineering, LAWA must be forced by either community outcry or by court decree to treat the outward expansion of the LAX perimeter fence and the realignment and tunneling of Lincoln Boulevard as a project which can only be entitled by means of a project level EIR.

During the scoping phase of the SPAS process, numerous comments were offered asking that the subsurface structures below Lincoln and Sepulveda boulevards be studied. The failure to do so, or the failure to disclose the result of doing so, constitutes a fatal flaw in the DEIR.

A word about the real-world context of this program versus project level debate: Gina Marie Lindsay and other advocates for moving the runway are openly and repeatedly refusing to defer the issue of the movement of the runway to a later time when more is known about LAX's passenger levels and the success or failure of the New Large Aircraft which the runway move is designed to accommodate. They are declaring that no other projects at LAX can be planned or implemented until the location of the runway is established. Clearly, this statement reveals that a program level EIR is simply not what LAWA needs at this time. At this time LAWA needs and should produce a Project Level EIR to move the runways. If LAWA has determined that the runway move and the attendant realignment and tunneling of Lincoln Blvd. is the lynchpin for all other LAWA projects, then it should withdraw the Program Level EIR, isolate the runway/Lincoln Blvd. project, study it thoroughly and circulate a project level DEIR for it.

Response:

Please see Response to Comment SPAS-PC00149-2 regarding the North Airfield Safety Study and Topical Response TR-SPAS-REG-1 regarding regional aviation transportation issues. The remainder of this comment is similar to portions of comment SPAS-PC00130-637. Please see Response to Comment SPAS-PC00130-637 as well as Topical Response TR-SPAS-LR-1 for a discussion of the Lincoln Boulevard realignment associated with Alternatives 1, 5, and 6.

SPAS-PC00151-5

Comment:

Response:

The remainder of this comment letter (see Attachment 5 of this Final EIR) consists of attachments identical to portions of ARSAC's comment package on the SPAS Draft EIR (SPAS-PC00130), the Neighborhood Council of Westchester/Playa's comment letter on the SPAS Draft EIR (SPAS-PC00147), and the LAX Coastal Area Chamber of Commerce's comment letter on the SPAS Draft EIR (SPAS-PC00149). Please see the responses to comment letters SPAS-PC00130, SPAS-PC00147, and SPAS-PC00149. In particular, please see Responses to Comments SPAS-PC00130-47 through SPAS-PC00130-372, SPAS-PC00130-374 through SPAS-PC00130-386, SPAS-PC00130-637, SPAS-PC00130-686, SPAS-PC00130-725 through SPAS-PC00130-728, SPAS-PC00147-1, and SPAS-PC00149-5.

SPAS-PC00152 Shahabi, Karim None Provided 10/10/2012

SPAS-PC00152-1

Comment:

My neighbors of 89th Street and Stanmore would like for LAX to adopt a combination of Alternatives 2 and 9 and NOT move the north runway further north into our neighborhoods.

Response:

The commentor's support for Alternatives 2 and 9 is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Chapter 2 of this Final EIR regarding the LAWA Staff-Recommended Alternative, which couples the airfield and terminal improvements associated with Alternative 1 with the ground access components associated with Alternative 9, including a discussion of the rationale behind the selection of these alternatives over the other alternatives evaluated in the SPAS Draft EIR.

SPAS-PC00152-2

Comment:

Why is there an assumption that the airport has to allow those new Airbus mega-jetliners landing and taking off even closer to our homes. Your plan to move the runway north and allow bigger planes to use them, will create a more unbearable situation for the residents of Westchester and Playa Del Rey.

If you bring the runway closer to Westchester/Playa Del Rey there will be a tremendous amount of noise pollution thrust upon these communities. Moreover, with this extension northward of the runway toward Westchester/Playa Del Rey, this northernmost runway will be able to accommodate those GIANT Airbus airplanes which make even more noise than regular airplanes.

Thus, by adopting any Alternative that moves the runway north, you will make the family oriented communities of Westchester and Playa Del Rey unbearable due to the foreseeable excessive runway noise.

Another concern is that if you move the runway further north there will be irreparable damage done to Neilson Park. Neilson Park is a family focus in our Westchester/Playa communities. Our children play soccer and baseball there all week long. It's one of our community's many gems. As it stands the planes descend over the edge of the park. Moving the runway north ANY NUMBER OF FEET will have devastating effects on our park. Rather than descending on the southern edge of the park, as currently is the case, planes will, with a northward move of the runway, now be flying at a low altitude directly OVERHEAD. This will have devastating effects for this park as it will not only be intimidating to have planes descend directly overhead but also be deafening for the children and the adults having the jets descend so close to our children and families. The park will be ruined and parents won't let their kids play there for health reasons. The Westchester/Playa Del Rey Little League Baseball and AYSO Youth Soccer programs will be decimated all because of your decision to move the runway further north. Please don't do it.

Please make the right choice and be the good neighbor that you've promised to be and do not move any runways north closer to our communities of Westchester and Playa Del Rey. Don't further encroach on our communities and make them less livable than they already. Take care of the communities, Westchester and Playa Del Rey, which have taken care of LAX.

Response:

A discussion of project impacts resulting from aircraft noise under Alternatives 1 through 7 is provided in Sections 4.9.6 and 4.10.1.6 of the SPAS Draft EIR. As analyzed therein, under Alternatives 1 through 7, some areas within Westchester and Playa del Rey (including areas near 89th Street and Stanmoor Drive) would be newly exposed to noise levels of 65 CNEL or higher, increases of 1.5 CNEL or higher within the 65 CNEL or higher noise contours.

Regarding the commentor's statement "why is there an assumption that the airport has to allow those new Airbus mega-jetliners landing and taking off even closer to our homes," note that LAWA does not have control over which aircraft operate at LAX. The make and model of aircraft operating at LAX are dictated by the aircraft operators.

To an extent, through LAWA's Aircraft Noise Abatement Program and updates to elements of the Aircraft Noise Abatement Program under LAX Master Plan Commitment N-1 and LAX Master Plan Mitigation Measure MM-N-4, as well as LAWA's Preferential Runway Use policy (SPAS Draft EIR Section 4.10.1.5), LAWA is able to implement some mitigation controls over aircraft activity, but not over which aircraft are being operated.

It is assumed that the commentor is referring to the Airbus A380 with the statements "Airbus mega-jetliners" and "giant Airbus airplanes." The commentor's statement that the Airbus A380s "make even more noise than regular airplanes" is incorrect. According to Airbus Industries and as reflected in the parameters of the Integrated Noise Model (INM) used for the SPAS Draft EIR aircraft noise modeling, the Airbus A380 produces "half the noise energy when taking off" and "three to four times less noise energy when landing" when compared to a Boeing 747-400.1 Through enhanced engine acoustic

treatment and optimized wing design, the Airbus A380 has been recognized by the airport and airline industry for its quietness, both inside and outside the aircraft, when compared to similar wide-body aircraft.

As of today, and as simulated under the SPAS Draft EIR aircraft noise modeling for future conditions, when operating on the north airfield, an Airbus A380 only uses Runway 6L/24R (the runway the closest to the communities of Westchester and Playa Del Rey) for landing and never for taking off, because Runway 6L/24R does not provide enough departure length for the Airbus A380. In general terms, an aircraft is louder during takeoff than it is during landing. Three SPAS alternatives include the northerly relocation of Runway 6L/24R: Alternative 1 (260 feet north), Alternative 5 (350 feet north) and Alternative 6 (100 feet north). Under these three SPAS alternatives, the take-off length of the relocated Runway 6L/24R would remain the same as the current runway take-off length, precluding an A380 from taking off on this runway. Please refer to Response to Comment SPAS-AL00008-30 regarding the numbers of arrivals and departures modeled under the SPAS Draft EIR aircraft noise analyses. It should be noted that airport-related noise impacts in the Playa del Rey area are primarily from aircraft that are departing from, or approaching (under "east flow" conditions when aircraft arrive from the west and land towards the east), the north airfield. Such aircraft are typically several hundred feet up in the air when passing by Playa del Rey.

Please see Responses to Comments SPAS-PC00130-794 and SPAS-PC00130-469 regarding air quality and noise impacts on Nielson Park.

1. Airbus Industries, A380 New generation, new experience, Available: http://www.airbus.com/aircraftfamilies/passengeraircraft/a380family/environment/noise/, accessed November 29, 2012.

SPAS-PC00153 Acherman, Robert ARSAC 10/10/2012

SPAS-PC00153-1

Comment:

ARSAC STATEMENT ON LAX SPECIFIC PLAN AMENDMENT STUDY
DRAFTENVIRONMENTAL IMPACT REPORT

ARSAC, the Alliance for a Regional Solution to Airport Congestion, reaffirms its opposition to moving the north runway, 24 Right, closer to the communities of Westchester/Playa del Rey.

"Moving Runway 24 Right closer to homes and businesses is unsafe, unnecessary, unacceptable and probably illegal under the Stipulated Settlement Agreement" said Denny Schneider, President of ARSAC. "We will vigorously fight efforts to move the runway to the north, especially when there are better alternatives available to increase safety, security and passenger convenience that would not require destroying homes and businesses in Westchester/Playa del Rey. Furthermore, any movement of the runway to the north will permanently alter flight patterns over Southern California, newly exposing millions of residents to aircraft noise, pollution and safety issues who have not been impacted by LAX operations in the past. If necessary, we will go back to court to protect our communities and to force LAX to reconsider other runway configurations which do not move aircraft closer to Westchester/Playa del Rey."

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project.

SPAS alternatives that would move Runway 6L/24R northward are not "illegal under the Stipulated Settlement Agreement." The Stipulated Settlement requires LAWA to, among other things, study potential alternative designs, technologies, and configurations for the LAX Master Plan Program that would provide solutions to the problems that the Yellow Light Projects were designed to address,

consistent with a practical capacity of LAX at 78.9 MAP. The Stipulated Settlement does not preclude study of configurations that include northward runway movements. LAWA has carefully considered a wide range of alternative designs during the SPAS process, as documented in Chapter 5 of the Preliminary LAX SPAS Report. The SPAS process and preparation of the SPAS Draft EIR have been conducted in accordance with the Stipulated Settlement, as described in Section 1.1.2 of the SPAS Draft EIR and reflected throughout the main text and appendices of the Preliminary LAX SPAS Report.

Please see Responses to Comments SPAS-PC00130-736, 800, 814, 815, 816, 843, 848, 849, and 969 which address alternatives suggested by ARSAC.

As noted in Response to Comment SPAS-PC00130-931, no acquisition of residences or businesses is proposed within Westchester or Playa del Rey. Please see Response to Comment SPAS-PC00149-2 regarding safety related to the north airfield and the SPAS Draft EIR findings relative to aircraft noise impacts on surrounding communities. The statement by the commentor that "any movement of the runway to the north will…newly expose millions of residents to aircraft noise…" is not accurate. As discussed in Response to Comment SPAS-PC00149-2, there would, in general, be fewer residential units exposed to 65 CNEL by moving Runway 6L/24R northward (Alternatives 1, 5, and 6) than would occur in moving 6R/24L southward (Alternatives 3 and 7) or not moving either runway (Alternatives 2 and 4), and the total residential population newly exposed to 65 CNEL would be lowest under Alternative 5 (i.e., relocate Runway 6L/24R 350 feet northward) than under any other alternative. Relative to a 1.5 CNEL increase above 65 CNEL, which includes areas currently exposed to >65 CNEL, the total residential units and residential population exposed to such an increase is consistently higher for alternatives that move Runway 6R/24L southward (Alternatives 3 and 7) or do not move the runways (Alternatives 2 and 4). These differences in the numbers of homes and people being exposed to aircraft noise impacts--specifically, that total overall aircraft noise impacts would be lower with alternatives that move Runway 6L/24R northward--are due to the fact that the land use/development intensities in areas to the east, southeast, and south are higher than in the areas north of the airport. That is, although more homes to the north of the airport would be impacted by noise with a northward move of Runway 6L/24R, an even greater number of homes to the east, southeast, and south of the airport would no longer be impacted by noise, resulting in an overall decrease in the numbers of homes and people exposed to aircraft noise impacts.

Regarding air quality, as indicated in Section 4.2 of the SPAS Draft EIR, even after mitigation, construction activities would result in significant and unavoidable air quality impacts under all of the alternatives. Specifically, under all of the alternatives except for Alternative 4, construction emissions of carbon monoxide (CO), volatile organic compounds (VOC), oxides of nitrogen (NOx), particulate matter with an equivalent aerodynamic diameter of 10 micrometers (PM10), and particulate matter with an equivalent aerodynamic diameter of 2.5 micrometers (PM2.5) would be significant and unavoidable. Under Alternative 4, significant and unavoidable construction emissions would occur for NOx and PM10. Under all of the alternatives, even after mitigation, construction-related concentrations of nitrogen dioxide (NO2) and PM10 would be significant and unavoidable.

Operation of the airport would also result in significant and unavoidable impacts to air quality. Even after mitigation, operational emissions of sulfur dioxide (SO2), PM10, and PM2.5 would be significant and unavoidable under all of the alternatives. Operational concentrations of NO2, PM10, and PM2.5 would also be significant and unavoidable under all of the alternatives.

SPAS-PC00153-2

Comment:

Schneider continued, "We all want an airport that we can proud of, but it does not mean that LAX adjacent communities have to be sacrificed for the greater good. When the north runway was built in the late 1960's, thousands of Westchester/Playa del Rey residents lost their homes. In addition, many businesses were dislocated from the Westchester Central Business District along Sepulveda Boulevard. It took more than 25 years for the business district to recover from the decimation of the community by LAX expansion. LAX officials promised then that future airport expansion would occur in Palmdale. LAX officials have reneged on their promises. We will hold them to their promises this time."

ARSAC supports a safe, secure and convenient LAX which does not expand into the surrounding communities. ARSAC also strongly backs expanding capacity at Palmdale and Ontario airports to meet Southern California's air capacity needs.

Response:

The commentor's opposition to expanding LAX is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project.

Regarding expansion into surrounding communities, Section 2.3.1.11 of the SPAS Draft EIR delineates the properties proposed to be acquired in conjunction with each of the SPAS alternatives. Those properties are located east of the airport and primarily involve existing airport-related uses. Regarding the role of LA/Ontario International Airport, Palmdale Regional Airport, and other airports in the region for meeting future air travel demands in Southern California, please see Topical Response TR-SPAS-REG-1.

SPAS-PC00153-3

Comment:

As a part of the EIR process, ARSAC submitted several runway, taxiway, terminal and ground access concepts that can transform LAX into a world-class airport without expanding into the surrounding communities. These concepts can be seen on ARSAC's website at www.regionalsolution.org. "We strongly encourage LAX officials and expansion proponents to study and champion our ideas to avoid costly and time-consuming litigation." Schneider concluded.

Response:

The concepts suggested by ARSAC are addressed in the responses to comments contained in comment letter SPAS-PC00130; see in particular Responses to Comments SPAS-PC00130-736, -800, -814, -815, -816, -843, -848, -849, -969, -1022, and -1033.

SPAS-PC00153-4

Comment:

ARSAC is a grass roots organization formed in 1995. ARSAC's mission is to establish a powerful, unified voice of elected officials and business and community leaders to promote a regional solution to the future commercial aviation demands of the entire Southern California region.

*This statement is one day ahead of the anticipated LAWA release of the DEIR and SPAS costing report on Friday, July 27. We have not seen the draft EIR.

Response:

The information concerning the mission of ARSAC is noted. The comment that the press release was published one day prior to the release of the SPAS Draft EIR is also noted. The comment will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

The SPAS Draft EIR was released on July 27, 2012. Electronic and hard copies of the SPAS Draft EIR and Preliminary LAX SPAS Report were provided to ARSAC on this release date.

SPAS-PC00153-5

Comment:

"Moving Runway 24 Right closer to homes and businesses is unsafe, unnecessary, unacceptable and probably illegal under the Stipulated Settlement Agreement" said Denny Schneider, President of ARSAC. "We will vigorously fight efforts to move the runway to the north, especially when there are

better alternatives available to increase safety, security and passenger convenience that would not require destroying homes and businesses in Westchester/Playa del Rey. Furthermore, any movement of the runway to the north will permanently alter flight patterns over Southern California, newly exposing millions of residents to aircraft noise, pollution and safety issues who have not been impacted by LAX operations in the past. If necessary, we will go back to court to protect our communities and to force LAX to reconsider other runway configurations which do not move aircraft closer to Westchester/Playa del Rey."

Schneider continued, "We all want an airport that we can proud of, but it does not mean that LAX adjacent communities have to be sacrificed for the greater good. When the north runway was built in the late 1960's, thousands of Westchester/Playa del Rey residents lost their homes. In addition, many businesses were dislocated from the Westchester Central Business District along Sepulveda Boulevard. It took more than 25 years for the business district to recover from the decimation of the community by LAX expansion. LAX officials promised then that future airport expansion would occur in Palmdale. LAX officials have reneged on their promises. We will hold them to their promises this time.

ARSAC supports a safe, secure and convenient LAX which does not expand into the surrounding communities. ARSAC also strongly backs expanding capacity at Palmdale and Ontario airports to meet Southern California's air capacity needs. As a part of the EIR process, ARSAC submitted several runway, taxiway, terminal and ground access concepts that can transform LAX into a world-class airport without expanding into the surrounding communities. These concepts can be seen on ARSAC's website at www.reqionalsolution.org. "We strongly encourage LAX officials and expansion proponents to study and champion our ideas to avoid costly and time-consuming litigation." Schneider concluded.

ARSAC is a grass roots organization formed in 1995. ARSAC's mission is to establish a powerful, unified voice of elected officials and business and community leaders to promote a regional solution to the future commercial aviation demands of the entire Southern California region.

*This statement is one day ahead of the anticipated LAWA release of the DEIR and SPAS costing report on Friday, July 27. We have not seen the draft EIR.

Response:

The content of this comment is essentially the same as comments SPAS-PC00153-1 through SPAS-PC00153-4 above; please refer to Responses to Comments SPAS-PC00153-1 through SPAS-PC00153-4 above.

SPAS-PC00154 Clarke, Darrell Sierra Club Angeles Chapter 10/10/2012

SPAS-PC00154-1

Comment:

The Sierra Club Angeles Chapter Transportation Committee is submitting the following comments on the Specific Plan Amendment Study Draft EIR, primarily about ground access to LAX. Good mass transit access to LAX is critical to its future functionality and will require close planning coordination between Los Angeles World Airports and Metro.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Topical Response TR-SPAS-T-1 regarding transit options to LAX, including coordination efforts between LAWA and Metro.

SPAS-PC00154-2

Comment:

Automated People Mover

* Considering that LAX is one of the busiest airports in the U.S. and sees itself competing on passenger amenities with other major U.S. airport hubs, it is absurd to consider the 1970s-era concept of buses looping the Central Terminal Area as competitive with the Automated People Mover (APM) systems installed at most other major airports. California's second-busiest, SFO, is a close model of an APM with stations at each of its three domestic terminals as well as two international terminals, BART, and the rental car facility.

* An APM should have at least two stations (not one) on each side plus the international terminal -if not a station for each terminal, like the current buses do.

Response:

SPAS Alternatives 3 and 9 include an APM system into the CTA. The commentor's suggestions regarding the number and locations of APM stations is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Should a SPAS alternative including an APM be selected for implementation, the number and locations of APM stations would be determined during detailed engineering and project-specific CEQA review. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00154-3

Comment:

* No discussion at the planning level has been made of vertical and horizontal circulation within the airport terminals via pedways and horizontal escalators to connect travelers and their luggage from the mass transit stations into the airport terminals.

Response:

Detailed information related to project-specific terminal improvements, including vertical and horizontal passenger circulation via pedestrian walkways and escalators, or the conveyance of passenger luggage from transit stations, would be developed during detailed engineering and project-specific CEQA review should a SPAS alternative be selected for implementation. Such details would be evaluated in a project-level EIR for the appropriate terminal or transit improvement project. Projects such as the Automated People Mover (APM) system described on page 8 in Section 5.1 in Appendix E2-2 of the Preliminary LAX SPAS Report suggest dedicated pedestrian walkways may be constructed to connect APM stations in the CTA to individual unit terminals, as well as a connection between the future Metro Crenshaw/LAX and Green Line Station to an adjacent APM station.

SPAS-PC00154-4

Comment:

* Routing of an APM should include interface with a potential future Metro rail branch line up the I-405 or Lincoln corridor. A station in the Lot C area would save people arriving on this coastal route from going out of their way to Aviation Boulevard and retracing to LAX.

Response:

Please see Topical Response TR-SPAS-T-1 regarding transit options into LAX, including interface with the future transit station at Aviation and Century Boulevards associated with the Crenshaw/LAX Transit Corridor, which parallels the I-405 corridor in the vicinity of LAX. Metro is not currently planning a rail line on the Lincoln corridor. However, the passenger conveyance systems in Alternatives 1, 2, 8 and 9 include a stop at the proposed Intermodal Transportation Facility (ITF) along 98th Street, while Alternative 3 includes a stop at the proposed Consolidated Rent-A-Car facility also along 98th Street. These stops could serve as a connection point between the airport conveyance system and a future Metro rail line serving the Lincoln corridor.

SPAS-PC00154-5

Comment:

* Operating costs of an APM must be compared with operating costs of the bus / BRT proposals, not just capital costs, for a complete financial analysis.

Response:

Please see Response to Comment SPAS-PC00130-730 regarding the treatment of economic conditions in an EIR. CEQA does not require an analysis of project-related construction or operating costs. (CEQA Guidelines Section 15131; Pub. Resources Code Section 21068.)

SPAS-PC00154-6

Comment:

* The costs and benefits of operations/infrastructure sharing between agencies similar to airline operation code-sharing between airlines is precedent for funding ground transportation like APM or LRT.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)). As identified in the SPAS Draft EIR, several alternatives include development of an APM system to assist with ground transportation. (See Section 2.3 of the SPAS Draft EIR.) The funding for such development is discussed in Chapter 8 of the Preliminary LAX SPAS Report. LAWA does not have unlimited discretion to spend all funds assumed for the construction of the alternatives, as some funds are encumbered by federal agencies. For example, funds dispersed pursuant to the Airport Improvement Program and Passenger Facility Charge are limited to certain types of uses identified by the FAA. Therefore, the ability of LAWA to fund certain projects is subject to LAWA's ability to use airport revenue to the extent permissible under federal law and policies, or to develop other state or federal funding sources. Please see Response to Comment SPAS-PC00130-429 for a discussion of the types of funds assumed in the Preliminary LAX SPAS Report.

SPAS-PC00154-7

Comment:

Traffic Measurement

* Current mode share (drive, transit, etc.) of both LAX passengers and employees should be documented and compared with similar major airports.

Response:

As stated in Section 4.12.2 of the SPAS Draft EIR, the current (2010) mode share for the airport was developed based on current and historic data in the Los Angeles International Airport 2006 Air Passenger Survey on the mode of access to LAX.

From a CEQA perspective, it is not necessary to break down baseline traffic into individual types of vehicles (i.e., mode share). As discussed under State CEQA Guidelines Section 15125(a), "the description of the environmental setting shall be no longer than is necessary to an understanding of the significant effects of the proposed project and its alternatives." The mode share for on airport baseline traffic operations is nevertheless provided in Table 4.12.1-5. The mode share for off-airport traffic is included in the baseline conditions described in Section 4.12.2.3 and discussed on page 4-1200. As described in Sections 4.12.1.3.12 and 4.12.2.2.2 the traffic models were calibrated and validated

against existing traffic conditions. The comment is requesting a comparison of LAX current mode share with similar major airports is noted; however, such a comparison would not provide meaningful information to the public and decision-makers relative to selecting one of the SPAS alternatives for approval, nor is this information required by CEQA. The trip generation and passenger travel mode shares of major airports are particular not only to the air passenger characteristics of each airport (i.e., major airports with comparable numbers of million annual passengers [MAP] can have very different vehicle trip generation depending on the split of connecting flights versus origin and destination flights; transport mode choices can vary substantially depending on relative proportions of business travelers versus pleasure travelers, etc.), but, more importantly, are strongly influenced by local and regional traffic conditions as well as the transit characteristics specific to each airport's local setting. For example, both LAX and JFK International Airport are major airports, but have very different public transit facilities in the local area. In short, such a comparison is not relevant to the analysis presented in the SPAS Draft EIR.

SPAS-PC00154-8

Comment:

* How is traffic in the Central Terminal Area loop measured? The stated LOS "B" sounds like an average of light times with jammed times, not a true measure of peak periods.

Response:

As discussed in Section 4.12.1.1 of the SPAS Draft EIR, traffic operations within the Central Terminal Area (CTA) roadway were evaluated based on three types of facilities: curbsides, roadways, and intersections. Terminal area curbsides are evaluated based on a curbside utilization factor which is a measure of the curbside demand in linear feet divided by the available curb length. The utilization factor provides an indication of the amount of double and triple parking that would result for a given space demand, and the Level of Service (LOS) associated with a given utilization rate recognizes that drivers do not park vehicles uniformly along the curbside.

The commentor is referred to Section 4.12.1.2 which provides a detailed discussion for the on-airport transportation analysis methodology. As indicated on page 4-1050 in Section 4.12.1.2.3 of the SPAS Draft EIR, CTA intersection LOS were estimated using the Critical Movement Analysis (CMA) planning level methodology as defined in Transportation Research Board Circular 212, in accordance with LADOT Traffic Studies Policies and Procedures guidelines, and the L.A. CEQA Thresholds Guide. The intersection at the exit point in the CTA adjacent to Terminal 8 on the lower level is a five legged intersection with Center Way and World Way South. The Circular 212 method does not provide for the analysis of five legged intersections; therefore, the LOS for this intersection was determined using Synchro 7 which calculates the LOS at the intersections by measuring the control delay at each leg of the intersection, then calculates the volume to capacity ratio and corresponding LOS.

CTA roadway LOS values for key roadway links within the CTA were prepared by calculating the ratio of roadway volume to capacity. The model used to evaluate curbside performance includes a tool for evaluating the throughput performance of the roadway lanes adjacent to the curbside. For this analysis, vehicle congestion created by stopped vehicles at the adjacent curbside is accounted for when evaluating the impacts on the roadway's throughput capacity.

A detailed description of how traffic conditions on each of the three facilities (curbsides, roadways, and intersections) were evaluated is provided in Section 4.12.1.3.13 on page 4-1074 of the SPAS Draft EIR. The analyses of the CTA departures and arrivals level roadways were conducted for each level's peak hour activity. As stated on page 4-1078 of the SPAS Draft EIR, individual terminals may experience spikes in arriving passenger traffic during other periods of the day which do not coincide with either the arrivals, departures or overall airport peak periods. Spikes at individual terminals not coinciding with peak hours could result in lower LOS values; however, these time periods were not included in this analysis.

SPAS-PC00154-9

Comment:

* There are a number of simple low-cost fixes to improve pedestrian and vehicle movements that should also be explored.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project.

The commentor states that "there are a number of simple low-cost fixes to improve pedestrian and vehicle movements that should also be explored." However, the commentor did not identify these low-cost improvements.

As discussed in Section 1.2.1 on page 1-11 of the SPAS Draft EIR, one of the objectives of the SPAS improvements is to improve traffic flows and pedestrian movements inside the Central Terminal Area (CTA).

SPAS-PC00155 Dillard, Joyce None Provided 10/10/2012

SPAS-PC00155-1

Comment:

In Biological Resources 5.5.3 you mention that Ballona is mitigated to a "level less than significant by an extensive restoration program."

With that, do you refer to the US Army Corps of Engineers and the California Department of Fish and Game Joint Draft EIS/EIR for Ballona Wetlands Restoration Project?

Your use of the word "were" means past tense.

What are the impacts of the different alternatives on this current Draft EIS/EIR?

Response:

Section 5.5.3 of the SPAS Draft EIR identifies existing biological resources in the cumulative impacts study area, including the Ballona Wetlands, which is no longer a part of the Playa Vista project, as well as degraded wetlands in the Playa Vista Planning Area. The reference to an extensive habitat restoration program refers to wetlands restoration associated with the Playa Vista project, which has been completed.

The SPAS Draft EIR does not address cumulative impacts associated with the proposed Ballona Wetlands Restoration Project, which will be the subject of environmental review by the U.S. Army Corps of Engineers (USACOE) and California Department of Fish and Game (CDFG). A public scoping meeting for the Ballona Wetlands Restoration Project Draft EIS/EIR was held on August 16, 2012.1 The SPAS Draft EIR was released on July 27, 2012, prior to the public scoping meeting for the Ballona Wetlands Restoration Project. The Ballona Wetlands Restoration Project is at a preliminary conceptual stage and, as such, the scope of the project has not been finalized and the Draft EIS/EIR has not yet been prepared. The Ballona Wetlands Restoration Project Draft EIS/EIR will evaluate cumulative impacts on biological resources, including cumulative impacts associated with the LAX SPAS project, if any. It is anticipated that future construction of the proposed Ballona Wetlands Restoration Project would result in beneficial impacts to aquatic resources in the vicinity of LAX, and thus would not alter the cumulative impacts analysis presented in Section 5.5.3 of the SPAS Draft EIR.

As stated in Section 5.5.3 of the SPAS Draft EIR, cumulative impacts to aquatic features subject to the jurisdiction of the USACOE and CDFG associated with Alternatives 1, 5, and 6 are considered significant. This finding of significance is based upon the historic loss of jurisdictional aquatic features in the LAX vicinity, including at Playa Vista. With implementation of mitigation described in Section 4.3 of the SPAS Draft EIR (MM-BIO (SPAS)-13), the contribution of SPAS Alternatives 1, 5, and 6 to this significant cumulative impact would not be cumulatively considerable. The other SPAS alternatives would not have any contribution to cumulative impacts on jurisdictional aquatic features.

1. California Department of Fish and Game, Ballona Wetlands Restoration Project Under Way With Public Input, Available: http://cdfgnews.wordpress.com/2012/08/01/ballona-wetlands-restoration-project-under-way-with-public-input/, accessed October 21, 2012.

SPAS-PC00155-2

Comment:

The El Segundo butterfly may be affected by the proposal for the use of 600,000 cubic feet of off-shore beach sand at Dockweiler State Beach for City of Malibu's Beach Replenishment Program.

How would this affect your alternatives?

Response:

The proposal for the use of 600,000 cubic feet of off-shore beach sand at Dockweiler State Beach for the City of Malibu's Beach Replenishment Program would not reasonably be expected to affect the restored dune habitat for El Segundo blue butterfly at the Dockweiler Beach habitat restoration area, as the sand would be dredged off-shore and would not affect the immediate nearshore and upland portions of the beach. The proposed Dockweiler Beach sand source is located approximately 0.5 mile offshore, outside the surf zone, at a depth of 40 - 45 feet. An alternative onshore sand source in Ventura County is also under consideration.1 It should be noted that the proposal to utilize off-shore beach sand at Dockweiler State Beach is preliminary, as the proposal was brought before the City of Los Angeles Department of Recreation and Parks Facility Repair and Maintenance Commission Task Force on October 3, 2012.2 Any environmental review that may have been conducted for the proposal has not yet been publicly released.

As the proposal to dredge sand off-shore of Dockweiler State Beach is not expected to affect El Segundo blue butterfly or its dune habitat, it is not relevant to the cumulative analysis of the SPAS alternatives.

1. Analysis of Impacts to Public Trust Resources and Values for the Broad Beach Restoration Project, October 2012, Available: http://www.slc.ca.gov/Division_Pages/DEPM/DEPM_Programs_and_Reports/Broad_Beach/PDF/BB-APTR__NOPR.pdf, accessed October 24, 2012; See http://www.slc.ca.gov/division_pages/DEPM/DEPM_Programs_and_Reports/Broad_Beach/PDF/BB-APTR_Section-3-01_Coastal-Processes.pdf, p.3.1-24, accessed December 26, 2012.
2. Agenda, City of Los Angeles Department of Recreation and Parks Facility Repair and Maintenance Commission Task Force, October 3, 2012, Available: http://ens.lacity.org/rap/frtf_agendas/rapfrtf_agendas324279001_10032012.pdf, accessed October 21, 2012.

SPAS-PC00155-3

Comment:

For the Hydrology issues, how does mitigation for the TMDLs Total Daily Maximum Load pollutants in the watersheds affect the Proposition O capital project?

Storm drain improvements will reduce TMDLs by what amount.

How is the Operations and Maintenance budget being addressed for this?

How will the alternatives affect Beneficial Uses of the Basin Plan?

What is the testing and analysis timeline for water quality?

Response:

The primary goal of the City of Los Angeles Bureau of Sanitation (BOS) Stormwater Infiltration and Treatment Facility project, consistent with all Proposition O projects undertaken by the City, is to reduce pollutants in urban runoff to help meet the City's TMDL obligations, in this case, those for Santa Monica Bay. Mitigation of water quality impacts associated with the SPAS alternatives would not affect the proposed BOS facility, although the goals would be complementary. By implementing Mitigation Measure MM-HWQ (SPAS)-1, set forth in Section 4.8.7 of the SPAS Draft EIR, LAWA would revise and update the Conceptual Drainage Plan (CDP) to address the selected alternative. Based on the updated CDP, LAWA would implement all identified BMPs to prevent a net increase in pollutant discharges to surface waters resulting from the overall LAX Master Plan improvements including if/as modified by the selected SPAS alternative. By preventing an increase in pollutant loads, the SPAS activities would not contribute any new load of pollutants covered by the TMDLs. Implementation of the BOS Stormwater Infiltration and Treatment Facility project would similarly reduce existing pollutant loads from urban runoff. That project, while on airport property, is independent of SPAS as indicated on page 5-22 of the SPAS Draft EIR.

Operations and maintenance of all LAWA facilities and activities at LAX are funded by airport revenues. This includes the operation and maintenance of all BMPs.

The Beneficial Uses of any water body in the Los Angeles Region are established in the Basin Plan, together with appropriate numerical and narrative water quality objectives to protect the Beneficial Uses. The Regional Water Quality Control Board uses a number of implementation measures to help maintain receiving water quality at or below the objectives. When waters consistently exceed any objective, the Regional Board adopts a TMDL to identify additional specific actions that must be implemented to achieve the objectives. By implementing the identified water quality improvements in the CDP, and implementing its SWPPP, LAWA's actions would meet its obligations under the TMDLs.

There are a number of testing and analysis programs in the area carried out by several agencies in response to Municipal Stormwater Permit and TMDL requirements. LAWA specifically has monitoring requirements identified in its SWPPP that it routinely implements.1

1. City of Los Angeles, Los Angeles World Airports, Los Angeles International Airport Storm Water Pollution Prevention Plan, September 2011.

SPAS-PC00156 Cope, Danna None Provided 10/10/2012

SPAS-PC00156-1

Comment:

Below are some additional comments on the document:

The DEIR fails to address the stipulations of the agreement following the lawsuit. Under these stipulations, LAWA agreed to accomplish several projects, such as:

- Green Light Projects, e.g., the Consolidated Car Rental Facility (even the location is still undecided)

- Establishing eight new Flyaway Bus lines (only two new Flyaway lines have been established)

I fervently hope that the next lawsuit (if one is necessary due to LAWA ignoring or inadequately addressing concerns raised about the DEIR) will result in court orders, not a stipulated agreement which LAWA has chosen to ignore.

Response:

LAWA has not "chosen to ignore" the Stipulated Settlement's terms related to a CONRAC and the FlyAway program. However, comments regarding LAWA's compliance with the Stipulated Settlement require legal conclusions that are beyond the scope of what is required by CEQA. Please see Response to Comment SPAS-PC00130-443 regarding the fact that LAWA had been independently advancing the planning and consideration of a CONRAC at LAX; however, the formulation of concept options for overall ground transportation system improvements at LAX, as part of SPAS, provided the basis for further evaluation of the need for, and location of, a CONRAC at LAX.

Please see Response to Comment SPAS-PC00130-957 regarding LAWA's FlyAway program and progress towards establishing additional new stations.

SPAS-PC00156-2

Comment:

It is truly regretible that LAWA does not realize and seize the opportunity it has right now to build Ontario (and/or Palmdale) into an airport that could handle air traffic without having a hugely detrimental effect on established residential communities so close to runways.

The DEIR does mention expanding other airports (especially those owned by LAWA), but postpones such development until LAX reaches 75 MAP. By that time, the opportunities that now exist at other sites will have evaporated, and we would all be stuck with a woefully inadequate and unsafe airport (LAX) which would clog the surface traffic for miles while it tries to handle far too much of the greater LA basin's air traffic. The stipulated agreement stated that LAWA should focus on regionalization, but did not give LAWA an extended time to do so.

Thank you.

Response:

Please see Topical Response TR-SPAS-REG-1 regarding the role of LA/Ontario International Airport, Palmdale Regional Airport, and other airports in the region for meeting future air travel demands in Southern California. The comment provides no facts or evidence supporting the assertion that expansion opportunities that now exist at other airports will no longer exist when LAX reaches its practical capacity.

SPAS-PC00157 Huth, Hans None Provided 10/10/2012

SPAS-PC00157-1

Comment:

Thank you for this opportunity to submit comments on the Specific Plan Amendment Study Draft Environmental Impact Report (SPAS DEIR). Please note that the DEIR is over 12,000 pages long, for which the public has been given less than three months to review. At three months, a comprehensive review would require reviewing over 4000 pages per month. On this note, I would appreciate the review period for the DEIR being extended to next year, so that adjacent communities have a fair opportunity to consider the full impact of the proposed alternatives.

Response:

The commentor's request for an extension of the public comment period for the SPAS Draft EIR is noted. LAWA provided a 75-day review period for the SPAS Draft EIR which ended on October 10, 2012. Section 21091(a) of the Public Resources Code requires that the review period for a Draft EIR

that is submitted to the State Clearinghouse for review shall be at least 45 days. (See also State CEQA Guidelines Section 15105.) The review period for the SPAS Draft EIR provided an additional 30 days for public comment beyond the requirements of CEQA.

It should be noted that the text of the SPAS Draft EIR is approximately 1,800 pages in length. Printed appendices total approximately 3,000 pages, much of which consists of model output data sheets. Appendix K2-6, which includes intersection level of service worksheets, is provided in electronic format only and is approximately 3,000 pages in length.

SPAS-PC00157-2

Comment:

In the interim, I will focus my comments on Chapter 4.2 focused on expected Air Quality Impacts, particularly in regards to PM10, PM2.5 and lead for which the area in question is designated in non-attainment of federal air quality standards, I have many concerns, but will focus on three important points:

(1) Baseline data is not inclusive of the LAX Air Quality and Source Apportionment Study:

As noted in the DEIR chapter 4.2.1.2, the scope of the analysis associated with construction activities requires that the consultant obtain background concentration data from the SCAQMD and estimate future concentrations with construction of each alternative. However, the chapter includes no reference to the LAX Air Quality and Source Apportionment Study, due for release on January 31, 2013. As per LAWA's own comments regarding the Source Apportionment Study:

"It is important to note that this study is focused solely on identifying and properly allocating airport and other emissions affecting the neighborhoods around LAX. However, the results of this study and its documented methodology may be used to guide the approach of future studies attempting to analyze health impacts in surrounding communities."

In light of LAWA's comments, the Apportionment Study and its associated data should be an essential component of a DEIR, especially given its scope of leveraging "future studies attempting to analyze health impacts in surrounding communities." This is critical for evaluating baseline conditions. However, the DEIR completely ignores this study. Instead, the DEIR considers regional air quality monitoring data which, in some cases, is not even in the same municipality. To make this point clear, please note that in section 4.2.3.3, the DEIR is using baseline data for PM 2.5 from an air quality monitoring station located at 3648 North Long Beach Boulevard, in North Long Beach. This is no where near the area that will be impacted by the proposed alternatives. On these grounds, modeling associated with the DEIR is based on an incomplete dataset in that it ignores the Source Apportionment Study, and the potential to use locally available data for PM2.5.

Please note that LAWA acknowledges that the Source Apportionment Study is expected to be released on January 31, 2013. As such, why is the DEIR publication and comment period being rushed in advance of the Source Apportionment Study publication? Why would LAWA ignore this important decade-long study? Couldn't LAWA and its consultant mine this study for the data needed to more accurately predict baseline conditions and model impacts from proposed alternatives, particularly for PM2.5?

Response:

Please refer to Response to Comment SPAS-PC00130-36 regarding the LAX Air Quality and Source Apportionment Study and its ties to LAX construction projects.

SPAS-PC00157-3

Comment:

(2) Fugitive dust from proposed construction staging sites not adequately modeled:

Chapter 2, Section 2.3.1.12 discusses Construction Staging Areas. As noted:

Figure 2-15 represent areas that are, or will be, generally vacant, are located outside of aircraft operation, and are generally suitable for the placement of construction trailers/offices, storage of construction materials, and staging of construction activities. They are considered to be equally available to all of the alternatives.

Seven potential construction staging areas have been identified. Of these, areas "C" and "D" are located directly adjacent to residences within the community of Westchester. In this context, Section 4.2.2.1 notes that:

Fugitive dust emissions resulting from excavation, dirt transfer operations, wind erosion of storage pile, and particle entrainment from vehicle travel on paved and unpaved roadways were quantified as part of the construction emissions inventories.

However, the inventory analysis is flawed in the context of LAWA's existing practices. Specifically, note the following assumption in the DEIR:

An additional source of PM10 and PM2.5 emissions associated with construction activities is fugitive dust. Fugitive dust includes resuspended road dust from both off-and on-road vehicles, as well as dust from grading, loading, and unloading activities.

Watering, as required under LAWA construction contracts and also being one of the main dust suppression measures recognized in SCAQMD Rule 403, was assumed to reduce fugitive dust emissions by 50 percent.

Please note that LAWA is currently using area "C", directly adjacent to Westchester residents as an LAWA site for storing construction material stockpiles and fill dirt without any kind of dust suppression measures. Local residents have witnessed and voiced concerns about these activities to LAWA for years, and yet the activity has recently increased with no mitigation.

As evidence, I have included a photo (collected August 11, 2012) summarizing the activities exercised by LAWA on Area "C". Please take note of the homes and Catholic Middle School (Visitation) plainly visible in the background. Note that there are no dust suppression technologies in place, nor have any been witnessed by the local community over the past three years. Additional photos are included in the following section.

In this context, baseline characterizations for PM 2.5 and PM10, and/or predicted impacts from the associated alternatives should model stockpiling of fill dirt as an unmitigated activity, rather than one that considers dust suppression measures. In addition, the DEIR must include a discussion of what impact moving the existing tons of fill dirt will have if the associated site will be used for other construction-staging activities associated with the proposed alternatives.

Response:

The content of this comment is similar to comment SPAS-PC00130-109; please refer to Response to Comment SPAS-PC00130-109.

SPAS-PC00157-4

Comment:

(3) Assumptions regarding adherence to historical agreements must be revisited in any modeling.

As noted in section 4.2.5 summarizing LAX Master Plan Community Benefits Agreement; X.L., Rock-Crushing Operations and Construction Materials Stockpiles:

This provision requires LAWA to locate rock-crushing operations and construction material stockpiles for all construction related to the LAX Master Plan in areas away from LAX-adjacent residents to reduce impacts form emissions of fugitive dust. This requirement would be included in specifications for any SPAS alternative requiring on-site construction.

However, the activities currently taking place in Area C demonstrate that LAWA is not abiding by this community agreement. As such, any assumptions that LAWA will adhere to this or any other community agreements as a foundation for any modeling of predicted impacts is questionable. The violation of trust is demonstrated by the following photos collected in Area C, directly adjacent to the Westchester community:

In this context, predicted impacts to adjacent communities from ongoing unmitigated activities must reflect what is being witnessed rather than rely on idealistic assumptions that LAWA will begin adhering to historical agreements. Specifically, DEIR modeling must consider that Area C will in fact be used for storage of construction-related fill materials as is currently taking place.

Response:

Comments on activities currently taking place in Area C are not comments on the adequacy of the SPAS Draft EIR or on impacts that would result from the SPAS project. The content of this comment is similar to comment SPAS-PC00130-109; please refer to Response to Comment SPAS-PC00130-109.

SPAS-PC00157-5

Comment:

In closing, I am concerned that the air-quality section of the DEIR is based on incomplete information and idealistic assumptions not based on observed facts. Air Quality modeling associated with DEIR must be revisited in the context of locally and readily available data (i.e. LAX Air Quality and Source Apportionment Study), and must reflect current practices by LAWA rather than assume idealistic adherence to historical community agreements which are being broken. Given that the foundation of the modeling is in question, a revised DEIR is necessary to accurately assess the impacts of the associated alternatives on air quality, particularly PM10, PM2.5 and lead for which the area is already federally designated as impaired.

Response:

Please refer to Response to Comment SPAS-PC00130-109 for a discussion of LAWA's mitigation monitoring as it pertains to construction. Please refer to Response to Comment SPAS-PC00130-36 for a discussion of the LAX Air Quality and Source Apportionment Study.

The air quality impact analysis presented in the SPAS Draft EIR complies with the requirements of CEQA, identifies significant air quality impacts associated with each alternative, and presents the air quality impact results in formats that allow the lead agency to compare the differences between alternatives. No revision to the analysis is warranted.

SPAS-PC00157-6

Comment:

Please take note of the DEIR section that discusses fine particulate matter:

PM10 and PM2.5 can accumulate in the respiratory system and are associated with a variety of negative health effects. Exposure to particulate matter can aggravate existing respiratory conditions, increase respiratory symptoms and disease, decrease long term lung function, and possibly cause premature death. The segments of the population that are most sensitive to the negative effects of particulate matter in the air are elderly, individuals with cardiopulmonary disease, and children. Aside from adverse health effects, particulate matter in the air causes a reduction of visibility and damage to paints and building materials.

As you know, there are elderly families that have lived in Westchester for over a generation. These families purchased their homes and built their lives in Westchester decades before any proposed expansion of LAX. In this context, I would hope that LAWA take into consideration a complete and accurate evaluation of expected air quality impacts on their health and well being rather than rush an incomplete DEIR. LAWA should be just concerned about accurately predicting air quality impacts on the health of residents in adjacent communities as much as it is concerned about airport safety and traffic.

As it now stands, the rushed nature of the DEIR suggests otherwise, and yet lives are in the balance on both sides of the equation.

Response:

The air quality impact analysis of particulate matter (PM10 and PM2.5) follows the methodology for construction described in Section 4.2.2.1 of the SPAS Draft EIR and is consistent with South Coast Air Quality Management District methods for assessing air quality impacts for CEQA documents. As indicated in Section 4.2 of the SPAS Draft EIR, even after mitigation, construction activities would result in significant and unavoidable air quality impacts under all of the alternatives. Specifically, under all of the alternatives except for Alternative 4, construction emissions of carbon monoxide (CO), volatile organic compounds (VOC), oxides of nitrogen (NOx), PM10, and PM2.5 would be significant and unavoidable. Under Alternative 4, significant and unavoidable construction emissions would occur for NOx and PM10. Under all of the alternatives, even after mitigation, construction-related concentrations of nitrogen dioxide (NO2) and PM10 would be significant and unavoidable.

Operation of the airport would also result in significant and unavoidable impacts to air quality. Even after mitigation, operational emissions of sulfur dioxide (SO2), PM10, and PM2.5 would be significant and unavoidable under all of the alternatives. Operational concentrations of NO2, PM10, and PM2.5 would also be significant and unavoidable under all of the alternatives.

The human health risk associated with toxic air contaminants released during construction and operation of the SPAS alternatives are identified in Section 4.7.1 of the SPAS Draft EIR. As indicated in that section, incremental cancer risks and incremental chronic non-cancer health hazards within the study area under all the alternatives would be less than significant for all receptor types (i.e., child resident, school child, adult resident, adult worker). The health impacts of pollutants on the elderly are discussed in Section 4.2.1.1 of the SPAS Draft EIR. Additionally, under all the alternatives, health effects to on-airport workers would be less than significant. Incremental acute non-cancer health hazards at small areas at or near the LAX fence-line under all the alternatives would be slightly above the threshold of significance and are considered to be significant and unavoidable for all analyzed receptor types (i.e., residents, recreational users, school child, off-site adult workers). The primary toxic air contaminant of concern contributing to this impact is associated with emissions of acrolein from aircraft operations, which would occur in 2025 even in the absence of SPAS. The primary health impact for acrolein is as an irritant for the eyes and nasal passages. It should be noted that, with the exception of Alternative 3, acute non-cancer health hazard impacts in 2025 would be lower under the SPAS alternatives than if no airfield improvements were implemented. Moreover, these significant impacts would occur at or near the fence-line; it is expected that actual impacts in the community would be less than significant.

SPAS-PC00158 Branham, Tammy Dollar Thrifty Automotive Group, Inc. 10/10/2012

SPAS-PC00158-1

Comment:

DTG Operations, Inc. has reviewed the above study and we would like to comment on options that include a consolidated facility on Lot C. The rental car industry worked with staff at LAWA and a team of consultants to develop a consolidated rental car facility at Lot C. Due to height restrictions, we were not able to find a solution that worked on that property.

The Manchester Square option would allow for a multiple level facility that is not restricted by the height limitations at Lot C. We urge you to only consider a consolidated rental car facility at Manchester Square, or another parcel of land that would allow for multiple levels.

Lot C does not meet the current needs of the rental car industry and would not meet the future needs. Manchester Square meets the current needs and allows for future growth. If we are going to build a consolidated facility that improves the rental car experience for our mutual customers, we cannot do it on Lot C.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00159 Ouellet, James V None Provided 10/10/2012

SPAS-PC00159-1

Comment:

After reviewing what I could of the Specific Plan Amendment Study and Draft Environmental Impact Report, I have some questions which are listed below.

1. In making its long-term forecast of airfield safety, please state whether LAWA is making the assumption that no new technology that would improve on ASDE-X and Runway Status Lights will ever be introduced to improve airfield safety? The SPAS-DEIR makes no mention of the possibility that a new technology could come along to further improve airfield safety. LAWA certainly includes a forecast of lower automobile emissions (owing to improving technology) when it discusses 2025 air quality.

Response:

The SPAS Draft EIR analysis of airfield safety takes into account the existing and proposed FAA/LAWA safety measures that are described on pages 4-501 and 4-502. While LAWA will continue to consult and coordinate with the FAA regarding any future advancements in airfield safety technology that could be implemented at LAX, the SPAS airfield safety analysis did not assume or take credit for such future possibilities, as that would be speculative. The SPAS Draft EIR air quality analysis took into account lower vehicle emissions rates for future year emissions based on the fact that those state and federally mandated reductions in emissions are a matter of law and are already incorporated into the EMFAC vehicle emissions factors developed by the California Air Resources Board for the specific purpose of modeling future year conditions.

SPAS-PC00159-2

Comment:

2. Page 4-502 (3rd bullet) says that LAWA and FAA agreed to expanded, improved Runway Status Lights. Then in May, 2011 FAA balked due to budget constraints. Then "Based on discussions between LAWA and the FAA in December 2011, the FAA is re-evaluating the scope and budget with the goal of initiating the implementation in 2012. In order for the safety benefit of this technology to be fully realized, an airfield geometry designed to accommodate modern aircraft is needed."

Is this saying FAA is refusing to provide funding for safety upgrades unless LAX redesigns the North Airfield to fully comply with FAA design standards for ADG V and ADG VI aircraft? The sentence quoted above sounds as if the FAA is trying to force LAWA to undertake a redesign the North Airfield before FAA will release funds for RWSL. Is that a correct interpretation of the sentence? Are LAWA and the FAA cooperating in this delay in order to force adoption of Alternatives 1, 5 or 6? State what progress has been made in fully implementing Runway Status Lights on the North Airfield since this paragraph was written.

Response:

As described in the subject discussion on page 4-502 of the SPAS Draft EIR, LAWA and the FAA entered into a Memorandum of Agreement for a full implementation (Phase 2) of runway status light system technology at LAX and although the Phase 2 system has been designed, implementation of the system was delayed by the FAA due to budgetary constraints; however, the installation of Phase 2 is

expected to occur in 2013. Implementation of the Phase 2 system is not dependent upon or awaiting the selection of any of the SPAS alternatives.

SPAS-PC00159-3

Comment:

3. Identify which North Airfield safety studies were done: 1) before the installation of ASDE-X and Runway Status Lights, 2) which were done after and 3) which took into consideration improved safety benefits of runway status lights and ASDE-X.

Response:

As indicated on pages 4-501 and 4-502 of the SPAS Draft EIR, the existing ASDE-X and Runway Status Light systems at LAX went into operation in 2009. As indicated on pages 4-502 through 4-505, the majority of north airfield safety studies were completed on 2007, with the exception of the North Airfield Safety Study (NASS), which acknowledges both ASDE-X and Runway Status Lights.

SPAS-PC00159-4

Comment:

4. The SPAS-DEIR summary of the various North Airfield safety studies unfairly lumps them together, for example, by saying that all agree that North Airfield safety would be improved by moving Runway 24R further north. For each study, please identify: 1) the total cost of the study, 2) the man-hours involved in actually studying North Airfield safety in each study, 3) whether the study attempted to the quantify the likely risk of disastrous runway crash and loss of life versus merely evaluating North Airfield compliance with FAA standards, 4) Whether the study addressed the issue of the whether the cost of moving Runway 24R north is worth the benefit in improved safety.

Response:

The content of this comment is similar to comment SPAS-PC00130-250; please refer to Response to Comment SPAS-PC00130-250.

SPAS-PC00159-5

Comment:

5. Page 4-505 describes the FAA criticism of the North Airfield Safety Study (NASS) performed by the Academic Panel in cooperation with NASA. It is shameful that the SPAS-DEIR does not even mention that the Academic Panel studied the FAA critique and issued a lengthy and detailed response.

Please amend the SPAS-DEIR to include a fair description of the Academic Panel's response to the criticisms brought against their report. The following quotes taken from the Academic Panels response should be included in any LAWA document that describes the FAA critique and the Panel's response:

"After reviewing the FAA critique of our study, we see no reason to amend our estimates. We disagree with the assessment that our work suffered from 'several critical flaws in the study's assumptions, methodology and conclusions.' We continue to believe that our analysis was logical, accurate, and conservative." "If the FAA critique had presented valid criticisms of our analysis, then we would have hastened to make full corrections: never would concerns about 'saving face' have meant anything to us compared to the imperative of saving lives." (Italics in the original.)

Response:

The content of this comment is similar to comment SPAS-PC00130-728; please refer to Response to Comment SPAS-PC00130-728.

SPAS-PC00159-6

Comment:

6. Table 4.7.2-9 (p. 4-516) lists 10 off-airport commercial parcels in the RPZ at the west end of the outboard runway, 24R. Google satellite views show zero structures in that area. Please list those structures and GPS coordinates of each.

Response:

The commentor may be referring to the 10 commercial parcels identified for the Departure RPZ on Runway 24R in Table 4.7.2-9 of the SPAS Draft EIR. The locations of those 10 parcels are shown in Figure 4.7.2-7. The structures that occupy those parcels, which are all located along Sepulveda Boulevard south of Westchester Parkway, include, but are not limited to, the Parking Spot, the Paradise office building, and miscellaneous commercial retail shops along the east side of Sepulveda Boulevard. Given that the comment references "in the RPZ at the west end of the outboard runway" the commentor may be thinking of the RPZ for Runway 6L, also shown in Figure 4.7.2-7, which is absent of any notable structures.

SPAS-PC00159-7

Comment:

7. Table 4.2-13: LAWA computes into its 2025 forecast a decrease in pollution
produced by on-road vehicles - people coming to the airport in cars. Those changes will be almost entirely due to new vehicle fuel economy rules passed by Congress, not by any changes at LAX. Why it appropriate to calculate those changes into forecasts of total pollutant counts? In effect, LAX will generate more pollution by increased air traffic but gives itself a "freebie" reduction in car-generated pollution.

Response:

The air emissions summarized in Table 4.2-13 of the SPAS Draft EIR were developed following standard CEQA methodology - the future project conditions are compared to baseline conditions (i.e., the conditions that exist at the time the Notice of Preparation was issued). This approach is consistent with the California Code of Regulations, Title 14, Chapter 3 (Guidelines for Implementation of the California Environmental Quality Act), Section 15126.2(a).

The model used to estimate emissions from cars and trucks, the USEPA and CARB-approved EMFAC model, takes into account the effect on emissions of regulations that have been adopted and are being implemented.

In addition to the standard comparison of air quality impacts relative to the existing (baseline) conditions, an additional comparison is included for informational purposes in Section 4.2.6 of the SPAS Draft EIR, as summarized in Table 4.2-14. This second approach compares conditions for a given alternative to those for Alternative 4, which is essentially a no project alternative relative to airfield improvements (i.e., the majority of emissions associated with the SPAS alternatives are from aircraft; hence, a delineation of, and comparison to, emissions estimated to occur in the future if no airfield improvements were implemented provides a meaningful indication of how airfield emissions would either increase or decrease due to changes in aircraft operations under each alternative that proposes airfield improvements). This approach eliminates the time difference (i.e., 2009 versus 2025) since all comparisons are made relative to a future no project condition, thus the emissions factors for all sources are the same. The differences shown in Table 4.2-14 indicate a given alternative's increase or decrease in 2025 emissions compared to doing nothing by 2025.

SPAS-PC00159-8

Comment:

8. Emissions due to construction are reported in peak emissions (in lbs/day) or peak concentration. Nothing in the Main document mentions total emissions, which would vary considerably, depending on which alternative is pursued. Please provide ROM estimates of total construction emissions for Alternatives 1-7 in a single table.

Response:

The total construction emissions, in tons, for each pollutant under each alternative are presented in Appendix C, Attachment 1, Table 1 of the SPAS Draft EIR.

SPAS-PC00159-9

Comment:

9. Page 4-451 which discusses human health impacts of the various alternatives,
says this: "In addition, Alternative 2 would have lower aircraft emissions than Alternatives 1, 3, 4, 5, 6, and 7." In contrast, page 4-130 says this: "In comparison to the other alternatives, Alternative 1 peak daily aircraft emissions for all criteria pollutants (CO, VOC, NOx, SO2, PM10, and PM2.5) would be lower than aircraft emissions under Alternatives 2, 3,4, and 7. Alternative 1 aircraft emissions would be the same or greater than aircraft emissions under Alternatives 5 and 6."

Which is it? Are emissions higher lower under Alt 1 or under Alt 2?

Response:

The aircraft emissions from Alternative 1 would be higher than aircraft emissions from Alternative 2 when viewed over the long term (months or years) but lower when viewed from a peak daily basis. This situation arises because aircraft fly in various types of weather conditions, and the weather on a given day affects the aircraft delays in the air and on the ground.

Most of the time, aircraft fly under visual flight rules (VFR) in and out of LAX, which has the best (lowest) impact on delays. Therefore, annual average emission calculations were made using VFR weather conditions. When emissions are averaged over a year or more, the emissions from Alternative 2 would typically be lower than those from Alternative 1. Since the discussion on page 4-451 of the SPAS Draft EIR was summarizing impacts related to long-term cancer risk, the evaluation correctly described Alternative 2 as having lower aircraft emissions than the other build alternatives because the impacts were based on long-term exposure.

On the other hand, the criteria pollutant impact analysis in Section 4.2.6 of the SPAS Draft EIR is discussing peak daily emissions from aircraft since the South Coast Air Quality Management District (SCAQMD) thresholds of significance for operational emissions are for peak daily activity and emissions. The airport does operate under Instrument Flight Rule (IFR) weather conditions occasionally, and these conditions produce the highest delays and emissions. Under these conditions, Alternative 1 would handle aircraft better than Alternative 2, meaning less ground delay and less emissions. Therefore, when describing aircraft emissions for peak daily impacts on page 4-130, the discussion correctly identifies Alternative 1 as having lower peak daily emissions.

Finally, the emissions from aircraft for each alternative under VFR and IFR conditions are presented in Appendix C, Attachment 2 of the SPAS Draft EIR. Aircraft IFR emissions are included in Tables 1 through 20, and aircraft VFR emissions are included in Tables 21 through 40.

SPAS-PC00159-10

Comment:

10. Table 4.2-13 (pp. 4-122 to 4-125) reports "Incremental Project Operational

Emissions Compared to Baseline (2009) Conditions" Does Table 4.2-13 report the predicted TOTAL aircraft emissions in 2025? Or does Table 4.2-13 report the amount of predicted emissions that would be added to the 2009 baseline conditions?

Response:

The aircraft emissions summarized in Table 4.2-13 of the SPAS Draft EIR represent the incremental emissions above the 2009 baseline for each alternative in 2025. Total aircraft emissions for each alternative in 2025 are presented in Appendix C, Attachment 2 of the SPAS Draft EIR. Please see Response to Comment SPAS-PC00159-9 for a discussion of the conditions assumed for those emissions.

SPAS-PC00159-11

Comment:

11. Noise: Please identify the variables used to calculate current and predicted
CNEL. For each variable, identify the value or range of values that was used in the calculations of CNEL. Do the calculations of CNEL include variables for the topography of the land, such as the hill at the west end of Playa del Rey and the sort of "valley" at the north end of Pershing Drive?

Response:

The aircraft noise analyses were conducted using the Federal Aviation Administration's Integrated Noise Model (INM). In order for the INM to generate CNEL aircraft noise exposure contours, the following inputs to the model are required: runway layout geometry; average annual weather (e.g., temperature); aircraft operations by time of day and aircraft type; runway use information by aircraft type; location and use of flight tracks; and aircraft arrival and departure profiles.

Regarding temperature and humidity, the FAA's INM takes into account the actual atmospheric absorption adjustment based on average airport temperature and relative humidity to incorporate the fact that the propagation of sound is affected by meteorological conditions. In a simple term, air absorbs sound. The INM uses the temperature to calculate aircraft performance (INM Users Guide 2007). The absorption of sound varies with temperature, humidity, and the frequency of the sound. For example, an aircraft climbs more efficiently and faster in cool weather than in hot weather. The INM also includes an option to match atmospheric sound propagation to aircraft performance in the form of a noise-power-distance (NPD) curve based on local standard temperature and humidity. As indicated in Section 3.1.1.3 of Appendix J-1-1 of the SPAS Draft EIR, for the LAX elevation (125 feet above sea level), the average annual temperature (63 degrees Fahrenheit) and the average annual humidity (72 percent) at LAX in 2009 were used.

Terrain elevation data obtained from the United States Geological Survey (USGS) were also included in the INM noise analyses. Information regarding aircraft noise analysis methodology was provided in Section 4.10.1.2 of the SPAS Draft EIR; however, as noted in the SPAS Draft EIR "more detailed information is provided in Appendix J1-1" of the SPAS Draft EIR (see Appendix J-1-1, Sections 2.3 and 3.1.1.3).

SPAS-PC00159-12

Comment:

12. Define how LAWA calculated the mix of ADG VI aircraft in its 2025 forecast.

Do LAWA's calculations of the 2025 aircraft group mix assume that sales forecasts of ADG VI aircraft such as the Airbus A380 and Boeing 747-8 are accurate? So far, sales of both are far below their manufacturers' projections. If it weren't for a single airline (Dubai-based Emirates, which flies to LAX once daily in a Boeing 777) that has ordered 90 A380s, the A380 would be a financial disaster. Are LAWA's predictions of ADG VI aircraft based on sales to date? On manufacturer forecasts? On declining sales and possible early phasing out of ADG VI aircraft? Currently, only Qantas, Korean Air, Singapore and Air France fly A380s into LAX. Which airlines, if any, have notified LAWA they intend to begin flying the A380 to LAX?

Response:

The commentor is inquiring about how the mix of Aircraft Design Group (ADG) VI aircraft was derived and refers to various uncertainties in terms of accurateness and realization of Airbus 380 and Boeing 747-800 sales forecasts. Parts of the comment appear to be of subjective nature with no supporting data being provided: "sales of both are far below their manufacturers' projections" and "If it were not for a single airline (…) that has ordered 90 A380s, the A380 would be a financial disaster." These parts of the comment are noted.

As discussed in Section 4.1 in Appendix F-1 of the Preliminary LAX SPAS Report, aircraft manufacturers' orders, manufacturing schedules and anticipated delivery dates were reviewed to assess future aircraft availability. Although the technical team reviewed manufacturers' information, the inclusion of ADG VI aircraft in the 2025 Design Day Flight Schedule (DDFS) did not depend on current sales (at the time the analysis took place, starting in summer 2010) or on sales forecasts by Airbus or Boeing to particular airlines or in general. In addition, the assumed number of ADG VI aircraft in the 2025 DDFS was not based on aircraft manufacturers' sales forecasts or an assumption suggested by the commentor of "declining sales and possible early phasing out of ADG VI aircraft."

As presented in Section 4 in Appendix F-1 of the Preliminary LAX SPAS Report, the 2025 DDFS was developed to represent a generalized flight schedule, independent from airline-specific characteristics. As such, the 2025 DDFS does not include air carrier identifiers. The technical team assumed ADG VI aircraft solely based on the following factors: forecasted passenger demand by market; ability of the destination or origin airport to handle ADG VI aircraft; numbers of seats per aircraft; and resulting passenger load factors. See the section entitled "Scheduled-Passenger Fleet Mix" in Section 4.2 in Appendix F-1 of the Preliminary LAX SPAS Report regarding the development of the 2025 DDFS fleet mix.

SPAS-PC00160 Dial, Karen Drollinger Properties 10/5/2012

SPAS-PC00160-1

Comment:

On behalf Drollinger Properties I have reviewed the Draft Environmental Impact Report and have included my comments herein.

As property and business owners in the Westchester/Playa del Rey community for over 65 years Drollinger Properties has a long standing relationship with the airport and this community. Drollinger Properties owns and operates properties which support more than 60 businesses and over 1,000 daily workers, as well as our own offices. No single private entity will be affected more by a northward expansion of LAX than Drollinger Properties. Drollinger Properties and related entities objects to the approval of the proposed project or projects included in the Draft Environmental Impact Report for the reasons stated below. Drollinger Properties also includes by reference the objections raised in the comment letter submitted by the Alliance for Regional Solutions to Airport Congestion.

Drollinger Properties is committed to the preservation of the Westchester Business District which contains the vast majority of the company's assets and the preservation of the broader Westchester/Playa del Rey community which supports the business district.

Drollinger Properties has been instrumental in the formation of the Westchester Business Improvement District and the Westchester Street Improvement Association which have transformed the area which was nearly destroyed by the expansion of LAX in the 1970's.

Drollinger Properties has invested millions of dollars into Westchester/Playa del Rey both in private investment in business and properties and in charitable donations to our local community and educational institutions.

It would be safe to say that Drollinger Properties will be a strong advocate for that which promotes a better quality of life for the people and businesses of Westchester and Playa del Rey.

The modernization of LAX is long overdue and Drollinger Properties supports the efforts of LAWA to upgrade the terminals, create a more efficient ground transportation system and to improve airplane safety at the airport without moving north.

The Draft EIR has modeled nine alternatives for the community to review and LAWA has indicated that a preferred alternative could be a combination of any of the nine.

In our review of the alternatives it appears to us that several of the alternatives will make the needed improvements to the terminal areas and ground transportation facilities. It seems that the relocation and configuration of the north airfield is the most contentious aspect of the alternatives.

It is our understanding that the north airfield has been deemed "safe" by the standards employed by the NASA study. The airfield could operate more efficiently with additional runway and/or taxiway modifications although it is our belief that the data does not justify the movement of the north runway for safety reasons. The Draft EIR noted that not moving the runway provided the most efficient movement of aircraft off runways to gates.

The Draft EIR presented several alternatives to the north airfield in order to address "safe and efficient" movement of aircraft.

We have reviewed the integrated alternatives in an effort to assess the environmental impacts of noise, traffic, safety and air quality on our properties. But we aren't able to choose an acceptable alternative based upon the information within the Draft EIR documents. In general we contend that the community is best served with alternatives which do not expand the perimeter of the airport to the North nor move the runways on the North airfield further North than their existing location.

Of the other alternatives it appears that alternative 2 if coupled with alternative 9 would address airfield safety issues, include efficiency features and would upgrade terminal and ground transportation facilities without moving the airfield to the North. It is critical for Drollinger Properties that the preferred alternative will provide clear and definitive plans showing how properties around the North side of the airport will be affected in terms of all environmental impacts, safety within Runway Protection Zones, waivers from the FAA and any and all requirements for private and/or public property acquisition. With the information provided we support alternatives 2 and 9.

Response:

The commentor's support for Alternatives 2 and 9 is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Chapter 2 of this Final EIR regarding the LAWA Staff-Recommended Alternative, which couples the airfield and terminal improvements associated with Alternative 1 with the ground access components associated with Alternative 9, including a discussion of the rationale behind the selection of these alternatives over the other alternatives evaluated in the SPAS Draft EIR.

Please see Responses to Comments SPAS-PC00130-1 through SPAS-PC00130-1051 for responses to the comment letter submitted by ARSAC, which is incorporated by reference by the commentor.

Please see Responses to Comments SPAS-AL00007-26 and SPAS-PC00130-931 regarding the potential for property acquisition and changes in the RPZ to have an impact on the Westchester Business District. As noted in Response to Comment SPAS-PC00130-931, no acquisition is proposed within the Westchester Business District.

Regarding impacts on quality of life, CEQA does not require purely social or economic impacts to be analyzed in an EIR. (CEQA Guidelines Section 15064(e)). As required by CEQA, the SPAS Draft EIR evaluates physical impacts on the environment associated with over 20 topical issues and how such impacts have the potential to affect residents in surrounding communities.

Please see Response to Comment SPAS-PC00149-2 regarding a summary of the project objectives associated with the north airfield improvements, as well as the conclusions of NASS relative to the safety enhancements associated with reconfiguration of the north airfield. Table 4.7.2-16 in Section 4.7.2 of the SPAS Draft EIR provides a summary of how each alternative relates to safety and efficiency enhancements to the north airfield. As indicated in that table, the SPAS alternatives achieve substantial enhancements to safety and efficiency; the degree to which safety and efficiency is enhanced varies between the alternatives. Please also see Response to Comment SPAS-PC00089-1 regarding efficiency associated with Alternative 2 compared to other airfield alternatives.

Please see Topical Response TR-SPAS-LR-1 regarding relocation of the perimeter fence associated with the realignment of Lincoln Boulevard. As noted in the topical response, relocation of the perimeter fence would occur entirely within airport property and would not affect any homes or businesses.

SPAS-PC00160-2

Comment:

Drollinger Properties is faced with years of uncertainty for its business partners and tenants if a northward movement of the north airfield is part of the approved plan for LAX. Even now we are inundated with concerns from tenants who are not willing to invest in Westchester for the fear their businesses may be required to move in the future. This is a very real cost to our business and affects the entire business district. The approval of a "program" narrows the uncertainty but until decisions are made on a "project" basis our economic future will remain in limbo. It is our contention that the "program" EIR is far too broad to have any real significance. This program EIR cannot possibly detail what is needed in a project EIR simply because no one knows the magnitude of each project within the program. We suggest that an individual project EIR be required for each element of work and that the community be allowed to comment on each project EIR.

Response:

Please see Responses to Comments SPAS-AL00007-26 and SPAS-PC00130-931 regarding the potential for property acquisition and changes in the RPZ to have an impact on the Westchester Business District. As noted in Response to Comment SPAS-PC00130-931, no acquisition is proposed within the Westchester Business District. The SPAS Draft EIR is a programmatic document. As indicated in Section 2.4 of the SPAS Draft EIR, additional project-level CEQA review is anticipated for implementation of the improvements associated with the selected SPAS alternative. Project-level CEQA documents would be subject to public review and comment. Please also see Response to Comment SPAS-PC00130-235 regarding the programmatic level of the SPAS Draft EIR. The programmatic nature of the SPAS Draft EIR is appropriate. An EIR is not required to speculate about the environmental consequences of future development that is unspecified or uncertain. (Environmental Protection Info. Ctr. v. Department of Forestry & Fire Protection (2008) 44 Cal.4th 459, 502.) As discussed in Response to Comment SPAS-PC00130-235, if an alternative is selected and when project details and plans are available, project-specific environmental review will be conducted. The public will have an opportunity to comment upon any such project-level review.

SPAS-PC00160-3

Comment:

Any alternative which includes the relocation of Lincoln Boulevard will have a significant impact on our business district and this is inadequately addressed in the DEIR. Traffic re-routing, utility disruptions, construction noise and dust will affect our local businesses for prolonged periods of time. We have high technology tenants who must receive continuous connectivity to broadband services and disruptions are very costly.

Response:

Please see Topical Response TR-SPAS-LR-1 for a discussion of the Lincoln Boulevard realignment associated with Alternatives 1, 5, and 6.

SPAS-PC00160-4

Comment:

This is our outline of the prime issues that Drollinger Properties has regarding the Draft EIR.

1. The Draft EIR does not address what will happen to specific properties in each of the alternatives. Please provide a detailed assessment of what properties will remain and what properties will be demolished in each of the alternatives.

Response:

A discussion of specific properties that would be acquired or affected by the development of the SPAS project (i.e., properties where structures would be demolished) is provided in Section 2.3.1.11 and Section 4.9.6 of the SPAS Draft EIR. Specifically, the property acquisition that would be required under Alternatives 1, 2, 3, 4, 8, and 9 is shown in Figures 2-11, 2-12, 2-13, and 2-14 and listed in Table 2-4 and Table 2-5 in Section 2.3.1.11 of the SPAS Draft EIR. In addition, Table 4.9-5 in Section 4.9.6 of the SPAS Draft EIR presents a comparison of acquisition areas by land use for the applicable SPAS alternatives. As noted in Table 4.9-5 of the SPAS Draft EIR, no acquisition is proposed for Alternatives 5, 6, and 7 since these alternatives focus on airfield and terminal components, although acquisition would be required for the ground access components with which these alternatives would be paired. Furthermore, existing facilities located on LAWA property that would be affected by the SPAS project are summarized in Table 2-3 and presented in Figure 2-10 in Section 2.3.1.10 of the SPAS Draft EIR. The impacts associated with properties that would be acquired or affected are described in Section 4.9.6 of the SPAS Draft EIR. As stated therein, impacts on acquired properties would be reduced through implementation of LAX Master Plan Commitment RBR-1 and LAX Master Plan Mitigation Measures MM-RBR-1 and MM-RBR-2. As also described in Section 4.9.6 for those properties, relocation would be a business decision. As noted in Table 2-3 in Section 2.3.1.10 of the SPAS Draft EIR, these properties could potentially relocate elsewhere in the vicinity.

Regarding what could happen to properties that would be located within the RPZ under the SPAS alternatives, please see Responses to Comments SPAS-AL00007-26 and SPAS-PC00130-931.

SPAS-PC00160-5

Comment:

a. For properties that will remain please describe the environmental impacts for interior and exterior noise impacts versus current conditions for each alternative.

Response:

The SPAS Draft EIR discusses noise impacts in Sections 4.9 and 4.10, including discussion of existing noise levels and proposed noise levels under the various alternatives (including discussion of interior and exterior noise levels). Sections 4.10.1.8 and 4.9.8 of the SPAS Draft EIR summarize the conclusions of these analyses for aircraft noise. Section 4.10.2.7 of the SPAS Draft EIR summarizes the conclusions related to road traffic noise, Section 4.10.3.8 of the SPAS Draft EIR summarizes the conclusions related to construction traffic and equipment noise, and Section 4.10.4.9 of the SPAS Draft EIR summarizes the conclusions related to transit noise and vibration.

SPAS-PC00160-6

Comment:

b. For properties that will remain please describe the environmental impacts for air quality compared to current conditions for each alternative.

Response:

The construction emissions associated with each alternative, including emissions from the realignment of Lincoln Boulevard under Alternatives 1, 5, and 6, are included in the impacts analysis in Section 4.2

of the SPAS Draft EIR and in Appendix C, Attachment 1 of the SPAS Draft EIR. Specifically, peak daily construction emissions are summarized in Table 4.2-10 on pages 4-110 and 4-111, and total project emissions are listed in Appendix C, Attachment 1, Tables 1 through 10, of the SPAS Draft EIR. Note that in the Appendix C tables, the Lincoln Boulevard realignment construction emissions are included in the line item titled "Runway 24L & South Parallel Taxiways" since it would be the movement of the runway that requires realignment of Lincoln Boulevard.

The impact of construction on ambient air concentrations surrounding LAX are summarized in Tables 4.2-11 and 4.2-12 on pages 4-115 through 4-117 of the SPAS Draft EIR. Detailed concentration results for each receptor and pollutant for each alternative are included in Appendix C, Attachment 1, Tables 11 through 66.

SPAS-PC00160-7

Comment:

c. For properties that will be demolished please provide a plan for business relocation in the event of property condemnation.

Response:

As described in Response to Comment SPAS-PC00160-4, impacts associated with properties that would be acquired under the SPAS project would be reduced through implementation of LAX Master Plan Commitment RBR-1 and LAX Master Plan Mitigation Measures MM-RBR-1 and MM-RBR-2. This LAX Master Plan mitigation measure and the two LAX Master Plan commitments are described on pages 4-687 through 4-689 of the SPAS Draft EIR, and include a Draft Relocation Plan (available at: http://ourlax.org/publications.aspx) and phasing to accommodate airport-dependent businesses. As also described in Section 4.9.6 of the SPAS Draft EIR, for those affected properties on LAWA-owned property, relocation would be a business decision. As noted in Table 2-3 in Section 2.3.1.10 of the SPAS Draft EIR, these uses could potentially relocate elsewhere in the vicinity.

Regarding properties that could potentially be impacted within the RPZ, as stated in Response to Comment SPAS-AL00007-26, in the event that acquisition is required, implementation of LAX Master Plan Commitment RBR-1 would serve to reduce impacts. Future project-specific CEQA documents, if any, would identify specific properties proposed for acquisition.

SPAS-PC00160-8

Comment:

d. For properties that will be demolished please provide a detailed analysis of what uses and restrictions will apply to the affected properties after the expansion for each alternative and what will the airport do with any properties it condemns?

Response:

As described in Chapter 2 and Section 4.9.6 of the SPAS Draft EIR and in Response to Comment SPAS-PC00160-4, under each of the SPAS alternatives some properties, occupied primarily by airport-related uses, would be acquired. Table 2-3 of the SPAS Draft EIR identifies other airport uses and non-airport tenants located on airport property, such as the urgent care facility, Travelodge Hotel, Burger King Restaurant, and Denny's Restaurant, that would also be removed with implementation of the SPAS alternatives. These properties would be demolished and replaced with SPAS-related improvements such as airfield, terminal, ground access, and parking facilities proposed under the respective alternatives. Land use impacts associated with acquisition and relocation are described in Section 4.9.6 of the SPAS Draft EIR for each SPAS alternative under the heading "Acquisition and Relocation." As stated in Section 4.9.6, since these properties are located within the boundaries of the LAX Plan and LAX Specific Plan, they would be required to comply with the applicable provisions and restrictions of these plans. The acquired areas and sites of businesses affected by the SPAS alternatives would be subject to LAX Master Plan Commitment LU-2, Establishment of a Landscape Maintenance Program for Parcels Acquired Due to Airport Expansion, which would require that,

following demolition, these areas would be fenced, landscaped, and maintained if there are delays in development for airport purposes.

SPAS-PC00160-9

Comment:

2. Please provide detailed analysis of the potential safety considerations for properties that are currently or will be in the Runway Protection Zone in each of the alternatives.

Response:

The requested information is provided throughout Section 4.7.2 of the SPAS Draft EIR.

SPAS-PC00160-10

Comment:

3. Please provide detailed analysis for utility service impacts, disruptions and capacities for each of the alternatives. Specifically, the area in and around the intersections of Lincoln Blvd. and Sepulveda and Westchester Parkway and Sepulveda Westway.

Response:

As explained on page 4-3 of the EIR, the SPAS Draft EIR is a programmatic document. Please see Responses to Comments SPAS-PC00130-235 and SPAS-PC00130-142 for a discussion of the appropriateness of the programmatic review conducted for the SPAS project. Project-level impacts associated with implementation of individual components would be assessed in future CEQA documents, including impacts associated with utilities. It should be noted that the portion of Lincoln Boulevard that would be relocated under Alternative 1, 5, and 6 is north of the intersection of Lincoln Boulevard and Sepulveda Boulevard. None of the SPAS alternatives is anticipated to result in any impacts or alterations to this intersection or to the intersection of Westchester Parkway and Sepulveda Westway.

SPAS-PC00160-11

Comment:

4. Please show which of the alternatives best minimizes, avoids or reduces the environmental impacts to surrounding communities. Please outline this analysis for each of the alternatives and each of the surrounding communities.

Response:

The information requested in the comment is included in the impact analyses presented throughout Chapter 4 of the SPAS Draft EIR, as well as in Chapter 5 (cumulative impacts), and is summarized in Chapter 1 of the SPAS Draft EIR.

SPAS-PC00160-12

Comment:

5. Please provide a landscape improvement and maintenance plan for all parcels acquired due to airport expansion for each alternative.

Response:

Please refer to Response to Comment SPAS-PC00160-4 for a discussion of parcels that would be acquired or otherwise affected (e.g., require demolition) under the SPAS alternatives.

A landscape maintenance and improvement plan would be implemented under LAX Master Plan Commitment LU-2, which is incorporated as a component of the LAX Street Frontage and Landscape

Development Plan Update. The LAX Street Frontage and Landscape Development Plan Update is described on pages 4-11 through 4-13 in Section 4.1 and on page 4-694 in Section 4.9 of the SPAS Draft EIR and requires that, following demolition, acquired parcels and affected parcels located on LAWA property would be fenced, landscaped, and maintained if there are delays in development for airport purposes.

Regarding properties that could potentially be impacted within the RPZ, in the event that acquisition is required, implementation of LAX Master Plan Commitment LU-2 would also apply to these parcels. This Master Plan commitment requires that land acquired and cleared for airport development be fenced, landscaped, and maintained regularly until the properties are developed for airport purposes. Project-specific information on landscape improvement and maintenance would be developed during project-specific CEQA review should an alternative calling for property acquisition be selected. It is appropriate for a first-tier program level EIR to defer detailed descriptions and impact analysis of individual projects in the program to future project-level CEQA documents. (State CEQA Guidelines Section 15383; Koster v. County of San Joaquin (1996) 47 Cal.App.4th 29, 37.) Please also see Responses to Comments SPAS-PC00130-235 and SPAS-PC00130-142 for a discussion of the appropriateness of the programmatic review conducted for the SPAS project.

SPAS-PC00160-13

Comment:

6. What aircraft noise mitigation measures will be employed on which properties for each of the alternatives?

Response:

Aircraft noise mitigation measures are discussed in Section 4.9.3.3, Section 4.9.5, and Section 4.10.1.5 of the SPAS Draft EIR. Please also see Response to Comment SPAS-PC00008-1 regarding current programs to address existing aircraft noise levels.

SPAS-PC00160-14

Comment:

7. Please outline how the Alternative proposal's level of mitigation is comparable to that described in the LAX Master Plan Program EIR as described on page 1-9 paragraph number 3.

Response:

Section V.D.3 of the Stipulated Settlement requires LAWA to focus SPAS on "Potential environmental impacts that could result from replacement of the Yellow Light projects with the Alternative Projects, and potential mitigation measures that could provide a comparable level of mitigation to that described for the Yellow Light Projects in the LAX Master Plan Program EIR." The SPAS Draft EIR identifies a comprehensive set of applicable LAX Master Plan commitments and mitigation measures, as well as SPAS-specific mitigation measures, that would reduce or eliminate significant impacts associated with the SPAS alternatives. The fact that the level of mitigation associated with the SPAS alternatives is comparable to that described in the LAX Master Plan Final EIR can be determined by comparing the significant unavoidable impacts associated with each. The significant unavoidable impacts of the LAX Master Plan are identified in Section 6.2 of the LAX Master Plan Final EIR.1 The significant, unavoidable impacts of the SPAS alternatives are identified in Section 7.1 of the SPAS Draft EIR. As indicated in these sections, both Alternative D, (i.e., the previously-approved LAX Master Plan), and the SPAS alternatives would have the following significant unavoidable impacts: Air Quality, Human Health Risk Assessment, Land Use as related to aircraft noise, Aircraft Noise, Construction Equipment Noise, and Off-Airport Transportation. In addition to these impacts, the SPAS alternatives would have significant unavoidable impacts related to Greenhouse Gases and On-Airport Transportation. The LAX Master Plan did not identify significant unavoidable impacts relative to Greenhouse Gases as this topic was not addressed in the LAX Master Plan EIR. The LAX Master Plan did not identify a significant unavoidable impacts to On-Airport Transportation as the CTA would be closed to traffic under the approved LAX Master Plan (i.e., Alternative D). This comparison demonstrates that the SPAS Draft EIR provides a level of mitigation comparable to that described in the LAX Master Plan Final EIR.

No further response is required because the comment does not raise any significant new environmental issues or address the adequacy of the environmental analysis in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

1. City of Los Angeles, Final Environmental Impact Report for Los Angeles International Airport (LAX) Proposed Master Plan Improvements, April 2004.

SPAS-PC00160-15

Comment:

8. The effects of Lincoln Blvd. tunneling or re-alignment has not been adequately analyzed or explored. What are the effects on surrounding traffic patterns with a modification of Lincoln Boulevard, particularly Sepulveda Boulevard?

Response:

As stated on page 2-55 in Chapter 2 of the SPAS Draft EIR, Alternatives 1, 5, and 6 would require the realignment of Lincoln Boulevard between Sepulveda Boulevard and the Lincoln Boulevard/Westchester Parkway interchange. As part of the realignment, approximately 540 feet of roadway would be covered and below grade under Alternative 1, approximately 765 feet under Alternative 5, and approximately 252 feet under Alternative 6. This improvement is not expected to affect the overall north/south through traffic capacity on Lincoln Boulevard nor on Sepulveda Boulevard. This improvement would result in a localized traffic redistribution surrounding the intersection of Lincoln Boulevard and Westchester Parkway. Motorists traveling northbound on Lincoln Boulevard wanting to transition to Westchester Parkway would no longer use McConnell Avenue but would use a new leg farther east at the existing T-intersection of La Tijera Boulevard/Westchester Parkway. Traffic westbound on Westchester Parkway seeking to transition to northbound Lincoln Boulevard would no longer use McConnell Avenue and instead, would travel farther west, making a right turn onto Loyola Boulevard and then make a left turn from La Tijera Boulevard or Loyola Boulevard onto Lincoln Boulevard northbound. This localized traffic redistribution is not expected to result in significant impacts on the Lincoln Boulevard corridor nor Sepulveda Boulevard corridor operations.

Traffic-related impacts associated with construction activities were addressed in Section 4.12.2.6.3 of the SPAS Draft EIR. The SPAS Draft EIR includes a number of LAX Master Plan commitments and mitigation measures specifically designed to reduce such impacts; however, at this time, it would be speculative to conclude that all construction-related traffic impacts would be reduced to a level that is less than significant.

SPAS-PC00160-16

Comment:

9. Any re-alignment of Lincoln Boulevard will have significant impacts on the community during construction. Please outline those impacts and the mitigation methods in terms of traffic, noise, air pollution, temporary and permanent drainage.

Response:

Please see Topical Response TR-SPAS-LR-1 for a discussion of the Lincoln Boulevard realignment associated with Alternatives 1, 5, and 6.

SPAS-PC00160-17

Comment:

10. Any re-alignment of Lincoln Boulevard could also affect other utilities. Please outline the impacts on other utilities, water, power, cable, telephone etc and provide mitigation solutions,

Response:

Please see Topical Response TR-SPAS-LR-1 regarding utility impacts associated with the relocation of Lincoln Boulevard under Alternatives 1, 5, and 6.

SPAS-PC00160-18

Comment:

11. There are currently major drainage issues in Westchester as even mild rain events result in flooding every year. Any changes to drainage facilities on the northside of the airport should be studied and analyzed for the 100 year storm event. If drainage facilities are modified all facilities should be upgraded for the 100 year storm event.

Response:

As stated on page 4-607 in Section 4.8 of the SPAS Draft EIR, previous hydrologic analysis of the conveyance system within the Argo sub-basin of the Santa Monica Bay Watershed indicates that flooding does not occur within the airport area as a result of the LADPW 50-year design storm under baseline conditions. The 50-year storm event is the maximum storm event used to design major drainage facilities in the City per the Bureau of Engineering Storm Drain Design Manual. As shown in Table 4.8-5 of the SPAS Draft EIR, there would be no increase or minimal (2 percent) increase in impervious area within the portion of the airport tributary to Santa Monica Bay, which includes the Argo Drain tributary area, and these facilities are expected to continue to be adequate to convey the 50-year storm event. Improvements associated with SPAS are not anticipated to result in any flooding within Westchester. Because the Argo Drainage Channel is expected to convey the 50-year storm event even with SPAS improvements, there would not be any new hydraulic limitation to conveying flows from the Westchester area into the channel that would result in increased flooding potential within Westchester. Please see Response to Comment SPAS-PC00130-169 regarding the design capacity of the proposed Argo Drainage Channel with implementation of Alternatives 1, 5, and 6. Please also see Response to Comment SPAS-PC00130-85 for a discussion of why a 10-year storm event is the standard applicable to LAX.

SPAS-PC00160-19

Comment:

12. The West Maintenance Facility should be included in this draft EIR as a cumulative impact part of LAWA's project. Please provide an impact analysis that includes environmental impacts of the West Maintenance Facility as part of this EIR as it relates to construction and ongoing noise, air pollution and traffic impacts. This facility could have a major impact on our community and should be included.

Response:

Please see Response to Comment SPAS-PC00130-15 regarding the West Aircraft Maintenance Area project.

SPAS-PC00160-20

Comment:

13. We would like a detailed timeline as part of the final EIR which outlines the timing for all improvements included in the approved plan.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Response to Comment SPAS-PC00130-41 regarding phasing of project improvements.

SPAS-PC00160-21

Comment:

14. General impacts on the community and businesses such as routing of equipment, noise, times of operation, temporary closures, etc. in addition to staging area A?

Response:

Detailed construction plans requested by the commentor are not available. As indicated on page 2-57 of the SPAS Draft EIR, the nine SPAS alternatives were formulated at a conceptual level only and there are no specific planning, design, or engineering studies or construction plans for any of the alternatives. Chapter 4 of the SPAS Draft EIR does disclose construction impacts of the alternatives at a program level of detail. Should a SPAS alternative be selected for implementation, project-level CEQA documents would present detailed design and construction plans and disclose detailed project-specific construction impacts and mitigation measures? It is appropriate for a first-tier program level EIR to defer detailed descriptions and impact analysis of individual projects in the program to future project-level CEQA documents. (State CEQA Guidelines Section 15383; Koster v. County of San Joaquin (1996) 47 Cal.App.4th 29, 37.)

Please also see Topical Response TR-SPAS-LR-1 regarding the fact that the SPAS Draft EIR is a program-level document prepared pursuant to the State CEQA Guidelines and the subsequent preparation of a project-level CEQA documents, which address in greater detail construction-related impacts, is appropriate and consistent with CEQA requirements.

SPAS-PC00160-22

Comment:

We have reviewed the comments submitted by the Alliance for a Regional Solution to Airport Congestion (ARSAC). In addition to the comments included herein we want to make it clear that Drollinger Properties supports, agrees and hereby incorporates the comments from ARSAC in its comments to the SPAS Draft EIR.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. ARSAC's comments package on the LAX SPAS Draft EIR is designated in this Final EIR as SPAS-PC00130. Responses to comments by ARSAC on the SPAS Draft EIR are provided in Responses to Comments SPAS-PC00130-1 through SPAS-PC00130-1051.

SPAS-PC00160-23

Comment:

Drollinger Properties is vested in Westchester unlike any other private property owner. Again, we have invested millions of dollars in our community over a period of 65 years. We support the efforts of LAWA in upgrading LAX. We support the upgrades to the terminal areas and we support the efforts of LAWA to improve ground transportation in and around the airport. As property owners and members of the Westchester BID we support an attractive "gateway" to LAX and to the City of Los Angeles. We support the efforts of LAWA to improve the safety of airport operations and to increase the efficient movement of aircraft around the airfields.

We support Alternative 9 and we support Alternative 2. We cannot support any alternative that moves the North airfield to the North.

Please consider these our comments to the SPAS DRAFT EIR.

Response:

The commentor's support for Alternatives 2 and 9 is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Chapter 2 of this Final EIR regarding the LAWA Staff-Recommended Alternative, which couples the airfield and terminal improvements associated with Alternative 1 with the ground access components associated with Alternative 9, including a discussion of the rationale behind the selection of these alternatives over the other alternatives evaluated in the SPAS Draft EIR.

SPAS-PC00161 Zifkin, Walter None Provided 10/2/2012

SPAS-PC00161-1

Comment:

My name is Walter Zifkin, and I was privileged to serve as a member of the Board of Airport Commissioners for seven years - from 2004 to 2011. I was originally appointed by Mayor James Hahn and re-appointed by Mayor Antonio Villaraigosa. My tenure on the Board spanned two mayors, three commission presidents and three airport directors.

The common thread shared by all who were involved with Los Angeles International Airport during those seven years was the commitment to modernize our aging airport. I joined the Commission in the midst of the City Council's consideration of the LAX Master Plan. Following its adoption in 2004, and the settlement of the lawsuit early in 2006, we began work on the so-called green-lighted projects which kicked off the modernization efforts.

Today we are witnessing unprecedented construction, thousands of jobs and millions of dollars infused daily into our economy. Next year, we will see the grand opening of the new Bradley West, which will re-shape the Tom Bradley International Terminal and change the way we serve our international passengers. This work is vital to improving the way our passengers experience this airport and this City. However, we stand at the threshold of all that yet needs to be accomplished. We are at one of the most critical times in this massive endeavor - deciding whether the modernization of LAX should continue to full completion, or whether we stop now and find satisfaction with a partial fix.

I believe that a partial fix is simply not enough. How can we truly believe we have modernized LAX without addressing key improvements to its North Airfield? How can we proclaim "mission accomplished" without forging ahead with a Consolidated Rental Car Facility? How can we claim victory before we find a way to connect the airport to public transportation? Obviously, we can't. That is why this Specific Plan Amendment Study is so important.

I know firsthand there remain contentious issues. I lived it for seven years - I heard the testimony, read the reports, met with stakeholders. But I remain completely convinced that our North Airfield must be reconfigured to accommodate today's aircraft fleet. It's vital we separate the runways and construct a centerline taxiway. We cannot continue with an airfield which was not designed and built for Group 5 and Group 6 aircraft. Air Traffic Control modifications have been stretched to accommodate this new generation of aircraft. How can we find it acceptable to shut down all North Airfield operations when an A380 aircraft is in operation? LAX must have a 21st century airfield.

The North Airfield is not as safe as it could or should be. During my time on the commission, we reviewed several safety studies and heard from experts relative to the condition of the North Airfield. While the conclusions varied, each of the studies indicated that a reconfigured North Airfield would result in a safer airport. Most noteworthy, the FAA and the airline pilots have consistently and strongly recommended the two northern runways be separated by at least 350 additional feet and that a centerline taxiway be added between them.

I have carefully reviewed each of the alternatives considered in the Draft EIR document. Recognizing that a reconfigured North Airfield can result in a safer airport while improving operational efficiency, I believe that only Alternative 5 contained in the Draft EIR can achieve these objectives. None of the other alternatives present a separation of runways at the level requested by the FAA (i.e. 350 feet).

Alternative 5, however, demonstrates a significant improvement to the existing condition and would enable the construction of a much-needed centerline taxiway.

This is probably one of the most important times in the history of this airport. Like the 1961 opening of the central terminal area or the 1984 renovation, we are faced with a decision which will shape the way the aviation industry views LAX for the next generation. Will airlines choose LAX for new routes using newer and cleaner aircraft, or will we continue to be eclipsed by competing airports eager for the business? Will we truly transform LAX to a 21st century facility or simply remain satisfied with a memory of its former glory? In addition to the safety issues discussed above, the answers to these questions will have a substantial impact on industries and jobs that are dependent on having a safer, vibrant and attractive airport. We must continue to improve the airport so that it continues to be a major economic engine for our city.

I urge, therefore, that you choose the appropriate option of Alternative 5 so that the North Airfield can be reconfigured for safety and operational improvements. For the decision makers, it will take courage to do what is right and the vision that we act today not just for us, but for future generations of the citizens of Los Angeles. I urge the Board of Airport Commissioners and the City Council to take the courageous and responsible action.

Response:

The commentor's support for Alternative 5 is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Chapter 2 of this Final EIR regarding the LAWA Staff-Recommended Alternative, which couples the airfield and terminal improvements associated with Alternative 1 with the ground access components associated with Alternative 9, including a discussion of the rationale behind the selection of these alternatives over the other alternatives evaluated in the SPAS Draft EIR. It should be noted that Alternative 1 provides for a centerline taxiway. Please see Response to Comment SPAS-PC00130-168 regarding conclusions of the NASS relative to north airfield safety.

SPAS-PC00162 Lund, Ph.D., P.E., Russell A — None Provided — 10/8/2012

SPAS-PC00162-1

Comment:

Thank you for taking the time to address our community at September 27's NCWP town hall meeting. You had little time to cover a great deal of information, and I think you used your time effectively. I was also impressed by the unanimity of views expressed by community organizations and political representatives. I agree with them that important improvements must be made at LAX. As outlined in part below, I am convinced that moving the north runway is NOT a cost effective or efficient approach to improve LAX and the flying experience for Los Angeles residents. The best information available does NOT support moving the runways for reasons of safety.

I was particularly struck by the comments of Mr. Voss of the LAX Coastal Area Chamber of Commerce. As I understood him, he was involved with determining the objectives for the LAX NASS. He described the researchers selected as experts who would provide the "gold standard" report on north runway safety. Nevertheless, the DEIR seems to denigrate the findings of these blue ribbon experts. The LAWA report seems instead to favor disagreements such as those expressed by the FAA, without emphasizing the fact that the NASS response to the FAA "review" largely debunks their criticisms. It is unfortunate that the important NASS response is largely relegated to the end of an appendix and is not given the prominence it deserves.

Response:

With regard to the commentor's opposition to moving the north runway, the comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. With regard to the comment's reference to comments from Mr.

Voss of the LAX Coastal Area Chamber of Commerce, please refer to the responses to comment letter SPAS-PC00149, particularly Responses to Comments SPAS-PC00149-2, -5, -6, -7, and -8.

SPAS-PC00162-2

Comment:

If flight safety is of paramount concern, LAWA could - in short order and at relatively little cost - reduce the risk of aircraft incursions on the north runways by simply eliminating exits along the length of north runway 6L/24R, thereby requiring all landing aircraft to cross runway 6R/24L at the far end of the runway. Although this would increase taxi time for some operations, many airports have taxi distances and times far longer than those presently at LAX, and this increase would only marginally increase total gate-to-gate times (of course, any alternative that involves moving the runways farther from the terminals may also increase taxi time). Taxi time is a very minor issue when compared to capital project costs, quality of life in the neighborhoods north of LAX, and even the misleading safety arguments. If large equipment (e.g. the A-380) needs more space, simply use the south runways for these few flights.

That this option was not included in the current set of Alternatives can only be viewed as part of the ongoing LAWA strategy to push one plan down the throats of Los Angeles residents, and its absence effectively constrained the work performed by the NASS (who nevertheless found that safety concerns do NOT support moving the north runways). Time and time again LAWA has proposed airport expansion through relocation of the north runways (only to have that proposal rejected), with the apparent hope that one day the heretofore strong opposition will be caught napping.

Response:

The runway design alternative to eliminate all runway exits along Runway 6L/24R except for the ones at far ends of the runway is infeasible due to the operational problems, environmental impacts, and safety issues that it would pose. Additionally, it would not respond to the project objectives related to improving the north airfield. Therefore, it was not evaluated in detail in the SPAS Draft EIR.

Under this runway design alternative, all arriving aircraft on Runway 6L/24R would be required to taxi to the end of the runway before crossing Runway 6R/24L, which is the primary departure runway in the north airfield. The implication in this concept is that arriving aircraft on Runway 6L/24R could taxi across Runway 6R/24L more safely at the end of the runway because any departing aircraft would probably be well up in the air by the time it gets to that taxiway crossing point (i.e., the taxiing arriving aircraft could cross beneath the departing aircraft). One of the many problems associated with such a concept is that no aircraft is allowed to taxi across an active runway, that is a runway where an aircraft arrival operation or an aircraft departure operation is occurring, for the entirety of the subject operation. In other words, for a departure operation, the air traffic control tower will hold all nearby aircraft from even starting to cross the departure runway until the departing aircraft has cleared the end of the runway on takeoff. There cannot be any objects, including taxiing and holding aircraft, within the FAA designated Object Free Zone (OFZ), which extends 2,600 feet past the end of the runway, as shown in Figure 4.7.2-2 of the SPAS Draft EIR. Should an aircraft taxi across a departure runway while an aircraft departure operation is occurring, thereby entering the runway in front of a departing aircraft, it would be classified as a Category A or Category B runway incursion, which are the most serious/hazardous incursion types, even if taxiing aircraft end up passing beneath the departing aircraft.

Runway approaches are always designed so that aircraft land about one thousand feet down the runway. The navigation aids (especially the glide slope) and the runway markings are designed around the one thousand foot target. A single taxiway exit at the very end would require aircraft to remain on the runway until they reach that exit. Given that the normal landing distance needed for aircraft does not put them at the very end of the runway, additional taxi distance would be required to reach the end of the runway. Although most larger ADG V and VI aircraft would finish their landing closer to the runway end, some additional taxiing on the runway would still be required. The majority of aircraft at LAX are typically smaller ADG III type aircraft (i.e., Boeing 737 or Airbus A320) and their required landing distance is much shorter; hence, having one exit taxiway at the very end would require substantially more taxiing time and distance. All of the extra taxiing on the runway would increase runway occupancy time (otherwise known as ROT) which would require increasing "in-trail" distances between aircraft on the approach to avoid "go-arounds." It should be noted that due to safety issues

and concerns, it is not practical for aircraft to "land long" or taxi faster in an effort to get to the end of the runway in a shorter amount of time.

Regarding the commentor's suggestion that if larger aircraft need more operating space than what is currently available on the north airfield, they should simply use the south runways, such an approach is contrary to the project objective to improve airfield balance. There is currently a disproportionate amount of large aircraft departures occurring on the south airfield, at which LAWA seeks to improve the north airfield to reduce taxiing between the north and south runway complexes.

In light of the types of operational problems described above, the suggested alternative would fail to respond to the project objectives described in Section 2.2 of the SPAS Draft EIR relative to providing north airfield improvements that support the safe and efficient movement of aircraft at LAX. Additionally, the operational problems associated with this alternative would not support other project objectives. For example, it would not maintain LAX's position as the premier international gateway in supporting and advancing the economic growth and vitality of the Los Angeles region (i.e., ongoing airfield congestion and delays and airspace delays and rerouting of arriving flights could hamper LAX's ability to accommodate international flights), would not enhance safety at LAX, and would not support an improvement program that is efficient, sustainable, feasible, and fiscally responsible.

SPAS-PC00162-3

Comment:

Usefulness of LAX is limited by ground transportation. Users of LAX (air travelers and freight from the southland) must reach the airport by car, truck, or bus. The nearby freeway and road infrastructure is overloaded. LAWA should focus its expansion desires on the regional airports (including Palmdale), not on shoehorning more people into the constrained area of LAX. It is reprehensible that flight safety is being used to try and "justify" the misguided goals of LAWA.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please refer to Topical Response TR-SPAS-REG-1 regarding the fact that LAWA, through the LAX Master Plan, the SPAS process, and other efforts, supports a regional approach to accommodating air travel demands in Southern California. The Topical Response also discusses Palmdale Regional Airport.

The SPAS alternatives provide potential modernizations and improvements designed for a practical capacity of 78.9 MAP. 78.9 MAP is a conservative growth assumption consistent with the Southern California Association of Governments 2012 Regional Transportation Plan/Sustainable Communities Strategy. (See footnote 670 on page 4-1048 of the SPAS Draft EIR.) Therefore, based upon the SCAG RTP/SCS, growth in airport use would naturally grow to 78.9 MAP, with or without any improvements. The SPAS alternatives are designed to provide improvements that will accommodate this increase in passengers, not to promote further growth. Additionally, as provided in Section 1.1.2 of the SPAS Draft EIR, the SPAS amendments are designed to create conditions that encourage airlines to go to other airports in the region, particularly those owned and operated by LAWA.

SPAS-PC00162-4

Comment:

Meanwhile, improvements to transportation local to the airport can and should be implemented. Furthermore, our terminals show their age, and are woefully inadequate to handle passenger loads. I notice this particularly in Terminals 1 and 3 (despite recent improvements made to the Terminal 1 arrival/bag claim area).

Of the options offered in the SPAS DEIR, I endorse Alternative 2 as being the closest to the approach described above.

Response:

The commentor's support for Alternative 2 is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Chapter 2 of this Final EIR regarding the LAWA Staff-Recommended Alternative, which couples the airfield and terminal improvements associated with Alternative 1 with the ground access components associated with Alternative 9, including a discussion of the rationale behind the selection of these alternatives over the other alternatives evaluated in the SPAS Draft EIR.

SPAS-PC00163 Healy, Helen M None Provided 10/6/2012

SPAS-PC00163-1

Comment:

I am a Playa Del Rey homeowner who was unable to attend the recent meeting on LAX expansion plan.

I want to add my objections to another land "grab" by LAX. I support only the two (2) possible plans backed by our Neighborhood Council. Thank you

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. LAWA hosted a virtual online meeting from September 10, 2012 to October 10, 2012, which was available to individuals unable to attend the three open house/public meetings. The virtual online meeting included audio recordings with information pertaining to the topics addressed at each of the eight meeting stations, accompanied by the visual materials that had been presented at each of the stations. The virtual meeting was accessible to all members of the public.

Please see Response to Comments SPAS-PC00147-1 regarding the alternatives supported by the Neighborhood Council of Westchester/Playa.

SPAS-PC00164 Parris, Michael None Provided 10/8/2012

SPAS-PC00164-1

Comment:

I could NOT ATTEND 9-27-12 MEETING As my wife HAS ALHEIMER'S Diseas AND I TAKE CARE OF HER.

We HAVE Lived HERE SINCE 1958, with Councilmen TimberLAKe-RussEl-GALANTER AND Now RosENDAHL. THE AiRport HAS RAISEd HAVOC WITH ouR AREA wHich is SouTH of MANchesTER, Now THEY TAMPER wiTH THE AREA NORTH of MANchESTER.

We SUED THE ciTy ANd won THE CASE AfTER Long STRuggles, AppeAls ETC ETC.

AGAIN THE AIRPORT UNDER THE GUISE of STudIES, MEETing's ETC THEY wish To DEsTRoy THE AREAS NORTH of MANchESTER wiTH ALL DESrpTIVES Going ON EiR Study ETC.

THE Answer should BE A fLAT NO To ANYTHING And A Huge Law SuiT if NOTHINg IS RESOLVED.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. LAWA hosted a virtual online meeting from September 10, 2012 to October 10, 2012, which was available to individuals unable to

attend the three open house/public meetings. The virtual online meeting included audio recordings with information pertaining to the topics addressed at each of the eight meeting stations, accompanied by the visual materials that had been presented at each of the stations. The virtual meeting was accessible to all members of the public.

It should be noted that none of the SPAS alternatives include facilities north of Manchester Avenue.

SPAS-PC00165 Geerligs, P.R. None Provided 8/28/2020

SPAS-PC00165-1

Comment:

I currently have three residences; my main residence is in The Netherlands with two more in the US and UK. Naturally I often compare airports to my main hub of Schiphol. And let me say that LAX is terrible--worse than Heathrow. I support any improvements done to the airport not only for passengers but for economic concerns as well. The airport is vital for the city's economy. However the only modification I would make to the plan is the light rail station. Why not build an underground station similar to Schiphol? As I currently understand the plan there will be bus transfers to the airport but this is cumbersome especially when travellers have more than one piece of luggage. An underground station would speed trips and prove extremely convenient whilst providing a real alternative to driving to the airport.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Topical Response TR-SPAS-T-1 regarding transit options into LAX. As indicated in the topical response, an underground alignment and station for a future Metro rail extension into the CTA are under consideration by Metro as part of the Metro Airport Connector Project.

SPAS-PC00166 Toledo, Luis O None Provided 9/5/2012

SPAS-PC00166-1

Comment:

I think the LAX SPAS Open House/Public Meeting Board information is deceptive when it answers "no" to the question will "more" people be affected by noise with the northfield expansion....especially when they then provide a representation that moves the noise line north for EVERY proposal. Even if it was accurate that you aren't affecting "more" people...you are affecting the "same" people in a worse way. In other words the people that were already affected by noise will now be MORE affected by it. As someone that just bought a home in Playa Del Rey and already deals with noise at all times of the day and night I think this is unacceptable.

Response:

The commentor states that they find the "LAX SPAS Open House/Public Meeting Board information deceptive when it answer 'no' to the question will 'more' people be affected by noise with the northfield expansion…" This misstates what was said in the referenced presentation, available at: http://www.lawa.org/uploadedFiles/SPAS/PDF/20120824_LAWA_SPAS_Boards.pdf. The language from board 5.1 states "Will moving the north airfield runway result in more people being impacted by aircraft noise *compared to future conditions with no movement of the airfield*?" (Emphasis added.) The board further responds to this question as follows: "No. Any increase in the number of people that would be impacted by aircraft noise will be due to natural growth in aircraft activity projected to occur by 2025. The SPAS noise analyses indicates that reconfiguring the north airfield would actually impact

fewer people than leaving the runways in their current locations. This is due to the relationship between the noise contours and the affected land uses and residential densities in the LAX region."

The discussion from the presentation above is correct and consistent with the analysis provided in the SPAS Draft EIR (see Table 4.10.1-55 and discussion under "Cumulative Contribution - Changes from 2025 'No Additional Improvements' Conditions"). As summarized on the top of page 1-84 of the SPAS Draft EIR "[t]he density of the population is not constant across the area exposed to noise above 65 CNEL or higher; consequently, while the area of exposure may be similar among alternatives, the numbers of persons, dwellings or non-residential noise-sensitive facilities varies among the alternatives." Similar discussion was also provided in Section 4.10.1.6.8 of the SPAS Draft EIR.

The comment also states that "you are affecting the 'same' people in a worse way." The aircraft noise analysis included in Sections 4.9 and 4.10.1 of the SPAS Draft EIR addresses impacts of increased noise levels at existing locations (see thresholds of significance in Section 4.10.1.4.1). Please see Response to Comment SPAS-PC00149-2 regarding aircraft noise impacts that would result from the relocation of Runway 6L/24R northward under Alternatives 1, 5, and 6 compared to Alternatives 2, 3, 4, and 7.

A discussion of aircraft noise impacts in Playa del Rey under Alternatives 1 through 7 is provided in Sections 4.9.6 and 4.10.1.6 of the SPAS Draft EIR. As analyzed therein, under Alternatives 1 through 7, some areas within Playa del Rey and surrounding communities would be newly exposed to noise levels of 65 CNEL or higher, increases of 1.5 CNEL or higher within the 65 CNEL or higher noise contours.

SPAS-PC00166-2

Comment:

I sent an application for soundproofing to the appropriate department and was told that this plan has expired...so LAWA isn't even helping current residents with the lower noise problem now...so how can we expect cooperation in the future?

Response:

LAWA'S Residential Soundproofing Program has a record of Mr. Toledo contacting LAWA on June 29, 2012. Mr. Toledo's request was logged into LAWA's database. However, Mr. Toledo's request came in after the deadline of June 1, 2010 (see discussion of the LAWA's Residential Soundproofing Program below). The Los Angeles County Assessor's Office website indicates that the commentor's recent purchase occurred on or about March 7, 2012. LAWA's records show that previous owners of the said property have been contacted by LAWA to participate in LAWA's Residential Soundproofing Program but the previous owners never followed through. It should be noted that based on the 4th Quarter of 2011 Quarterly Noise Report and its associated noise contour map (available at http://www.lawa.org/welcome_lax.aspx?id=1090), Mr. Toledo's property is located outside the 65 CNEL contour.

LAWA's Residential Soundproofing Program began in 1997 with implementation of the first soundproofing project in Playa del Rey and Westchester in the City of Los Angeles. At that time, LAWA opened a community office on Sepulveda Boulevard, which remained open to the public until September 2009. After an extensive outreach effort to contact all eligible homeowners, a final deadline for participation in the original program was issued for June 1, 2010. Since the start of the program, LAWA has soundproofed over 7,300 residential dwelling units near LAX.

As discussed on page 4-664 of the SPAS Draft EIR, "LAX shall continue to implement its ANMP, with assistance of the affected jurisdictions, and shall update the entire ANMP from time to time to ensure that it reasonably represents the mitigation and funding programs that are in place, being implemented, or proposed for future implementation.

However, as acknowledged in Section 4.10.1.8 of the SPAS Draft EIR, because these programs will take time to implement "…significant noise impacts would be experienced in the area after implementation of the selected SPAS alternative but before the mitigation measures are fully

implemented. Thus, significant and unavoidable interim noise impacts would be experienced over an indeterminate period of time."

SPAS-PC00166-3

Comment:

I also think that it's NOT true that in the future the noise level will increase anyway because of more planes....the frequency of the noise might increase but NOT the individual noise level (unless the traffic is directed further north as in all these expansion plans). I think there is a lot of information that downplays how this will affect the residents in Playa Del Rey. As someone who deals with this noise on a daily basis I want to have the whole commission out on our street and do some "fly overs" based on current traffic patterns and then based on the "new" proposed flight patterns...and let's see them argue that there isn't a problem with the northfield expansion!!

Response:

As shown in Table 1-4 on page 1-48 of the SPAS Draft EIR, impacts related to aircraft noise are classified as "significant unavoidable impacts" under SPAS Alternatives 1 through 7. Under the heading of "Aircraft Noise Exposure" on page 1-82, the SPAS Draft EIR discusses the fact that, under Alternatives 1 through 7, residential and non-residential noise-sensitive facilities would be newly exposed to noise levels of 65 CNEL or higher, or increases of 1.5 CNEL or higher within the 65 CNEL or higher noise contours. From a CEQA perspective, these impacts would be significant. In addition, as discussed under the heading of "Aircraft Noise" on page 1-84 of the SPAS Draft EIR and presented in Table 1-17 on page 1-84, it was determined that the area of exposure is similar under each alternative. However, within each area of exposure, residential density (number of persons and dwelling units) as well as the concentration of non-residential sensitive facilities varies among the alternatives.

Refer to Tables 1-18, 1-19, and 1-20, on pages 1-85 and 1-86 of the SPAS Draft EIR for additional results in terms of aircraft noise impacts as well as Section 4.10.1 of the SPAS Draft EIR.

Regarding the statement that "there is a lot of information that downplays how this will affect the residents in Playa Del Rey," each alternative analyzed in the SPAS Draft EIR was fully assessed through the process regardless of which area or community would potentially be impacted.

SPAS-PC00167 Turner, Jordann None Provided 9/7/2012

SPAS-PC00167-1

Comment:

movement of runway north 100 feet in conjunction with runway improvements and extentions

Response:

The commentor's support for moving Runway 6L/24R 100 feet north (i.e., Alternative 6) is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Chapter 2 of this Final EIR regarding the LAWA Staff-Recommended Alternative, which couples the airfield and terminal improvements associated with Alternative 1 with the ground access components associated with Alternative 9, including a discussion of the rationale behind the selection of these alternatives over the other alternatives evaluated in the SPAS Draft EIR.

SPAS-PC00168 Turner, Jordann None Provided 9/7/2012

SPAS-PC00168-1

Comment:

First comment was sent in error as it was not complete. My main comment is follows. The changes to the specific plan should include moving the runway 100 feet north to accomodate a center taxiway. Also include related runway and taxiway extensions as well as the rapid transit options to the airport as contemplated in various alternatives. Two questions: how are the alternatives that include runway shifts north evaluated with the Northside Plan ? How is Metro's airport access study handled during the LAWA's study to do the same? Hopefully they are not redundant.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. An update to the LAX Northside plan is currently underway and a Draft EIR is being prepared. The Draft EIR for the LAX Northside Plan Update will take into account, as appropriate, the SPAS study as well as any concurrent LAWA and non-LAWA projects.

Please see Topical Response TR-SPAS-T-1 regarding the relationship of SPAS to the Airport Metro Connector Project and collaboration between LAWA and Metro regarding transit issues related to LAX.

SPAS-PC00169 Mitchell, Michael S None Provided 9/10/2012

SPAS-PC00169-1

Comment:

I cannot comment on the virtual meeting site? it will not open i have put the needed info in my computer

Response:

Upon receipt of this comment, which was submitted on September 10, 2012, LAWA confirmed that the website for the Virtual Meeting was functioning and able to be accessed. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00170 Steinbach, David None Provided 9/10/2012

SPAS-PC00170-1

Comment:

Please do everything you can to reduce noise in our community. Install sound walls if it would help. This is my only concern. Thank you.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their considerations prior to any action on the SPAS project.

Please refer to pages 4-664 through 4-667 in Section 4.9.3.3 of the SPAS Draft EIR for a discussion of the LAWA Aircraft Noise Mitigation Program (ANMP). Section 4-10.1.7 of the SPAS Draft EIR discussed in details the aircraft noise abatement techniques in general and specific measures analyzed under each SPAS alternative. Relative to the commentor's suggestion to install noise walls, airport-related noise impacts in the Playa del Rey area are primarily from aircraft that are departing from, or approaching (under "east flow" conditions when aircraft arrive from the west and land towards the east), the north airfield. Such aircraft are typically several hundred feet up in the air when passing by Playa del Rey. Noise attenuation (reduction) associated with noise walls comes from the ability to interrupt (block) the noise path between source and receptor. As such, it is anticipated that the placement of noise walls between the airport and Playa del Rey would not reduce aircraft noise levels. Additionally, placement of noise walls may result in visual impacts to the local area. Therefore, the suggestion to install noise walls in this area is rejected because there is no evidence it would reduce significant environmental impacts and would likely have additional adverse impacts.

SPAS-PC00171 Davis, Janis None Provided 9/13/2012

SPAS-PC00171-1

Comment:

In order for LAX to provide exemplary service far into the future and create the unique gateway to the city of Los Angeles I look forward to the update to the airport that will take place in the near future.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00172 Stacey, Pamela None Provided 9/26/2012

SPAS-PC00172-1

Comment:

My name is Pamela Stacey and i have lived in Playa del Rey for the past 27 years and love my community. I am here to advocate for the adoption of Alternative 2 combined with transportation features of Alternative 9. I oppose and will work to obstruct adoption of any other plan most especially any plan to move the north runway. Concerning the expansion people often ask us--What did you expect when you moved near the airport? We all did our homework. We expected an improvement in technology and proper management and governance. For the most part as evidenced by how many of us have stayed so long the airport has been a decent neighbor. Only Alternative 2 allows that to continue. Everybody in our neighborhoods wants to see LAX revitalized and improved --we too use the airport and know its low ranking--but we want it to be done to 21st century standards which include green technology the promotion of clean air and minimal vehicle traffic. Other plans risk turning LAX into a lumbering over-sized over-capitalized small-brained dinosaur. The people of Southern California and travelers to LAX deserve better. Most important to me only Alternative 2 states that there will be minimal or no increase in pollution. Moving the runway north will spew more toxins over more homes that are even now relatively compromised. It doesn't improve safety or air traffic to move the north runway. It does harm people. In only the two blocks where I live there are six cases of cancer. In only two blocks. I know the complications legitimate ones to proving cause and effect with cancer clusters. But you all know including our elected officials Council Members and LAWA power brokers that increased noise and air pollution put people at greater risk of cancer and other problems. There comes a time when common sense has to rule while science weighs in. That time is now. That decision has to be Alternative 2. Thank you. Pamela Stacey.

Response:

The commentor's support for Alternatives 2 and 9 is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Chapter 2 of this Final EIR regarding the LAWA Staff-Recommended Alternative, which couples the airfield and terminal improvements associated with Alternative 1 with the ground access components associated with Alternative 9, including a discussion of the rationale behind the selection of these alternatives over the other alternatives evaluated in the SPAS Draft EIR.

The commentor's statement that Alternative 2 will have minimal or no increase in pollution is incorrect. Related to air quality impacts, as indicated in Section 4.2 of the SPAS Draft EIR, even after mitigation, construction activities would result in significant and unavoidable air quality impacts under all of the alternatives. Specifically, under all of the alternatives except for Alternative 4, construction emissions of carbon monoxide (CO), volatile organic compounds (VOC), oxides of nitrogen (NOx), particulate matter with an equivalent aerodynamic diameter of 10 micrometers (PM10), and particulate matter with an equivalent aerodynamic diameter of 2.5 micrometers (PM2.5) would be significant and unavoidable. Under Alternative 4, significant and unavoidable construction emissions would occur for NOx and PM10. Under all of the alternatives, even after mitigation, construction-related concentrations of nitrogen dioxide (NO2) and PM10 would be significant and unavoidable.

Operation of the airport would also result in significant and unavoidable impacts to air quality. Even after mitigation, operational emissions of sulfur dioxide (SO2), PM10, and PM2.5 would be significant and unavoidable under all of the alternatives. Operational concentrations of NO2, PM10, and PM2.5 would also be significant and unavoidable under all of the alternatives.

Related to health concerns, As indicated in Section 4.7.1 of the SPAS Draft EIR, incremental cancer risks and incremental chronic non-cancer health hazards within the study area under all the alternatives would be less than significant for all receptor types (i.e., child resident, school child, adult resident, adult worker). Additionally, under all the alternatives, health effects to on-airport workers would be less than significant. Incremental acute non-cancer health hazards at small areas at or near the LAX fence-line under all the alternatives would be slightly above the threshold of significance and are considered to be significant and unavoidable for all analyzed receptor types (i.e., residents, recreational users, school child, and off-site adult workers). The primary toxic air contaminant of concern contributing to this impact is associated with emissions of acrolein from aircraft operations, which would occur in 2025 even in the absence of SPAS. It should be noted that, with the exception of Alternative 3, acute non-cancer health hazard impacts in 2025 would be lower under the SPAS alternatives than if no airfield improvements were implemented. Moreover, these significant impacts would occur at or near the fence-line; it is expected that actual impacts in the community would be less than significant.

The SPAS Draft EIR addresses impacts associated with aircraft noise, road traffic noise, construction traffic and equipment noise, and transit noise and vibration in Sections 4.10.1, 4.10.2, 4.10.3, and 4.10.4 respectively. The impacts associated with each of these categories of noise are summarized below.

As indicated in Section 4.10.1 of the SPAS Draft EIR, Alternatives 1 through 7 would result in some residential uses and non-residential noise-sensitive facilities being newly exposed to noise levels of 65 CNEL or higher or increases of 1.5 CNEL or higher within the 65 CNEL or higher noise contours. With implementation of LAX Master Plan mitigation measures, these impacts would be less than significant. However, interim impacts prior to the completion of mitigation, impacts on residential uses with outdoor habitable areas, and impacts on parks would remain significant and unavoidable. Alternatives 8 and 9 focus on ground access improvements that, in themselves, would not result in aircraft noise exposure but would be coupled with the airfield improvements proposed under Alternatives 1, 2, 5, 6, or 7, the impacts of which are summarized above. None of the alternatives would result in a significant impact relative to sleep awakenings. Under Alternatives 1 through 7, significant impacts would occur with an additional school being newly exposed to the 55 dBA Lmax. Each alternative would also result in significant impacts due to sustained interruption of classroom teaching at newly exposed schools through interior noise levels in excess of 35 dBA Leq(h). Implementation of LAX Master Plan mitigation measures would ultimately reduce impacts to these schools to a level that is less than significant.

However, interim impacts prior to completion of mitigation measures would remain significant and unavoidable.

Concerning road traffic noise, as indicated in Section 4.10.2 of the SPAS Draft EIR, impacts related to ground access improvements proposed under Alternatives 1, 2, 3, 4, 8, and 9 would be less than significant as the incremental changes in road traffic noise levels under each of these alternatives would be less than a 3 dBA increase in CNEL. Alternatives 5, 6, and 7 do not include ground access improvements and would therefore not affect road traffic noise levels at off-site noise-sensitive uses.

Regarding construction traffic and equipment noise, as indicated in Section 4.10.3 of the SPAS Draft EIR, due to the periodic nature and limited incremental increase on area roadways, none of the alternatives would result in significant impacts related to construction traffic noise. However, all of the alternatives would result in significant impacts from construction equipment noise with the potential to effect sensitive receptors such as residential and school uses. The sources of those impacts differ by alternative, but can be generally characterized as temporary impacts associated with airfield improvements, ground access system improvements, and construction staging areas. While LAX Master Plan commitments and mitigation measures would reduce construction equipment noise impacts associated with all of the SPAS alternatives, it cannot be definitively concluded that all construction equipment noise impacts would be reduced to levels that are less than significant and these impacts are considered to be significant and unavoidable.

SPAS-PC00173 Vaughn, Vicki None Provided 9/28/2012

SPAS-PC00173-1

Comment:

The options presented in recent community meetings of pushing the north runway further north by 50 "" 350 feet are not acceptable. THE CURRENT CONFIGURATION OF THE NORTH RUNWAYS ARE SAFE ACCORDING TO THE 2010 NASA "" AMES STUDY RELEASED IN FEBRUARY 2010. It is unbelievable that the Los Angeles city council could ignore the report of 'rocket scientists' in terms of safety at our airport. I'm not into accusing anyone of unethical dealings but the mere fact that these options are still on the table tells me that someone is going to benefit enormously and it won't be the local residents!

Response:

As indicated in Section 4.7.2 of the SPAS Draft EIR, the LAX North Airfield Safety Study (NASS) was initiated at the request of City of Los Angeles elected officials. The North Runway Safety Advisory Committee, composed of LAX stakeholders, was formed to oversee the study, including selection of academic panel members to be involved in the study. The panel consisted of six professors from various universities and various disciplines in Science and Engineering, but who had in common a longstanding interest in issues about aviation safety and efficiency. As indicated on page 4-505 of the SPAS Draft EIR, the academic panel's review of the technical work completed for the NASS had several main conclusions including, but not limited to: the LAX north airfield is extremely safe under the current configuration for the projected 2020 activity forecast; and, certain improvements to, and reconfiguration of, the north airfield would substantially increase airfield safety (i.e., reduce the risk of a fatal runway collision). The academic panel also concluded that, based on safety grounds alone, it would be hard to argue for reconfiguring the north airfield (i.e., given that the baseline level of risk is so low, reducing the risk of a fatal runway collision by a substantial level is of "limited practical importance"). The academic panel's opinion, which represents a subjective value judgment on the importance of reducing the risk of a fatal runway collision, is not shared by the Federal Aviation Administration, the federal agency responsible for the safety of civil aviation.

SPAS-PC00173-2

Comment:

We'll be left with sleepless nights from the noise increased air pollution and increased traffic.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project.

The SPAS Draft EIR addresses impacts associated with aircraft noise, road traffic noise, and construction traffic and equipment noise in Sections 4.10.1, 4.10.2, and 4.10.3, respectively. The impacts associated with each of these categories of noise are summarized below.

As indicated in Section 4.10.1 of the SPAS Draft EIR, Alternatives 1 through 7 would result in some residential uses and non-residential noise-sensitive facilities being newly exposed to noise levels of 65 CNEL or higher or increases of 1.5 CNEL or higher within the 65 CNEL or higher noise contours. With implementation of LAX Master Plan mitigation measures, these impacts would be less than significant. However, interim impacts prior to the completion of mitigation, impacts on residential uses with outdoor habitable areas, and impacts on parks would remain significant and unavoidable. Alternatives 8 and 9 focus on ground access improvements that, in themselves, would not result in aircraft noise exposure but would be coupled with the airfield improvements proposed under Alternatives 1, 2, 5, 6, or 7, the impacts of which are summarized above. None of the alternatives would result in a significant impact relative to sleep awakenings.

Concerning road traffic noise, as indicated in Section 4.10.2 of the SPAS Draft EIR, impacts related to ground access improvements proposed under Alternatives 1, 2, 3, 4, 8, and 9 would be less than significant as the incremental changes in road traffic noise levels under each of these alternatives would be less than a 3 dBA increase in CNEL. Alternatives 5, 6, and 7 do not include ground access improvements and would therefore not affect road traffic noise levels at off-site noise-sensitive uses.

Regarding construction traffic and equipment noise, as indicated in Section 4.10.3 of the SPAS Draft EIR, due to the periodic nature and limited incremental increase on area roadways, none of the alternatives would result in significant impacts related to construction traffic noise. However, all of the alternatives would result in significant impacts from construction equipment noise with the potential to effect sensitive receptors such as residential and school uses. The sources of those impacts differ by alternative, but can be generally characterized as temporary impacts associated with airfield improvements, ground access system improvements, and construction staging areas. While LAX Master Plan commitments and mitigation measures would reduce construction equipment noise impacts associated with all of the SPAS alternatives, it cannot be definitively concluded that all construction equipment noise impacts would be reduced to levels that are less than significant and these impacts are considered to be significant and unavoidable.

The SPAS Draft EIR addresses air quality impacts associated with the SPAS alternatives, including Alternatives 1, 5, and 6 which propose a northward relocation of Runway 6L/24R, in Sections 4.2. As indicated therein, even after mitigation, construction activities would result in significant and unavoidable air quality impacts under all of the alternatives. Specifically, under all of the alternatives except for Alternative 4, construction emissions of carbon monoxide (CO), volatile organic compounds (VOC), oxides of nitrogen (NOx), particulate matter with an equivalent aerodynamic diameter of 10 micrometers (PM10), and particulate matter with an equivalent aerodynamic diameter of 2.5 micrometers (PM2.5) would be significant and unavoidable. Under Alternative 4, significant and unavoidable construction emissions would occur for NOx and PM10. Under all of the alternatives, even after mitigation, construction-related concentrations of nitrogen dioxide (NO2) and PM10 would be significant and unavoidable.

Operation of the airport would also result in significant and unavoidable impacts to air quality. Even after mitigation, operational emissions of sulfur dioxide (SO2), PM10, and PM2.5 would be significant and unavoidable under all of the alternatives. Operational concentrations of NO2, PM10, and PM2.5 would also be significant and unavoidable under all of the alternatives.

Relative to off-airport traffic impacts, as addressed in Section 4.12.2 of the SPAS Draft EIR, the majority of the 200 intersections evaluated within the SPAS off-airport transportation study area would not be significantly impacted under Alternatives 1, 2, 3, 4, 8, and 9; however, significant impacts to some off-airport intersections and/or Congestion Management Plan (CMP) facilities would occur under each of

these alternatives. The total number of significantly-impacted intersections and/or CMP facilities would vary slightly among those alternatives. Alternatives 5, 6, and 7 focus on airfield and terminal improvements that, in themselves, would not affect off-airport traffic, but would be coupled with the ground transportation improvements proposed under Alternatives 1, 2, 8, or 9, the impacts of which are summarized above.

SPAS-PC00173-3

Comment:

The mellow-dramatic act by Mr. Rothenberg at a recent meeting was ridiculous and highlights the fact that the committee whom he represented could care less about the residents of the area. His only concern was that one air conditioning unit on a business building might have to be moved. Never did he mention the degradation in the quality of life that the local neighborhood would suffer with the proposed changes to push further north. Just because the airport OWNS the land does not mean that it is OK for LAX to impose its presence on the neighborhoods. THERE IS LEGAL PRECEDENCE IN THE CITY OF LOS ANGELES THAT DEMANDS COMPENSATION OF HOMEOWNERS WHO SUFFER PROPERTY VALUE DEPRECIATION DUE TO NEARBY DEVELOPMENT AND EMINENT DOMAIN TAKINGS (West Hills Property Owners circa 1990) I don't know all the details which homes will be taken because of eminent domain but those of us who are left and are exposed to increased noise/pollution/traffic should be compensated for the loss in property value. I recently moved to the Westchester area thinking that the threat of pushing the airport runways further north was over because of the NASA report. While house hunting a local relator pointed out to me that homes south of Manchester around Emerson were 50-100k cheaper than north of Manchester. I bought north of Manchester and paid the extra amount expecting a quieter existence. My property value will drop $100k or more because of someone else's greediness (it is well documented that this is NOT being done for safety reasons.) IT WILL MATTER IN TERMS OF THE VALUE OF MY HOUSE. Back in the early '90s I lived in an area of Los Angeles called West Hills located in the western edge of the San Fernando valley. A developer came in the city approved their plans they created 50 foot high hills behind many homeowners who had a "view" Pushing the runways further north will cause me to LOSE ALL OF THE EQUITY IN MY HOUSE. How do you plan to compensate me and my neighbors?

Response:

A discussion of property acquisition that would occur under the SPAS alternatives is provided in Section 2.3.1.11 and Section 4.9.6 of the SPAS Draft EIR. Specifically, the property acquisition that would be required under Alternatives 1, 2, 3, 4, 8, and 9 is shown in Figures 2-11, 2-12, 2-13, and 2-14 and listed in Table 2-4 and Table 2-5 in Section 2.3.1.11 of the SPAS Draft EIR. In addition, Table 4.9-5 in Section 4.9.6 of the SPAS Draft EIR presents a comparison of acquisition areas by land use for the applicable SPAS alternatives. As noted in Table 4.9-5, no acquisition is proposed for Alternatives 5, 6, and 7 since these alternatives focus on airfield and terminal components, although acquisition would be required for the ground access components with which these alternatives would be paired. As indicated in these figures and tables, no residential acquisition is proposed.

Regarding the displacement of homes and businesses within the RPZ for alternatives proposing moving runways north, please see Responses to Comments SPAS-AL00007-26 and SPAS-PC00130-931. One of the objectives of the SPAS alternatives, as presented on page 2-2 of the SPAS Draft EIR, is for LAWA to seek airfield improvements that minimize or eliminate the extent that RPZs overlay residential areas. As shown in Table 4.7.2-16 in Section 4.7.2 of the SPAS Draft EIR, Alternatives 1, 5, and 6 would result in residences no longer being located within the RPZ.

Regarding the assumption that eminent domain would be used to acquire property affected by the RPZ, the City of Los Angeles would use the most appropriate and practical measures available (e.g., voluntary acquisition, leasing, and/or public condemnation) to implement the project. However, at this early point in the planning process, it is not possible to predict which, if any, properties would be acquired through eminent domain.

Regarding property value impacts, CEQA does not require property value impacts or other purely social or economic impacts to be analyzed in an EIR (State CEQA Guidelines Section 15064(e).) Please see Response to Comment SPAS-PC00189-4 for further discussion about impacts on property values.

Regarding effects associated with air quality, noise, and traffic, these issues have been evaluated in Section 4.2, 4.9, 4.10, and 4.12 of the LAX SPAS Draft EIR.

SPAS-PC00173-4

Comment:

THE REDUCTION IN AIRPORT NOISE LEVELS FROM THE MOST EXTREME PLAN (PUSH 350' NORTH) IS ERRONESOULY BEING APPLIED TO THE WESTCHESTER/PLAYA AREAS. THAT REFERS TO EL SEGUNDO BECAUSE THE SOUTHERN RUNWAYS WILL HAVE FEWER INTERNATIONAL FLIGHTS. NOISE LEVEL WILL BE INCREASED FOR RESIDENTS NORTH OF THE AIRPORT.

Response:

The commenter states that "THE REDUCTION IN AIRPORT NOISE LEVELS FROM THE MOST EXTREME PLAN (PUSH 350` NORTH) IS ERRONESOULY BEING APPLIED TO THE WESTCHESTER/PLAYA AREAS…" In comparison to baseline (2009) conditions, the SPAS Draft EIR concludes that Alternative 1 would result in significant impacts "located principally along the approach to the north and south airfield." (See page 4-837 of the SPAS Draft EIR.) The commentor is referred to Sections 4.9 and 4.10.1 of the SPAS Draft EIR for additional discussion of aircraft noise analysis associated with the SPAS alternatives. Please also see Response to Comment SPAS-AL00007-22 regarding impacts under Alternative 5 (which would relocate Runway 6L/24R 350 feet north) compared to Alternatives 1, 2, 3, 4, 6, and 7.

SPAS-PC00173-5

Comment:

Currently my house is violently shaken EVERY TIME that a 747 long haul jet takes off from the north runway. The vibrations are so strong that my closet doors on the north side of the house rattle! I asked one of your "engineers" at the meeting at the Proud Bird about where sensors were placed when the study was done concerning the noise because I can't believe I'm outside of the 65 decibel area. Turns out it was mathematically calculated without taking into account the terrain of my house. My house sits up on a small knoll exposed to the sound waves as they travel across Westchester park. I'm 100 feet (my best guess) outside the area that had windows replaced by the airport. I've had to replace the windows myself. However it does NOTHING to abate the vibrations of those 747s. I'm at the corner of 85th and Holy Cross Pl 90045 Plus unless and until you force airlines to not use their reverse thrusters on their 757s and 737s and just use the turn out further down the runway there will be no peace. I just can't imagine THAT noise 350' closer to my house as well. Thank you for your consideration.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Note that the comment primarily addresses existing conditions and does not address or comment on the noise analysis conducted in the SPAS Draft EIR, which addresses noise impacts of the SPAS alternatives.

The aircraft noise analysis is provided in Section 4.10.1 of the SPAS Draft EIR. This analysis was based in part on a number of variables including topography. The SPAS Draft EIR aircraft noise analysis was undertaken using the FAA's Integrated Noise Model (INM), the standard model used for aircraft noise analysis in the United States. The noise analysis incorporated digital topographic data from the U.S. Geological Survey. Thus, the results of the noise modeling reflected the effects of topographic variations in the study area at LAX region. Appendix J1-1 of the SPAS Draft EIR further describes the INM and the input data and assumptions used for modeling current noise (2009) and forecast noise (2025) for all SPAS alternatives.

The commentor also discusses concerns regarding the use of reverse thrusters under existing conditions. As stated in Section 4.10.1 of the SPAS Draft EIR, Alternatives 1, 2, 3, 5, 6, and 7 include improving the locations of high-speed exit taxiways from the outboard runway. The improvements of the high-speed exit taxiways from the runway would allow the aircraft to exit the runway at greater

speeds, with reduced reverse thrust that directs aircraft away from noise-sensitive uses. Please see Response to Comment SPAS-PC00038-3 regarding vibration impacts associated with aircraft operations.

SPAS-PC00174 Barry, Bill None Provided 9/28/2012

SPAS-PC00174-1

Comment:

This family is strongly opposed to Alternatives 1 5 or 6. I cannot believe that our local state and federal agencies would even consider much less decide to move a pollutant source closer to a densely populated residential area with schools parks and playgrounds. "Fine" particulates and the other toxic emissions from jet engines even new generation engines are a known problem. What can you be thinking of? You even recognize that the pollution is a concern because Alternate 5 has an "SU" labelwhich I understand to mean that the pollution issues are significant and NOT CAPABLE OF BEING MITIGATED. Please adopt alternative 2 which leaves the North runway where it is.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Note that the SPAS Draft EIR determined that operational air quality particulate matter impacts for all alternatives would be significant and unavoidable (SU), as shown in Section 1.4, Table 1-7 of the SPAS Draft EIR. All of the alternatives, including Alternative 2, would result in operational air quality impacts that exceed the significance thresholds.

SPAS-PC00175 Haythorn, Joseph D None Provided 9/30/2012

SPAS-PC00175-1

Comment:

From the outset of the process to explore development of the facility at LAX it appears that LAWA has been acting in a duplicitous manner toward the citizens of Westchester and Playa del Rey. Inglewood has been treated in similar way. The idea that the if LAWA were to pursue moving the runway an additional group of houses condominiums apartments schools and businesses would need to be condemned. Any remaining outside the condemned area would surely bring actions for diminished value. The violation of the consent decree from the last condemnation would serve as the basis of the action but even without that the property owners would be successful in stopping the development resulting in no activity or at worst delaying any construction for years and ultimately receiving compensation forcing the costs of the project far beyond LAWA"TMs predictions.

Response:

A discussion of property acquisition that would occur under the SPAS alternatives is provided in Sections 2.3.1.11 and 4.9.6 of the SPAS Draft EIR. Specifically, the property acquisition that would be required under Alternatives 1, 2, 3, 4, 8, and 9 is shown in Figures 2-11, 2-12, 2-13, and 2-14. As indicated therein, no acquisition is required due to the movement of the runway and associated realignment of Lincoln Boulevard. As summarized in Table 4.9-5 in Section 4.9.6 of the SPAS Draft EIR, no acquisition of residential uses is proposed and under Alternatives 1, 2, 3, 8, and 9 two charter schools within Manchester Square would be acquired.

Regarding the potential for changes in the RPZ to have an impact on homes, please see Responses to Comments SPAS-AL00007-26 and SPAS-PC00130-931. One of the objectives of the SPAS, as presented on page 2-2 of the SPAS Draft EIR, is for LAWA to seek airfield improvements that minimize or eliminate the extent that RPZs overlay residential areas. As shown in Table 4.7.2-16 in Section 4.7.2

of the SPAS Draft EIR, Alternatives 1, 5, and 6 would result in residences no longer being located within the RPZ.

Regarding concerns related to reduction of property values, please see Response to Comment SPAS-PC00189-4. Comments related to potential future lawsuits are speculative, and in any event are not relevant to assessment of the SPAS alternatives' physical environmental impacts.

SPAS-PC00175-2

Comment:

The recent charade of the Northside development project meetings and "negotiations" are a further indication that LAWA is either not serious about the alternatives which involve or intending to lull the neighbors into a false sense of security. Neither reflects well as to whether LAWA is a trustworthy party in this project. As LAWA proves again inept and it is difficult to understand whether the entire process of proposing alternatives is a sham.

Response:

The content of this comment is similar to comment SPAS-PC00108-2; please refer to Response to Comment SPAS-PC00108-2.

SPAS-PC00175-3

Comment:

Community partners have demonstrated that the safety claims are so exaggerated they may be dismissed.

Response:

Section 4.7.2 of the SPAS Draft EIR summarizes the results of seven independent assessments of north airfield safety. The commentor provides no substantial evidence in support of its statement regarding safety claims, or any specificity, analysis, or other evidence of the assessments being inadequate or inaccurate as claimed to be demonstrated by "community partners."

SPAS-PC00175-4

Comment:

The statement that noise would not be worse if the runways are moved may be technically true but the noise would be closer to the residences schools and businesses so louder there. To actually claim otherwise again demonstrates that LAWA is not dealing seriously. So I am left to speculate as to whether LAWA is lying or inept. In either case my only alternative at this point is to seek counsel unless LAWA begins to address this business honestly with a clear understanding of the consequences of their actions.

Response:

The commentor appears to be referring to the reduction in the population and dwelling units that would be exposed to 65 CNEL or higher noise levels under Alternatives 1, 2, 3, 5, 6, and 7 compared to 2025 "No Additional Improvements" Conditions. as shown in Table 1-17 of the SPAS Draft EIR, which would occur because some more densely populated areas would be removed from the 65 CNEL noise contour, as further described in Response to Comment SPAS-PC00166-1.

Aircraft noise impacts under Alternatives 1 through 7 were provided in Sections 4.9.6 and 4.10.1.6 of the SPAS Draft EIR in comparison to Baseline (2009) Conditions. As analyzed therein, aircraft noise impacts would be significant for Alternatives 1 through 7 for those noise-sensitive uses newly exposed to noise levels of 65 CNEL or higher, increases of 1.5 CNEL or higher within the 65 CNEL or higher noise contours, outdoor noise levels of 75 CNEL or higher, and single event aircraft noise levels which result in classroom disruption. LAX Master Plan commitments and mitigation measures that would address these impacts are identified in Sections 4.9.7 and 4.10.1.8 of the SPAS Draft EIR, and include

LAX Master Plan Mitigation Measures MM-LU-1, MM-LU-3, MM-LU-4, MM-N-4, and LAX Master Plan Commitment N-1. As concluded in Sections 4.9.7, 4.9.8, and 4.10.1.8 of the SPAS Draft EIR, interim impacts, prior to implementation of these LAX Master Plan mitigation measures and LAX Master Plan Commitment N-1, would be significant and unavoidable. In addition, impacts on parks and certain residential uses with outside private habitable areas newly exposed to noise levels of 75 CNEL or higher would be significant and unavoidable.

SPAS-PC00175-5

Comment:

I still believe that the best alternative has not been considered to close the interior parking and access roads construct two or three north-south terminals with access by passengers from a subterranean mall as at the airports in Atlanta or Denver. Passengers would enter the facility east of the airport at Manchester Square or the area now with derelict warehouses between the two points.

Response:

The comment is identical to comment SPAS-PC00108-4; please see Response to Comment SPAS-PC00108-4.

SPAS-PC00175-6

Comment:

Otherwise I agree with the Neighborhood Council of Westchester Playa that alternatives 2 and 9 appear to be the only reasonable ones. The other would receive such opposition as to block all construction. If LAWA is actually intent on ignoring their prior consent agreements there is really no reason to bother negotiating. I further agree with the Neighborhood Council of Westchester Playa that we do support intelligent development of LAX it is a shame any development is relegated to the abilities of the existing management of LAWA.

Response:

The commentor's support for Alternative 9 is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Chapter 2 of this Final EIR regarding the LAWA Staff-Recommended Alternative, which couples the airfield and terminal improvements associated with Alternative 1 with the ground access components associated with Alternative 9, including a discussion of the rationale behind the selection of these alternatives over the other alternatives evaluated in the SPAS Draft EIR. The comment regarding LAWA's compliance with "prior consent agreements" requires legal conclusions that are beyond the scope of what is required by CEQA.

SPAS-PC00176 — Montealegre, Andrew — None Provided — 9/30/2012

SPAS-PC00176-1

Comment:

Two ideas for accessing LAX: 1) create a transfer station where people transfer from their cars to a pod-type self-driving car; 2) run the train to the Theme Bldg and create walkways from there to all the terminals. See my website drawings: www.accesslax.blogspot.com

Response:

The basic concept of having people park their cars at an off-airport facility and take an alternative mode of transportation into the CTA is the same as proposed in Alternatives 1, 2, and 8, which propose the ITF linked to the CTA with by an elevated/dedicated busway, and in Alternatives 3 and 9, where an APM system would transport people to the CTA from the GTC, ITC, or ITF. The comment suggesting

the use of a "pod-type self-driving car" is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. The comment does not indicate any environmental advantages of a "pod-type self-driving car" relative to the alternatives evaluated in the SPAS Draft EIR, nor is there any evidence that such vehicles are technologically feasible. For these reasons, the commentor's suggested alternative was not evaluated in detail in the SPAS Draft EIR.

No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00177 Harrell, Erica None Provided 10/2/2012

SPAS-PC00177-1

Comment:

Alternative 2 seems to be the best option for those of us who live south of Manchester west of Sepulveda. If any other proposals go through do you plan to purchase any properties in this area?

Response:

Please refer to Response to Comment SPAS-PC00160-4 for a discussion of parcels that would be acquired under the SPAS alternatives. As shown in Figure 2-11 in Section 2.3.1.11 of the LAX SPAS Draft EIR, no areas are proposed for acquisition or purchase south of Manchester Avenue and west of Sepulveda Boulevard.

As implied by this and the following comment, the commentor may also be requesting the purchase of properties due to increased aircraft noise exposure. As described on pages 4-664 through 4-667 in Section 4.9.3.3 of the SPAS Draft EIR, incompatible uses (including residential) located within the 65 CNEL or higher noise levels are eligible for sound insulation. LAWA's current practice is to provide sound insulation to residential uses rather than purchase incompatible properties, with the exception of a separate voluntary residential acquisition and relocation program currently underway for the Manchester Square and Belford areas.

SPAS-PC00177-2

Comment:

I can assure you the airport noise is really a nuisance already here. With all of these alternative what would the sound impact be on those in my area? If alternative 2 is passed are there any incentives that could be done for the neighbors in this area? Specifically we have these horrible power poles on86th that do not even power our neighborhood. Having more trees would be nice around this area as well. Are there any neighborhood incentives planned with any of these proposals? If so what are they? Thank you!

Response:

Please see Response to Comment SPAS-PC00008-1 regarding current measures underway to address existing aircraft noise levels.

A discussion of aircraft noise impacts in Westchester, including the area south of Manchester Avenue and west of Sepulveda Boulevard (and east of the Westchester Municipal Golf Course), under Alternatives 1 through 7 is provided in Sections 4.9.6 and 4.10.1.6 of the SPAS Draft EIR.

Regarding noise levels at the commentor's property (located at 6527 West 86th Place in the community of Westchester), as analyzed in Sections 4.9.6 and 4.10.1.6 of the Draft EIR, under all of the alternatives the referenced property would not be newly exposed to high noise levels within the 65 CNEL noise contour. Therefore, impacts at the commentor's property would be less than significant.

Regarding the incentives proposed by the commentor, the SPAS project does not include the removal of power poles or the planting of trees for this area of Westchester. However, along the southern boundary of the area referenced by the commentor, south of 88th Place and 88th Street and east of Emerson Avenue, is LAX Northside which serves as an airport buffer zone (comprised of compatible development and landscape) between airfield operations and the Westchester community. This area is subject to use restrictions, height restrictions, setback requirements, and landscape requirements (including a 30-foot landscaped buffer setback along 88th Street between Sepulveda Westway and Liberator Avenue).

SPAS-PC00178 Mitchell, Michael None Provided 10/3/2012

SPAS-PC00178-1

Comment:

The city is broke the state is broke to think you have the money to do any of this is a scam to take city money that we do not have and the bond market is a bubble. This is a scam and the design of the international terminal should be the end of the new work on the airport the rest will not work any way the one mile loop works great if you move off this area everyone will go to other airports for it will be torture to come to lax and get out of it. the truth is spas is made to make money from a plan 15 years ago that is out of date will not work and a sin if you do. when the mayor leaves next year the secret that the city is really broke will come out the bond market will crash and the city will not be able to sell the lax bonds. It will go bankrupt and have to be sold to the highest bidder especially if you spend all this needless money for spas.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Response to Comment SPAS-PC00096-2 regarding funding sources for SPAS improvements, including bonds. As noted in that response, no general tax dollars would be used to pay for any of the proposed on-airport improvements.

SPAS-PC00179 Smith, Chris None Provided 10/3/2012

SPAS-PC00179-1

Comment:

It was very difficult to find this space on your website. I am in favor of all efforts to modernize LAX. It is evident that it has been allowed to go for far too long with making the improvements necessary to keep it a world class airport.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)). It is unclear as to what the commentor is referring regarding his difficulty finding "this space" on LAWA's SPAS website. If the commentor is referring to the location on the website where comments could be provided, the home page of the website contained a prominently-placed section in the top right-hand corner of the page with a headline reading: "Tell us what you think. Once you have reviewed the study information, submit a comment on the Draft Environmental Impact Report by using the form below."

SPAS-PC00179-2

Comment:

That said I also think that LAWA needs to speak in a more neutral fashion about the safety studies that have been commissioned and completed - there is no sense of balance in how you portray the findings.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00180 Wiles, Jim None Provided 10/4/2012

SPAS-PC00180-1

Comment:

The only alternatives that make sense for LAX and the surrounding community are alternatives 2 & 9. I have lived in Westchester for over 30 years. Please desist from ruining this great community. If you choose an alternative that moves the runway north there will be many more years of litigation. Do the right thing.

Response:

The commentor's support for Alternatives 2 and 9 is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Chapter 2 of this Final EIR regarding the LAWA Staff-Recommended Alternative, which couples the airfield and terminal improvements associated with Alternative 1 with the ground access components associated with Alternative 9, including a discussion of the rationale behind the selection of these alternatives over the other alternatives evaluated in the SPAS Draft EIR.

SPAS-PC00181 Allen, Marilyn M None Provided 10/4/2012

SPAS-PC00181-1

Comment:

I am a life long resident of the LAX area. We do not need LAX to be expanded... we need it to be modernized... tearing up streets and moving the runway are not necessary... alternatives 2 and 9 are the only way to go...if I could I would vote for them. thank you

Response:

The commentor's support for Alternatives 2 and 9 is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Chapter 2 of this Final EIR regarding the LAWA Staff-Recommended Alternative, which couples the airfield and terminal improvements associated with Alternative 1 with the ground access components associated with Alternative 9, including a discussion of the rationale behind the selection of these alternatives over the other alternatives evaluated in the SPAS Draft EIR.

SPAS-PC00182 Lund, Julie None Provided 10/8/2012

SPAS-PC00182-1

Comment:

I do understand that improvements need to be made to the airport but as a Westchester neighbor and a airport employee I do not want the north runway moved. The best options in my view are either option 2 or 9.

Response:

The commentor's support for Alternatives 2 and 9 is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Chapter 2 of this Final EIR regarding the LAWA Staff-Recommended Alternative, which couples the airfield and terminal improvements associated with Alternative 1 with the ground access components associated with Alternative 9, including a discussion of the rationale behind the selection of these alternatives over the other alternatives evaluated in the SPAS Draft EIR.

SPAS-PC00183 Peterson, Linda None Provided 10/8/2012

SPAS-PC00183-1

Comment:

As homeowners near LAX and frequent users of the airport we are disappointed that the expressed Project Objectives for the SPAS do not include the goal of regionalizing Southern California air traffic. Regionalization should have been one of the enumerated Project Objectives and the DEIR should have discussed how much each alternative would help to accomplish that objective. It is short-sighted of the City to put all of its eggs into the LAX basket. In addition although LAX brings economic benefits to all of Southern California the burdens of the airport are unfairly shouldered by the communities surrounding it. It is time to take a serious regional approach to air transportation to mitigate the safety concerns noise congestion and air pollution currently impacting those who live work and travel the roads near LAX.

Response:

Please refer to Topical Response TR-SPAS-REG-1 regarding the fact that LAWA, through the LAX Master Plan, the SPAS process, and other efforts, supports the regionalization of air travel demand in Southern California. The topical response explains why regionalization was not included as a project objective.

SPAS-PC00183-2

Comment:

As to the specific alternatives included in the SPAS we favor a combination of Alternatives 2 and 9 which we believe would modernize the airport and improve the airfield and ground transportation without unduly harming nearby communities. Not only is Alternative 2 the "environmentally superior alternative" (page 1-103) it appears to be the most affordable option and the one that could be accomplished with the least delay. Many of the other alternatives in the SPAS are prohibitively expensive and there is no indication of how they will be funded. We support the airfield improvements in Alternative 2 which does not relocate the north runways but instead lengthens the left runway and improves taxiways. Alternative 2 is preferable given that these modifications to the airfield would mean that the larger Group 5 and 6 aircraft could be acceptably handled with no additional runway separation (pages 4-514-515). The expert safety study conducted by the North Airfield Safety Advisory Committee considered the "gold standard" when it was commissioned unanimously concluded that the North

Runway Complex is extremely safe even with future projected traffic levels. In addition Alternative 2 would have the least impact on road traffic (page 4-942). Alternative 2 would not require the very expensive modifications to Lincoln Boulevard or the Argo Drainage Channel that would be required under the options that would move the runway so the modernization in Alternative 2 should not take as long or be as expensive as the alternatives that would move the runways. We support Alternative 9 as well because we believe that the Consolidated Rental Car center project in Alternative 2 combined with the automated people mover from Alternative 9 would improve traffic by taking rental car shuttles off the road.

Response:

The commentor's support for Alternatives 2 and 9 is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Chapter 2 of this Final EIR regarding the LAWA Staff-Recommended Alternative, which couples the airfield and terminal improvements associated with Alternative 1 with the ground access components associated with Alternative 9, including a discussion of the rationale behind the selection of these alternatives over the other alternatives evaluated in the SPAS Draft EIR. It should be noted that Alternative 2 does not include a CONRAC; however, a CONRAC is a feature of Alternative 9.

Please see Response to Comment SPAS-PC00089-1 for an explanation of why Alternative 2 coupled with the ground access components of Alternative 9 is not the environmentally superior alternative. Please see Response to Comment SPAS-PC00130-730 regarding the treatment of economic impacts in an EIR. As noted in that response, CEQA does not require an analysis of cost or project funding. (State CEQA Guidelines Section 15131; Pub. Resources Code Section 21068.) Nevertheless, it should be noted that the combination of Alternatives 2 and 9 is not the lowest cost alternative (see Table 8-2 in Chapter 8 of the Preliminary LAX SPAS Report). The comment that many of the SPAS alternatives are prohibitively expensive is a personal opinion unsupported by facts or evidence. Regarding the statement that there is no indication of how the SPAS alternatives will be funded, as indicated in Table 8-1 of Chapter 8 of the Preliminary LAX SPAS Report, the total escalated costs associated with each SPAS alternative match the approximate amount of funding from various sources that is anticipated to be available for the alternatives. Please also see Response to Comment SPAS-PC00096-2 regarding funding sources for SPAS improvements. The comment that Alternative 2 "could be accomplished with the least delay" and "should not take as along" as other alternatives is noted. Because of the programmatic nature of the SPAS Draft EIR, the relative construction time for each alternative is not currently known. As indicated on page 2-57 of the SPAS Draft EIR, the nine SPAS alternatives were formulated at a conceptual level only and there are no specific planning, design, or engineering studies or construction plans for any of the alternatives. In conjunction with the preparation of more detailed design and engineering plans for airfield improvements, it is anticipated that several potential options for construction approaches and phasing will be explored.

Please see Response to Comment SPAS-PC00149-2 regarding the conclusions of NASS relative to the safety enhancements associated with reconfiguration of the north airfield. Please also see Responses to Comments SPAS-PC00130-3 and SPAS-PC00089-1 regarding efficiency associated with Alternative 2 compared to other airfield alternatives.

Page 4-942 of the SPAS Draft EIR does not indicate that Alternative 2 would have the least impact on road traffic. The analysis on page 4-942 addresses impacts from road traffic noise, not road traffic. The conclusions on page 4-942 state that road traffic noise impacts associated with Alternative 2 would be less than significant. They do not state that road traffic noise impacts would be lower under Alternative 2 than under the other alternatives. Comparisons of road traffic noise impact associated with the SPAS alternatives are provided in Tables 4.10.2.3 and 4.10.2-4 of the SPAS Draft EIR. As indicated in the tables, road traffic noise impacts would vary at each receptor point. There is no alternative that would have the lowest road traffic noise impacts at all of the receptor points. Off-airport transportation impacts are addressed in Section 4.12.2 of the SPAS Draft EIR. A summary of off-airport traffic impacts associated with the SPAS alternatives is provided in Table 4.12.2-26 of the SPAS Draft EIR. As indicated in the table, similar to the results associated with road traffic noise, no single alternative would have the lowest road traffic impacts associated with all scenarios and types of facilities evaluated.

SPAS-PC00183-3

Comment:

The people mover in Alternative 9 would be easier for travelers than would the elevated bus way proposed in Alternative 8 simply because stepping onto a tram with luggage is more convenient than climbing into a bus with luggage. However the drawings of the people mover suggest that it dead-ends at Terminal 7 which would be a bad design. Why not have a circular design that does not end at any one terminal but instead goes to them all?

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. The busway in Alternatives 1, 2, and 8, and the APM under Alternative 9 have been developed at a program level of planning for SPAS. The levels of the bus platforms in the busway system have not yet been defined. Additionally, the final APM system, including the number and placement of stations within the CTA, has not yet been defined. The SPAS Draft EIR is a programmatic document, and no design or engineering plans, or construction phasing plans or schedules, are available for any of the alternatives. Nonetheless, the APM would be fully compliant with the requirements of the Americans with Disabilities Act and all other applicable laws. No further response is required because the comment, which reflects the commentor's opinion without factual support of substantial evidence, does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00183-4

Comment:

We oppose the three alternatives that propose to move the right runway north (Alternative 1: 260 feet north Alternative 5: 350 feet north Alternative 6: 100 feet north). The NASA study demonstrated that further runway separation is unnecessary for safety (page 4-505). In removing the safety rationale for further separating the north runways that study also destroyed any legitimate argument that the communities near LAX must be required to bear all the adverse effects of runway movement so the airport will be safe. The airport is safe now.

Response:

The content of this comment is similar to comment SPAS-PC00096-8; please refer to Response to Comment SPAS-PC00096-8.

SPAS-PC00183-5

Comment:

The DEIR predicts increases in the size of the noise contour over nearby communities from these runway movements (page 4-829 (Alt. 1); page 4-881-2 (Alt. 5); page 4-897 (Alt. 6)) which would negatively affect the quality of life in the communities near the airport.

Response:

The information referenced by the commentor refers to the change in the 65 CNEL noise contour area. As shown in Tables 4.10.1-8, 4.10.1-15, 4.10.1-22, 4.10.1-29, 4.10.1-34, 4.10.1-41, 4.10.1-48, under Alternatives 1 through 7 the area currently exposed to noise levels of 65 CNEL or higher would increase compared to 2009 baseline conditions.

However impacts were determined based on noise-sensitive uses that would be newly exposed to noise levels of 65 CNEL or higher, increases of 1.5 CNEL or higher within the 65 CNEL or higher noise contours, outdoor noise levels of 75 CNEL or higher, and single event aircraft noise levels which result in classroom disruption. As analyzed in Sections 4.9.6 and 4.10.1.6 of the SPAS Draft EIR, under Alternatives 1 through 7, some areas within Playa del Rey would be newly exposed to noise levels of 65

CNEL or higher, increases of 1.5 CNEL or higher within the 65 CNEL or higher noise contours, and single event aircraft noise levels which results in classroom disruption. As concluded in Sections 4.9.7, 4.9.8, and 4.10.1.8 of the SPAS Draft EIR, interim impacts prior to implementation of LAX Master Plan Mitigation Measures MM-LU-1, MM-LU-3, MM-LU-4, MM-N-4, and LAX Master Plan Commitment N-1, would be significant and unavoidable.

CEQA does not require that impacts on quality of life be assessed, and interpretation of effects on quality of life would likely be subjective and highly variable. The SPAS Draft EIR does however evaluate physical impacts on the environment associated with over 20 topical issues and how such impacts affect residents in surrounding communities.

SPAS-PC00183-6

Comment:

It appears that the primary reason to expand LAX in these ways would be to increase the capacity of the airport. Although LAWA needs to modernize we do not favor expansion.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Consistent with the requirements of the Stipulated Settlement, the SPAS identifies and evaluates potential alternative designs, technologies, and configurations for the LAX Master Plan Program that would provide solutions to the problems that the Yellow Light Projects were designed to address, consistent with a practical capacity of LAX at 78.9 MAP. Please see Response to Comment SPAS-PC00130-328 regarding the fact that the airfield improvements proposed under the SPAS alternatives are intended and designed to address the problems associated with the current outdated design of the airfield. Airfield capacity is not identified as a problem and none of the airfield improvements are proposed to increase the capacity of the airport.

SPAS-PC00183-7

Comment:

We do not understand how it can be as the DEIR states that the impacts of these runway movements to businesses within the Runway Protection Zones (RPZ) under these three alternatives can be considered "less than significant" (page 1-77). It is clear that businesses which we rely upon in the Westchester business district not currently located within an RPZ would be located within it and may need to be destroyed (for example page 4-516). LAWA appears to assume that it would have to purchase very little of the existing Westchester business district even though much of it would fall into the RPZ because it is assumed that pilots will land mid-runway on the right runway. However where is the guarantee that all pilots will land mid-runway or that the FAA will agree that telling them to do so is sufficient protection for the businesses within the RPZ? If the FAA insists that these businesses be removed not only from the Runway Safety Area but also from the RPZ then the airport will again need to destroy significant parts of Westchester which currently provide both jobs and services to local residents and furnish significant tax dollars to the City. Even assuming that these businesses would not have to be moved it is not at all clear that these businesses should remain in the RPZ. Please explain how these nearby businesses would be safe if they remain in the RPZ.

Response:

The contents of this comment are similar to the concerns expressed in comment SPAS-PC00130-253; please refer to Response to Comment SPAS-PC00130-253.

SPAS-PC00183-8

Comment:

We also oppose Alternative 3 because it unnecessarily proposes to move the left runway 340 feet south at what would necessarily be an extraordinary expense including demolition of three terminals and

extensive central terminal construction because again the separation of the north runways by this amount of distance is not necessary for either airfield safety or efficiency. Alternative 7 which proposes a 100 foot southward movement for the left runway does not seem as expensive as Alternative 3. However given that Alternative 2 is the "environmentally superior" alternative and accomplishes the project objectives there is no reason for the additional costs that Alternative 7 would be likely to entail.

Response:

The commentor's support for Alternative 2 and opposition of Alternative 3 is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Chapter 2 of this Final EIR regarding the LAWA Staff-Recommended Alternative, which couples the airfield and terminal improvements associated with Alternative 1 with the ground access components associated with Alternative 9, including a discussion of the rationale behind the selection of these alternatives over the other alternatives evaluated in the SPAS Draft EIR.

Regarding enhancements to the safety and efficiency of the airfield under each alternative, please see Table 4.7.2-16 on pages 4-569 and 4-570 in Section 4.7.2 of the SPAS Draft EIR. As indicated in that table, the SPAS alternatives achieve substantial enhancements to safety and efficiency; the degree to which safety and efficiency is enhanced varies between the alternatives.

SPAS-PC00183-9

Comment:

As frequent travelers through LAX we appreciate the need to modernize it. However we believe the travelling public would appreciate things like on-airport mass transit better signage repairs to roadways more efficient baggage screening better elevators and modernized restrooms more than moving the north runway.

Response:

The comment is noted and is hereby part of the Final EIR, and will forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project.

Regarding improvements related to on-airport mass transit, please see Topical Response TR-SPAS-T-1.

Regarding improvements related to better signage, repairs to roadways, improved baggage screening, better elevators, and modernized restrooms, such improvements pertain to ongoing projects at LAX that are separate from the program-level improvements analyzed in the SPAS Draft EIR. Ongoing maintenance and miscellaneous improvements were considered in the cumulative impacts analyses provided in Chapter 5 of the SPAS Draft EIR, including improvements to lighting (as part of the "New Face" of the CTA Improvements/Enhancements Project), roadways (such as the CTA Second Level Roadway Expansion Joint and Deck Repairs project), baggage screening (various terminal-related projects), and elevators and escalators. Please see pages 5-17 through 5-22 of the SPAS Draft EIR for a description of the ongoing and planned airfield-, terminal-, and infrastructure/security-related improvements at LAX. Additionally, LAWA provides information on ongoing projects on their website under "Projects and Reports": http://www.lawa.org/welcomeLAX.aspx.

SPAS-PC00183-10

Comment:

Further it is time the City recognizes that regardless of what it does at LAX it will not give LA a first-rate airport. Because of its geographic constraints LAX is simply not the location for a world-class airport. The best alternative is to develop an airport where there is open space for such an airport as other cities such as Denver and Houston have done and at the same time build a mass transportation system that actually goes into that airport.

Response:

The content of this comment is similar to that of comment SPAS-PC00096-24; please see Response to Comment SPAS-PC00096-24.

SPAS-PC00184 White, Eugene None Provided 10/8/2012

SPAS-PC00184-1

Comment:

As homeowners near LAX and frequent users of the airport we are disappointed that the expressed Project Objectives for the SPAS do not include the goal of regionalizing Southern California air traffic. Regionalization should have been one of the enumerated Project Objectives and the DEIR should have discussed how much each alternative would help to accomplish that objective. It is short-sighted of the City to put all of its eggs into the LAX basket. In addition although LAX brings economic benefits to all of Southern California the burdens of the airport are unfairly shouldered by the communities surrounding it. It is time to take a serious regional approach to air transportation to mitigate the safety concerns noise congestion and air pollution currently impacting those who live work and travel the roads near LAX. As to the specific alternatives included in the SPAS we favor a combination of Alternatives 2 and 9 which we believe would modernize the airport and improve the airfield and ground transportation without unduly harming nearby communities. Not only is Alternative 2 the "environmentally superior alternative" (page 1-103) it appears to be the most affordable option and the one that could be accomplished with the least delay. Many of the other alternatives in the SPAS are prohibitively expensive and there is no indication of how they will be funded. We support the airfield improvements in Alternative 2 which does not relocate the north runways but instead lengthens the left runway and improves taxiways. Alternative 2 is preferable given that these modifications to the airfield would mean that the larger Group 5 and 6 aircraft could be acceptably handled with no additional runway separation (pages 4-514-515). The expert safety study conducted by the North Airfield Safety Advisory Committee considered the "gold standard" when it was commissioned unanimously concluded that the North Runway Complex is extremely safe even with future projected traffic levels. In addition Alternative 2 would have the least impact on road traffic (page 4-942). Alternative 2 would not require the very expensive modifications to Lincoln Boulevard or the Argo Drainage Channel that would be required under the options that would move the runway so the modernization in Alternative 2 should not take as long or be as expensive as the alternatives that would move the runways. We support Alternative 9 as well because we believe that the Consolidated Rental Car center project in Alternative 2 combined with the automated people mover from Alternative 9 would improve traffic by taking rental car shuttles off the road. The people mover in Alternative 9 would be easier for travelers than would the elevated bus way proposed in Alternative 8 simply because stepping onto a tram with luggage is more convenient than climbing into a bus with luggage. However the drawings of the people mover suggest that it dead-ends at Terminal 7 which would be a bad design. Why not have a circular design that does not end at any one terminal but instead goes to them all? We oppose the three alternatives that propose to move the right runway north (Alternative 1: 260 feet north Alternative 5: 350 feet north Alternative 6: 100 feet north). The NASA study demonstrated that further runway separation is unnecessary for safety (page 4-505). In removing the safety rationale for further separating the north runways that study also destroyed any legitimate argument that the communities near LAX must be required to bear all the adverse effects of runway movement so the airport will be safe. The airport is safe now. The DEIR predicts increases in the size of the noise contour over nearby communities from these runway movements (page 4-829 (Alt. 1); page 4-881-2 (Alt. 5); page 4-897 (Alt. 6)) which would negatively affect the quality of life in the communities near the airport. It appears that the primary reason to expand LAX in these ways would be to increase the capacity of the airport. Although LAWA needs to modernize we do not favor expansion. We do not understand how it can be as the DEIR states that the impacts of these runway movements to businesses within the Runway Protection Zones (RPZ) under these three alternatives can be considered "less than significant" (page 1-77). It is clear that businesses which we rely upon in the Westchester business district not currently located within an RPZ would be located within it and may need to be destroyed (for example page 4-516). LAWA appears to assume that it would have to purchase very little of the existing Westchester business district even though much of it would fall into the RPZ because it is assumed that pilots will land mid-runway on the right runway. However where is the guarantee that all pilots will land mid-runway or that the FAA

will agree that telling them to do so is sufficient protection for the businesses within the RPZ? If the FAA insists that these businesses be removed not only from the Runway Safety Area but also from the RPZ then the airport will again need to destroy significant parts of Westchester which currently provide both jobs and services to local residents and furnish significant tax dollars to the City. Even assuming that these businesses would not have to be moved it is not at all clear that these businesses should remain in the RPZ. Please explain how these nearby businesses would be safe if they remain in the RPZ. We also oppose Alternative 3 because it unnecessarily proposes to move the left runway 340 feet south at what would necessarily be an extraordinary expense including demolition of three terminals and extensive central terminal construction because again the separation of the north runways by this amount of distance is not necessary for either airfield safety or efficiency. Alternative 7 which proposes a 100 foot southward movement for the left runway does not seem as expensive as Alternative 3. However given that Alternative 2 is the "environmentally superior" alternative and accomplishes the project objectives there is no reason for the additional costs that Alternative 7 would be likely to entail. As frequent travelers through LAX we appreciate the need to modernize it. However we believe the travelling public would appreciate things like on-airport mass transit better signage repairs to roadways more efficient baggage screening better elevators and modernized restrooms more than moving the north runway. Further it is time the City recognizes that regardless of what it does at LAX it will not give LA a first-rate airport. Because of its geographic constraints LAX is simply not the location for a world-class airport. The best alternative is to develop an airport where there is open space for such an airport as other cities such as Denver and Houston have done and at the same time build a mass transportation system that actually goes into that airport.

Response:

The content of this comment letter is identical to comment letter SPAS-PC00183; please refer to the responses to comment letter SPAS-PC00183.

SPAS-PC00185 McKinnon, Christopher — None Provided — 10/8/2012

SPAS-PC00185-1

Comment:

I support the Consolidated Rental Car facility with a people mover to access it. Same people mover to Metro as well if green line does not go to the terminal area. All vehicle parking lots hotels should be accessed by people mover. Any remaining hotels or vehicle lots should have a central pickup accessed from the people mover. In other words the only vehicles allowed in the horseshoe would be passenger vehicles.

Response:

The comment does not indicate any environmental advantages of the suggested alternative relative to the alternatives evaluated in the SPAS Draft EIR. The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00186 Lund, Russell — None Provided — 10/9/2012

SPAS-PC00186-1

Comment:

I mailed a letter with comments yesterday thinking that two days would be enough to meet the Oct 10 deadline. I failed to recognize that yesterday was a USPS holiday so my letter would not be picked up

until today. To make sure my comments are timely I'm submitting them in this format as well -- I am not trying to stuff the ballot box. Thanks... Mr. Alvarez: Thank you for taking the time to address our community at September 27"™s NCWP town hall meeting. You had little time to cover a great deal of information and I think you used your time effectively. I was also impressed by the unanimity of views expressed by community organizations and political representatives. I agree with them that important improvements must be made at LAX. As outlined in part below I am convinced that moving the north runway is NOT a cost effective or efficient approach to improve LAX and the flying experience for Los Angeles residents. The best information available does NOT support moving the runways for reasons of safety. I was particularly struck by the comments of Mr. Voss of the LAX Coastal Area Chamber of Commerce. As I understood him he was involved with determining the objectives for the LAX NASS. He described the researchers selected as experts who would provide the "gold standard" report on north runway safety. Nevertheless the DEIR seems to denigrate the findings of these blue ribbon experts. The LAWA report seems instead to favor disagreements such as those expressed by the FAA without emphasizing the fact that the NASS response to the FAA "review" largely debunks their criticisms. It is unfortunate that the important NASS response is largely relegated to the end of an appendix and is not given the prominence it deserves. If flight safety is of paramount concern LAWA could "" in short order and at relatively little cost "" reduce the risk of aircraft incursions on the north runways by simply eliminating exits along the length of north runway 6L/24R thereby requiring all landing aircraft to cross runway 6R/24L at the far end of the runway. Although this would increase taxi time for some operations many airports have taxi distances and times far longer than those presently at LAX and this increase would only marginally increase total gate-to-gate times (of course any alternative that involves moving the runways farther from the terminals may also increase taxi time). Taxi time is a very minor issue when compared to capital project costs quality of life in the neighborhoods north of LAX and even the misleading safety arguments. If large equipment (e.g. the A-380) needs more space simply use the south runways for these few flights. That this option was not included in the current set of Alternatives can only be viewed as part of the ongoing LAWA strategy to push one plan down the throats of Los Angeles residents and its absence effectively constrained the work performed by the NASS (who nevertheless found that safety concerns do NOT support moving the north runways). Time and time again LAWA has proposed airport expansion through relocation of the north runways (only to have that proposal rejected) with the apparent hope that one day the heretofore strong opposition will be caught napping. Usefulness of LAX is limited by ground transportation. Users of LAX (air travelers and freight from the southland) must reach the airport by car truck or bus. The nearby freeway and road infrastructure is overloaded. LAWA should focus its expansion desires on the regional airports (including Palmdale) not on shoehorning more people into the constrained area of LAX. It is reprehensible that flight safety is being used to try and "justify" the misguided goals of LAWA. Meanwhile improvements to transportation local to the airport can and should be implemented. Furthermore our terminals show their age and are woefully inadequate to handle passenger loads. I notice this particularly in Terminals 1 and 3 (despite recent improvements made to the Terminal 1 arrival/bag claim area). Of the options offered in the SPAS DEIR I endorse Alternative 2 as being the closest to the approach described above.

Response:

The content of this comment letter is essentially identical to comment letter SPAS-PC00162; please refer to the responses to comment letter SPAS-PC00162.

SPAS-PC00187 Fletcher, M.D., Betty C None Provided 10/9/2012

SPAS-PC00187-1

Comment:

After careful review of the plans to extend the runway at LAX I think #2 or #9 is the best choice for our community in Playa Del Rey

Response:

The commentor's support for Alternatives 2 and 9 is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Chapter 2 of this Final EIR regarding the LAWA Staff-Recommended Alternative, which couples the airfield and terminal improvements associated with Alternative 1 with the ground access components associated with Alternative 9, including a discussion of the rationale behind the selection of these alternatives over the other alternatives evaluated in the SPAS Draft EIR.

SPAS-PC00188 Redner, James None Provided 10/9/2012

SPAS-PC00188-1

Comment:

To Whom It May Concern We have reviewed the nine alternatives currently being suggested for LAX. Based on where we lives (85th Place between Georgetown and McConnell) across Manchester from the golf course. As it is the flights coming in and out are fairly loud and depending on the direction of the wind we can smell jet fuel. The idea that runways may move up to 350/300 ft closer to where we live is very troubling. The movement will negatively impact our lives with unwanted and potentially harmful pollution (noise and air). If this movement were to occur it will have undesired repercussions. With that in mind we support Alternative 2 and Alternative 9. The improvement of transportation in and out of LAX would help elevate current congestion. Alternative 9 would improve the airport helping to make it a top destination which it is current not.

Response:

The content of this comment is similar to comment SPAS-PC00139-1; please refer to Response to Comment SPAS-PC00139-1.

SPAS-PC00189 Wallace, Erin None Provided 10/9/2012

SPAS-PC00189-1

Comment:

I am a resident and homeowner in Playa del Rey. I have lived here for three years and in the surrounding area for my entire life. I am very disappointed by the push to move the north runways 350 feet closer to my neighborhood. The following issues illustrate the fault with this plan: 1. The "safety" issues in the report which I have read cover-to-cover are either unimportant or minimal (when compared to both other airports and the south runways). This is expressed in the report and in several analyses done of the report. 2. Air Force One takes off from the north runways. I assume the President of the United States would not do so if it was unsafe. 3. Most of the air traffic at LAX comes in and out of the south runways which since recently renovated should continue to provide excellent service. 4. Many of the industrial flights that come through LAX are transporting products through hangars and warehouses on the south side of the airport.

Response:

The commentor's opinion regarding the relative unimportance of safety issues discussed in the SPAS Draft EIR is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Regarding the commentor's second point, neither the FAA or LAWA would allow unsafe runway conditions anywhere at LAX for any flight. As described in Section 2.2 of the SPAS Draft EIR, one of the project objectives of SPAS is to enhance the safety and efficiency of the north airfield. Regarding the third point, improvements made to the south airfield as part of the South Airfield Improvement Project have improved the safety and efficiency of the south airfield; however, current and anticipated aircraft activity for LAX as a whole warrants improvements on the north airfield as well. Regarding the fourth point, it is true that the majority of air

cargo operations at LAX occur on the south side of the airport; however, that does not alleviate the need to make improvements to the north airfield given the amount of non-cargo aircraft activity that occur in that area of the airport.

No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00189-2

Comment:

5. There are many schools parks and residences close to the airport that already experience noise and air pollution that need not be furthered by decreasing the distance between them and the airport.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project.

The SPAS Draft EIR addresses impacts associated with aircraft noise, road traffic noise, and construction traffic and equipment noise in Sections 4.10.1, 4.10.2, and 4.10.3, respectively. The impacts associated with each of these categories of noise are summarized below.

As indicated in Section 4.10.1 of the SPAS Draft EIR, as a result of the increase in the number of aircraft operations forecasted in the future, all of the airfield Alternatives (1 through 7) would result in some residential uses and non-residential noise-sensitive facilities being newly exposed to noise levels of 65 CNEL or higher or increases of 1.5 CNEL or higher within the 65 CNEL or higher noise contours. With implementation of LAX Master Plan mitigation measures, these impacts would be less than significant. However, interim impacts prior to the completion of mitigation, impacts on residential uses with outdoor habitable areas, and impacts on parks would remain significant and unavoidable. Alternatives 8 and 9 focus on ground access improvements that, in themselves, would not result in aircraft noise exposure but would be coupled with the airfield improvements proposed under Alternatives 1, 2, 5, 6, or 7, the impacts of which are summarized above. None of the alternatives would result in a significant impact relative to sleep awakenings. Under Alternatives 1 through 7, significant impacts would occur with an additional school being newly exposed to the 55 dBA Lmax. Each alternative would also result in significant impacts due to sustained interruption of classroom teaching at newly exposed schools through interior noise levels in excess of 35 dBA Leq(h). Implementation of LAX Master Plan mitigation measures would ultimately reduce impacts to these schools to a level that is less than significant. However, interim impacts prior to completion of mitigation measures would remain significant and unavoidable.

Concerning road traffic noise, as indicated in Section 4.10.2 of the SPAS Draft EIR, impacts related to ground access improvements proposed under Alternatives 1, 2, 3, 4, 8, and 9 would be less than significant as the incremental changes in road traffic noise levels under each of these alternatives would be less than a 3 dBA increase in CNEL. Alternatives 5, 6, and 7 do not include ground access improvements and would therefore not affect road traffic noise levels at off-site noise-sensitive uses.

Regarding construction traffic and equipment noise, as indicated in Section 4.10.3 of the SPAS Draft EIR, due to the periodic nature and limited incremental increase on area roadways, none of the alternatives would result in significant impacts related to construction traffic noise. However, all of the alternatives would result in significant impacts from construction equipment noise with the potential to effect sensitive receptors such as residential and school uses. The sources of those impacts differ by alternative, but can be generally characterized as temporary impacts associated with airfield improvements, ground access system improvements, and construction staging areas. While LAX Master Plan commitments and mitigation measures would reduce construction equipment noise impacts associated with all of the SPAS alternatives, it cannot be definitively concluded that all construction equipment noise impacts would be reduced to levels that are less than significant and these impacts are considered to be significant and unavoidable.

The SPAS Draft EIR addresses air quality impacts associated with the SPAS alternatives, including Alternatives 1, 5, and 6 which propose a northward relocation of Runway 6L/24R, in Sections 4.2. As indicated therein, even after mitigation, construction activities would result in significant and unavoidable air quality impacts under all of the alternatives. Specifically, under all of the alternatives except for Alternative 4, construction emissions of carbon monoxide (CO), volatile organic compounds (VOC), oxides of nitrogen (NOx), particulate matter with an equivalent aerodynamic diameter of 10 micrometers (PM10), and particulate matter with an equivalent aerodynamic diameter of 2.5 micrometers (PM2.5) would be significant and unavoidable. Under Alternative 4, significant and unavoidable construction emissions would occur for NOx and PM10. Under all of the alternatives, even after mitigation, construction-related concentrations of nitrogen dioxide (NO2) and PM10 would be significant and unavoidable.

Operation of the airport would also result in significant and unavoidable impacts to air quality. Even after mitigation, operational emissions of sulfur dioxide (SO2), PM10, and PM2.5 would be significant and unavoidable under all of the alternatives. Operational concentrations of NO2, PM10, and PM2.5 would also be significant and unavoidable under all of the alternatives.

Please also see Response to Comment SPAS-PC00130-794 regarding noise and air quality impacts of the SPAS alternatives on parks and recreational uses, including Nielson Park, Westchester Golf Course, Westchester Recreation Center (i.e., Westchester Park), and Del Rey Lagoon.

SPAS-PC00189-3

Comment:

6. The illustration of the plan shows the runway starting on Lincoln Boulevard. Are we to assume that this important street will now be a dead end? 7. Westchester Parkway has been a place for recreation for many years. Many people use it for running walking their dogs and riding their bicycles. This relocation will make it less likely to be used for such purposes.

Response:

Please see Topical Response TR-SPAS-LR-1 for a discussion of the Lincoln Boulevard realignment associated with Alternatives 1, 5, and 6. As indicated in that topical response, under Alternatives 1, 5, and 6, Lincoln Boulevard would be relocated to the north in order to move the roadway out of the footprint of the runway. With the relocation, Lincoln Boulevard would continue to provide access from Sepulveda Boulevard to Westchester, as it does today. Although the portion of Lincoln Boulevard in the vicinity of LAX is identified as a part of the backbone bikeway network in the 2010 Bicycle Plan, and the street segment has been identified for a future bicycle lane, there is currently no existing bicycle path or bicycle lane along this portion of Lincoln Boulevard, nor has funding for a future bicycle path or lane been identified.1 Nevertheless, the realigned Lincoln Boulevard would continue to include sidewalks that could be used for recreational activities, such as running, dog walking, and bicycle riding.

1. City of Los Angeles, Department of City Planning, 2010 Bicycle Plan: A Component of the City of Los Angeles Transportation Element, March 1, 2011, Available: http://planning.lacity.org/cwd/gnlpln/transelt/NewBikePlan/Txt/LA%20CITY%20BICYCLE%20PLAN.pdf, accessed December 17, 2012.

SPAS-PC00189-4

Comment:

8. This will most certainly decrease property values in my neighborhood. This will mean that my neighbors and I will experience further hardships than those already placed on us by this dreadful economy.

Response:

Regarding concerns about property values, it should be noted that, per Section 15131(a) of the State CEQA Guidelines, "economic or social effects of a project shall not be treated as significant effects on

the environment." This section of the guidelines further states that "intermediate economic or social changes need not be analyzed in any greater detail than necessary" to identify a physical change caused by the economic or social changes. As outlined in Section 15002(a) of the State CEQA Guidelines, the basic purposes of CEQA are to inform decision-makers and the public about the potential significant environmental effect of proposed activities; to identify means to reduce, avoid, or mitigate environmental damage; and to disclose reasons why the decision-makers approved a project if significant environmental effects are involved. Although considerations other than environmental impacts have a role in the action taken by the decision-makers, the purpose of an EIR is to focus on environmental effects. Accordingly, CEQA does not require an analysis of project impacts on property values.

SPAS-PC00189-5

Comment:

For years we have been adding lanes to our freeways in an attempt to decrease traffic and we have done nothing but increase it. While traffic through our airports can help our community as a whole through tourism and consumerism it also increases pollution and decreases property values in the surrounding areas. Does it really make sense to spend taxpayer dollars on this project when it could potentially cause decreased revenues in both property taxes and sales taxes? Is this project the best use of taxpayer dollars? Please look at the big picture and see that this will do more harm than good to this community. Thank you Erin Wallace CPA Playa del Rey Resident and Homeowner

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project.

Relative to off-airport traffic impacts, as addressed in Section 4.12.2 of the SPAS Draft EIR, the majority of the 200 intersections evaluated within the SPAS off-airport transportation study area would not be significantly impacted under Alternatives 1, 2, 3, 4, 8, and 9; however, significant impacts to some off-airport intersections and/or Congestion Management Plan (CMP) facilities would occur under each of these alternatives. The total number of significantly-impacted intersections and/or CMP facilities would vary slightly among those alternatives. Alternatives 5, 6, and 7 focus on airfield and terminal improvements that, in themselves, would not affect off-airport traffic, but would be coupled with the ground transportation improvements proposed under Alternatives 1, 2, 8, or 9, the impacts of which are summarized above.

As indicated in Section 4.2 of the SPAS Draft EIR, operation of the airport, including emissions from vehicles, would result in significant and unavoidable impacts to air quality. Even after mitigation, operational emissions of sulfur dioxide (SO2), PM10, and PM2.5 would be significant and unavoidable under all of the alternatives. Operational concentrations of NO2, PM10, and PM2.5 would also be significant and unavoidable under all of the alternatives.

Regarding property value impacts, CEQA does not require property value impacts, sales tax revenue impacts, or other purely social or economic impacts to be analyzed in an EIR (State CEQA Guidelines Section 15064(e)). Please see Response to Comment SPAS-PC00189-4 for further discussion about impacts on property values. Please see Response to Comment SPAS-PC00096-2 regarding funding sources for SPAS improvements. As noted in that response, no general tax dollars would be used to pay for any of the proposed on-airport improvements.

SPAS-PC00190 Worf, Homer None Provided 10/9/2012

SPAS-PC00190-1

Comment:

Moving ahead..how far ahead ? In 20 to 30 years we might have other than petroleum powered jets.. Fortunately LAX IS A huge property..Should be build in any plans now.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00192 Melton, Greg None Provided 10/10/2012

SPAS-PC00192-1

Comment:

As a long time resident of Westchester I fully support "Alternative 2" (modernization with NO runway movement) and "Alternative 9" addressing transportation. We all want a world class airport but we object to moving any runway that would grossly impact our community with noise pollution and the loss of any more of our business district. Please take into account any plan that would disrupt the lives of people and property values in one of the best communities in the city of Los Angeles. Be a good neighbor.

Response:

The commentor's support for Alternatives 2 and 9 is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Chapter 2 of this Final EIR regarding the LAWA Staff-Recommended Alternative, which couples the airfield and terminal improvements associated with Alternative 1 with the ground access components associated with Alternative 9, including a discussion of the rationale behind the selection of these alternatives over the other alternatives evaluated in the SPAS Draft EIR.

The SPAS Draft EIR addresses impacts associated with aircraft noise, road traffic noise, construction traffic and equipment noise, and transit noise and vibration in Sections 4.10.1, 4.10.2, 4.10.3, and 4.10.4 respectively. The impacts associated with each of these categories of noise are summarized below.

As indicated in Section 4.10.1 of the SPAS Draft EIR, Alternatives 1 through 7 would result in some residential uses and non-residential noise-sensitive facilities being newly exposed to noise levels of 65 CNEL or higher or increases of 1.5 CNEL or higher within the 65 CNEL or higher noise contours. With implementation of LAX Master Plan mitigation measures, these impacts would be less than significant. However, interim impacts prior to the completion of mitigation, impacts on residential uses with outdoor habitable areas, and impacts on parks would remain significant and unavoidable. Alternatives 8 and 9 focus on ground access improvements that, in themselves, would not result in aircraft noise exposure but would be coupled with the airfield improvements proposed under Alternatives 1, 2, 5, 6, or 7, the impacts of which are summarized above. None of the alternatives would result in a significant impact relative to sleep awakenings. Under Alternatives 1 through 7, significant impacts would occur with an additional school being newly exposed to the 55 dBA Lmax. Each alternative would also result in significant impacts due to sustained interruption of classroom teaching at newly exposed schools through interior noise levels in excess of 35 dBA Leq(h). Implementation of LAX Master Plan mitigation measures would ultimately reduce impacts to these schools to a level that is less than significant. However, interim impacts prior to completion of mitigation measures would remain significant and unavoidable.

Concerning road traffic noise, as indicated in Section 4.10.2 of the SPAS Draft EIR, impacts related to ground access improvements proposed under Alternatives 1, 2, 3, 4, 8, and 9 would be less than significant as the incremental changes in road traffic noise levels under each of these alternatives would be less than a 3 dBA increase in CNEL. Alternatives 5, 6, and 7 do not include ground access improvements and would therefore not affect road traffic noise levels at off-site noise-sensitive uses.

Regarding construction traffic and equipment noise, as indicated in Section 4.10.3 of the SPAS Draft EIR, due to the periodic nature and limited incremental increase on area roadways, none of the alternatives would result in significant impacts related to construction traffic noise. However, all of the alternatives would result in significant impacts from construction equipment noise with the potential to effect sensitive receptors such as residential and school uses. The sources of those impacts differ by alternative, but can be generally characterized as temporary impacts associated with airfield improvements, ground access system improvements, and construction staging areas. While LAX Master Plan commitments and mitigation measures would reduce construction equipment noise impacts associated with all of the SPAS alternatives, it cannot be definitively concluded that all construction equipment noise impacts would be reduced to levels that are less than significant and these impacts are considered to be significant and unavoidable.

Relative to transit noise and vibration, as indicated in Section 4.10.4 of the SPAS Draft EIR Alternatives 1, 2, and 8 would result in significant but mitigable transit noise impacts at noise-sensitive receptors (hotels) associated with the elevated/dedicated busway system. Transit noise impacts under Alternative 3 related to the two APMs would be less than significant with implementation of mitigation already required under the LAX Master Plan. Under Alternative 9, transit noise impacts related to operation of the APM operations would be less than significant. Alternative 4 does not propose an elevated/dedicated busway system or APM system; as such, this alternative would not result in any transit-related noise impacts. Alternatives 5, 6, and 7 focus on airfield and terminal improvements that, in themselves, would not have transit noise impacts, but would be coupled with the ground transportation improvements proposed under Alternatives 1, 2, 8, or 9, the impacts of which are summarized above.

Transit-related ground-borne vibration would be less than significant for Alternatives 1, 2, 3, 8, and 9. Alternatives 4, 5, 6, and 7 do not propose an elevated/dedicated busway system or APM system and would not result in any transit-related vibration impacts.

As noted in Response to Comment SPAS-PC00130-931, no acquisition is proposed within the Westchester Business District. In addition, please see Response to Comment SPAS-PC00189-4 regarding impacts to property values.

SPAS-PC00193 Kokelaar, Linda None Provided 10/10/2012

SPAS-PC00193-1

Comment:

I support a combination of Alternatives 2 and 9. Improvements are needed on the ground in the terminals and on the air field. I oppose moving the runways further north. The current configuration of the runways is safe. The quality of life for the residents in the surrounding communities is equally important and must be preserved. LAX has already disrupted the lives of thousands with previous expansions. More existing homes do not need to be destroyed.

Response:

The commentor's support for Alternatives 2 and 9 is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Chapter 2 of this Final EIR regarding the LAWA Staff-Recommended Alternative, which couples the airfield and terminal improvements associated with Alternative 1 with the ground access components associated with Alternative 9.

Please see Response to Comment SPAS-PC00149-2 regarding a summary of the project objectives associated with the north airfield improvements, as well as the conclusions of North Airfield Safety Study (NASS) relative to the safety enhancements associated with reconfiguration of the north airfield.

CEQA does not require that impacts on "quality of life" be assessed since it is a subjective social impact. Purely economic and social impacts are not required to be evaluated under CEQA. (State CEQA Guidelines Section 15064(e).) The SPAS Draft EIR does however evaluate physical impacts on

the environment associated with over 20 topical issues and how such impacts have the potential to affect residents in surrounding communities.

As indicated in Tables 2-4 and 4.9-5 of the SPAS Draft EIR, no residential acquisition is proposed under any of the SPAS alternatives.

SPAS-PC00194 The Allen Family None Provided 10/10/2012

SPAS-PC00194-1

Comment:

Our family purchased our home in Westchester in 1947. As long time residents we have witnessed many and various changes in our community over the years. In recent decades however LAX issues have become foremost to the residents of Weschester and the surrounding communities. We are writing to express our support of the LAWA draft EIR Alternatives 2 and 9. We are opposed to all the other Alternatives. Thank you for the opportunity to express our opinion on this extremely important issue. The Allen Family

Response:

The commentor's support for Alternatives 2 and 9 is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Chapter 2 of this Final EIR regarding the LAWA Staff-Recommended Alternative, which couples the airfield and terminal improvements associated with Alternative 1 with the ground access components associated with Alternative 9, including a discussion of the rationale behind the selection of these alternatives over the other alternatives evaluated in the SPAS Draft EIR.

SPAS-PC00195 Gat, Jonathan None Provided 8/25/2012

SPAS-PC00195-1

Comment:

My name is Jonathon Gat. I live in West LA. I'm a business person. I use the airport, a business person, I use the airport about once a month and about one in every four trips is an international trip. The airport is old in many ways, it needs to be modernized. The safety needs to be enhanced which means realigning the runways. I am very much for the idea of a consolidated car rental facility. I think that works well in other cities where it has been tried. And in general we have to get this airport out of the sixties it was designed for the 707 and they're not around anymore. So thank you for this opportunity.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00196 Livers, Gregory None Provided 8/25/2012

SPAS-PC00196-1

Comment:

Hello my name is Gregory Livers and I'm a homeowner here in the Westchester LAX area and I'm here today to discuss with you about the importance of MTA connecting the airport as soon as possible. We need this service as soon as possible in order to deal with our economy. I just came back from places like New York, Chicago where they have infrastructure, where unemployment is low due to that because they move people. In order for us to be a first class city we have to be able to move people as they do in New York, Chicago, in San Francisco. What we fail to do it here and with all this MTA expansion right now with connecting Culver City the priority should the airport, LAX, especially with the expansion of Tom Bradley going on right now. That is the first entrance of people to our city and we need to move them as soon as they get here. The time of LA being landlocked is over with. The days of Firestone, the days of Exxon-Mobil are behind us. We now have to immediately get involved with mass transit and move people for our economy's sake so that people can be able to afford good jobs and be able to have access and be able to use what they are able to receive from working but not have to pay enormous traffic costs in the car repairs, cars the way that LA actually was set up to be if you don't have a car in Los Angeles you are landlocked. This is not a major city to be landlocked without a vehicle. In order to produce and have for our children to have opportunities we have to have a better transit system, one that we can all be proud of. Thank you very much.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Topical Response TR-SPAS-T-1 regarding transit options into LAX.

SPAS-PC00197 Saifi, Sean Central Coast Shuttle Services 8/29/2012

SPAS-PC00197-1

Comment:

Hi, good afternoon, my name is Sean Saifi, I am a representative of Central Coast Shuttle Services. We're a local transportation company located in Santa Maria Airport. First off I wanted to commend you guys leave you guys open meeting trying to have everybody involved we do really appreciate that especially us small business owners and I would like to propose this, to just leave it the way it is. If anything I'm ok with alternative route 4 because of the car rental situation but I would really like to leave it the way it is. Couple of reasons why is, first off I think it's public or private you know we're all trying here to serve the public, what's in their best interest and I have dealt with a lot of customers in the past and you know for them to even get to the bus is a long distance sign is even a difficult task sometimes to convey to foreign customers or to even domestic customers it is a little bit hard to pass that message along and it's just it's hardly a huge inconvenience just to move everybody outside the line. And I think it is a very efficient system that we have right now at LAX and I am actually proud to say that we come from LAX when we compare to DFW, compare to JFK which is a nightmare and any most other airports, even Denver where they have the long train system set up it's just really inconvenient that this whole another cost of fuel, buses, massport and the construction so I really would like to leave it the way it is. I think you guys did a great job the way it circles is really efficient and I just want to thank you for that. Have good day.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required

because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00198 Mitchell, Michael Mickey's Space Ship Shuttle 8/29/2012

SPAS-PC00198-1

Comment:

I'm Michael Mitchel with Mickey's Space Ship Shuttle I represent eight companies that drop 35 miles out as their first stop out from LAX Airport and we are scheduled bus services. We think that you should leave the CTA the way it is, the way Clifton Moore designed it, it's perfect now. If you get a million and a half people on a Christmas the weekend to take them to the transportation intermodal facility it'd be ridiculous so we'd rather you wouldn't do it at all to build that. But if you do build it please let us stay in the CTA because we drop 35 miles out of town for a first stop. Also you're building it where airplanes could hit it and get air damage from the people out there. But to load them and take them all the way out there it's ridiculous, we think and we are going to get a lawyer if we have to, the companies I talked to this morning so we will sue the airport if you force us to go out there. At least let us stay inside because we go 35 miles for our first stop. It's totally wrong to take people, it will be a fiasco to take a million people out there and try to load with all our companies. Now we pay loop fees, we're not a concession, we've been doing it 22 years, we've done millions of people and our companies are well respected and we feel it's discriminating if you try to push us out of the way and give it all to a Fortune 500 company. We want you to support local LA companies and we feel you've discriminated us already, you've taken the courtesy phones away and pushing Super Shuttle to the inside which is owned out of France and Mr. Biar is actually on the commissioners. He actually worked for the bank that owns Viola so we think he should be recused from the commission. But we think we should leave the loop, the CTA, the way it is right now.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00199 Schuelein, Steve None Provided 10/11/2012

SPAS-PC00199-1

Comment:

Reports of LAX expansion plans are frightening. It is ill-conceived to move the runways further north for dubious gains at the expense of established area neighborhoods. This insanity must be stopped.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00200 Schneider, Barry None Provided 10/10/2012

SPAS-PC00200-1

Comment:

About twelve years ago, realizing a lifelong dream to retire near the ocean, my wife and I bought what was basically a tear down house in Playa del Rey, about one block from the airport owned land, affectionately known in the neighborhood as "the dead lands". As I started to lovingly remodel this drab old house inch by inch, I realized that we had very noisy neighbors who obviously had plenty of money, because in a few years they had bought up the property even closer to our home. It was tolerable at first because we installed what was touted as sound proof windows. But our wealthy neighbors bought up even more property closer to our home and the partying increased to all hours of the day and night seven days a week without let-up. No amount of sound proofing, complaining, telling them that our health was affected, would quiet them. They had the money and, it seemed, the law on their side.

It appears our lifelong dream has turned into a lifelong nightmare. Our noisy neighbors only continue to get noisier even later into the night; not even the early AM hours allow any respite. They just love to party and have their way pushing us to near insanity with the constant wall of noise. We have learned to live with our windows closed, doors sealed up, and the beautiful scent of the ocean drifting out of our reach. Watching television is a joke - we have to tape everything so we can stop the picture and sound until our neighbors decide to quiet down enough for us to enjoy even the simplest of pleasures.

Response:

Although the comment indicates that LAWA has purchased property in Playa del Rey within the past twelve years, no property acquisition in areas north of the airport has occurred in that time period. Moreover, airport operations have not materially changed within that timeframe (see Table 3 of Appendix F-1 of the Preliminary LAX SPAS Report). As discussed on page 4-796, footnote 570, of the SPAS Draft EIR, "the commercial aircraft fleet now operating in the United States is generally much quieter than the earlier aircraft fleets…the 65 CNEL contours for LAX under current and future conditions are generally smaller than the 65 CNEL [contours] for LAX from two decades ago."

A discussion of aircraft noise impacts in Playa del Rey under Alternatives 1 through 7 is provided in Sections 4.9.6 and 4.10.1.6 of the SPAS Draft EIR. As analyzed therein, under Alternatives 1 through 7, some areas within Playa del Rey would be newly exposed to noise levels of 65 CNEL or higher, increases of 1.5 CNEL or higher within the 65 CNEL or higher noise contours. As concluded in Sections 4.9.7, 4.9.8, and 4.10.1.8 of the SPAS Draft EIR, interim impacts prior to implementation of LAX Master Plan Mitigation Measures MM-LU-1, MM-LU-3, MM-LU-4, MM-N-4, and LAX Master Plan Commitment N-1, would be significant and unavoidable.

Although the commentor's property (located at 7520 Earldom in Playa del Rey) is within the 65 CNEL noise contour and has received soundproofing, noise exposure at the commentor's property could increase by 1.5 CNEL or higher within the 65 CNEL contour under Alternatives 1, 2, 4, 5, 6, and 7 as analyzed in Sections 4.9.6 and 4.10.1.6 of the SPAS Draft EIR. In conformance with Title 21 requirements, interior noise levels must be 45 CNEL or less. As stated in LAX Master Plan Mitigation Measure MM-LU-1, LAWA would continue post-insulation noise monitoring to help ensure achievement of interior noise levels at or below 45 CNEL. Currently, LAWA conducts post-construction noise tests on a random sample of homes to verify the efficacy of the soundproofing installation. To date, all testing has confirmed that interior noise levels have been reduced to 45 CNEL through soundproofing, as required.

Please see Response to Comment SPAS-PC00008-1 regarding current measure underway to address existing aircraft noise levels.

SPAS-PC00200-2

Comment:

Frankly, Mr. Alvarez, I don't think our neighbors will ever move and sometimes I wish they would just buy my lovely hand-built house and let me live my life in peace elsewhere. But I do love it here, and perhaps if my neighbors would just stop getting closer and closer to us, carrying on in whatever fashion they want, we will learn to live with them, and maybe they will learn to live with us in a more respectable and sympathetic manner.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00201 Sambrano, Diane None Provided 10/10/2012

SPAS-PC00201-1

Comment:

The Draft Environment Impact Report for the Los Angeles International Airport Specific Plan Amendment Study fails to address many of the concerns that the community surrounding the airport has expressed in the past with regard to health impacts. The DEIR does not discuss what the airport will do to mitigate or minimize health impact for the long term increase of pollutants or what the residents can expect that their health issues may be with those increases. If in fact, the general population does not purchase new low-emission-automobiles or for some reason the better-mileage-vehicles after time do not maintain as low emissions as anticipated, will the airport decrease Its increase in direct proportion ? Or will LAWA staff blame automobiles for the air pollution it hoped the vehicles would reduce so it could increase the Toxic Air Contaminants released by the increased air traffic!?

Response:

LAWA has committed to a long list of mitigation measures for air quality and human health risk, which are discussed in Section 4.2.5 of the SPAS Draft EIR, and referenced in the Mitigation Measures subsection in both Sections 4.2 (Air Quality) and 4.7.1 (Human Health Risk Assessment). These measures include mitigation for construction and operational impacts. The construction mitigation measures are summarized under the LAX Master Plan Mitigation Measure MM-AQ-2 (Construction-Related Mitigation Measures), and include at least 17 specific mitigation actions listed in Tables 4.2-7 and 4.2-8 (pages 4-104 and 4-105) of the SPAS Draft EIR. The operational mitigation measures are summarized under LAX Master Plan Mitigation Measures MM-AQ-3 (Transportation-Related Mitigation Measures) and MM-AQ-4 (Operations-Related Mitigation Measures). Table 4.2-9 (pages 4-106 and 4-107) lists at least 15 mitigation actions for transportation-related impacts that encourage transit use, improve roadways, reduce parking emissions, promote clean vehicle use, and conserve energy, in addition to the expansion of the LAX FlyAway service. LAWA continues to encourage and assist tenants in the conversion of ground support equipment (GSE) to alternative fuels or electric power, as noted on page 4-107 of the SPAS Draft EIR. Finally, LAWA has committed to a number of operational and construction mitigation measures through the Community Benefits Agreement, also noted in Section 4.2.5 of the SPAS Draft EIR.

The impact analyses for human health risk and air quality are based on the assumption that these mitigation measures are required to be implemented for any of the SPAS alternatives. Therefore, the human health risk impacts identified in Section 4.7.1.6 and air quality impacts identified in Section 4.2.6 assume these measures will be implemented.

The types of health impacts typically associated with exposure to criteria air pollutants are described in Section 4.2.1.1 of the SPAS Draft EIR. Descriptions of potential health impacts associated with exposure to toxic air contaminants are part of the toxicity profiles listed in Appendix G1, Attachment 1 of the SPAS Draft EIR.

The analysis of air quality impacts as well as human health risk was conducted following guidance and methodology developed by the South Coast Air Quality Management District (SCAQMD), the California Office of Environmental Health Hazard Assessment (OEHHA), and the California Air Resources Board (CARB). The ground vehicles (cars and trucks) analyzed in the SPAS Draft EIR were those that began or ended a trip at LAX. In addition, the GSE that were analyzed service the aircraft at LAX and will continue to do so under the selected SPAS alternative. Therefore, it is appropriate to incorporate the impact of existing regulations on future emissions from these vehicles and equipment when determining air quality and health risk impacts since they are airport emission sources that will be associated with future airport activity under the selected SPAS alternative. The evaluation approach is valid and appropriate (please see Response to Comment SPAS-PC00159-7), and this change does result in lower overall emissions and impacts for several pollutants when comparing future conditions to existing baseline conditions.

The air quality impact analysis presented in Section 4.2.6 also looks at future emissions for each alternative compared to the future emissions for Alternative 4, which would have the fewest improvements of the alternatives considered. Please see Response to Comment SPAS-PC00159-7, regarding the usefulness of this analysis.

SPAS-PC00201-2

Comment:

The airport long term impact study relies on non-airport operations to reduce impact created by the increase by the airport! A classic "someone else did it" response fails to accept responsibility for airport action. The focus on mitigation appears to be on the short-term-construction contaminants crossing the fence-line rather than on the long term falling and drifting contaminants from the aircraft emissions. While construction issues are important operational issues seem to be discounted.

Response:

Please see Response to Comment SPAS-PC00201-1 regarding mitigation measures and the appropriateness of the air quality impacts analysis in the SPAS Draft EIR.

SPAS-PC00201-3

Comment:

The Exposure assessment states that "pathways other than inhalation were not assessed in this HHRA". Therefore any exposure to settled contaminants, not directly inhaled, as on the skin, ground, sidewalk or the cumulative effect of small particulates that we all know do not simply disappear, but will or may be absorbed or even later may be inhaled when the area where the contaminants landed are disturbed, is not even evaluated!! Does no one remember the smoking ---cancer long term effect? This non-assessment fails to mitigate and does not provide solutions for the non-inhalation methods of exposure! Where is the evaluation of skin exposure, we often see the black fail-out on surfaces in our neighborhood?! - page 4-433

Response:

As stated in Section 2.2.2 of Appendix G1 of the SPAS Draft EIR, "Other exposure pathways -- including deposition of TAC onto soils and subsequent exposure via incidental ingestion of this soil, uptake from soil into homegrown vegetables, and other indirect pathways -- were addressed quantitatively in the programmatic HHRA developed for the LAX Master Plan EIR (see LAX Master Plan Final EIR Technical Report 14a and Technical Report S-9a). No pathway other than inhalation was found to be an important contributor to exposure and thus to risk/hazard. Based on this previous analysis, pathways other than inhalation were not assessed in this HHRA." Specifically, the analysis of soil deposition in the LAX Master Plan Final EIR Technical Report 14a was very conservative; it

assumed that all toxic air contaminants deposited on the soil would stay in the soil indefinitely and not be removed by rain, wind, and other mechanical methods of removal that the airport uses to keep areas clean. Even with this assumption, the analysis suggested that the estimated contributions of TAC from LAX emissions would make no measurable difference in expected background concentrations. As such, further evaluation of these non-inhalation pathways was deemed unnecessary.

With respect to the "black fall out," it is assumed that the commentor is referring to "deposition," (i.e., the gravitational fallout of material (both solid and liquid) from the atmosphere). Commonly, this material, called particulate matter, consists of dust and soot that can form deposits or cause discoloration on outdoor surfaces (i.e., building materials, motor vehicles, small water bodies, etc.). Please see Response to Comment SPAS-PC00043-2 regarding pollutant deposition. As indicated in Response to Comment SPAS-PC00043-2, to date, the research results indicate that aircraft do not contribute substantially to deposition.

SPAS-PC00201-4

Comment:

The assessment "assumes that exposure concentrations of TAC are constant" yet everyone ever exposed to smog knows that there are times of higher concentration and lesser concentration. Temperature, and lack-of-wind do cause a much different impact on the human body and the reaction not seen in an "average period". Over time these high intensity exposures cause distressing hours not displayed in the "averaging". Pollen exposure and asthma attacks would be an example of the variant body response to irritants. While a bad asthma attack might kill someone occasionally, I guess "its okay" as long as they patient can usually breathe!

Response:

The full statement that the commentor is referring to is from page 4-433 of the SPAS Draft EIR, which states "Assessment of chronic non-cancer health hazard impacts due to release of TAC associated with the SPAS alternatives assumes that exposure concentrations of TAC are constant over a 70-year period for residential receptors." Therefore, the statement in the SPAS Draft EIR refers to long-term impacts not short-term "high intensity" impacts, such as asthma attacks and allergies, as discussed in the comment.

Short-term impacts are addressed under the modeling for acute non-cancer health hazards presented in Section 4.7.1.6.3 of the SPAS Draft EIR. As discussed in the section starting on page 4-435, exposure concentrations used to evaluate acute impacts are estimated maximum 1-hour TAC concentrations in air - which represent the highest predicted concentrations of TAC - not the 70-year average.

Air quality modeling was used to develop exposure concentrations used in the HHRA. Estimations of TAC emissions took into account multiple factors including varying on-airport meteorological data such as temperature, wind speed, wind direction, atmospheric stability, and mixing height parameters based on several years of meteorological (weather) data collected at LAX. Please refer to Section 4.2 of the SPAS Draft EIR for details on the air quality modeling.

With regards to the commentor's assertion regarding asthma, health risk assessment cannot be used to link individual illnesses to past chemical exposures, nor can health risk assessments and epidemiological studies prove that a specific toxic substance caused an individual's illness 1. In particular, it would not be possible to link health risks estimated by risk assessment to observed health effects for an airport through epidemiological studies because of the typical lack of exposure information about the study population. This population may have lived in the area for many years or just a few weeks. They may have had exposure to chemicals from other sources, such as work or emissions from other sources (e.g., automobile exhaust). They may have engaged in behavior such as smoking, drinking, overeating, or other lifestyle habits that increased their risk of adverse health effect. They may have been exposed to short-term high concentrations of background (non-airport related) urban air pollutants due to meteorological conditions. Further, health effects may be unrelated to chemical exposure at all. For example, people may have exercise-induced asthma, or asthma that is triggered by allergens, molds, or other environmental agents. Thus, simple observations of adverse effects provide little information on health effects due to exposure to airport emissions.

Although subject to a number of uncertainties common to epidemiological studies, such studies have been performed at other airports in large metropolitan areas to help determine whether individuals living near airports have a greater incidence of disease than populations living in other areas. For example, the Illinois Department of Public Health examined actual cancer incidence observed in communities near Chicago's O'Hare and Midway airports between 1987 and 1997.2 Results of the study showed no elevation in cancer incidence for all cancers combined among whites, non-whites, males, and females living near the airports. Trend analysis did not indicate a higher cancer burden for populations near the airports as compared to populations living farther away. A study conducted by the Washington State Department of Health provided an examination of actual cancer cases near Washington State's SeaTac airport.3 Results of the study indicated that incidence of cancer was not statistically significantly higher for the SeaTac area.

One of the limitations to airport epidemiological studies is that they treat people living adjacent to an airport as if they were similar to living farther from airports. In fact, many factors can vary between populations including time of residence, race, socioeconomic status, smoking behavior, age of housing, and so on. A significant difference in one or more of these factors between close and far populations would make studies very difficult to interpret. Moreover, airport studies to date have not been able to assess actual exposure of individuals. Distance from an airport is a crude and unreliable measure of exposure due to the influence of wind speed and direction, terrain, buildings, time spent indoors and out, time spent away from the airport at work or school, and other factors 2.

Some reports, including ones from studies conducted in the Los Angeles area, do suggest some association between some respiratory illnesses, such as asthma and allergies, and levels of some criteria pollutants and/or TAC. Some people may be more sensitive than the majority of the population to the effects of TAC. These people are considered "sensitive" receptors, and may include children, the elderly, people in poor health and/or those suffering from illness, such as chronic bronchitis. Sensitive individuals may form a subpopulation of people living in the Los Angeles basin that do suffer some health impacts due to poor air quality. Possible associations between illness and air quality, and the existence of sensitive individuals suggest that common sources of air pollutants could cause some health impacts at the concentrations in air found in the Los Angeles basin. However, concentrations of TAC in the vicinity of LAX do not appear to be greater than those in other parts of the basin, according to South Coast Air Quality Management District (SCAQMD) studies. In fact, the higher pollution levels noted from SCAQMD's fixed site monitoring were found to be in Burbank, Central Los Angeles, Inland Valley San Bernardino, Huntington Park, and West Long Beach. SCAQMD's modeling analysis found the highest risks to be in the port areas (e.g., Long Beach) and the area south of Central Los Angeles, where there is a major transportation corridor.4 These observations suggests that general air pollution due mainly to car and truck traffic, not single sources such as LAX, would have locally greater impacts on health impacts.

1. California EPA, Office of Environmental Health Hazard Assessment, A Guide to Health Risk Assessment, 2001.
2. Illinois Department of Public Health, Office of Epidemiology and Health Systems Development, Cancer Incidence in Populations Living Near Chicago O'Hare and Midway Airports, Illinois 1987 - 1997, November 2001.
3. Washington State Department of Health, Office of Epidemiology. Cancer Rates in the Proximity of SeaTac International Airport (Questions 1 and 2 of the August 1998 Work Plan), February 1999.
4. South Coast Air Quality Management District, Multiple Air Toxics Exposure Study (MATES-III) for the South Coast Air Basin, March 2008.

SPAS-PC00201-5

Comment:

If evaluations are based upon"duration of 70 years" rather than "quality of life," many will not survive the study in good health, but will continue to exist in a state of painfully impacted non-death. (Page 4-434) Clearly a study of life-span and illness during living years of those in surrounding communities should have been conducted. What were the results of the analysis of the several hundred Inglewood residents

"Chronic Health forms" which were submitted for the earlier draft EIR? (The prior "Comments noted" response does not suffice.)

Response:

The SCAQMD often uses an exposure duration of 70 years (a lifetime) to represent an upper bound of possible exposure. This duration is significantly greater than the typical assumption used in many risk assessments, where an exposure duration of 30 years is used as an upper range estimate of the time a person in the U.S. might spend at one address. A duration of 70 years makes no assumption about an individual's life span. Instead, it is used as a worst-case scenario for the number of years someone living near LAX and, therefore, maximizes estimates for total exposure. As indicated on page 28 in Appendix G1 of the SPAS Draft EIR, the 70-year period is used in the SPAS HHRA for consistency with SCAQMD guidance, which considers its use to be protective for human health effects.

As discussed in Section 4.7.1 and Appendix G1 of the SPAS Draft EIR, risk estimates based on a lifetime exposure are likely to be conservative (i.e., will error on the side of protection of public health), since many people will not live in the same location for a lifetime, and their exposure to TAC from LAX will therefore be less than estimated in the SPAS Draft EIR. Further, risk estimates were based on individuals exposed to TAC at locations where air concentrations would be highest. Since these locations were typically at or very near to the LAX fence-line, people that actually live, work, or attend school at some distance from the airport fence-line would be subject to lower air concentrations of TAC, and thus their risks would be lower. Results of the SPAS HHRA are best estimates of possible risks associated with the SPAS alternatives, using common and accepted regulatory methods. Risk estimates in the SPAS Draft EIR are not intended to, nor can they, be used to link individual illnesses or quality of life to past chemical exposures, nor can health risk assessments and epidemiological studies prove that a specific toxic substance caused an individual's illness.

In addition, the commentor presumes that cancer and non-cancer risk estimates indicate a definitive number of actual cases of disease rather than estimates of risk for health effects. In fact, the incidence of disease attributable to airport TAC emissions, as distinct from background concentrations of TAC in the South Coast Air Basin, is not known, but could range from zero to some small fraction of disease attributable to poor air quality in the basin in general. Incremental impacts from the SPAS alternatives would be less, and might even be beneficial (i.e., might reduce total TAC emissions during airport operations).

To summarize the approach and intent of the analyses, the SPAS HHRA assessed incremental changes to health impacts for people exposed to TAC resulting from construction and operations associated with each SPAS alternative. That is, the HHRA examined the difference between existing (baseline) emissions from LAX and emissions projected during future construction and operations. The difference between these two conditions is the incremental impact of alternatives. Incremental impacts are appropriate, since baseline emissions from LAX will be ongoing regardless of whether SPAS is implemented.

The HHRA identified whether the SPAS alternatives would increase health risks for people living, working, recreating, or attending school near LAX. As noted above, estimates provided are "worst case" since they are based on the assumption that people will live at the LAX fence-line for 70 years. Since no one does or will live in such a location, and since TAC concentrations decrease with distance from the fence-line, all exposures and risk will actually be less than predicted for all residents living near the airport. This approach is typical for human health risk assessments. These assessments are used to estimate the potential for health impacts resulting from a given set of exposure conditions. In order to avoid underestimating chemical exposure, the HHRA prepared for the SPAS alternatives estimated risks for the hypothetical maximally exposed individual (MEI), an individual that lives, works, or goes to school at a location with the highest predicted concentrations of TAC in air, and who has other characteristics, such as years of exposure, that result in maximum intake of TAC. In addition, toxicity criteria used in all health risk assessments are developed to be protective of groups that may be exceptionally sensitive to a chemical, such as children and the elderly. The result is a conservative estimate of potential health impacts associated with the SPAS alternatives. Please refer to Section 5 of Appendix G1 of the SPAS Draft EIR for further discussion of the uncertainties involved with the risk assessment. Thus, when risk estimates are low, as in the case for the SPAS alternatives, one can be confident that actual exposure and risk will be minimal.

With respect to the health forms from Inglewood residents, health risks estimated for an airport cannot be used to attribute health issues for individuals to TAC emissions. Epidemiological studies could, in theory, achieve this goal, but many factors make such studies difficult, if not impossible. Please see Response to Comment SPAS-PC00201-4 regarding epidemiological studies.

SPAS-PC00201-6

Comment:

The Airport concept that Aircraft Toxic Air Contaminant Pollution should be offset by others reducing their emissions is an insult.

That LAWA should be permitted to increase pollution while others are expected to reduce pollution is a concept far more consistent to the words of a bully on a playground than a public transportation agency, which should be setting an example, rather than thinking it is an island unto itself, with the right to disregard the local population's health, simply because it will feed someone's ego or increase financial reward for a few not physically impacted. "Cancer risk impacts-would be less than significant and would be beneficial" when based on the anticipated offset of reduction of motor vehicle emissions is straight from a reading of Grimm's -- here my pretty, the apple is delicious the poison inside is only a teeny tiny syringe-full! (See Page 4-446- 451).

Using the word beneficial ? really! Is that like ... well does the author of that statement want to join us for a nice little cup of..botox.... rumor has it you won't feel . . . well anything!

Response:

The emissions reductions of diesel particulate matter from trucks traveling to or from the airport, as well as from airport GSE operating at LAX, represents the major source of cancer risk reductions for all alternatives. Because these trucks and equipment are airport-related sources, it is appropriate to incorporate the impact that existing regulations will have on diesel emissions. Please also see Response to Comment SPAS-PC00201-1 regarding the appropriateness of the air quality impacts analysis in the SPAS Draft EIR.

SPAS-PC00201-7

Comment:

Really!! again Really!!! "adult+child resident receptor was not evaluated" (Page 4-456)

How does Acrolein and formaldehyde NOT IMPACT to a greater extent children who are exposed when every pediatrician and healthcare professional expresses that even the intake of sugar or other "good" consumables have lasting impacts on young developing bodies? Maybe the "must be 21 years old" alcohol laws should be repealed! Perhaps medical prescriptions "dosage" guidelines for children or those underweight should be eliminate if one size fits all. Did a healthcare professional sign off on the Formaldehyde isn't all that bad statement???

Response:

The SPAS HHRA followed current U.S. Environmental Protection Agency (USEPA) protocols for health risk assessment. These protocols no longer evaluate an adult+child receptor for inhalation exposure. However, young children and children of school age are protected by the new methods. After health risk assessment efforts for the LAX Master Plan began a number of years ago, USEPA upgraded its methodology for examining health impacts from inhalation exposure using available toxicological and physiological information. This methodology is described in detail in USEPA's Risk Assessment Guidance for Superfund (RAGS), Part F.1 As noted on pages 4-455 and 4-456 of the SPAS Draft EIR, the RAGS Part F methodology does not normalize hazard indices to body weight unlike the original and now outdated RAGS Part A methodology did.2 The SPAS HHRA assumes the same exposure pattern for adult and child residents (i.e., inhalation of TACs 24 hours per day, 350 days a year) and non-cancer hazard indices for adult and child residents are thus the same. The current evaluation in the SPAS HHRA appropriately covers possible health impacts for adults, children, and adult+child populations.

Further discussion comparing results using the RAGS Part F methodology to the RAGS Part A methodology which evaluates the adult+child receptor are provided in Section 5.5.1 of Appendix G1 of the SPAS Draft EIR. RAGS Part A methodology is still presented in the discussions of uncertainties for several reasons: 1) to maintain consistency with the LAX Master Plan EIR; 2) to enable the results of the SPAS HHRA to be compared directly with the results of the HHRAs included in previous tiered LAX Master Plan EIRs (i.e., the South Airfield Improvement Project EIR, Crossfield Taxiway Project EIR, and Bradley West Project EIR); and 3) to allow for SPAS HHRA risks and hazards to be combined with the calculated results of the other tiered LAX Master Plan EIRs in the determination of cumulative construction impacts. However, the RAGS Part A methodology is now obsolete and may be overly conservative. RAGS Part F methodology is currently used exclusively by the USEPA for calculating risks and hazards for the inhalation pathway and is universally applied within the United States, including California.

Acute and chronic reference exposure levels (RELs) developed by the State of California were used to characterize acute hazards and chronic non-cancer hazards associated with exposure to TAC. As stated in Section 2.3 of Appendix G1 of the SPAS Draft EIR, "RELs are based on the most sensitive, relevant, adverse health effect reported in the medical and toxicological literature." As stated by the Office of Environmental Health Hazard Assessment (OEHHA), RELs were developed with the intention of protecting nearly all individuals - including individuals with low susceptibility for chemical injury and sensitive subpopulations (e.g., children, pregnant women, and elderly persons) from adverse health effects.3 Note that this definition does not include "hypersensitive individuals (those exhibiting idiosyncratic responses that cannot be predicted from studying health effects of the substance)."

1. U.S. Environmental Protection Agency, Office of Emergency and Remedial Response, Risk Assessment Guidance for Superfund, Vol. I, Human Health Evaluation Manual (Part F, Supplemental Guidance for Inhalation Risk Assessment), Final, EPA-540-R-070-002, OSWER 9285.7-82, January 2009.
2. U.S. Environmental Protection Agency, Office of Emergency and Remedial Response, Risk Assessment Guidance for Superfund, Vol. I, Human Health Evaluation Manual (Part A), Interim Final, EPA/540/1-89/002, December, 1989.
3. California EPA, Office of Environmental Health Hazard Assessment Air Toxics Hot Spots Program Risk Assessment Guidelines, Part III, Technical Support Document for the Determination of Noncancer Chronic Reference Exposure Levels, February 2000.

SPAS-PC00201-8

Comment:

Now that the "Human Health Risk Assessment" portion of the study is found seriously lacking I will shift to the "Cultural Resources" section! This will be as gentle as I can muster!!!

Seriously! Really! Are you kidding? This is all you have on Cultural Historic Background? How much was spent on this Section? Clearly this contract scope was not well written or funds should be returned!

Perhaps the Consultants should have driven around the local area rather than going to Fullerton for information about which Historic significant buildings/ sites would be impacted by anything LAX related!

Response:

Please see Responses to Comments SPAS-PC00201-1 through SPAS-PC00201-7 regarding the human health risk assessment. Historical and archaeological resources identified within the SPAS cultural resources study area are discussed in Section 4.5 of the SPAS Draft EIR. Historical resources survey methods are discussed on pages 4-337 and 4-338 of the SPAS Draft EIR. The potential impacts of the SPAS alternatives were considered as they relate to known historical resources identified in previous surveys undertaken in association with the LAX Master Plan EIS/EIR and the LAX Master Plan Supplemental Section 106 Report, discussed on pages 4-350 through 4-354 in Section 4.5 of the SPAS Draft EIR. The Section 106 Report and Supplemental Section 106 Report for the LAX Master Plan are provided in Appendix I and Appendix S-G of the LAX Master Plan Final EIS/EIR, respectively. Previously unevaluated buildings/structures within the SPAS cultural resources study area, which were not old enough to be considered for evaluation as part of the previous LAX Master Plan EIR Section

106 historical resources surveys but are now over 45 years in age, were surveyed and evaluated and are discussed on pages 4-354 through 4-358 in Section 4.5 of the SPAS Draft EIR. A pedestrian survey of the SPAS cultural resources study area was conducted in December 2011 and January 2012 to identify and evaluate potentially eligible resources within the SPAS cultural resources study area that would be impacted by the SPAS alternatives. Site-specific property research involving examination of primary and secondary materials was conducted in conjunction with the survey. Historical resources identified within the SPAS cultural resources study area are shown in Figure 4.5-1 of the SPAS Draft EIR. A written description, accompanied by representative photographs, of each of the surveyed properties evaluated in the 2011-2012 survey is provided on the California DPR Primary Record and Continuation Sheets in Appendix E1 of the SPAS Draft EIR.

SPAS-PC00201-9

Comment:

Had the Consultant firm been researchers with a background in local area history they might have wanted to clarify that the original home of the Centinela Rancho, built in 1834, received National Historic Status from the Department of the interior in 1939 rather than referencing only the then newly formed National Register status recognition of 1974. (But what's a mere 35 years ?)

Response:

Historical and archaeological resources identified within the SPAS cultural resources study area are discussed in Section 4.5 of the SPAS Draft EIR. There are no historic elements from previous ranches or ranch uses that exist today within LAX or the SPAS project area, and there would be no effect on the Centinela Adobe as a result of the SPAS Project. The historic context for the rancho period in the area now occupied by the Los Angeles International Airport is identified in the LAX Master Plan EIR Section 106 Report, and the LAX Master Plan Supplemental Section 106 Report, discussed on pages 4-350 through 4-354 in Section 4.5 of the SPAS Draft EIR. Therefore, while the information regarding the Centinela Rancho is noted, there would be no effect on this property associated with the SPAS alternatives.

SPAS-PC00201-10

Comment:

Amazingly, the entire History of the Airport itself is skeletal at best! The complete disregard for the post War years that created the commercial airline service and cargo service that have become the majority users and reason for "needed expansion" is startling to those who have watched the area change from the days of P-51's and North American pre-Rockwell. The failure to acknowledge the role played by significant contributors to aerospace and commercial air service is significant. The comments regarding the "historical setting" leave the casual reader with no awareness that a terminal even existed at the south end of "Airport Blvd."

Response:

The historical setting discussion presented in Section 4.5 of the SPAS Draft EIR on pages 4-349 and 4-350 is based in part on the Section 106 historical resources investigations undertaken in association with the LAX Master Plan EIR (i.e., the Section 106 Report and the Supplemental Section 106 Report for the LAX Master Plan), which are provided in Appendix I and Appendix S-G of the LAX Master Plan Final EIR, respectively, and included as a reference in the SPAS Draft EIR (see page 9-6 in Chapter 9, References, [i.e., the Final EIR for the LAX Master Plan Improvements, which includes all appendices and technical reports, including Appendix I and Appendix S-G]. As discussed on page 1-105 in Section 1.7 of the SPAS Draft EIR, the LAX Master Plan Final EIR, including Appendix I and Appendix S-G, are available for public review at Los Angeles World Airports, Capital Programming and Planning Division, One World Way, Los Angeles, CA 90045, and are also accessible via the internet at www.ourlax.org). The Section 106 surveys undertaken for the LAX Master Plan EIR discuss the early history of the Los Angeles Municipal Airport (1928-1945) and the post war history of the Los Angeles International Airport at length. The 2011-2012 historical resources survey completed for the SPAS Draft EIR relied in part on the more comprehensive data from the previous surveys, as stated on pages 4-337 and 4-352, but focused on historical resources with the potential to be adversely affected by the nine proposed SPAS

alternatives. These include Hangar One (1929) and the Intermediate Terminal Complex (1946) which are extant historical resources remaining from the airport's early history, and are discussed on pages 4-352 and 4-354 in Section 4.5 of the SPAS Draft EIR, and documented on DPR survey forms on pages 12 through 14 in Appendix E of the SPAS Draft EIR. Specifically, a summary of the Intermediate Terminal Complex is provided on page 4-354 of the SPAS Draft EIR, and notes that the complex included passenger terminals as well as other facilities. Additional information regarding the Intermediate Terminal Complex is provided on the DPR survey forms in Appendix E. The location of the Intermediate Terminal Complex southeast of the terminus of Airport Boulevard is clearly illustrated in Figure 4.5-1 of the SPAS Draft EIR.

SPAS-PC00201-11

Comment:

There is only a passing mention of the subterranean passenger tunnels to the satellites which are approaching the magical 50 in historical age. Has the Los Angeles Conservancy or any other preservation group been provided the opportunity to see the possibly restorable tunnels with their then futuristic art walks? The filling-in of the passenger-way tunnels, as planned by the North Runway Relocation, would be counterproductive to appreciating the innovative mid-century solution to moving so many people to the air-gates, not to mention a tragic end to what was considered a great expression of futuristic transportation art.

Response:

Section 4.5 of the SPAS Draft EIR is based in part on more comprehensive information contained in Appendix E of the SPAS Draft EIR. The existing subterranean passenger tunnel to the Terminal 3 Satellite is documented on the Department of Parks and Recreation (DPR) inventory form included in Appendix E, pages 21 through 23. As documented in Appendix E, while over 45 years of age, Terminal 3 (including the satellite, passenger tunnel, and attached mosaic mural) has undergone considerable alterations and additions and does not retain sufficient integrity or significance to merit eligibility under any of the applicable federal, state, or local criteria discussed on page 23. For the same reasons, neither the tunnel nor the mosaic qualify as historical resources under CEQA Guidelines section 15064.5.

SPAS-PC00201-12

Comment:

Within the area covered in the study of Area of Potential Effect there seems to be a major lack of recognition of buildings in close proximity with significant roles because of architectural significance or historical role. That the Academy Theatre on Manchester near Crenshaw Boulevard is mentioned yet there is no mention of the Fox Theatre on Market just north of Manchester, which is much closer to LAX, is baffling.

Response:

Historical and archaeological resources identified within the SPAS cultural resources study area are discussed in Section 4.5 of the SPAS Draft EIR. Section 4.5 of the of the SPAS Draft EIR is based in part on more comprehensive information contained in the previous Section 106 historical resources investigations undertaken in association with the LAX Master Plan EIR provided in Appendix I and Appendix S-G of the LAX Master Plan Final EIR. The National Register eligible Academy Theatre (1939) on Manchester Avenue between Crenshaw Boulevard and Western Avenue, and the Fox Theater just north of Manchester Avenue are both located outside of the SPAS cultural resources study area boundary shown in Figure 4.5-1 in Section 4.5 of the SPAS Draft EIR, and would not be impacted by the SPAS alternatives. The Academy Theatre was identified in the LAX Master Plan EIS/EIR as a National Register eligible resource, and is acknowledged as a resource within the LAX Master Plan Composite Area of Potential Effect (APE) in Table 4.5-1 of the SPAS Draft EIR. The Fox Loyola Theater at 6266 Manchester Avenue and 8600-8610 S. Sepulveda Boulevard was designated a City of Los Angeles Cultural-Historic Monument No. 259, adopted December 17, 1982. The theater was closed and the interior remodeled for a medical office building. Included in the APE for the LAX Master Plan EIS Section 106 survey, the property was not eligible for listing in the California Register or the

National Register and, therefore, was not included in the LAX Master Plan Section 106 documentation. An additional reason why certain historic or potentially historic resources more proximate to LAX than the Academy Theatre were not identified in earlier LAX Master Plan historic investigations, is that the APE was established in part to assess potential indirect impacts associated with high levels of aircraft noise, which follow a pattern that runs much farther to the east of the airport than to the north and south.

SPAS-PC00201-13

Comment:

How is it that there is no mention or inclusion of concern regarding the former IBM (designed to look like a key punch card) building now occupied by Otis Parsons College? Located just outside the acquisition area this building stands as a reminder of technological change, without the transitional computer capabilities there would still be handwritten passenger ticketing and terminal arrival/departure update boards would still be changed with individual letters kept in boxes under the gate desks. (Lincoln south of Manchester close to- oh yes the airport).

Response:

Historical and archaeological resources identified within the SPAS cultural resources study area are discussed in Section 4.5 of the SPAS Draft EIR. The former IBM building now occupied by Otis Parsons College is located outside of the SPAS cultural resources study area boundary shown in Figure 4.5-1 in the SPAS Draft EIR, and would not be impacted by the SPAS alternatives. It should be noted that the former IBM building is located approximately 1.3 miles northwest of the closest SPAS acquisition area (SPAS acquisition areas are illustrated in Figures 2-12, 2-13, and 2-14 of the SPAS Draft EIR).

SPAS-PC00201-14

Comment:

Not far away, but close in proximity also are several Loyola University buildings, the Magee Building- among the first business buildings in Inglewood, the 1924 building of Peoples Savings and Loan - the second institution in the United States to received FDIC approval, and it's 1960's newer building across the street, Dinah's Restaurant, The first Foster's Freeze (home of the first soft serve ice cream cone) and of course Pann's of Google architecture fame, all of which are closer to the impact area than the Academy Theatre.

Response:

Historical and archaeological resources identified within the SPAS cultural resources study area are discussed in Section 4.5 of the SPAS Draft EIR. The Loyola University buildings are located over one mile north of the airport off Lincoln Boulevard. Commercial buildings, banks, and restaurants are located over one mile northeast of the airport in Inglewood. The university buildings and commercial uses are located outside of the SPAS cultural resources study area boundary shown in Figure 4.5-1 of the SPAS Draft EIR, and would not be impacted by the SPAS alternatives. Similarly, Randy's Donuts at 805 West Manchester Boulevard, Dinah's Family Restaurant at 6521 Sepulveda Boulevard, Foster's Freeze at 999 S. La Brea Boulevard, and Pann's Restaurant at 6710 La Tijera Boulevard, are all located outside of the SPAS cultural resources study area boundary shown in Figure 4.5-1 of the SPAS Draft EIR, and would not be impacted by the SPAS alternatives.

SPAS-PC00201-15

Comment:

Also left off the list but closer than the Academy is the Transportation Mural which in mosaic stone (terrazzo) depicts the transition from foot traffic to flying machines as the largest art work remaining of the WPA years! Not only is this a significant and eligible work, it also is listed by that National Register that took so much discussion space!

Response:

Historical and archaeological resources identified within the SPAS cultural resources study area are discussed in Section 4.5 of the of the SPAS Draft EIR. Helen Lundeberg's historic Work Progress Administration (WPA) mural, "History of Transportation," was originally located at the southeast corner of Centinela Park at the intersection of Florence Avenue and Redondo Boulevard. It was restored in 2007 and is now located in the Grevillea Art Park (230 S. Grevillea Avenue) in Inglewood, directly across from Inglewood High School. The transportation mural is located outside of the SPAS cultural resources study area boundary shown in Figure 4.5-1 of the SPAS Draft EIR, and would not be impacted by the SPAS alternatives. As previously indicated, the reason certain resources more proximate to LAX than the Academy Theatre were not identified in earlier historic investigations is due to the pattern of aircraft noise contours and the potential for indirect noise impacts under Section 106 of the National Historic Preservation Act.

SPAS-PC00201-16

Comment:

While it appears a great deal of explanation about "Historic" was essentially cut and pasted to create pages, a serious shortcoming is the looking about the community to see what or who impacted the local area .... There is no mention of the Maddox home (largest airline of the early years - later renamed Trans World Airlines) also located closer to LAX than the Academy Theatre. How is it the home of what was the nation's greatest library collection on aviation does not even merit mention!! Does the name Howard Hughes only conjure up a movie theatre complex to the writers of the EIR?

Response:

The early history of LAX is documented in the Supplemental Section 106 Report, in Appendix S-G of LAX Master Plan Final EIR, and included as a reference in the SPAS Draft EIR (see page 9-6 in Chapter 9, References, [i.e., the Final EIR for the LAX Master Plan Improvements, which includes all appendices and technical reports, including Appendix I and Appendix S-G]. As discussed on page 1-105 in Section 1.7 of the SPAS Draft EIR, the LAX Master Plan Final EIR, including Appendix I and Appendix S-G, are available for public review at Los Angeles World Airports, Capital Programming and Planning Division, One World Way, Los Angeles, CA 90045, and are also accessible via the internet at www.ourlax.org). The "Maddox home" and the aviation collection purported to be associated with it is not located within the SPAS cultural resources study area. The comment may be in reference to LAX as "home" of Maddux Air Lines, and the aviation collection referred to may be the David D. Hatfield collection of aviation history formerly housed at Northrop University. Maddux Air Lines was founded in 1927 by John Luther "Jack" Maddux. However, the Los Angeles air strip was too small and not suitable at the time for the airline's passenger service, so Maddux chose instead Rogers Airport, and later Grand Central Air Terminal in Glendale. On November 16, 1929, Transcontinental Air Transport bought Maddux Air Lines, which became known as TAT-Maddux Air Lines, with Jack Maddux as the western head. In 1930, TAT-Maddux merged with its former competitor, Western Air Express, which became known as Transcontinental & Western Air (T&WA) and later became TWA.1 Howard Hughes became the principal stockholder of T&WA in 1939 and expanded the airline, beginning transatlantic service in 1946 using the new Lockheed Constellation aircraft.2 The only remaining building at LAX from the late 1920s and early 1930s that may once have been associated with Maddux Air Lines is Hangar One. Hangar One is discussed on pages 4-352 and 4-353 in Section 4.5 of the SPAS Draft EIR, its location is depicted in Figure 4.5-1, and a DPR form for Hangar One is included in Appendix E of the SPAS Draft EIR. Hangar One would not be impacted by the SPAS alternatives due to its distance from the proposed improvements.

The David D. Hatfield collection of aviation history was formerly housed at Northrop University. The majority of the former Northrop University campus at 1155 West Arbor Vitae Street is outside of the SPAS cultural resources study area boundary, shown in Figure 4.5-1 in the SPAS Draft EIR, and would not be impacted by the SPAS alternatives.3 The American Hall of Aviation History was established at Northrop University in 1975 to house the Hatfield collection, which brought together more than 250,000 photographs, and thousands of documents, manuals, motion pictures, maps, magazines, posters, paintings, and newspaper articles on aviation history.4 Too large to be displayed on the 3rd floor of the Northrop University Library, where it had been housed since its donation in 1967, the collection was transferred in 1975 to a vacated, 31-room, two-story engineering building at 5520 Arbor Vitae Street.5 The existing Postwar Modern building at 5520 Arbor Vitae Street (built in 1956) is situated across the

street from the former main campus of Northrop University. Original building permits for 5520 Arbor Vitae Street show that the building was originally designed as an "adult training school" and the original owner was Cal Avitron, Inc. The American Hall of Aviation History exhibits were opened to the public in 1976.6 After Northrop University closed its doors in 1992, the Hatfield Collection was acquired by the Museum of Flight in Seattle, Washington and was moved to Seattle and archived in the Museum of Flight collections.7. The 5520 Arbor Vitae Street building was surveyed in January 2012 and documented on a DPR form, which is included on pages 44 through 47 in Appendix E of the SPAS Draft EIR. The property was found not eligible for historic designation at the federal, state, or local level based upon lack of architectural and/or historic merit. The building is now owned by LAWA and leased to TSA for training. The building would be demolished under all of the SPAS alternatives except for Alternative 4 to allow for the development of parking, a GTC or parking/CONRAC proposed under these alternatives. Because the building is not eligible for historic designation at the federal, state, or local level, this demolition is not considered a significant environmental impact.

1. The Maddox Family, Maddux Airlines, Available: https://sites.google.com/site/maddoxfamilywebsite/maddox-famous/maddux-airlines, accessed October 25, 2012.
2. TWA Skyliner Magazine, "History of TWA Skyliner Magazine," Available: http://www.umkc.edu/whmckc/twa/twaskyliner.htm, accessed October 25, 2012.
3. Rice, James Michael, President, Northrop Rice Advanced Institute of Technology, Personal Communication, October 25, 2012.
4. "Northrop Technology Institute--It's Big and Getting Bigger: Largest Private Undergraduate Engineering College in West Continues Ambitious $12 Million Expansion Plan," Los Angeles Times, October 28, 1968, p. B1.
5. Hillinger, Charles, "40 Years of Collecting Air Historian Compiles Encyclopedia of Sky," Los Angeles Times, December 27, 1970, p. A1; Miles, Marvin, "Facility Chronicles History of Aviation," Los Angeles Times, February 16, 1976, p. C5; Miles, Marvin, "Museum on History of Flight Planned," Los Angeles Times, March 9, 1975, p. OC_A8.
6. Los Angeles Times, July 29, 1976, p. CS1; Los Angeles Times, July 29, 1976, page OC_B4.
7. The David Hatfield Collection is presently housed in the Museum of Flight Archives, Available: http://www.museumofflight.org/collections/museum-archives, accessed October 25, 2012.

SPAS-PC00201-17

Comment:

With very little effort they should have been able to discover that the Northrop Institute of Technology is a stones-throw from the cultural resources study area and at a minimum worthy of mention.

Response:

The study area used for cultural resources investigation, as discussed in Section 4.5.2 of the SPAS Draft EIR, represents an area sufficient to determine whether the project may cause a substantial adverse change in the significance of an historical resources. (State CEQA Guidelines Section 15064.5(b).) Historical and archaeological resources identified within the SPAS cultural resources study area are discussed in Section 4.5 of the SPAS Draft EIR. Northrop Aeronautical Institute was founded in 1946; after 1953, the institution was known as the Northrop Institute of Technology and, after 1971, as Northrop University. Formerly located at 1155 West Arbor Vitae Street at the northeast corner of Arbor Vitae Street and Aviation Boulevard in Inglewood, California,1 the majority of the site of the former Northrop University campus is outside of the SPAS cultural resources study area boundary shown in Figure 4.5-1 in the SPAS Draft EIR and would not be impacted by the SPAS alternatives.

The existing Postwar Modern building at 5520 Arbor Vitae Street (built in 1956) is situated across the street from the former main campus of Northrop University and once served as a classroom building for the University. Original building permits for 5520 Arbor Vitae Street show that the building was originally designed as an "adult training school" and the owner at the time of its construction in 1956 was Cal Avitron, Inc. The 5520 Arbor Vitae Street building was used as an engineering building by Northrop University. Later, the American Hall of Aviation History was located in the vacant engineering building in 1975 and exhibits were opened to the public in 1976.2 Please see Response to Comment SPAS-PC00201-16 for further discussion of this building. Because the building is not eligible for historic designation at the federal, state, or local level, this demolition is not considered a significant environmental impact.

The 5520 Arbor Vitae building was surveyed in January 2012 and documented on a DPR form which is included on pages 44 through 47 in Appendix E of the SPAS Draft EIR. The property was found not eligible for historic designation at the federal, state, or local level based upon lack of architectural and/or historic merit. The building is now owned by LAWA and leased to TSA for training. The building would be demolished under all of the SPAS alternatives except Alternative 4 to allow for the development of parking, a GTC or parking/CONRAC proposed under these alternatives. Because the building is not eligible for historic designation at the federal, state, or local level, this demolition is not considered a significant environmental impact.

1. Rice, James Michael, President, Northrop Rice Advanced Institute of Technology, Personal Communication, October 25, 2012.
2. Hillinger, Charles, "'40 Years of Collecting' Air Historian Compiles Encyclopedia of Sky," Los Angeles Times, December 27, 1970, p. A1; Miles, Marvin, "Facility Chronicles History of Aviation," Los Angeles Times, February 16, 1976, p. C5.; Miles, Marvin, "Museum on History of Flight Planned," Los Angeles Times, March 9, 1975, p. OC_A8; Los Angeles Times, July 29, 1976, p. CS1; Los Angeles Times, July 29, 1976, page OC_B4.

SPAS-PC00201-18

Comment:

Moving on though I could go on about what was left out.....

Response:

As previously indicated, historical and archaeological resources identified within the SPAS cultural resources study area are discussed in Section 4.5 of the SPAS Draft EIR, which is based in part on the comprehensive information contained in the previous Section 106 historical resources investigations undertaken in association with the LAX Master Plan EIS/EIR (Appendix I and Appendix S-G of the LAX Master Plan Final EIR). The various resources that the commentor suggests should have been included in the SPAS Draft EIR were not because they would not be impacted by the SPAS alternatives and were, therefore, outside of the SPAS cultural resources study area. Furthermore, as previously indicated, the Academy Theatre, located well to the east of LAX, was included in the LAX Master Plan Section 106 APE, while more proximate resources to LAX were not, due to potential indirect impacts associated with aviation noise where high noise levels follow a pattern that runs much farther to the east than to the north and south.

SPAS-PC00201-19

Comment:

While today's LAX traveler's experience is less than delightful, expanding the footprint and intruding into the neighboring communities is not the best solution.

The complete disregard for the actual history of the area, health of the community that still occupy the area, and the complete lack of sincerity in interacting with the truth of impact on the "CIMBY"S who will suffer significant impacts, leaves this writer absolutely convinced that the most important factor in decisions regarding the "modernization" of LAX is not how well is serves or fits into the community. Very few genuinely believe that the concept of "destination airport" is truly a realistic desire for any resident or business in the general area. As a long term business traveler with more air travel miles than the majority of United States residents, a multitude of car-rental experiences and over 1800 hotels nights in my background, I have never encountered anyone who has chosen to go somewhere based on the joys of spending quality time on airport property. It is more likely passengers select airports for the ease in getting off the property rather leisurely spending the afternoon or evening surrounded by jet fumes and sound levels requiring mitigation.

Countless suggestions for improving the guest experience given by local residents who also are regular air travelers seem to be often pushed aside. The multitude of local community members who have made the recommendations and who have offered their expertise are in fact often the very individual's

who helped design, implement, and build the very intricate inner workings of the equipment that flies both onto runways and into outer-space. It is unfortunate that many of these very skilled engineers, chemists, physicists, geo¬thermal scientists and other aero-aware have been disregarded by those who have as their goal the bigger-is-better mindset which often leads to soon obsolescence.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. In accordance with CEQA Guidelines Section 15088, LAWA has prepared written responses to all comments received on the SPAS Draft EIR, including all comments submitted by local community members. The written responses are thorough, detailed, and provide good faith, reasoned analyses. These responses are provided herein as part of this Final EIR. The responses to comments on the SPAS Draft EIR will be considered by the decision-makers during project deliberations.

Please see Response to Comment SPAS-PC00130-731 for a detailed explanation of the public outreach and public participation campaign during the SPAS process. Also, please see Chapter 4 of the Preliminary LAX SPAS Report for a discussion of the community and Advisory Committee input.

SPAS-PC00201-20

Comment:

I would hope that the collection of other comments regarding the inadequacies of the EIR will focus some of those in positions to make final decisions, that the alternatives presented which impact the community to do their best to limit construction to improve within the footprint and truly make the airport better rather focus on making it bigger. Regionalization would meet the need for transportation of more passengers and cargo without destroying the LAX community.

Response:

The comment regarding making the airport better rather than bigger is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Topical Response TR-SPAS-REG-1 regarding regionalism of air travel demands in Southern California.

Please refer to Topical Response TR-SPAS-REG-1 regarding the fact that LAWA, through the LAX Master Plan, the SPAS process, and other efforts, supports the regionalization of air travel demand in Southern California.

SPAS-PC00201-21

Comment:

More than any other group of people in Los Angeles County those who live close to the airport believe in Safety. Unfortunately the concepts presented in the EIR provide limited understanding that we will be those most impacted or dead and our concerns are not just a bunch of "Nimbisms" but are based on experience, knowledge and commitment that the place we call home is safe, functional, and healthy.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00202 Toebben, Gary Los Angeles Area Chamber of Commerce 10/8/2012

SPAS-PC00202-1

Comment:

The Los Angeles Area Chamber of Commerce (Chamber) is on record in full support for the complete modernization of Los Angeles International Airport (LAX), and the efforts of Los Angeles World Airports (LAWA) to provide state-of-the art facilities, including its airfield, terminals and ground transportation access modes. We believe the Specific Plan Amendment Study (SPAS) has the potential to result in a complete renovation of LAX, ensuring we haVe an airport worthy of our world class city.

We commend Mayor Antonio Villaraigosa, the Board of Airport Commissioners and the LAWA staff for the important work already begun, such as the renovated South Airfield, the construction of a new cross field taxiway, significant improvements to Terminal 6, the selection and approval of new concessionaires and Duty Free shopping opportunities and the current construction of a new Central Utility Plant. We also eagerly anticipate further capital improvements not directly related to SPAS, including more renovations to passenger terminals and the construction of the Midfield Satellite Concourse.

At the heart of the current modernization of LAX is the renovation of the Tom Bradley International Terminal. We believe Bradley West will be the finest international passenger terminal of any U.S. airport, which will further solidify the airport's current role as the premier gateway for the Asian and Australian markets.

At the same time, despite economic uncertainties and recovery from the Great Recession, LAWA has successfully recruited new air carriers and routes to its schedules. In the last two years, LAX has added direct, non-stop flights to such new destinations as Madrid, Rome, Istanbul, Dubai and Melbourne. Some of these international flights are serviced with the new generation of quieter and cleaner aircraft. The A380 and 747-8 are now daily fixtures at LAX as international carriers such as Qantas, Singapore, Korean, Cathay and Air France have included these aircraft as part of their local fleets.

As the region's largest business organization, we recognize the tremendous impact of LAX to our local economy. Last year, 61 million passengers were served at LAX and nearly two million tons of air freight and mail were handled by 22 domestic and 58 international airlines. Several recent reports published by the Los Angeles County Economic Development Corporation have well documented the value LAX provides to our region:

- LAX impacts, directly and indirectly, 294,000 jobs in Los Angeles County;
- LAX generates over $39 billion into our county's economy;
- Current construction projects generate nearly $7 billion to the local economy and employ 39,900 jobs;
- Each daily, non-stop international flight generates $623 million in economic value each year.

Simply put, LAX is one of the region's most significant job generators and it is a major driver of our continued economic recovery. Objective 3 of the SPAS Draft ER most accurately describes the airport's importance in the goal to "maintain LAX's position as the Premier International Gateway supporting and advancing economic growth and vitality of the Los Angeles Region."

This objective is one reason for the Chamber's recent efforts in forming the Coalition to Fix LAX Now, a collaboration co-chaired by this Chamber, the Los Angeles County Federation of Labor and the Los Angeles and Orange Counties Building and Trades Council. While we commend LAWA for the construction already completed and / or underway, we believe it is just the beginning towards a full restoration of LAX's identity as a premier airport. There is much work to be done, and SPAS is the road map to get us there.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00202-2

Comment:

The Specific Plan Amendment Study (SPAS)

The SPAS process is conducted under strict consistency with the provisions of the 2006 Stipulated Settlement Agreement. In particular, the designs and configurations that provide alternatives to the so-called yellow-lighted projects are all compliant to the practical capacity of 78.9 million annual passengers.

This restriction has therefore provided us with a short-sided analysis of actual airside and landside impacts as passenger levels continue to grow during the 21st Century - with or without SPAS approval. Had the airport been allowed to study alternatives that would more fully address the practical growth of the airport, we feel a more justified, long-range planning process would have been achieved.

The limiting boundaries upon which this study is based concerns those of us who believe in modernizing LAX as a 21st Century aviation facility. The report cannot accurately demonstrate long-range air emission improvements resulting from the increased use of the new generation of aircraft over the long term. Without the limitations to annual passenger count mandated by the Stipulated Settlement Agreement, would LAWA have provided a more long-range analysis as it searched for alternatives to challenges relative to the yellow-lighted projects?

This constrained analysis may compel some to advocate for "quick-fix" options for the North Airfield, such as Alternative 2. In the short term, Alternative 2 could be viewed as an attractive solution for alleviating some of the North Airfield's existing challenges. However, when addressing the complete and comprehensive improvement of the North Airfield, the alternative selected must include a realignment of the runways which would accommodate the construction of a centerfield taxiway.

Despite the constraints placed upon the study, we once again commend the LAWA management and staff for its thorough and exhaustive process which has resulted in this draft report. We submit the following analyses and endorsements for the alternatives defined in the DEIR.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. The SPAS process, including preparation of the SPAS Draft EIR, was conducted in accordance with the requirements of the LAX Master Plan Stipulated Settlement, and all alternatives were considered in light of a practical capacity of 78.9 MAP. This passenger activity level at LAX is projected to occur by 2025, which was used as the planning and analysis horizon year for SPAS. Please see Response to Comment AL00004-7 for a discussion of why the use of a more distant horizon is not required by CEQA. To make specific planning assumptions beyond 2025 would be speculative. (See State CEQA Guidelines Sections 15144 and 15145.)

SPAS-PC00202-3

Comment:

Ground Transportation Access

Alternatives 8 and 9 outline two options for connecting the airport to three key arterial locations: (1) an Intermodal Transportation Facility, (2) a future Light Rail Station to be constructed by the Metropolitan Transportation Authority (MTA), and (3) a Consolidated Rental Car facility plus remote parking at

Manchester Square. Alternative 8 would utilize an elevated and dedicated busway connecting these remote locations to the Central Terminal Area (CTA). Alternative 9 would access the CTA by use of an Automated People Mover (APM) system.

Both alternatives, with the corresponding projects described, would greatly enhance the passenger experience and encourage travelers to access LAX via public transportation. This would reduce vehicular traffic in and around the airport alleviating congested intersections and potentially providing an improved quality of life for neighboring residents.

The Chamber of Commerce views both alternatives as acceptable, with an Automated People Mover system as optimal. However, we recognize the cost implications of such a project and whether an APM offers the most benefit when compared to other modernization projects. Significant issues must also be resolved between LAWA, the MTA, the Federal Aviation Administration (FAA) and the airlines before such a project is funded. The Chamber encourages ongoing and fruitful negotiations among the parties so that the project remains on a timeline consistent with the completion of the Light Rail Station, which is a Measure R-funded MTA project. It is, therefore, the Chamber's position that an elevated and dedicated busway would be an acceptable alternative as an immediate first step, and that the project be constructed to accommodate a future APM.

Response:

The commentor's support for a dedicated busway as a first step (i.e., Alternative 8) and an APM in the future (i.e., Alternative 9) is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Topical Response TR-SPAS-T-1 regarding transit options to LAX and Chapter 2 of this Final EIR regarding the LAWA Staff-Recommended Alternative, which couples the airfield and terminal improvements associated with Alternative 1 with the ground access components associated with Alternative 9, which includes an APM.

SPAS-PC00202-4

Comment:

North Airfield Realignment

The Chamber strongly supports the realignment of LAX's North Airfield for safety and operational efficiency. Designed in the 1960s, the North Airfield was built to accommodate a fleet of aircraft that is now nearly mothballed.

Operational Efficiency is of paramount importance. We are now witnessing the arrival of yet another generation of new aircraft which cannot be accommodated on LAX's North Airfield without significant Air Traffic Control modifications. We know when an A380 lands or departs from the North Airfield, virtually all operations stop for several minutes. In fact, on a recent return trip from Paris, I was a passenger of an Air France A380 and we were delayed by nearly one hour waiting for the runway to be cleared and a gate to be assigned. This results in a poorly efficient airfield with passenger delays and the real potential of further negative air emissions. How can we settle for a modernization of LAX's aging facilities and not address our North Airfield once and for all?

The Chamber is aware of neighborhood anxiety and fear of an increased intrusion by airfield operations. However, none of the alternatives considered will result in the taking of homes. We support efforts to reduce the impact to the Westchester business community due to North Airfield realignment, particularly the runway protection zone. We are confident a solution can be achieved which alleviates the concerns of Downtown Westchester businesses without compromising North Airfield improvements. We urge LAWA to continue its dialogue with the FAA to find a solution to this challenge.

Safety is everyone's concern. There is no doubt safety will be improved as a result of runway realignment. All recent safety studies conducted relative to the North Airfield have reached that same conclusion. In fact, the most recent study released by an academic panel with modeling performed by NASA / Ames concluded that North Airfield runway separation would result in as much as 55% improvement to safety. While some make an effort to portray safety as an issue of percentages, it's more than that; it's the one thing where no margin for error can be afforded. LAWA must make every

effort to protect the safety of its passengers and the neighboring communities. It is paramount that the North Airfield realignment must proceed to reduce any possible risk to passenger safety, especially in this day and age of larger aircraft.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00202-5

Comment:

Alternatives 1 and 6

These options would separate the north runways by moving Runway 24R 240 feet north (Alternative 1) or 100 feet north (Alternative 6). While we see the merits to furthering these alternatives and commend LAWA for producing alternatives which address separation of runways, we are concerned that these alternatives are still inadequate to accommodate aircraft in all weather conditions and factors. Additionally, the separation of 100 or 240 feet north does not achieve the maximum level of increased safety for passengers. Therefore, the Chamber does not endorse these alternatives.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Section 4.7.2 of the SPAS Draft EIR discusses and analyzes safety issues associated with the SPAS alternatives, including runway separation distances. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00202-6

Comment:

Alternatives 2 and 4

These options reflect no further separation of the runways, but do modify the North Airfield with improvements to runways and reconfiguration of certain taxiways. Only Alternative 2 addresses terminal and Ground Transportation enhancements. Because these alternatives provide no additional separation to the runways and prohibit the construction of a centerfield taxiway, they do not improve operational efficiency and safety. They do not fully address terminal and Ground Transportation issues and the Chamber does not endorse these alternatives.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Section 4.7.2 of the SPAS Draft EIR discusses and analyzes safety issues associated with the SPAS alternatives, including runway separation distances. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00202-7

Comment:

Alternative 3

This option identifies projects in accordance with LAX's currently approved Master Plan (also known as Alternative D). While some of these projects had merit when originally designed to reflect an immediate post 9/11 security-conscious environment (e.g. the closure of the CTA to all private vehicles), many of these projects are now obsolete and should be scrapped. Additionally, the movement of Runway 24L 340 feet south would mean the demolition of Terminals 1, 2 and 3 and the elimination of the northernmost gates in the Bradley Terminal. This severe renovation of LAX was designed ten years ago and does not make sense today. Therefore, the Chamber does not endorse this alternative.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00202-8

Comment:

Alternative 5

This option provides the most responsible solution to the North Airfield's limitations. By relocating Runway 24R 350 feet north, LAWA can construct a new centerline taxiway. Other important runway and taxiway improvements can also be completed. The North Airfield would be fully operational in all weather conditions and the northern terminals would be enhanced. While not specifically addressing Ground Transportation issues, this alternative, combined with Alternatives 8 or 9, provides the best solution for a full modernization of LAX.

Alternative 5 will also include significant improvements to the Lincoln Boulevard / Sepulveda Boulevard intersection, Other mitigation measures to improve traffic flow at key intersections should be a component of the final EIR. These improvements will enhance the ground transportation access for passengers using LAX. It would also benefit local traffic flow for residents surrounding the airport.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Section 4.12.2.7.2 of the SPAS Draft EIR identifies mitigation measures proposed to address off-airport transportation impacts associated with the SPAS alternatives, including mitigation measures designed to improve key intersections in the surrounding areas. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00202-9

Comment:

Again, it is most unfortunate that LAWA was mandated to conduct an analysis of impacts not based on projected 21st Century passenger levels, but rather under the constraints of the Stipulated Settlement Agreement (i.e. 78.9 million annual passengers). However, there is no question that Alternative 5 provides the most promise towards full modernization. The Chamber views this alternative as the best and most responsible path towards completing LAX's long-awaited modernization and therefore fully endorses Alternative 5.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the

adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PC00202-10

Comment:

Conclusion

A Word Class City deserves a World Class Airport. Tourism is our region's leading industry and LAX is our front door for the traveler's experience. The approval of SPAS by the Board of Airport Commissioners, the County's Airport Land Use Commission and the City Council will clear the way for important projects to enhance passenger experience - generate thousands of more jobs and pumping billions more into our economy with no expense to the taxpayer.

The Chamber strongly supports the modernization of LAX and commends the Mayor, City Council, Board of Airport Commissioners and airport management for the significant progress already underway. But the process is far from complete and will result in a "lopsided" airport without resolving several important long-term development issues. We therefore strongly endorse Alternatives 5, 8 and 9 as reasonable and preferred options towards fully modernizing our airport.

We thank you for the opportunity to provide comments and we look forward to actively participating during the approval process once the final report is published.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PFA00001 Washington Jr., James H — None Provided

SPAS-PFA00001-1

Comment:

NO PEOPLE MOVER!!!
Build transit INTO airports now.
Start building transit until it becomes the #1 Way to connect our airports with the world!

Response:

The commentor attached a hand-marked plan delineating the main components of a suggested alternative concept for improvements to LAX. Based on LAWA's review of the attachment, the main components are summarized as follows:

1. Extend heavy-rail transit service to LAX via Metrolink, Amtrak, and High-Speed Rail (HSR). This would be accomplished via an underground rail tunnel system coming from the north along Aviation Boulevard and turning west at Century Boulevard to extend beneath the CTA, where the Metrolink and Amtrak would continue along beneath the north side of the CTA with stops at the CTA terminals, Tom Bradley International Terminal (TBIT), and the future Midfield Satellite Concourse (MSC). The HSR would continue along beneath the south side of the CTA with stops at the CTA, TBIT, MSC, and an LAX employee commuter station proposed in the western portion of the airport.
2. Extend light-rail transit service to LAX via an extension of the Metro Green Line along Aviation Boulevard with a western branch line along Century Boulevard extending into and around the CTA. The segments of the Green Line within the CTA, Century Boulevard, and Aviation Boulevard north of

Century Boulevard would be on an aerial (elevated) platform, while the segment south of Century Boulevard would be in an underground tunnel.
3. Convert the CTA's easternmost parking garages (Parking Structures P-1 and P-7) into a municipal bus terminal, with station connecting to the Green Line, Metrolink, and Amtrak.
4. Do not develop an Automated People Mover (APM) system at LAX.
5. Leave the north airfield and surrounding areas essentially as they are today. Under this concept, there would be minimal airfield changes and the north airfield would be used primarily for smaller aircraft. Lincoln Boulevard would not be modified at all and there would be no development in LAX Northside.
6. Extend the south runways east past Aviation Boulevard and place Aviation Boulevard within a tunnel between Century Boulevard and Imperial Highway. With these runway extensions, larger aircraft would operate primarily on the south airfield. Under this concept, uses within the runway extension area, as well in the areas extending north to Century Boulevard and between La Cienega Boulevard and the I-405 would be acquired by LAWA and demolished.

Elements of the alternative concept described above for LAX improvements are not feasible, are similar to elements already included in the SPAS alternatives, and/or do not avoid or substantially lessen significant environmental impacts that would occur under the alternatives addressed in the SPAS Draft EIR. Therefore, the alternative concept was not evaluated in detail in the SPAS Draft EIR. The reasons for this are described below, based on the same order of concept elements summarized above.

1. Heavy-Rail Transit Service to LAX: LAWA does not have any responsibility, authority, or jurisdiction to bring heavy-rail transit to LAX. Such transit services occur directly through Metrolink, Amtrak, and the California High-Speed Rail Authority. None of those agencies currently has plans or funding to extend service to or near LAX. The planned California High-Speed Rail system does not include a stop at or near LAX; however, as currently envisioned, the high-speed rail alignment would stop at Union Station in downtown Los Angeles, where passengers could board the Union Station FlyAway to reach LAX. Therefore, heavy-rail transit service to LAX is considered infeasible. Also, the construction impacts associated with development of an extensive underground tunnel network into and beneath the CTA, extending that tunnel network west beneath the airfield operations area, and development of above-ground station connections would be substantial; these impacts would far exceed construction impacts of ground transportation system improvements, such as the elevated busway or APM system, proposed under the various SPAS alternatives.
2. Light-Rail Transit Service to LAX: LAWA does not have the responsibility or authority to bring light-rail transit service into LAX, as that service is within the jurisdiction of Metro. However, with the exception of Alternative 4, all of the SPAS alternatives include improvements to enhance connections with and use of Metro light-rail transit service at LAX. This would occur primarily through the integration of SPAS-related ground transportation system improvements with Metro light-rail transit corridors and stations, such as the connectivity between the elevated busway or APM systems proposed under Alternatives 1, 2, 8, and 9 and the future Metro Crenshaw/LAX Transit Corridor and Station, or the pedestrian walkway between the Intermodal Transportation Center (ITC) and the existing Green Line Aviation Station proposed under Alternative 3. Additionally, LAWA and Metro have been coordinating, and will continue to coordinate, on the Airport Metro Connector Project described on page 5-22 of the SPAS Draft EIR to provide light-rail transit service directly into the CTA. It is anticipated that Metro's formulation and evaluation of alternative concepts for the Airport Metro Connector Project may include the types of alignments and facilities suggested by the commentor. (See Topical Response TR-SPAS-T-1 for further discussion of transit options into LAX.)
3. Municipal Bus Terminal Within CTA: Regarding the suggested conversion of existing parking facilities at the east end of the CTA to a municipal bus terminal, having a major bus facility within the CTA would adversely affect traffic conditions within the CTA, based on the size and number of buses that would likely be added to the traffic mix within the CTA. Of particular concern would be the one intersection within the CTA that is anticipated to have unavoidable significant impacts under all of the SPAS alternatives in future (2025) conditions. That intersection, World Way South and Center Way, is one of the main exit points from the CTA and the placement of a municipal bus facility immediately adjacent to it, and addition of numerous bus trips to the intersection, would exacerbate that significant impact. Also, the bus trips within the CTA could result in additional intersections being significantly impacted, that would not otherwise occur under the current range of SPAS alternatives. The worsening of traffic conditions within the CTA would be contrary to the project objective of improving traffic conditions in the CTA, as described in Section 2.2 of the SPAS Draft EIR. In addition to the adverse impacts to CTA traffic, the placement of the municipal bus center within the CTA would not, from a bus

route logistics standpoint, be as efficient as the location currently proposed by Metro, that being adjacent to the future Crenshaw/LAX Century/Aviation Station. The location proposed by Metro would enable buses to take access to and from a number of major streets in the nearby area, whereby the location within the CTA would require all buses to travel on Century Boulevard and Sepulveda Boulevard before accessing other major streets in the nearby area.

4. No APM: Although this concept suggests that all non-automobile access to and within the CTA be provided by a combination of the aforementioned heavy-rail transit and light-rail transit systems, such systems would not provide the traffic benefits of having an APM or elevated busway connect the CTA with the ITF, ITC, CONRAC, or GTC proposed under various SPAS alternatives, which would transport passengers/customers between these airport-related facilities using a dedicated route removed from the local street system. Not providing an APM would be contrary to the project objective of improving the ground access system to improve traffic conditions within the CTA.

5. No/Minimal Improvements to the North Airfield: SPAS Alternative 4 already reflects a scenario where no improvements are made to the north airfield, except for federally-mandated Runway Safety Area improvements. As described in the impacts analysis presented in Chapter 4 of the SPAS Draft EIR, implementation of this alternative would substantially reduce construction-related impacts compared to the other SPAS alternatives, but would result in greater long-term operations-related air quality and aircraft noise impacts. However, this concept would not respond to the project objective described in Section 2.2 of the SPAS Draft EIR relative to improving the north airfield to support safe and efficient movement of aircraft. Regarding the suggestion that there be no LAX Northside development, the LAX Northside project is not part of SPAS.

6. Extend Runways in South Airfield: The concept of further improving the south airfield to better accommodate large aircraft, in lieu of improving the north airfield, not only fails to address other problems associated with the north airfield, as described in Section 2.2 of the SPAS Draft, but would exacerbate the existing imbalance between the north and south airfields relative to large aircraft. As described in Section 2.2, the inability of some large heavy aircraft to depart from Runway 6R/24L due to insufficient runway length requires them to use Runway 7L/25R, which causes an imbalance in such operations between the two airfields. Although the south airfield can already accommodate large heavy aircraft and there is not a need to lengthen the runways, as suggested under this alternative concept, any degree to which additional operations of large aircraft are shifted to the south airfield under this concept (i.e., by leaving the north airfield unimproved and discouraging large aircraft operations in that area while improving the south airfield to draw such operations), would result in greater air quality and aircraft noise impacts than would otherwise occur by leaving the south airfield in its current configuration and improving the north airfield. Adverse air quality and noise impacts associated with shifting a greater number of aircraft operations from the north airfield to the south airfield would occur due to longer taxiing times and distances for aircraft (i.e., more air pollutant emissions from aircraft engines) that are gated near the north airfield but have to use the south runway and from placing a greater number of aircraft arrivals and departures over densely populated areas east of the south airfield (higher concentrations of homes and people exposed to aircraft noise impacts). Additionally, the easterly extension of the runways would shift the aircraft noise contours for the south airfield eastward, which, in turn, would increase noise impacts on highly populated areas east of the airport. Also, the extent of land area proposed for acquisition and demolition of existing uses under this concept would substantially increase construction-related impacts as well as land use impacts (i.e., loss of existing land uses).

SPAS-PFA00001-2

Comment:

"PEOPLEMOVERS ARE A SIGN OF FAILURE"! Gil Mallery
MOVING RUNWAYS IS FOR AIRCRAFT CARRIERS!
FIX LAX GROUND TRANSPORTATION FIRST: BUILD TRANSIT TO & INTO OUR AIRPORTS!

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Topical Response TR-SPAS-T-1 regarding transit options to LAX.

SPAS-PFA00001-3

Comment:

PUBLIC COMMENT: LOS ANGELES WORLD AIRPORTS [LAWA] SPECIFIC PLAN AMENDMENT STUDY

Alternative 2 is the "Environmentally Superior Alternative" [that achieves] "compliance with FAA Airport Design Standards, the larger aircraft are more acceptably handled by Alt. 2" without requiring additional runway spacing [=runway relocation]. Alt. 2 provides higher-speed taxiway exits for aircraft, lengthens the north runway, & "should be a no-brainer," according to Alliance for a Regional Solution to Airport Congestion [ARSAC] president Denny Schneider . . .

Response:

The commentor's support for Alternative 2 is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Chapter 2 of this Final EIR regarding the LAWA Staff-Recommended Alternative, which couples the airfield and terminal improvements associated with Alternative 1 with the ground access components associated with Alternative 9, including a discussion of the rationale behind the selection of these alternatives over the other alternatives evaluated in the SPAS Draft EIR. Regarding enhancements to airfield safety and efficiency under Alternative 2, please see Table 4.7.2-16 on pages 4-569 and 4-570 in Section 4.7.2 of the SPAS Draft EIR. Please also see Responses to Comments SPAS-PC00130-3 and SPAS-PC00089-1 regarding efficiency associated with Alternative 2 compared to other airfield alternatives.

SPAS-PFA00001-4

Comment:

But Schneider points out: 'NONE OF THESE OPTIONS CREATE SIGNIFICANT CAPACITY INCREASES FOR VEHICLE TRAFFIC FLOW!" UNACCEPTABLE! For years, ARSAC + other LAX neighbors have been pressing LAWA and LAC MTA to meet airport traffic demand by distributing it away from LAX, with Public Transportation & High Speed Rail. Some of these neighbors now back big commercial development plans north of LAX, hoping to make land too expensive for further runway expansion; HOW SELF-DEFEATING! Construction trades want any construction, however misguided . . . . . but it's TRANSIT CONSTRUCTION WE NEED to fix LAX & regional airports' worst problems! It's MOVING PEOPLE NOT CARS, NOT RUNWAYS; that's the focus MISSING or DONE WRONG in all 9 SPAS Alternatives:

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project.

Please see Topical Response TR-SPAS-T-1 regarding transit options to LAX. As indicated in that topical response, LAWA is working closely with Metro regarding the planning of the Airport Metro Connector Project and implementation of the Crenshaw/LAX Transit Corridor Project. In addition, all of the SPAS alternatives, with the exception of Alternative 4, include a connection to the planned Metro Aviation/Century Station that would provide improved passenger connectivity as compared to the existing service.

LAWA does not have the responsibility or authority for planning regional roadway capacity. Within the airport, the creation of significant amounts of additional roadway capacity would require building new roads within the CTA. Options for this are limited by a variety of constraints within the CTA and would require significant reconstruction of existing facilities. Instead, LAWA seeks to maximize existing capacity by employing a variety of methods which are presented in the SPAS alternatives and Draft EIR (see discussions of the SPAS alternatives in Section 2.3.1, beginning on page 2-13 under the subheading "Ground Access"). The methods intended to reduce future vehicle demand in the CTA include (1) relocating some modes which currently access the CTA to facilities such as the ITF (e.g.,

Shared Ride Vans and FlyAway buses from the arrivals level, and five percent of the passenger cars accessing the CTA on both the departures and arrives levels who would instead use the kiss-and-ride lot), (2) consolidation of the various commercial shuttles, and (3) implementing single level busing operations for specific commercial modes (i.e., rental car, hotel, and private parking operator shuttles) which would permit shuttles to both pick up and drop off passengers on a single level of the CTA.

Regarding the comment that "neighbors now back big commercial development plans north of LAX" to make land more expensive, no facts or evidence has been provided to support this assertion, and a response is not required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 14204(a)).

SPAS-PFA00001-5

Comment:

Alternative 1 would move north side Runway "6L/24R" 260 feet north of its present location, add "center field" taxiways, & require significant grading changes to airport drainage channels. Aviation professionals say they don't need center taxiways- UNACCEPTABLE!
Alternative 3 would implement the changes described in LAX Master Plan D- Including "Yellow Light projects:" A. unneeded "center field" taxiways, B. demolition of existing Air Terminals 1, 2, & 3, and C. a Ground Transportation Center (GTC). plus an Automated People Mover [APM]***. UNACCEPTABLE WASTEFUL RIDICULOUS! And Mayor Villaraigosa promised NOT to build the "Yellow Light Projects"!
Alternative 4 would implement changes described In LAX Master Plan D, without the "Yellow Light projects . . . " Still UNACCEPTABLE WASTEFUL and RIDICULOUS!
Alternative 5 would move the northernmost Runway "6L/24R" a whopping 350 feet north of its present location toward Westchester . . . This is NOT ACCEPTABLE! Will Lincoln Blv. go thru the WallyPark garage?
Alternative 6 would move north Runway "6L/24R" 100 feet north . . . and is UNACCEPTABLE.
Alternative 7 would move the other north Runway "6R/24L" 100 feet south . . . also UNACCEPTABLE.
Alternative 8 addresses ground access improvements, yet favors inefficient car traffic over transit . . . this is UNACCEPTABLE; TRANSIT IS 21ST CENTURY TRANSPORTATION!
Alternative 9 concentrating rental cars [or any cars] in a single facility [CONRAC] = a traffic jam, not and improvement! Concentrating on cars & People Mover transfers curses transit riders! UNACCEPTABLE!***
"PEOPLE-MOVERS ARE A SIGN OF FAILURE!" -Gil Mallery

Quit moving runways; that's for aircraft carriers! Kill the People-Movers! AFTER 20 YEARS WASTED ON STUDYING & FOOLING AROUND, why on earth is LAWA talking People-Mover Nonsense.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. The commentor does not provide any evidence that aviation professionals have opined that center taxiways are not needed. For further discussion on the operational and safety benefits of a centerfield taxiway please see page 505 in Section 4.7.2 of the SPAS Draft EIR. Please see Chapter 2 of this Final EIR regarding the LAWA Staff-Recommended Alternative, which couples the airfield and terminal improvements associated with Alternative 1 with the ground access components associated with Alternative 9, including a discussion of the rationale behind the selection of these alternatives over the other alternatives evaluated in the SPAS Draft EIR. Please see Topical Response TR-SPAS-T-1 regarding transit options into LAX.

SPAS-PFA00001-6

Comment:

TODAY we should be riding that excess capacity in Green Line trains aerial to 3rd floor Airtel stations over Century Blvd, then straight inside LAX's inner airport loop! NOT BUILDING A NEW INCOMPATIBLE PEOPLE-MOVER SYSTEM with new equipment, new yard, new maintenance personnel . . . & time-wasting mode transfers that'll never go away. Likewise why wasn't the curse of a remote 98th Street Municipal Bus Terminal demolished long ago, giving way to excellent -one seat muni

bus rides- by taking over the eastern-most parking garage of the airport loop- to put buses IN WALKING DISTANCE OF LAX AIR GATES? Why aren't Metrolink commuter trains arriving under the International Terminal TODAY [in a tunnel station, pulled by electric locomotives from the Harbor Sub]- from Ontario & Burbank Airports? Flyaway Trains from Van Nuys? from LA Union Station?
Why aren't we planning to bring in Amtrak on the same route- from John Wayne & San Diego Airports? Trains from New Orleans, Chicago, Vancouver? Cruise ship passengers & Port employees from San Pedro & Long Beach? Planning more tunnels TODAY for High Speed rail under LAX's new Terminal for passengers to take from San Francisco Airport, Sacramento . . . shortening trip times to Asia, South America & Europe?

LAX is one of the last US airports that isn't all screwed up: Start building transit TO & INTO our airports, til TRANSIT IS THE #1 WAY to connect our airports with the world- without wasting our time, without laying waste to our airports or neighboring communities!

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project.

Please see Topical Response TR-SPAS-T-1 regarding transit options into LAX. As indicated in that topical response, LAWA is working closely with Metro regarding the planning of the Metro Airport Connector Project and implementation of the Crenshaw/LAX Transit Corridor Project. In the vicinity of LAX, the Crenshaw/LAXTransit Corridor Project will also serve as an extension of the Green Line, which is currently located along the I-105 corridor and turns south just west of Aviation Boulevard. All of the SPAS alternatives, with the exception of Alternative 4, include a connection to the planned Metro Aviation/Century Station that would provide improved passenger connectivity as compared to the existing service. As part of the Metro Airport Connector Project, Metro is currently evaluating a range of options for connecting the regional rail system to LAX, including two light rail options directly into the CTA, and two airport circulator options-including an APM and a Bus Rapid Transit (BRT)-that would connect to Metro's service at the planned Aviation/Century Station. Please see Response to Comment SPAS-PFA00001-1 for reasons why the extension of heavy-rail service, such as for Metrolink and Amtrak, to LAX is considered infeasible.

It is assumed that by the SPAS horizon year (2025), Metro will relocate the current 96th Street Metro Bus Station, with is located between Vicksburg Avenue and Jenny Street, to a new bus center located adjacent to the planned Aviation/Century Station. Access to the CTA from the relocated bus center would be provided by the SPAS APM or dedicated busway. Relocation of the bus station to the CTA is not under consideration by either LAWA or Metro and is considered infeasible for a number of reasons. Specifically, relocating this station to the CTA would result in delays for the non-airport passengers who are believed to make up the majority of the passengers on these buses. The existing garages on the eastern end of the CTA do not have sufficient vertical clearance to accommodate Metro buses; accommodation of buses could only occur if a garage was demolished and reconstructed. Moreover, use of a garage for regional bus service would reduce the amount of on-airport parking. Finally, airport passengers arriving on Metro buses to the easternmost parking garage in the CTA could be required to walk in excess of 2,300 feet to reach their terminal or transfer to the airport's inter-terminal shuttle. Please also see Response to Comment SPAS-PFA00001-1 for additional reasons supporting the conclusion that relocating the municipal bus terminal to the CTA is considered infeasible.

LAWA has no responsibility or planning authority for high-speed rail. It should be noted that the planned California High-Speed Rail system does not include a stop at or near LAX. As currently envisioned and stated on page ES-1 in the California High-Speed Rail Program Revised 2012 Business Plan, Building California's Future, April 2012, the high-speed rail alignment would stop at Union. Please also see Response to Comment SPAS-PFA00001-1 for additional discussion regarding the idea of extending high-speed rail to LAX.

SPAS-PFA00002 Neff, Jack None Provided

SPAS-PFA00002-1

Comment:

Start building transit until it becomes the #1 Way to connect our airports with the world!

Build transit INTO airports now.

Response:

The alternative concept reflected in this comment is the same as in comment SPAS-PFA00001-1; please refer to Response to Comment SPAS-PFA00001-1.

SPAS-PFA00002-2

Comment:

"PEOPLEMOVERS ARE A SIGN OF FAILURE"! Gil Mallery
MOVING RUNWAYS IS FOR AIRCRAFT CARRIERS!
FIX LAX GROUND TRANSPORTATION FIRST: BUILD TRANSIT TO & INTO OUR AIRPORTS!

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Topical Response TR-SPAS-T-1 regarding transit options to LAX.

SPAS-PFA00002-3

Comment:

PUBLIC COMMENT: LOS ANGELES WORLD AIRPORTS [LAWA] SPECIFIC PLAN AMENDMENT STUDY
that achieves] "compliance with FAA Airport Design Standards, the larger aircraft are more acceptably handled by Alt. 2," without requiring additional runway spacing [=runway relocation]. Alt. 2 does provide higher-speed taxiway exits for aircraft, lengthens the north runway, & "should be a no-brainer," according to Alliance for a Regional Solution to Airport Congestion [ARSAC] president Denny Schneider . . .

Response:

The content of this comment is similar to comment SPAS-PFA00001-3; please refer to Response to Comment SPAS-PFA00001-3.

SPAS-PFA00002-4

Comment:

But Schneider points out: 'NONE OF THESE OPTIONS CREATE SIGNIFICANT CAPACITY INCREASES FOR VEHICLE TRAFFIC FLOW" UNACCEPTABLE! For years, ARSAC + other LAX neighbors have been pressing LAWA & LAC MTA to meet airport traffic demand by distributing it away from LAX, with Public Transportation & High Speed Rail. Some neighbors back big commercial developming north of LAX, hoping to make land too expensive for further runway expansion; HOW SELF-DEFEATING! Construction trades want construction work, however foolish . . . . . but it's TRANSIT CONSTRUCTION WE NEED to fix LAX!

Response:

The content of this comment is similar to comment SPAS-PFA00001-4; please refer to Response to Comment SPAS-PFA00001-4.

SPAS-PFA00002-5

Comment:

Alternative 1 would move north side Runway "6L/24R" 260 feet north of its present location, add "center field" taxiways, & require significant grading changes to airport drainage channels. Aviation pres say they don't need center taxiways- UNACCEPTABLE!
Alternative 3 would implement the changes described in LAX Master Plan D- Including "Yellow Light projects:" A. unneeded "center field" taxiways, B. demolition of existing Air Terminals 1, 2, & 3, and C. a Ground Transportation Center (GTC), plus an Automated People Mover [APM]***. . . UNACCEPTABLE; Mayor Villaraigosa promised not to build theese!
Alternative 4 would implement changes described In LAX Master Plan D, without the "Yellow Light projects" Still UNACCEPTABLE WASTEFUL and RIDICULOUS!
Alternative 5 would move the North Runway "6L/24R" a whopping 350 feet north of its present location . . . This is UNACCEPTABLE!
Alternative 6 would move Runway "6L/24R" 100 feet north . . . and is UNACCEPTABLE.
Alternative 7 would move Runway "6R/24L" 100 feet south . . . also UNACCEPTABLE.
Alternative 8 addresses ground access improvements, but favors low capcity auto traffic over transit . . . this is UNACCEPTABLE; TRANSIT IS 21ST CENTURY TRANSPORTATION!
Alternative 9 concentrating rental cars [or any cars] in a single facility [CONRAC] = a traffic jam, not an improvement! Concentrating on cars & People Mover transfers curses transit riders! UNACCEPTABLE!***
"PEOPLE-MOVERS ARE A SIGN OF FAILURE!" -Gil Mallery

Quit moving runways; that's for aircraft carriers! Kill the People-Movers! AFTER 20 YEARS WASTED ON STUDYING & FOOLING AROUND, why on earth are you now talking People-Mover Nonsense.

Response:

The content of this comment is similar to comment SPAS-PFA00001-5; please refer to Response to Comment SPAS-PFA00001-5.

SPAS-PFA00002-6

Comment:

we should be bringing the unused capacity in Green Line trains aerial to 3rd floor Airtel stations over Century Blv., then straight inside LAX's inner airport loop! Likewise why hasn't the curse of a remote 98th Street Municipal Bus Terminal demolished long ago, giving way to excellent one-seat muni bus rides, by taking over the eastern-most parking garage of the airport loop for transit WITHIN WALKING DISTANCE OF LAX AIR GATES?
Why aren't Metrolink commuter trains arriving under the International Terminal TODAY [in a tunnel station, pulled by electric locomotives from the Harbor Sub]- arriving from Ontario, from Burbank and Van Nuys Airports? from LA Union Station?Why aren't we planning to bring in Amtrak the same way- from John Wayne airport, & San Diego... Cruise ship passengers from San Pedro & Long Beach? Trains from New Orleans, Chicago? Planning tunnels NOW for High Speed rail under LAX's new terminal for new passengers from San Francisco Airport, Sacramento... & across the Pacific Rim?
Start building transit until it becomes the #1 Way to connect our airports with the world!

Build Transit INTO airports now; don't screw up LAX!

Response:

The content of this comment is essentially the same as comment SPAS-PFA00001-6; please refer to Response to Comment SPAS-PFA00001-6.

SPAS-PFA00003 Taylor, Lisa None Provided

SPAS-PFA00003-1

Comment:

Start building transit until it becomes the #1 Way to connect our airports with the world!
Build transit INTO airports now.

Response:

The alternative concept reflected in this comment is the same as in comment SPAS-PFA00001-1; please refer to Response to Comment SPAS-PFA00001-1.

SPAS-PFA00003-2

Comment:

DON'T MOVE LAX NORTH RUNWAYS AROUND!
FIX LAX GROUND TRANSPORT 1ST- BUILD TRANSIT TO + INTO OUR AIRPORTS!

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Topical Response TR-SPAS-T-1 regarding transit options to LAX.

SPAS-PFA00003-3

Comment:

PUBLIC COMMENT: LOS ANGELES WORLD AIRPORTS [LAWA] SPECIFIC PLAN AMENDMENT STUDY

Alternative 2 is the "Environmentally Superior Alternative", [achieves] "compliance with FAA Airport Design Standards, the larger aircraft are more acceptably handled by Alt. 2 "without requiring additional runway spacing [=runway relocation]. Alt. 2 also provides higher-speed taxiway exits for aircraft, lengthens the north runway, and "should be a no-brainer," says Alliance for a Regional Solution to Airport Congestion [ARSAC] president Denny Schneider . . .

Response:

The content of this comment is similar to comment SPAS-PFA00001-3; please refer to Response to Comment SPAS-PFA00001-3.

SPAS-PFA00003-4

Comment:

But Schneider points out: "NONE OF THESE OPTIONS CREATE SIGNIFICANT CAPACITY INCREASES FOR VEHICLE TRAFFIC FLOW!" UNACCEPTABLE! For years, ARSAC + other LAX neighbors have been pressing LAWA & LAC MTA to meet airport traffic demand by distributing it away from LAX, with Public Transportation & High Speed Rail. Some of them now back commercial development north of LAX, hoping to make land too expensive for further runway expansion; how self-defeating! . . . Construction trades want work, however foolish . . . but TRANSIT CONSTRUCTION IS WHAT IS NEEDED TO FIX LAX!

Response:

The content of this comment is similar to comment SPAS-PFA00001-4; please refer to Response to Comment SPAS-PFA00001-4.

SPAS-PFA00003-5

Comment:

Alternative 1 would move north side Runway "6L/24R" 260 feet north of its present location, add "center field" taxiways, & require significant grading changes to airport drainage channels. Aviation pros say they don't need center taxiways- UNACCEPTABLE!
Alternative 3 would implement the changes described in LAX Master Plan D, Including "Yellow Light projects": A. unneeded "center field" taxiways, B. demolition of existing Air Terminals 1, 2, & 3, and C. a Ground Transportation Center (GTC), plus Automated People Mover [APM]***. UNACCEPTABLE! & Mayor Villaraigosa promised NOT to build them!
Alternative 4 would implement changes described in LAX Master Plan D, without the "Yellow Light projects" Still UNACCEPTABLE, WASTEFUL, and RIDICULOUS!
Alternative 5 would move the North Runway "6L/24R" a whopping 350 feet north of its present location . . . This is UNACCEPTABLE!
Alternative 6 would move Runway "6L/24R" 100 feet north . . . and is UNACCEPTABLE..
Alternative 7 would move Runway "6R/24L" 100 feet south . . . also UNACCEPTABLE..
Alternative 8 addresses ground access improvements, that favors inefficient auto traffic over transit . . . this is UNACCEPTABLE; TRANSIT IS 21ST CENTURY TRANSPORTATION!
Alternative 9 concentrating rental cars [or any cars] in a single facility [CONRAC] = a traffic jam, not an improvement! Concentrating on cars & People Mover transfers curses transit riders! UNACCEPTABLE!***
"PEOPLE-MOVERS ARE A SIGN OF FAILURE!" -Gil Mallery

FRMR-USDOT FEDERAL RAILROAD ADMINISTRATOR, FOUNDING CHAIR U DENVER, FRMR.SR.V.P. MORRISON KNUDSEN CORP.
Quit moving runways; that's for aircraft carriers! Kill the People-Movers! AFTER 20 YEARS WASTED ON STUDYING & FOOLING AROUND, why on earth is LAWA talking People-Mover Nonsense

Response:

The content of this comment is similar to comment SPAS-PFA00001-5; please refer to Response to Comment SPAS-PFA00001-5.

SPAS-PFA00003-6

Comment:

we should be routing the extra capacity in Green Line trains aerial to 3rd floor Airtel stations over Century Blvd., then straight inside LAX's inner airport loop!
Likewise why hasn't the curse of a remote 98th Street Municipal Bus Terminal been long ago demolished, giving way to excellent one-seat muni bus rides by taking over the eastern-most parking garage of the airport loop for transit WITHIN WALKING DISTANCE OF LAX AIR GATES? Why aren't Metrolink commuter trains arriving under the International Terminal TODAY [in a tunnel station, pulled by electric locomotives from the Harbor Sub]- from Ontario & Burbank Airports? Flyaway Trains from Van Nuys? from LA Union Station?
Why aren't we planning to bring in Amtrak on the same way- from John Wayne airport, San Diego Airport . . Ship passengers from San Pedro & Long Beach? Trains from New Orleans, Chicago? TODAY planning more tunnels for High Speed rail under LAX's new Terminal, for passengers to arrive from San Francisco Airport, Sacramento... & across the Pacific Rim?
Start building transit until it becomes the #1 Way to connect our airports with the world!

Build Transit INTO airports now; don't screw up LAX!

Response:

The content of this comment is essentially the same as comment SPAS-PFA00001-6; please refer to Response to Comment SPAS-PFA00001-6.

SPAS-PFA00004 Yeager, Will None Provided

SPAS-PFA00004-1

Comment:

"PEOPLEMOVERS ARE A SIGN OF FAILURE"! Gil Mallery
MOVING RUNWAYS IS FOR AIRCRAFT CARRIERS!
FIX LAX GROUND TRANSPORTATION FIRST: BUILD TRANSIT TO & INTO OUR AIRPORTS!

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Topical Response TR-SPAS-T-1 regarding transit options to LAX.

SPAS-PFA00004-2

Comment:

PUBLIC COMMENT: LOS ANGELES WORLD AIRPORTS [LAWA] SPECIFIC PLAN AMENDMENT STUDY

Alternative 2 is the "Environmentally Superior Alternative", [achieves] "compliance with FAA Airport Design Standards, the larger aircraft are more acceptably handled by Alt. 2, "without requiring additional runway spacing [=runway relocation]. Alt. 2 does provide higher-speed taxiway exits for aircraft, lengthens the north runway, & "should be a no-brainer," according to Alliance for a Regional Solution to Airport Congestion [ARSAC] president Denny Schneider . . .

Response:

The content of this comment is similar to comment SPAS-PFA00001-3; please refer to Response to Comment SPAS-PFA00001-3.

SPAS-PFA00004-3

Comment:

But Schneider points out: "NONE OF THESE OPTIONS CREATE SIGNIFICANT CAPACITY INCREASES FOR VEHICLE TRAFFIC FLOW" UNACCEPTABLE! For years, ARSAC + other LAX neighbors have been pressing LAWA & LAC MTA to meet airport traffic demand by distributing it away from LAX, with Public Transportation & High Speed Rail. Some neighbors back commercial developing north of LAX, hoping to make land too expensive for further runway expansion; HOW SELF-DEFEATING! Construction trades want construction work, however foolish . . . but IT'S TRANSIT CONSTRUCTION WE NEED to fix LAX!

Response:

The content of this comment is similar to comment SPAS-PFA00001-4; please refer to Response to Comment SPAS-PFA00001-4.

SPAS-PFA00004-4

Comment:

Alternative 1 would move north side Runway "6L/24R" 260 feet north of its present location, add "center field" taxiways, & require significant grading changes to airport drainage channels. Aviation pros say they don't need center taxiways- UNACCEPTABLE!
Alternative 3 would implement the changes described in LAX Master Plan D. Including "Yellow Light projects:" A. unneeded "center field" taxiways, B. demolition of existing Air Terminals 1, 2, & 3, and C. a Ground Transportation Center (GTC), plus Automated People Mover [APM]***.. UNACCEPTABLE; Mayor Villaraigosa promised NOT to build these!
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Alternative 5 would move the North Runway "6L/24R" a whopping 350 feet north of its present location . . . This is UNACCEPTABLE!
Alternative 6 would move Runway "6L/24R" 100 feet north . . . and is UNACCEPTABLE..
Alternative 7 would move Runway "6R/24L" 100 feet south . . . also UNACCEPTABLE..
Alternative 8 addresses ground access improvements, but favors low capacity auto traffic over transit . . . this is UNACCEPTABLE; TRANSIT IS 21ST CENTURY TRANSPORTATION!
Alternative 9 concentrating rental cars [or any cars] in a single facility [CONRAC] = a traffic jam, not an improvement! Concentrating on cars & People Mover transfers curses transit riders! UNACCEPTABLE!***
"PEOPLE-MOVERS ARE A SIGN OF FAILURE!" -Gil Mallery

FRMR. USDOT FEDERAL RAILROAD ADMINISTRATOR, FOUNDING CHAIR U DENVER, FRMR.SR.V.P. MORRISON KNUDSEN CORP.
Quit moving runways; that's for aircraft carriers! Kill the People-Movers! AFTER 20 YEARS WASTED ON STUDYING & FOOLING AROUND, why on earth are you now talking People-Mover Nonsense

Response:

The content of this comment is similar to comment SPAS-PFA00001-5; please refer to Response to Comment SPAS-PFA00001-5.

SPAS-PFA00004-5

Comment:

we should be bringing the unused capacity in Green Line trains aerial to 3rd floor Airtel stations over Century Blv., then straight inside LAX's inner airport loop!
Likewise why hasn't the curse of a remote 98th Street Municipal Bus Terminal been demolished long ago, giving way to excellent one-seat muni bus rides, by taking over the easternmost parking garage of the airport loop for transit WITHIN WALKING DISTANCE OF LAX AIR GATES? Why aren't Metrolink commuter trains arriving under the International Terminal TODAY [in a tunnel station pulled by electric locomotives from the Harbor Sub]- arriving from Ontario, from Burbank, and Van Nuys Airports? from LA Union Station?
Why aren't we planning to bring in Amtrak the same way- from John Wayne airport, & San Diego . . . Cruise ship passengers from San Pedro & Long Beach? Trains from New Orleans, Chicago? Planning tunnels NOW for High Speed rail under LAX's new terminal, for new passengers from San Francisco Airport, Sacramento... & across the Pacific Rim?
Start building transit until it becomes the #1 Way to connect our airports with the world!

Build Transit INTO airports now; don't screw up LAX!

Response:

The content of this comment is essentially the same as comment SPAS-PFA00001-6; please refer to Response to Comment SPAS-PFA00001-6.

SPAS-PFA00005 Chavez, Mike None Provided

SPAS-PFA00005-1

Comment:

Start building transit until it becomes the #1 Way to connect our airports with the world!
Build transit INTO airports now.

Response:

The alternative concept reflected in this comment is the same as in comment SPAS-PFA00001-1; please refer to Response to Comment SPAS-PFA00001-1.

SPAS-PFA00005-2

Comment:

CONNECT OUR AIRPORTS WITH TRANSIT!
LEAVE THE LAX NORTH RUNWAYS ALONE~
FIX LAX GROUND TRANSPORTATION 1ST!

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Topical Response TR-SPAS-T-1 regarding transit options to LAX.

SPAS-PFA00005-3

Comment:

PUBLIC COMMENT: LOS ANGELES WORLD AIRPORTS [LAWA] SPECIFIC PLAN AMENDMENT STUDY

Alternative 2 is the "Environmentally Superior Alternative", [achieves] "compliance with FAA Airport Design Standards, the larger aircraft are more acceptably handled by Alt.. 2 "without requiring additional runway spacing [=runway relocation]. It provides higher-speed taxiway exits for aircraft, lengthens the north runway. "Should be a no-brainer," according to Alliance for a Regional Solution to Airport Congestion [ARSAC] president Denny Schneider . . .

Response:

The content of this comment is similar to comment SPAS-PFA00001-3; please refer to Response to Comment SPAS-PFA00001-3.

SPAS-PFA00005-4

Comment:

But Schneider points out: "NONE OF THESE OPTIONS CREATE SIGNIFICANT CAPACITY INCREASES FOR VEHICLE TRAFFIC FLOW!" UNACCEPTABLE! For years, ARSAC + other LAX neighbors have been pressing LAWA & LAC MTA to meet airport traffic demand by distributing it away from LAX, with Public Transportation & High Speed Rail. Some neighbors back commercial developing north of LAX, hoping to make land too expensive for further runway expansion; HOW SELF-DEFEATING! Construction trades want construction work, however foolish . . . but it's TRANSIT CONSTRUCTION WE NEED to fix LAX!

Response:

The content of this comment is similar to comment SPAS-PFA00001-4; please refer to Response to Comment SPAS-PFA00001-4.

SPAS-PFA00005-5

Comment:

Alternative 1 would move north side Runway "6L/24R" 260 feet north of its present location, add "center field" taxiways, & require significant grading changes to airport drainage channels. Aviation pros say they don't need center taxiways- UNACCEPTABLE!
Alternative 3 would implement the changes described in LAX Master Plan D- including "Yellow Light projects:" A. unneeded "center field" taxiways, B. demolition of existing Air Terminals 1, 2, & 3, and C. a Ground Transportation Center (GTC), plus an Automated People Mover [APM]***. UNACCEPTABLE! & Mayor Villaraigosa promised NOT to build them!
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Alternative 9 concentrating rental cars [or any cars] in a single facility [CONRAC] = a traffic jam, not an improvement! Concentrating on cars & People Mover transfers curses transit riders! UNACCEPTABLE!***
"PEOPLE-MOVERS ARE A SIGN OF FAILURE!" -Gil Mallery

FRMR. USDOT FEDERAL RAILROAD ADMINISTRATOR, FOUNDING CHAIR U DENVER, FRMR. SR.V.P. Morrison Knudsen Corp.
Quit moving runways; that's for aircraft carriers! Kill the People-Movers! AFTER 20 YEARS WASTED ON STUDYING & FOOLING AROUND, why on earth is LAWA talking People-Mover Nonsense?

Response:

The content of this comment is similar to comment SPAS-PFA00001-5; please refer to Response to Comment SPAS-PFA00001-5.

SPAS-PFA00005-6

Comment:

We should be taking the excess capacity in Green Line trains aerial to 3rd floor Airtel stations over Century Blvd., then straight inside LAX's inner airport loop!
Likewise why wasn't the curse of a remote 98th Street Municipal Bus Terminal demolished long ago, giving way to excellent one-seat muni bus rides by taking over the eastern-most parking garage of the airport loop - to put buses IN WALKING DISTANCE OF LAX AIR GATES? Why aren't Metrolink commuter trains arriving under the International Terminal TODAY [in a tunnel station pulled by electric locomotives from the Harbor Sub]- from Ontario & Burbank Airports? Flyaway Trains from Van Nuys? from LA Union Station?
Why aren't we planning to bring in Amtrak the same way- from John Wayne airport, San Diego Airport? Ship passengers from San Pedro & Long Beach? Trains from New Orleans, Chicago? TODAY planning more tunnels for High Speed rail under LAX's new Terminal for passengers to arrive from San Francisco Airport, Sacramento... & across the Pacific Rim?
Start building transit until it becomes the #1 Way to connect our airports with the world!

Build Transit INTO airports; don't screw up LAX!

Response:

The content of this comment is essentially the same as comment SPAS-PFA00001-6; please refer to Response to Comment SPAS-PFA00001-6.

SPAS-PFA00006 Torres, Robert None Provided

SPAS-PFA00006-1

Comment:

No text.

Response:

The alternative concept reflected in this comment is the same as in comment SPAS-PFA00001-1; please refer to Response to Comment SPAS-PFA00001-1.

SPAS-PFA00006-2

Comment:

"PEOPLEMOVERS ARE A SIGN OF FAILURE"! Gil Mallery
MOVING RUNWAYS IS FOR AIRCRAFT CARRIERS!
FIX LAX GROUND TRANSPORTATION FIRST: BUILD TRANSIT TO & INTO OUR AIRPORTS!

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Topical Response TR-SPAS-T-1 regarding transit options to LAX.

SPAS-PFA00006-3

Comment:

PUBLIC COMMENT: LOS ANGELES WORLD AIRPORTS [LAWA] SPECIFIC PLAN AMENDMENT STUDY

Alternative 2 is the "Environmentally Superior Alternative", [achieves] "compliance with FAA Airport Design Standards, the larger aircraft are more acceptably handled by Alt.. 2 "without requiring additional runway spacing [=runway relocation]. Alt.. 2 also provides higher-speed taxiway exits for aircraft, lengthens the north runway, and "should be a no-brainer," says Alliance for a Regional Solution to Airport Congestion [ARSAC] president Denny Schneider . . .

Response:

The content of this comment is similar to comment SPAS-PFA00001-3; please refer to Response to Comment SPAS-PFA00001-3.

SPAS-PFA00006-4

Comment:

But Schneider points out: "NONE OF THESE OPTIONS CREATE SIGNIFICANT CAPACITY INCREASES FOR VEHICLE TRAFFIC FLOW!" UNACCEPTABLE! For years, ARSAC + other LAX neighbors have been pressing LAWA & LAC MTA to meet airport traffic demand by distributing it away from LAX, with Public Transportation & High Speed Rail. Some neighbors back commercial developing north of LAX, hoping to make land too expensive for further runway expansion; HOW SELF-DEFEATING! Construction trades want construction work, however foolish . . . but TRANSIT IS WHAT WE NEED BUILT to fix LAX now!

Response:

The content of this comment is similar to comment SPAS-PFA00001-4; please refer to Response to Comment SPAS-PFA00001-4.

SPAS-PFA00006-5

Comment:

Alternative 1 would move north side Runway "6L/24R" 260 feet north of its present location, add "center field" taxiways, & require significant grading changes to airport drainage channels. Aviation pros say they don't need center taxiways- UNACCEPTABLE!
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FRMR. USDOT FEDERAL RAILROAD ADMINISTRATOR, FOUNDING CHAIR U DENVER, FRMR.SR.V.P. MORRISON KNUDSEN CORP.
Quit moving runways; that's for aircraft carriers! Kill the People-Movers! AFTER 20 YEARS WASTED ON STUDYING & FOOLING AROUND, why on earth is LAWA proposing People-Mover Nonsense-

Response:

The content of this comment is similar to comment SPAS-PFA00001-5; please refer to Response to Comment SPAS-PFA00001-5.

SPAS-PFA00006-6

Comment:

we should be taking the extra capacity in Green Line trains aerial- to 3rd floor Airtel stations over Century Blvd.- then straight inside LAX's inner airport loop!
Why wasn't the curse of the remote 98th Street Municipal Bus Terminal demolished years ago, giving way to excellent one-seat muni bus rides, taking over the easternmost parking garage in the airport loop for buses WITHIN WALKING DISTANCE OF LAX AIR GATES! Why aren't Metrolink commuter trains arriving under the International Terminal from Harbor Subdivision tracks TODAY [via tunnel station pulled by electric locomotives], arriving from Ontario Airport, Burbank? Flyaway Trains from Van Nuys? LA Union Station?
Why aren't we planning to bring in Amtrak the same way- from John Wayne airport, San Diego Airport . . . Ship passengers from San Pedro & Long Beach? Trains from New Orleans, Chicago? Planning more tunnels for High Speed rail under LAX's new Terminal TODAY for passengers to arrive from San Francisco Airport, Sacramento... & across the Pacific Rim?
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Build Transit INTO airports now; don't screw up LAX!

Response:

The content of this comment is essentially the same as comment SPAS-PFA00001-6; please refer to Response to Comment SPAS-PFA00001-6.

SPAS-PFA00007 Ghasri, Kamran None Provided

SPAS-PFA00007-1

Comment:

Start building transit until it becomes the #1 Way to connect our airports with the world!

Build transit INTO airports now.

Response:

The alternative concept reflected in this comment is the same as in comment SPAS-PFA00001-1; please refer to Response to Comment SPAS-PFA00001-1.

SPAS-PFA00007-2

Comment:

"PEOPLEMOVERS ARE A SIGN OF FAILURE"! Gil Mallery
MOVING RUNWAYS IS FOR AIRCRAFT CARRIERS!
FIX LAX GROUND TRANSPORTATION FIRST: BUILD TRANSIT TO & INTO OUR AIRPORTS!

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Topical Response TR-SPAS-T-1 regarding transit options to LAX.

SPAS-PFA00007-3

Comment:

PUBLIC COMMENT: LOS ANGELES WORLD AIRPORTS [LAWA] SPECIFIC PLAN AMENDMENT STUDY

Alternative 2 is the "Environmentally Superior Alternative", [achieves] "compliance with FAA Airport Design Standards, the larger aircraft are more acceptably handled by Alt.. 2, "without requiring additional runway spacing [=runway relocation]. Alt.. 2 does provide higher-speed taxiway exits for aircraft, lengthens the north runway, & "should be a no-brainer," according to Alliance for a Regional Solution to Airport Congestion [ARSAC] president Denny Schneider . . .

Response:

The content of this comment is similar to comment SPAS-PFA00001-3; please refer to Response to Comment SPAS-PFA00001-3.

SPAS-PFA00007-4

Comment:

But Schneider points out: "NONE OF THESE OPTIONS CREATE SIGNIFICANT CAPACITY INCREASES FOR VEHICLE TRAFFIC FLOW-" UNACCEPTABLE! For years, ARSAC + other LAX neighbors have been pressing LAWA & LAC MTA to meet airport traffic demand by distributing it away from LAX, with Public Transportation & High Speed Rail. Some neighbors back commercial developing north of LAX, hoping to make land too expensive for further runway expansion; HOW SELF-

DEFEATING! Construction trades want construction work, however foolish . . . but IT'S TRANSIT CONSTRCUTION WE NEED to fix LAX!

Response:

The content of this comment is similar to comment SPAS-PFA00001-4; please refer to Response to Comment SPAS-PFA00001-4.

SPAS-PFA00007-5

Comment:

Alternative 1 would move north side Runway "6L/24R" 260 feet north of its present location, add "center field" taxiways, & require significant grading changes to airport drainage channels. Aviation pros say they don't need center taxiways- UNACCEPTABLE!
Alternative 3 would implement the changes described in LAX Master Plan D. including "Yellow Light projects:" A. unneeded "center field" taxiways, B. demolition of existing Air Terminals 1, 2, & 3, and C. a Ground Transportation Center [GTC], plus an Automated People Mover [APM]*** . . . UNACCEPTABLE; Mayor Villaraigosa promised not to build these!
Alternative 4 would implement changes described in LAX Master Plan D, without the "Yellow Light projects" Still UNACCEPTABLE WASTEFUL and RIDICULOUS!
Alternative 5 would move the North Runway "6L/24R" a whopping 350 feet north of its present location . . . This is UNACCEPTABLE!
Alternative 6 would move Runway "6L/24R" 100 feet north . . . and is UNACCEPTABLE..
Alternative 7 would move Runway "6R/24L" 100 feet south . . . also UNACCEPTABLE..
Alternative 8 addresses ground access improvements. but favors low capacity auto traffic over transit . . . this is UNACCEPTABLE; TRANSIT IS 21ST CENTURY TRANSPORTATION!
Alternative 9 concentrating rental cars [or any cars] in a single facility [CONRAC] = a traffic jam, not an improvement! Concentrating on cars & People Mover transfers curses transit riders! UNACCEPTABLE!*** "PEOPLE-MOVERS ARE A SIGN OF FAILURE!" -Gil Mallery

FRMR. USDOT FEDERAL RAILROAD ADMINISTRATOR, FOUNDING CHAIR U DENVER, FRMR.SR.V.P. MORRISON KNUDSEN CORP.
Quit moving runways; that's for aircraft carriers! Kill the People-Movers! AFTER 20 YEARS WASTED ON STUDYING & FOOLING AROUND, why on earth are you now talking People-Mover Nonsense-

Response:

The content of this comment is similar to comment SPAS-PFA00001-5; please refer to Response to Comment SPAS-PFA00001-5.

SPAS-PFA00007-6

Comment:

we should be bringing the unused capacity in Green Line trains aerial- to 3rd floor Airtel stations over Century Blv., then straight inside LAX's inner airport loop!
Likewise, why hasn't the curse of a remote 98th Street Municipal Bus Terminal been demolished long ago, giving way to excellent one-seat muni bus rides, by taking over the easternmost parking garage of the airport loop for transit WITHIN WALKING DISTANCE OF LAX AIR GATES? Why aren't Metrolink commuter trains arriving under the International Terminal TODAY [in a tunnel station pulled by electric locomotives from the Harbor Sub]- arriving from Ontario, from Burbank and Van Nuys Airports? from LA Union Station?
Why aren't we planning to bring in Amtrak the same way- from John Wayne airport, & San Diego . . . Cruise ship passengers from San Pedro & Long Beach? Trains from New Orleans, Chicago? Planning tunnels NOW for High Speed rail under LAX's new terminal for new passengers from San Francisco Airport, Sacramento... & across the Pacific Rim?
Start building transit until it becomes the #1 Way to connect our airports with the world!

Build Transit INTO airports now; don't screw up LAX!

Response:

The content of this comment is essentially the same as comment SPAS-PFA00001-6; please refer to Response to Comment SPAS-PFA00001-6.

SPAS-PFA00008 Friedwen, Alexander None Provided

SPAS-PFA00008-1

Comment:

CONNECT OUR AIRPORTS WITH TRANSIT!
LEAVE THE LAX NORTH RUNWAYS ALONE~
FIX LAX GROUND TRANSPORTATION 1ST!

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Topical Response TR-SPAS-T-1 regarding transit options to LAX.

SPAS-PFA00008-2

Comment:

PUBLIC COMMENT: LOS ANGELES WORLD AIRPORTS [LAWA] SPECIFIC PLAN AMENDMENT STUDY

Alternative 2 is the "Environmentally Superior Alternative", [achieves] "compliance with FAA Airport Design Standards, the larger aircraft are more acceptably handled by Alt.. 2 "without requiring additional runway spacing [=runway relocation]. Alt.. 2 does provides higher-speed taxiway exits for aircraft, lengthens the north runway, and "should be a no-brainer," says Alliance for a Regional Solution to Airport Congestion [ARSAC] president Denny Schneider . . .

Response:

The content of this comment is similar to comment SPAS-PFA00001-3; please refer to Response to Comment SPAS-PFA00001-3.

SPAS-PFA00008-3

Comment:

But Schneider points out: "NONE OF THESE OPTIONS CREATE SIGNIFICANT CAPACITY INCREASES FOR VEHICLE TRAFFIC FLOW!" UNACCEPTABLE! For years, ARSAC + other LAX neighbors have been pressing LAWA & LAC MTA to meet airport traffic demand by distributing it away from LAX, with Public Transportation & High Speed Rail. Some are behind big commercial developing north of LAX, hoping to make land too expensive for further runway expansion; how self-defeating! Construction trades want construction work, however foolish . . . but it's TRANSIT CONSTRCUTION WE NEED to fix LAX!

Response:

The content of this comment is similar to comment SPAS-PFA00001-4; please refer to Response to Comment SPAS-PFA00001-4.

SPAS-PFA00008-4

Comment:

Alternative 1 would move north side Runway "6L/24R" 260 feet north of its present location, add "center field" taxiways, & require significant grading changes to airport drainage channels. Aviation pros say they don't need center taxiways- UNACCEPTABLE!
Alternative 3 would implement the changes described in LAX Master Plan D. including "Yellow Light projects:" A. unneeded "center field" taxiways, B. demolition of existing Air Terminals 1, 2, & 3, and C. a Ground Transportation Center (GTC), plus an Automated People Mover [APM]*** . This is A. UNACCEPTABLE, B. WASTEFUL. And C. RIDICULOUS!
Alternative 4, would implement changes described in LAX Master Plan D. without the "Yellow Light projects" Still UNACCEPTABLE; Mayor Villaraigosa promised not to do them!
Alternative 5 would move the North Runway "6L/24R" 350 feet north of its present location . . . This is UNACCEPTABLE!
Alternative 6 would move Runway "6L/24R" 100 feet north . . . and is UNACCEPTABLE..
Alternative 7 would move Runway "6R/24L" 100 feet south . . . also UNACCEPTABLE..
Alternative 8 addresses ground access improvements. but favors inadequate car traffic over transit . . . this is UNACCEPTABLE; TRANSIT IS 21ST CENTURY TRANSPORTATION!
Alternative 9 concentrating rental cars [or any cars] in a single facility [CONRAC] = a traffic jam; not an improvement! Concentrating on cars & People Mover transfers curses transit riders! UNACCEPTABLE!*** "PEOPLE-MOVERS ARE A SIGN OF FAILURE!" -Gil Mallery

Kill the People-Movers! Quit moving runways; that's for aircraft carriers! Start building transit til it becomes LAX's #1 Way to connect airport's passengers with the world! AFTER 20 YEARS WASTED ON STUDYING & FOOLING AROUND, Why on earth are you talking People-Mover Nonsense

Response:

The content of this comment is similar to comment SPAS-PFA00001-5; please refer to Response to Comment SPAS-PFA00001-5.

SPAS-PFA00008-5

Comment:

when we should be taking the excess capacity of Green Line trains aerial to 3rd floor stations for Century Blv. Airtels, & right inside LAX's inner airport loop?
Why wasn't the curse of a remote 98th Street Municipal Bus Terminal demolished years ago, to give way to excellent one-seat -rides: muni buses taking over the eastern-most parking garage of the airport loop WITHIN WALKING DISTANCE OF LAX AIR GATES! Why aren't Metrolink commuter trains arriving under the Tom Bradley International Terminal from Harbor Subdivision tracks TODAY [via tunnel station pulled by electric locomotives] . . . arriving from Ontario Airport, from Burbank Airport, Van Nuys, & from Union Station?
Why aren't we planning to bring in Amtrak the same way from John Wayne airport, San Diego Airport . . . Ship passengers from San Pedro & Long Beach? Trains from New Orleans, Chicago.? Planning more tunnels for High Speed rail under the new Terminal TODAY for passengers arriving from San Francisco Airport, Sacramento... & across the Pacific Rim?

Don't' screw up LAX; build transit to connect the others!

Response:

The content of this comment is essentially the same as comment SPAS-PFA00001-6; please refer to Response to Comment SPAS-PFA00001-6.

SPAS-PFA00009 Malanaphy, Hugh None Provided

SPAS-PFA00009-1

Comment:

IT"S EASY, BRING THE GREEN LINE INTO THE AIRPORT"

Start building transit until it becomes the #1 Way to connect our airports with the world!

Build transit INTO airports now.

Response:

The alternative concept reflected in this comment is the same as in comment SPAS-PFA00001-1; please refer to Response to Comment SPAS-PFA00001-1.

SPAS-PFA00009-2

Comment:

"PEOPLEMOVERS ARE A SIGN OF FAILURE"! Gil Mallery
MOVING RUNWAYS IS FOR AIRCRAFT CARRIERS!
FIX LAX GROUND TRANSPORTATION FIRST: BUILD TRANSIT TO & INTO OUR AIRPORTS!
-BRING THE GREEN LINE INTO THE AIRPORT-

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Topical Response TR-SPAS-T-1 regarding transit options to LAX.

SPAS-PFA00009-3

Comment:

PUBLIC COMMENT: LOS ANGELES WORLD AIRPORTS [LAWA] SPECIFIC PLAN AMENDMENT STUDY

Alternative 2 is the "Environmentally Superior Alternative" [that achieves] "compliance with FAA Airport Design Standards, the larger aircraft are more acceptably handled by Alt. 2 "without requiring additional runway spacing [=runway relocation]. Alt. 2 provides higher-speed taxiway exits for aircraft, lengthens the north runway. & "should be a no-brainer," according to Alliance for a Regional Solution to Airport Congestion [ARSAC] president Denny Schneider . . .

Response:

The content of this comment is similar to comment SPAS-PFA00001-3; please refer to Response to Comment SPAS-PFA00001-3.

SPAS-PFA00009-4

Comment:

But Schneider points out: "NONE OF THESE OPTIONS CREATE SIGNIFICANT CAPACITY INCREASES FOR VEHICLE TRAFFIC FLOW!" UNACCEPTABLE! For years, ARSAC + other LAX neighbors have been pressing LAWA & LAC MTA to meet airport traffic demand by distributing it away from LAX, with Public Transportation & High Speed Rail. Some of those neighbors now back big commercial development plans north of LAX, hoping to make land too expensive for further runway

expansion; HOW SELF-DEFEATING! Construction trades want any construction, however misguided . . . . . but it's TRANSIT CONSTRUCTION WE NEED to fix LAX & regional airports' worst problems! It's MOVING PEOPLE, NOT CARS, NOT RUNWAYS, that's the focus MISSING or DONE WRONG in all 9 SPAS Alternatives:

Response:

The content of this comment is similar to comment SPAS-PFA00001-4; please refer to Response to Comment SPAS-PFA00001-4.

SPAS-PFA00009-5

Comment:

Alternative 1 would move north side Runway "6L/24R" 260 feet north of its present location, add "center field" taxiways, & require significant grading changes to airport drainage channels. Aviation professionals say they don't need center taxiways- UNACCEPTABLE!
Alternative 3 would implement the changes described in LAX Master Plan D- including "Yellow Light projects:" A. unneeded "center field" taxiways, B. demolition of existing Air Terminals 1, 2, & 3, and C. a Ground Transportation Center (GTC), plus an Automated People Mover [APM]***. UNACCEPTABLE, WASTEFUL, RIDICULOUS! And Mayor Villaraigosa promised NOT to build the "Yellow Light Projects"!
Alternative 4 would implement changes described in LAX Master Plan D, without the "Yellow Light projects . . . " Still UNACCEPTABLE WASTEFUL and RIDICULOUS!
Alternative 5 would move the Northernmost Runway "6L/24R" a whopping 350 feet north of its present location toward Westchester . . . This is NOT ACCEPTABLE! Will Lincoln Blv. Go thru the WallyPark garage?
Alternative 6 would move north Runway "6L/24R" 100 feet north . . . and is UNACCEPTABLE.
Alternative 7 would move the other north Runway "6R/24L" 100 feet south . . . also UNACCEPTABLE.
Alternative 8 addresses ground access improvements, yet favors inefficient car traffic over transit . . . this is UNACCEPTABLE; TRANSIT IS 21ST CENTURY TRANSPORTATION!
Alternative 9 concentrating rental cars [or any cars] in a single facility [CONRAC] = a traffic jam, not an improvement! Concentrating on cars & People Mover transfers curses transit riders! UNACCEPTABLE!***
"PEOPLE-MOVERS ARE A SIGN OF FAILURE!" -Gil Mallery

FRMR. USDOT FEDERAL RAILROAD ADMINISTRATOR, FRMR.SR.V.P. MORRISON KNUDSEN CORP.
Quit moving runways; that's for aircraft carriers! Kill the People-Movers! AFTER 20 YEARS WASTED ON STUDYING & FOOLING AROUND, why on earth is LAWA talking People-Mover Nonsense?

Response:

The content of this comment is similar to comment SPAS-PFA00001-5; please refer to Response to Comment SPAS-PFA00001-5.

SPAS-PFA00009-6

Comment:

TODAY we should be riding that excess capacity in Green Line trains aerial to 3rd floor Airtel stations over Century Blvd., then straight inside LAX's inner airport loop! NOT BUILDING A NEW INCOMPATIBLE PEOPLE-MOVER SYSTEM with new equipment, new yard, new maintenance personnel, . . . & time-wasting mode transfers that'll never go away.
Likewise, why wasn't the curse of a remote 98th Street Municipal Bus Terminal demolished long ago, giving way to excellent one-seat muni bus rides- by taking over the eastern-most parking garage of the airport loop- to put buses IN WALKING DISTANCE OF LAX AIR GATES? Why aren't Metrolink commuter trains arriving under the International Terminal TODAY [in a tunnel station, pulled by electric locomotives from the Harbor Sub]- from Ontario & Burbank Airports? Flyaway Trains from Van Nuys? from LA Union Station?
Why aren't we planning to bring in Amtrak on the same route- from John Wayne & San Diego Airports? Trains from New Orleans, Chicago, Vancouver? Cruise ship passengers & Port employees from San

Pedro & Long Beach? Planning more tunnels TODAY for High Speed rail under LAX's new Terminal for passengers to take from San Francisco Airport, Sacramento... shortening trip times to Asia, South America, & Europe?

LAX is one of the last US airports that isn't all screwed up: Start building transit TO & INTO our airports til TRANSIT IS THE #1 WAY to connect our airports with the world- without wasting our time, without laying waste to our airports or neighboring communities!

Response:

The content of this comment is essentially the same as comment SPAS-PFA00001-6; please refer to Response to Comment SPAS-PFA00001-6.

SPAS-PFA00010 Drummond, J.K. None Provided

SPAS-PFA00010-1

Comment:

Start building transit until it becomes the #1 Way to connect our airports with the world!

Build transit INTO airports now.

Response:

The alternative concept reflected in this comment is the same as in comment SPAS-PFA00001-1; please refer to Response to Comment SPAS-PFA00001-1.

SPAS-PFA00010-2

Comment:

"PEOPLEMOVERS ARE A SIGN OF FAILURE"! Gil Mallery
MOVING RUNWAYS IS FOR AIRCRAFT CARRIERS!
FIX LAX GROUND TRANSPORTATION FIRST: BUILD TRANSIT TO & INTO OUR AIRPORTS!

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Topical Response TR-SPAS-T-1 regarding transit options to LAX.

SPAS-PFA00010-3

Comment:

PUBLIC COMMENT: LOS ANGELES WORLD AIRPORTS [LAWA] SPECIFIC PLAN AMENDMENT STUDY

Alternative 2 is the "Environmentally Superior Alternative" [that achieves] "compliance with FAA Airport Design Standards, the larger aircraft are more acceptably handled by Alt. 2 "without requiring additional runway spacing [=runway relocation]. Alt. 2 provides higher-speed taxiway exits for aircraft, lengthens the north runway. & "should be a no-brainer," according to Alliance for a Regional Solution to Airport Congestion [ARSAC] president Denny Schneider . . .

Response:

The content of this comment is similar to comment SPAS-PFA00001-3; please refer to Response to Comment SPAS-PFA00001-3.

SPAS-PFA00010-4

Comment:

But Schneider points out: "NONE OF THESE OPTIONS CREATE SIGNIFICANT CAPACITY INCREASES FOR VEHICLE TRAFFIC FLOW!" UNACCEPTABLE! For years, ARSAC + other LAX neighbors have been pressing LAWA & LAC MTA to meet airport traffic demand by distributing it away from LAX, with Public Transportation & High Speed Rail. Some of those neighbors now back big commercial development plans north of LAX, hoping to make land too expensive for further runway expansion; HOW SELF-DEFEATING! Construction trades want any construction, however misguided . . . . . but it's TRANSIT CONSTRUCTION WE NEED to fix LAX & regional airports' worst problems! It's MOVING PEOPLE, NOT CARS, NOT RUNWAYS; that's the focus MISSING or DONE WRONG in all 9 SPAS Alternatives:

Response:

The content of this comment is similar to comment SPAS-PFA00001-4; please refer to Response to Comment SPAS-PFA00001-4.

SPAS-PFA00010-5

Comment:

Alternative 1 would move north side Runway "6L/24R" 260 feet north of its present location, add "center field" taxiways, & require significant grading changes to airport drainage channels. Aviation professionals say they don't need center taxiways- UNACCEPTABLE!
Alternative 3 would implement the changes described in LAX Master Plan D- including "Yellow Light projects:" A. unneeded "center field" taxiways, B. demolition of existing Air Terminals 1, 2, & 3, and C. a Ground Transportation Center (GTC), plus an Automated People Mover [APM]***. UNACCEPTABLE, WASTEFUL, RIDICULOUS! And Mayor Villaraigosa promised NOT to build the "Yellow Light Projects"!
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Alternative 7 would move the other north Runway "6R/24L" 100 feet south . . . also UNACCEPTABLE.
Alternative 8 addresses ground access improvements. yet favors inefficient car traffic over transit . . . this is UNACCEPTABLE; TRANSIT IS 21ST CENTURY TRANSPORTATION!
Alternative 9 concentrating rental cars [or any cars] in a single facility [CONRAC] = a traffic jam, not an improvement! Concentrating on cars & People Mover transfers curses transit riders! UNACCEPTABLE!*** "PEOPLE-MOVERS ARE A SIGN OF FAILURE!" -Gil Mallery

FRMR. USDOT FEDERAL RAILROAD ADMINISTRATOR, FRMR.SR.V.P. MORRISON KNUDSEN CORP.
Quit moving runways; that's for aircraft carriers! Kill the People-Movers! AFTER 20 YEARS WASTED ON STUDYING & FOOLING AROUND, why on earth is LAWA talking People-Mover Nonsense?

Response:

The content of this comment is similar to comment SPAS-PFA00001-5; please refer to Response to Comment SPAS-PFA00001-5.

SPAS-PFA00010-6

Comment:

TODAY we should be riding that excess capacity in Green Line trains aerial to 3rd floor Airtel stations over Century Blvd., then straight inside LAX's inner airport loop! NOT BUILDING A NEW

INCOMPATIBLE PEOPLE-MOVER SYSTEM with new equipment, new yard, new maintenance personnel, . . . & time-wasting mode transfers that'll never go away.
Likewise, why wasn't the curse of a remote 98th Street Municipal Bus Terminal demolished long ago, giving way to excellent one-seat muni bus rides- by taking over the eastern-most parking garage of the airport loop- to put buses IN WALKING DISTANCE OF LAX AIR GATES? Why aren't Metrolink commuter trains arriving under the International Terminal TODAY [in a tunnel station, pulled by electric locomotives from the Harbor Sub]- from Ontario & Burbank Airports? Flyaway Trains from Van Nuys? from LA Union Station?
Why aren't we planning to bring in Amtrak on the same route- from John Wayne & San Diego Airports? Trains from New Orleans, Chicago, Vancouver? Cruise ship passengers & Port employees from San Pedro & Long Beach? Planning more tunnels TODAY for High Speed rail under LAX's new Terminal for passengers to take from San Francisco Airport, Sacramento... shortening trip times to Asia, South America, & Europe?

LAX is one of the last US airports that isn't all screwed up: Start building transit TO & INTO our airports, til TRANSIT IS THE #1 WAY to connect our airports with the world- without wasting our time, without laying waste to our airports or neighboring communities!

Response:

The content of this comment is essentially the same as comment SPAS-PFA00001-6; please refer to Response to Comment SPAS-PFA00001-6.

SPAS-PH100001 Ali, Micah Compton School Board 8/25/2012

SPAS-PH100001-1

Comment:

Good morning. My name is Micah Ali and I serve as a member of the Compton Unified School District Board of Education and I'm also a member of -- the president of the Los Angeles County School Trustees Association.

All would agree that the Los Angeles International Airport is an extremely vital economic engine to this entire region. Last year, LAX generated nearly 40 billion dollars in economic output and created 300,000 jobs within our voluminous county.

So what does that mean? That means that LAX cannot operate without service workers. What does that mean? That workers must be included and must be valued as an element with respect to airport expansion. We believe that airport expansion is important because this is not just Los Angeles airport. This is the airport for our entire region.

What it also means is that we must make certain that if there are contractors who are not holding their end of the bargain, who are not being responsible stewards with respect to the public's trust, then they should not have a place at the airport.

And last but not least, we must make certain that we are very diligent in making sure that workers are treated fairly and equitable and that whether it's a tradesman or whether it's a service worker, the same level of respect is yielded, because all of us utilize this airport as a mode of transportation within our region.

Thank you.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the

adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PH100002 Toebben, Gary Los Angeles Area Chamber of Commerce 8/25/2012

SPAS-PH100002-1

Comment:

My name is Gary Toebben. I'm the president of the Los Angeles Area Chamber of Commerce and the co-chair of the Fix LAX Now coalition of businesses, labor unions and individual citizens.

Our economic future depends on LAX. As the previous speaker just said, the airport pours nearly 40 billion dollars into our economy each year and generates direct and indirect employment of 300,000 jobs. When you add the current and future construction projects, LAX will generate another 15 billion dollars in economic impact.

It is not an exaggeration to say that improving LAX is the single-most important infrastructure project in our region today. Modernization is long overdue and our inaction is a source of embarrassment for Los Angeles.

The Coalition to Fix LAX Now is advocating for a full and complete modernization of LAX, which means the successful passage of the Specific Plan Amendment Study and its corresponding EIR. LAX needs three things: state-of-the-art terminals, a safe and efficient North Airfield, and appropriate ground transportation access. Only when all three areas are improved will we be able to say that we are a 21st century airport for our world-class city.

We urge the Airport Board to diligently but aggressively proceed through the SPAS EIR process. Our Coalition pledges to provide strong support and advocacy. Business and labor are unanimous in our view that now is the time to approve a full and complete modernization of LAX. Our airport is an incredible asset for Southern California and its modernization is essential to the improvement of our city.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PH100003 Lobera, Jose SEIU-USWW 8/25/2012

SPAS-PH100003-1

Comment:

My name is Jose Lobera and I've been working for LAX for 30 years to support my family.

My name is Jose Lobera. I've been working at LAX for 30 years to take care of my family. That includes my lovely wife and my three kids.

I am proud of working at LAX. I work hard at Aviation Safeguards, but yet it is difficult to take care of my family economically. Like all workers at LAX, I believe expansion is a good thing and it can be positive. I say that it could be positive, but I'm worried that the struggle to modernize the airport does not consider the health, safety, and the living wage of workers. That's why I am here this morning to express my support for the expansion, but only if it includes the prosperity of the LAX workers.

As long as we have irresponsible contractors at LAX that make a mockery of the living wage and the laws at LAX, there's no way that we can seriously talk about progress.

Thank you very much. The communities, the companies, the workers, and their families can progress together. Thank you.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PH100004 Reeg, Kristin Unite Here Local 11 8/25/2012

SPAS-PH100004-1

Comment:

Hi. My name is Kristin Reeg and I'm the Director of Airports for Unite Here, Local 11. We represent -- over 3,000 of our members live very close to the airport. They work in the hotels along Century Boulevard and they also work inside the airport itself in concessions, both food and beverage and retail, and we also represent about 500 members who work behind the airport in more of a factory setting, making the food that goes on the airlines.

So our members are mostly, you know, working class. They live right in the area. They live in Lennox, they live in Hawthorne, and our union supports the expansion of the airport, making sure that we have decent jobs and more good jobs that provide benefits and provide good and decent wages for working folks in the neighborhood.

So we support the expansion. Thank you.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PH100005 Kelly, Michael The Los Angeles Coalition for the Economy of Jobs 8/25/2012

SPAS-PH100005-1

Comment:

Good morning. Michael Kelly. I'm the Executive Director of the L.A. Coalition for the Economy and Jobs. We're a bipartisan alliance of business, labor, academia and nonprofit and are committed to working with policy makers to advance initiatives that are going to produce economic and job growth throughout this region.

We are particularly focused on this region's bigger economic assets such as the port, LAX, and our transportation network because they are going to be most directly linked to economic growth in a global marketplace.

You know, a growing economy just doesn't happen. It requires vision, collaboration, and political will. L.A.'s founders were not afraid of being ambitious, decisive, and boisterous when it came to promoting the region's image as one full of opportunity.

Because of the foundation they laid, L.A. County from 1949 to 1990 experienced a 208 percent growth in jobs, outpacing the entire United States by 58 percent. Since then, the population of L.A. County has grown by 19 percent, yet the number of jobs in the region has decreased by 9 percent. The most staggering fact is that the City of Los Angeles that actually owns the region's top economic assets mentioned above disproportionately represented the most jobs lost.

That is why we strongly support LAWA's vision to maintain and modernize LAX and to amass the economic realities of today's rising consumer demands, travel and trade units from around the world. The proposals to realign the North Airfield, build a consolidated rental car facility and an automatic people mover are all economically justified product and they will create tens of thousands of jobs, open trade and tourism, improve the air quality throughout the region, and connect all of us to family and friends throughout the world.

That's why the L.A. Coalition encourages everyone involved to demonstrate prudent leadership by moving this process forward with all deliberate speed in order to achieve the necessary competence as well as meet the expectations of L.A.'s customers and the residents most impacted by these changes.

Thank you.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PH100006 Durazo, Maria E LA County Federation at Labor, AFL-C10 8/25/2012

SPAS-PH100006-1

Comment:

Thank you. Good morning. I am secretary-treasurer of the Los Angeles Federation of Labor. We represent hundreds of thousands of men and women throughout Los Angeles County that work hard every day throughout our region.

As passengers travel through LAX, there are thousands of people who work hard to make sure that their experience is safe, that it's comfortable, and it's reliable. From flight attendants to baggage screeners, food and retail, construction workers, cabin cleaners, and customer service representatives, all of these employees deserve to have a voice on the job. They work very hard. They need the tools, the training and the working conditions. Some of them are here today, not only as employees of LAX but also as residents of the immediate area.

You know, LAX is an asset for all of us. 300,000 people raise their families through the jobs directly or indirectly related to LAX. Our airport generates 40 billion dollars. Those men and women spend their paychecks buying groceries, shopping in their stores, and reinvesting back into their local neighborhoods. Jobs at LAX are divided throughout L.A. city, all the districts, all the supervisorial. There is not a corner of our county that isn't touched by the economic vitality of the airport.

We have an opportunity here to put another incredible shot in the arm to our economic recovery that is the issue nationally. So we -- the sooner we approve and we finalize the approval process, which by the way has been going on for the past eight years, then we're going to be able to get another 8 billion dollars in projects and thousands of people back to work.

Thank you all very much.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PH100007 Cruz, Marisol Lennox School District 8/25/2012

SPAS-PH100007-1

Comment:

Yes. My name is Marisol Cruz, Lennox School Board president, but most importantly, I'm a long-life Lennox resident and I'm here to support the service worker. We need dignant jobs, benefits, salaries that justify the working class, and to increase our benefits as a community, giving us the jobs that we need to uplift our communities, our families. Given that Lennox is right at the runway of LAX and if LAWA will be expanding the runway north of LAX, it will heavily impact our community with pollution, with more traffic, and we want to make sure that we are serving the needs of the workers, the community, the students, the parents of the community that we are the labor force of LAX, like my parents, my brother and many of my neighbors.

So I want to make sure that we are providing those services, those salaries, those benefits that will really benefit our community, our parents, our students, and our teachers as a community.

Thank you so much and I have high hopes that you will provide the needs of our community. Thank you.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project.

The SPAS Draft EIR addresses impacts associated with aircraft noise, road traffic noise, and construction traffic and equipment noise in Sections 4.10.1, 4.10.2, and 4.10.3, respectively. The impacts associated with each of these categories of noise are summarized below.

As indicated in Section 4.10.1 of the SPAS Draft EIR, Alternatives 1 through 7 would result in some residential uses and non-residential noise-sensitive facilities being newly exposed to noise levels of 65 CNEL or higher or increases of 1.5 CNEL or higher within the 65 CNEL or higher noise contours. With implementation of LAX Master Plan mitigation measures, these impacts would be less than significant. However, interim impacts prior to the completion of mitigation, impacts on residential uses with outdoor habitable areas, and impacts on parks would remain significant and unavoidable. Alternatives 8 and 9 focus on ground access improvements that, in themselves, would not result in aircraft noise exposure but would be coupled with the airfield improvements proposed under Alternatives 1, 2, 5, 6, or 7, the impacts of which are summarized above. None of the alternatives would result in a significant impact relative to sleep awakenings. Under Alternatives 1 through 7, significant impacts would occur with an additional school being newly exposed to the 55 dBA Lmax. Each alternative would also result in significant impacts due to sustained interruption of classroom teaching at newly exposed schools through interior noise levels in excess of 35 dBA Leq(h). Implementation of LAX Master Plan mitigation measures would ultimately reduce impacts to these schools to a level that is less than significant. However, interim impacts prior to completion of mitigation measures would remain significant and unavoidable.

Concerning road traffic noise, as indicated in Section 4.10.2 of the SPAS Draft EIR, impacts related to ground access improvements proposed under Alternatives 1, 2, 3, 4, 8, and 9 would be less than

significant as the incremental changes in road traffic noise levels under each of these alternatives would be less than a 3 dBA increase in CNEL. Alternatives 5, 6, and 7 do not include ground access improvements and would therefore not affect road traffic noise levels at off-site noise-sensitive uses.

Regarding construction traffic and equipment noise, as indicated in Section 4.10.3 of the SPAS Draft EIR, due to the periodic nature and limited incremental increase on area roadways, none of the alternatives would result in significant impacts related to construction traffic noise. However, all of the alternatives would result in significant impacts from construction equipment noise with the potential to effect sensitive receptors such as residential and school uses. The sources of those impacts differ by alternative, but can be generally characterized as temporary impacts associated with airfield improvements, ground access system improvements, and construction staging areas. While LAX Master Plan commitments and mitigation measures would reduce construction equipment noise impacts associated with all of the SPAS alternatives, it cannot be definitively concluded that all construction equipment noise impacts would be reduced to levels that are less than significant and these impacts are considered to be significant and unavoidable.

The SPAS Draft EIR addresses air quality impacts associated with the SPAS alternatives, including Alternatives 1, 5, and 6 which propose a northward relocation of Runway 6L/24R, in Sections 4.2. As indicated therein, even after mitigation, construction activities would result in significant and unavoidable air quality impacts under all of the alternatives. Specifically, under all of the alternatives except for Alternative 4, construction emissions of carbon monoxide (CO), volatile organic compounds (VOC), oxides of nitrogen (NOx), particulate matter with an equivalent aerodynamic diameter of 10 micrometers (PM10), and particulate matter with an equivalent aerodynamic diameter of 2.5 micrometers (PM2.5) would be significant and unavoidable. Under Alternative 4, significant and unavoidable construction emissions would occur for NOx and PM10. Under all of the alternatives, even after mitigation, construction-related concentrations of nitrogen dioxide (NO2) and PM10 would be significant and unavoidable.

Operation of the airport would also result in significant and unavoidable impacts to air quality. Even after mitigation, operational emissions of sulfur dioxide (SO2), PM10, and PM2.5 would be significant and unavoidable under all of the alternatives. Operational concentrations of NO2, PM10, and PM2.5 would also be significant and unavoidable under all of the alternatives.

Relative to off-airport traffic impacts, as addressed in Section 4.12.2 of the SPAS Draft EIR, the majority of the 200 intersections evaluated within the SPAS off-airport transportation study area would not be significantly impacted under Alternatives 1, 2, 3, 4, 8, and 9; however, significant impacts to some off-airport intersections and/or Congestion Management Plan (CMP) facilities would occur under each of these alternatives. The total number of significantly-impacted intersections and/or CMP facilities would vary slightly among those alternatives. Alternatives 5, 6, and 7 focus on airfield and terminal improvements that, in themselves, would not affect off-airport traffic, but would be coupled with the ground transportation improvements proposed under Alternatives 1, 2, 8, or 9, the impacts of which are summarized above.

SPAS-PH100008 Schneider, Nancy WNA-ARSAC 8/25/2012

SPAS-PH100008-1

Comment:

I want to just say that I've lived near LAX since I was five years old. I think that it is time to improve LAX grossly. I think we should start with the biggest jobs, the most permanent jobs that you have. We need to improve the passenger experience and we need to clean up the surrounding areas and get some mass transit into LAX in order to make this airport operable and, you know, a much better neighbor.

The only way you can make it a better neighbor is to get all these loose cars off the road. We approved the CONRAC, the consolidated rental car, six years ago. Where is it? Thank you.

Response:

Please see Response to Comment SPAS-PC00130-443 regarding the fact that LAWA had been independently advancing the planning and consideration of a CONRAC at LAX; however, the formulation of concept options for overall ground transportation system improvements at LAX, as part of SPAS, provided the basis for further evaluation of the need for, and location of, a CONRAC at LAX.

SPAS-PH100009 Hunter, Robbie LA/OC Building Trades Council 8/25/2012

SPAS-PH100009-1

Comment:

Robbie Hunter. I represent the Los Angeles and Orange County Building and Construction Trades Council. We represent 140,000 construction workers. We live in this community as well. We want this airport to be friendly to the neighbors. We want it to be a better environmental neighbor and we supported Measure R for a transit system in Los Angeles, not only for jobs but because we live in this city and we want a better place to live.

This modernization will improve the environmental footprint, will improve the traffic for the neighbors. The transit systems that we hope will be built here, people will be getting on transit systems to get to the airport from the neighborhoods that they live on and will have no impact in this area, and that's what we would like to see and we believe that this is the first step in this modernization.

We do believe that the airport as it exists today needs to be improved as far as being a neighbor and we believe today that this is the plan to do it. So it will provide jobs, but we have to look at the effect on the neighbors on the long term and we believe this will improve the environment.

Thank you.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. The environmental impacts of the SPAS alternatives are addressed in Chapter 4 of the SPAS Draft EIR and summarized in Chapter 1. While some environmental conditions would improve compared to what would occur in the absence of SPAS, all of the alternatives would result in significant unavoidable impacts relative to existing conditions. These impacts are summarized in Table 1-5 of the SPAS Draft EIR.

Relative to off-airport traffic impacts, as addressed in Section 4.12.2 of the SPAS Draft EIR, the majority of the 200 intersections evaluated within the SPAS off-airport transportation study area would not be significantly impacted under Alternatives 1, 2, 3, 4, 8, and 9; however, significant impacts to some off-airport intersections and/or Congestion Management Plan (CMP) facilities would occur under each of these alternatives. The total number of significantly-impacted intersections and/or CMP facilities would vary slightly among those alternatives. Alternatives 5, 6, and 7 focus on airfield and terminal improvements that, in themselves, would not affect off-airport traffic, but would be coupled with the ground transportation improvements proposed under Alternatives 1, 2, 8, or 9, the impacts of which are summarized above. Please see Topical Response TR-SPAS-T-1 regarding transit options to LAX.

SPAS-PH100010 Mishelevich, David ARSAC 8/25/2012

SPAS-PH100010-1

Comment:

Good morning. I'd like to thank the work that the staff put together and the consulting firms to produce the Draft EIR. I am a member of the Board of ARSAC, the Alliance for a Regional Solution to Airport Congestion.

All of the alternatives have different economic impacts. In Section 8 of the main volume, it talks about the costs of the different alternatives, but it would be extremely important to have the basis for what those estimates were. The reality is that each of them has a different jobs profile and economic impact in terms of customer satisfaction.

LAX is, as I understand, the largest origins and destinations airport in the U.S., so we have more opportunities if we improve the customer satisfaction to increase the dollars that will remain in the community, as opposed to airports like Hartsfield in Atlanta or O'Hare in Chicago that are mainly transfer airports and the dollars do not stay there.

Jobs are absolutely critical and the reality is that if you build runways, you get fewer jobs and less diverse jobs for the various trades than if you improve the terminals; and it isn't an infinite load of money that we have available and I would encourage those estimates and the basis for those estimates to be made available so we can consider the alternatives in that economic light.

Thank you.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Please see Response to Comment SPAS-PC00130-730 regarding the treatment of economic conditions in an EIR. As noted in that response, CEQA does not require an analysis of cost or project funding. (State CEQA Guidelines Section 15131; Pub. Resources Code Section 21068.) Nevertheless, please see SPAS-PC00130-77 regarding the cost estimates prepared for the SPAS alternatives and Response to Comment SPAS-PC00130-725 regarding the economic benefits of terminal improvements versus runway improvements.

SPAS-PH100011 Mendoza, Maria USWW 8/25/2012

SPAS-PH100011-1

Comment:

My name is Maria Mendoza. I am a resident of Los Angeles in the airport area and I have been working at LAX for 16 years.

I have two children and I work as a janitor for the company Air Serv where I work proudly and honestly; and even though I put in all this hard work, it's really tough to maintain my family. I'm here as a member of the communities that surround LAX, as a worker of LAX, and as a mother and as a working mother.

I'm here to express my support for the modernization of LAX. I think that the modernization of LAX is good for the workers if it means that we will have new jobs and new opportunities. However, the prosperity of LAX and its communities cannot move forward if you forget the workers that make this airport work without any problems.

The modernization of LAX has to include respect for workers, respect for living wage ordinances, and respect for unions. So that's why I'm here today, so that the effort to modernize LAX also includes health, safety, and prosperity for the workers who do the job.

So do what you can to police these contractors in LAX for violating the laws of the city and/or not following living wages. We can't have prosperity for everyone at LAX if you keep these contractors who are not following the laws at LAX. Yes to modernization, but no to some of these contractors that are responsible.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PH100012 Lopez, Joe Sheet Metal Workers 8/25/2012

SPAS-PH100012-1

Comment:

Good morning. My name is Joe Lopez. I'm with Local 105, Sheet Metal Workers, longtime resident of this area, and I support this project.

In California, we face over 10 percent unemployment and I ask that we approve this modernization of this project, if we could. It would give me a chance to go back to work after so many years of hard times. I'm not asking for handout. I'm just asking for an opportunity to give me and my family -- give me a chance to put food on the table for my two kids. So let's support this project.

I also -- since I am in the sheet metal industry, we will be modern- -- a modernization of this airport will -- we will be modernizing the roads of the surrounding areas and pollution that our local deals with. We will be modernizing all this, so thank you very much. Thank you.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PH100013 Callahan, Edward None Provided 8/25/2012

SPAS-PH100013-1

Comment:

Hi. I'm just a homeowner in Playa del Rey and it sort of feels like we're being steamrollered by all the great powers. The unions are not our enemy. We can't fly anywhere without them, but this all seems to be about expansion and moving the north runway. That's what people are talking about and the head of the Chamber of Commerce talks about safety, that was an issue, which it's been proven that it's not. So there's some sort of steamrolling process here that's probably going to roll over the union as well as the homeowners.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PH100014 Freeman, Stefan None Provided 8/25/2012

SPAS-PH100014-1

Comment:

Hello everybody. Stefan Freeman.

I live in Playa del Rey as well and what I'll tell you is LAX, you know, we're your neighbors; right? And it's our responsibility as a neighbor to take care of the other neighbors around us, and for all the different labor organizations that are represented here right now, you guys do an unbelievable job. You do world-class work and I will tell you that our concern is not with you. We know that when you're in there, the work's going to get accomplished and it's going to be the best that it possibly can.

You know, our concern is really around the how and the what that's about to be done. Our concern is that LAX is going to come in there and do what they want without any sensitivity around the neighbors. Okay? And we wouldn't do that to you and all I ask is that you go back and try to figure out a way to even potentially move that runway further south. Now, it might mean more work, right, in terms of what you have to do to the terminals, but at the end of the day, that would be more work for the employees that you see here as well.

So that's what we're asking for right now is really just the how and what you're going to do and make sure that you have these employees included.

Thank you.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)). Regarding the commentor's request that "all I ask is that you go back and try to figure out a way to even potentially move that runway further south," SPAS Alternatives 3 and 7 propose the southward relocation of Runway 6R/24L and are included within the range of alternatives to be considered by the LAWA Board of Airport Commissioners.

SPAS-PH100015 Ferrer, Mirella Unite Here 8/25/2012

SPAS-PH100015-1

Comment:

Good morning. My name is Mirella Farvrer. I live at 416 West 105th, L.A. and I work for El Camacho's Cantina, LAX. I am a cook and I am backing up the project for the modernization of the airport because with this, it's going to benefit. It's going to create more work and we're going to better the economy of the city and the country.

This expansion is going to benefit everybody. Like, for example, me, that I am a worker, a middle-class worker, and this is going to benefit myself and my family and, therefore, we do not have to depend on any public service. I would like to state again that I approve of this project to 100 percent.

Thank you.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PH100016 Lemus, Teresa Unite Here 8/25/2012

SPAS-PH100016-1

Comment:

Good morning. I would like to thank all of you for being present here this morning and, God willing, I hope you put your hands to your heart and think about us, the poor people. We need work.

My name is Maria Teresa Lemus and I live in South Central Los Angeles and I've worked for Sky Chef for 13 years. I prepare the meals and the drinks that are for the airplanes. I approve of the project of the airport because this is going to benefit all of us. It's going to create more work for the -- it's going to create more work and it's going to better the economy.

I am alone and I depend on my job and, like me, there is many others. I would like to state again that I approve the modernization project to 100 percent.

Thank you for being here present and please, kindly, I request that you think about this. We need those jobs so we can continue to live in this world.

Thank you. Thank you. May God bless you.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PH100017 Mendoza, Marlene Unite Here 11 8/25/2012

SPAS-PH100017-1

Comment:

Good morning. My name is Marlene Mendoza. I'm a proud member of Unite Here, Local 11, but I'm more proud of being a single mom and I have two children, Frankie and Valerie. My son is -- has cerebral palsy as well as dysphagia. I want to share that with you because I want you to think about what I have say.

I worked for HMS Host for 24 years and at Gladstone's at Terminal 3 and I'm very proud to serve you when you come through LAX, and I also want to say that I have a union job that gives me all the benefits that I need and I feel that no, it just can't be Marlene, Valerie, and Frankie who can have these benefits.

There are so many kids. I live in the city of Lawndale. There are so many families, so many single moms like me that deserve the rights to have these jobs. We have the right that LAX creates more jobs, and good jobs, and we also have the right to have a beautiful airport and we have the right of the modern- -- I support the modernization because of what it gives me and it gives my family, and the most

important thing that I get, even though sometimes I have to work the jobs, just -- having a job at LAX gives me more time to be with my kids and I want you to think about it because this is our future and it's our future. These are our kids.

This is our family and in order for us to create the communities, we need to have this modernization to have a better city, to have a better L.A., to have a better country. So keep that in mind that we are here. We are at the airport every single day supporting you. I say, "Hi. My name is Marlene. Welcome to Gladstone's."

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PH100018 Chavez, Sinia Unite Here Local 11 8/25/2012

SPAS-PH100018-1

Comment:

Good morning. My name is Sinia Chavez. I work for HMS Host as a chief supervisor of the Food Court. I've been working there in the airport for eight years, which has given me the opportunity to have a good living-wage job, which helps me to support my kids. I'm a single mom of six. And also, my older daughter is working at the airport, too, and she's getting the opportunity that -- the job is giving her by -- giving her the chance to go to a university. She's 23 years old and I support this expansion at the airport because I know it's going to give us better jobs each day, which we will have the opportunity to support our families the best we can and give my kids the opportunity to keep going to school while I work at the LAX. So I support 100 percent this project.

Thank you.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PH100019 Hinson, Stephen Sheet Metal Worker Local 105 8/25/2012

SPAS-PH100019-1

Comment:

Good morning, ladies and gentlemen. My name is Steve Hinson. I'm the Business Representative for Local 105 Sheet Metal Workers. We represent over 6,000 sheet metal workers, active and retirees, roughly about 3500 active members.

At the height of our unemployment, we were about 1100 members out of work. Now we're roughly about 600, which is still kind of high, but this expansion that we've had so far in the modernization of Tom Bradley, we've been able to put over 200 sheet metal workers to work on-site, not to mention countless members that are working off-site, project management, everything that's included within the construction.

Thousands of members -- thousands of good construction jobs have been created because of the Tom Bradley expansion. It's given our members a sense of hope, a sense of pride. It's helped them keep their houses, helped them keep their health care. It's done a great thing. This next modernization at LAX will not only enhance the community, but it will also be able to put our members back to work and, you know, I hope we can do this and get this thing passed.

Thank you.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PH100020 Morrison, Nancy-Gene None Provided 8/25/2012

SPAS-PH100020-1

Comment:

I'm Nancy-Gene Morrison. I live in Westchester and have for 30 years.

I am all for modernizing the airport. I am opposed to moving the runways and moving -- expanding LAX. I feel that it is very important that we not have all our eggs in one basket and our only major airport here being LAX. We have Ontario. There's Palmdale. Those areas need to be used and we are in an area that has geographic problems, geological problems with earthquake faults here. The ocean here is subject to tsunami and only this week we have had two major incidents at LAX where traffic has been halted on the roadways. A plane had to be unloaded the other day. There are constantly helicopters overhead.

There have been enough emergencies in this country in the last month that we cannot have everything all at LAX. We need to use other areas around. If there's any emergency in this area, there will be nothing here as far as air transportation.

I'm all for workers having jobs and being respected, but they can also have jobs in building at Palmdale and at Ontario.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project.

Please refer to Topical Response TR-SPAS-REG-1 regarding the fact that LAWA, through the LAX Master Plan, the SPAS process, and other efforts, supports the regionalization of air travel demand in Southern California. As indicated therein, the LAX Specific Plan amendment proposed as part of SPAS further supports such regionalization. The subject Topical Response also discusses LA/Ontario International Airport and Palmdale Regional Airport. As also described therein, there are six major airports, not just LAX, serving the Southern California region. In addition, please see Response to Comment SPAS-PC00094-2 regarding emergency response.

SPAS-PH100021 Schneider, Denny ARSAC 8/25/2012

SPAS-PH100021-1

Comment:

I'm Denny Schneider, president of ARSAC, and we want to see the airport fixed for four reasons: It's difficult and impossible to get to it, get through it, get out, and navigate among the terminals. Other than that, it's great.

The Master Plan is like a jigsaw puzzle with several key pieces that are still missing and it needs to be solved. Traffic gridlock, getting to and out of the airport, and besides that, it also short-changes the people who are traveling domestically because so far all we've done is work for the international passengers. All those other terminals need to be fixed, badly.

We know there's a lot of conflicts in the 6,000 pages that was written in the EIR and the other 6,000 in the SPAS report. We haven't had more than a month to look through all of those pages yet, but you will get lots of written comments.

We want to make sure that we do the alternative that the EIR suggests is best. That's Alternative 2. It's the lowest cost, provides the most efficient movement of aircraft on the ground, and is the best environmentally. Taxiways are moved. They make it safer so that you can move around. It extends 24R -- or 24L, I mean, to the east so that we have the runway safety area protected and it provides for balance among the airport, and it's just a good idea. Add number 9 and overall the key here is jobs, jobs, jobs, but what we need is jobs that are sustainable and that's what we really need here.

So thank you. I just want to make sure that you understand I have not talked about the local impacts because those aren't important to most of the people listening. It's what happens in the whole region.

Response:

The commentor's support for Alternatives 2 and 9 is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Chapter 2 of this Final EIR regarding the LAWA Staff-Recommended Alternative, which couples the airfield and terminal improvements associated with Alternative 1 with the ground access components associated with Alternative 9, including a discussion of the rationale behind the selection of these alternatives over the other alternatives evaluated in the SPAS Draft EIR. The commentor provides no substantiation regarding conflicts in SPAS Draft EIR and the Preliminary LAX SPAS Report.

In accordance with State CEQA Guidelines Section 15088, LAWA has prepared written responses to all comments received on the SPAS Draft EIR during the public review period. The written responses are thorough, detailed, and provide good faith, reasoned analyses. These responses are provided herein as part of this Final EIR. The responses to comments on the SPAS Draft EIR will be considered by the decision-makers during project deliberations.

Please see Response to Comment SPAS-PC00130-730 regarding the treatment of economic impacts in an EIR. As noted in that response, CEQA does not require an analysis of cost or project funding. (State CEQA Guidelines Section 15131; Pub. Resources Code Section 21068.) Nevertheless, Chapter 8 of the Preliminary LAX SPAS Report provides a financial analysis of each alternative. As identified in Table 8-2 of the Preliminary LAX SPAS Report, the combination of Alternatives 2 and 9 is not the lowest cost alternative.

Regarding enhancements to the safety and efficiency of the airfield under each alternative, please see Table 4.7.2-16 on pages 4-569 and 4-570 in Section 4.7.2 of the SPAS Draft EIR. As indicated in that table, the SPAS alternatives achieve substantial enhancements to safety and efficiency; the degree to which safety and efficiency is enhanced varies between the alternatives. Please also see Responses to Comments SPAS-PC00130-3 and SPAS-PC00089-1 regarding efficiency associated with Alternative 2 compared to other airfield alternatives. Response to Comment SPAS-PC00089-1 also provides an

explanation of why Alternative 2 coupled with the ground access components of Alternative 9 is not the environmentally superior alternative.

SPAS-PH100022 Cope, Danna None Provided 8/25/2012

SPAS-PH100022-1

Comment:

I'm Danna Cope, resident of Westchester for a long time.

Why does the Draft EIR present so many very, very expensive alternatives? Alternative 2, which does not include moving the runway north, plus the CONRAC, the consolidated rental car complex, plus train access into the airport meets the safety requirements. It does not disrupt the North Airfield and, therefore, impact our neighbors to the south, because the South Airfield would be terribly impacted. It meets environmental requirements with much less impact and it does create jobs.

Response:

The commentor's support for Alternative 2 plus the CONRAC and APM (i.e., Alternative 9) is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Chapter 2 of this Final EIR regarding the LAWA Staff-Recommended Alternative, which couples the airfield and terminal improvements associated with Alternative 1 with the ground access components associated with Alternative 9, including a discussion of the rationale behind the selection of these alternatives over the other alternatives evaluated in the SPAS Draft EIR. Regarding enhancements to the safety of the airfield under each alternative, please see Table 4.7.2-16 on pages 4-569 and 4-570 in Section 4.7.2 of the SPAS Draft EIR. Please also see Response to Comment SPAS-PC00149-2 regarding safety related to the north airfield. Please see Topical Response TR-SPAS-T-1 regarding transit options into LAX. The commentor is not specific in the comment that Alternative 2 plus Alternative 9 "meets environmental requirements with much less impact." However, please see Response to Comment SPAS-PC00089-1 for an explanation of why Alternative 2 coupled with the ground access components of Alternative 9 is not the environmentally superior alternative. The impacts associated with Alternatives 2 and 9 are discussed throughout the SPAS Draft EIR.

SPAS-PH100022-2

Comment:

There is a lot of modernization that needs to be done at this airport that does not involve moving the runway. Why doesn't the -- why, when development of other LAWA-owned airports is a Draft EIR goal, does LAWA want to wait until LAX meets 75 MAP? We should be immediately developing Ontario for the safety reasons that previous speakers mentioned and that would create many, many more jobs.

LAWA projects must include fair wages for all workers, including subcontractors. Is that included in the Draft EIR? Why not go right now to developing Ontario? It would increase jobs in this area incrementally -- I mean, immeasurably and we need it.

Thank you.

Response:

Please refer to Topical Response TR-SPAS-REG-1 regarding the fact that LAWA, through the LAX Master Plan, the SPAS process, and other efforts, supports the regionalization of air travel demand in Southern California. As indicated therein, the LAX Specific Plan amendment proposed as part of SPAS further supports such regionalization. The subject Topical Response also discusses LA/Ontario International Airport.

The comment also raises employment and wage issues. These are purely economic impacts not required to be analyzed under CEQA. (State CEQA Guidelines Section 15064(e).)

SPAS-PH100023 Czyzyk, Joe Mercury Air Group 8/25/2012

SPAS-PH100023-1

Comment:

Good morning. My name is Joe Czyzyk and I'm chairman and CEO of Mercury Air Group and the immediate past chair of the Los Angeles Area Chamber of Commerce.

I've been a Playa del Rey resident since 1984 and my company has continuously operated among other airports and LAX since 1955. My company will not profit or benefit from any decision made on these SPAS.

I am here today to speak in support of SPAS and specifically Alternatives 1 or 5 to ensure that the North Airfield is finally configured in such a way as to accommodate the next generation of longer and wider aircraft. It's hard to believe that LAX doesn't operate as a fully functional and approved Group V airport under FAA guidelines when there are Group VI aircraft landing here today.

LAX modernization, not expansion, not what you've been hearing. People have been saying "expansion." There's no expansion contemplated in Alternative 1 or 5. It's important to point out that even if the North Runway is moved 350 feet, which is Alternative 5, it stays within LAX's existing fence line. I repeat, it is not an expansion; just modernization. If there is an expansion, it's only for safety and jobs.

I have lived in this community for nearly 30 years. I don't want to see our community hurt by this airport, but at the same time I don't want to see the airport's future hurt by a lack of action on undertaking a complete modernization, including the North Airfield. The airport provides growing and massive economic support to the City of Los Angeles and its surrounding communities, including my community of Playa del Rey and Westchester. Inaction will cause us to have a dangerous-to-use, noncompliant airport.

Thank you.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. As indicated on pages 1-10 and 1-11 in Chapter 1 of the SPAS Draft EIR, one of the objectives of the SPAS project is to provide north airfield improvements that support the safe and efficient movement of aircraft at LAX. The existing problems associated with the outdated airfield design at LAX are described therein. A summary of the safety and efficiency enhancements to the north airfield operations under the SPAS alternatives, including Alternatives 1 and 5, is provided in Table 4.7.2-16 on pages 4-569 and 4-570 of the SPAS Draft EIR.

SPAS-PH100024 Lestz, Patricia None Provided 8/25/2012

SPAS-PH100024-1

Comment:

Hi. I live in Playa del Rey. My name is Patricia Lestz and I've only lived been there for seven years, so obviously the airport was here when I moved here. I was not aware -- I lived in Los Angeles for 30-some-odd years. I was not aware of really what was happening in Playa del Rey.

The first thing that I want to say is that I think that anyone who was involved in whatever we want to call it, you know, expansion, modernization, et cetera, that whether it's a subcontractor or a contractor, that they ought to pay them a living wage. That I think is number one. That's the most important thing. We should not live in a city where that is not the case.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PH100024-2

Comment:

Number two, I think that all of these things on the wall should show the economic impact. Money is certainly not easy to come by, especially in this state and in the city and yes, we need the jobs, but we also need to know how we're going to compensate the businesses that are affected outside of the airport, the homeowners that are affected -- and obviously I'm concerned about that. I mean, all of our values have already dropped. How much more is it going to drop with runways being closer to us?

So those are the points that I want to make. I think that, once again, the economic impact of everything that is in this community -- is it going to affect Otis? Is it going to affect Loyola? We have to think about those things because those are the things that really make us special as a community.

Thank you.

Response:

Regarding the need for an economic impact analysis, per Section 15131(a) of the State CEQA Guidelines, "economic or social effects of a project shall not be treated as significant effects on the environment." This section of the guidelines further states that "intermediate economic or social changes need not be analyzed in any greater detail than necessary" to identify a physical change caused by the economic or social changes. As outlined in Section 15002(a) of the State CEQA Guidelines, the basic purposes of CEQA are to inform decision-makers and the public about the potential significant environmental effects of proposed activities; to identify means to reduce, avoid, or mitigate environmental damage; and to disclose reasons why the decision-makers approved a project if significant environmental effects are involved. Although considerations other than environmental impacts have a role in the action taken by the decision-makers, the purpose of an EIR is to focus on environmental effects. Please also see Response to Comment SPAS-PC00189-4 regarding property values.

It is not clear in the overall context of the comment what the commentor is referring to other than potential economic effects on Otis College of Art and Design and Loyola Marymount University. As shown in Figures 2-11, 2-12, 2-13, and 2-14 and listed in Tables 2-4 and 2-5 of the SPAS Draft EIR, no acquisition of Otis College of Art or Design or Loyola Marymount University is proposed under the SPAS alternatives. However, potential physical impacts of the proposed SPAS alternatives on surrounding land uses, including Otis College of Art and Design and Loyola Marymount University, were analyzed in Chapter 4 of the SPAS Draft EIR. Key issues that were analyzed and relevant to these educational institutions include noise, traffic, and changes to the RPZ associated with aviation safety.

SPAS-PH100025 Widener, Bill None Provided 8/25/2012

SPAS-PH100025-1

Comment:

Yes. I'm Bill Widener and I'm a resident of the city of Inglewood. I've lived in the airport area for 70 years, since I was almost a baby, and so I've seen a lot of changes in everything and that's good, but I'm speaking for the residents east of the airport. If they expand, fine. Just don't move that runway north any more because it's too far north as far as I'm concerned already. But, you know, I live in Inglewood and they've done sound insulation on all these apartment buildings and stuff and they haven't done it on single-residence homes. See, I hear about all these jobs and everything here and no one's defending the residents east of here.

You know, now, there was -- during some expansion period of the airport, a lot of my relatives and everything relocated in Atlanta because that's where all the jobs went at one time and so, you know, I realize that as these things happen and the expansion goes on that there's evolution and there will be more jobs automatically, you know, but let's just don't create any hardships for people. That's the whole trick, as far as I'm concerned, because we lost one house in Westchester at one time and -- you know, to the airport and it's part of a parking lot today.

Inglewood -- Westchester Elementary School I went to and it's gone completely because of being part of a parking lot.

So these are necessary things and I hope we can proceed and not hurt anybody. Thank you.

Response:

This comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project.

Regarding lack of progress for providing sound insulation to single-family homes in the City of Inglewood, a comparison of the LAX ANMP Tables Update included with the Quarterly Report for the 2nd Quarter 2010 (as referenced in footnote 493 on page 4-666 of the SPAS Draft EIR) with the Quarterly Report for the 4th Quarter 2011, indicates that progress has been made towards reducing the number of incompatible residential dwelling units exposed to 65 CNEL or higher noise levels in the City of Inglewood. As shown on these tables, in the 4th Quarter of 2011, the number of incompatible residential dwelling units in the City of Inglewood was reduced by 1,423 single- and multi-family units and 984 single-family units compared to 2nd Quarter 2010 conditions.

Please refer to pages 4-664 through 4-667 in Section 4.9.3.3 of the SPAS Draft EIR, for a description of the Aircraft Noise Mitigation Program (ANMP) established to provide soundproofing to eligible properties exposed to 65 or higher noise levels, pursuant to the land use compatibility requirements of the California Airport Noise Standards (California Code of Regulations, Title 21, Subchapter 6, Section 5000 et seq.). Participants in the ANMP include communities within unincorporated Los Angeles County, the City of Los Angeles, City of Inglewood, and City of El Segundo. Each participating jurisdiction is responsible for implementing its own ANMP to mitigate noise impacts or eliminate incompatible land use within the communities surrounding LAX. Regarding priority for completion of sound insulation for specific properties under the existing ANMP, the commentor should contact the City of Inglewood, Residential Sound Insulation Department at (310) 412-5289.

As noted in LAX Master Plan Mitigation Measure MM-LU-1, priority would be given to the completion of the current ANMP, prior to adjusting the ANMP boundaries to include residential and non-residential noise-sensitive facilities that may be newly exposed uses under the selected SPAS alternative.

SPAS-PH100026 Gray, Gloria West Basin Water District 8/25/2012

SPAS-PH100026-1

Comment:

Good morning to the audience and folks in front. I want -- well, first of all, my name is Gloria Gray and I'm a resident of the city of Inglewood. I've lived in Inglewood for over 30 years and I want to acknowledge the fact that it's a good thing to have community meetings and so forth, so I know it's a requirement when you do an EIR and so forth.

I know that we're here to hear results and also to talk about the modernization proposal for the airport. It's always a good thing to upgrade any particular facility and certainly the airport is one that -- where it needs to happen and certainly that modernization will create jobs, I assume, for this community and so that's a good thing, because job -- increasing jobs in our community is very positive.

But I'm here also to address another issue which is very important and it should be important to the airport because it is important to our community and that is the issue of supporting the service workers at LAX.

You're probably aware of different demonstrations that have been going on. I have been a member of the union for many years so I do support organized labor and working family issues and so I beg to ask you to please consider the plight of the service workers. They have a right to benefits. They certainly have a right to health care. They have a right to jobs that will support them and their families and so I think, you know, looking at the issue of contracting out is very important. It's an issue throughout the state of California for local cities and municipalities.

And so I beg you to please look at protecting the service workers because they are the nuts and bolts of the airport. So, again, I encourage you to look at those issues and support their efforts, and I am here to support their efforts and will continue to do that.

So thank you.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PH100027 Orellana, Patricia SEIU-USWW 8/25/2012

SPAS-PH100027-1

Comment:

My name is Patricia Orellana from Inglewood. I have two kids. I have worked at LAX for 14 years.

I'm here to support a modernization today, but it's not unconditional. I'm here to say that it's important if the airport and the community want to move forward together, that the airport needs to take more at hand in protecting workers against some of these contractors that work at the airport, like Aviation Safeguards.

What I am here to say is that both the workers and their families also have to progress in this modernization process. LAX can make new terminals, can build new routes for planes to land, but it is

the workers who work in it every day that make this airport function. If you want to make a nicer looking airport, a more functioning airport, you still have to address the issue of contractors. If not, you're going to get a beautiful, shiny airport on the outside, shiny and clean airport on the outside, but the dirt will be inside.

Thank you.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PH100028 Hamilton, Jacqueline — Tuskegee Airmen, Inc. — 8/25/2012

SPAS-PH100028-1

Comment:

I'm Jacqueline Hamilton with the Tuskegee Airmen organization. I lived in this area, the Manchester Square area, from 2001 to 2006, and one of the things we experienced in living in this area was a lot of fumes and a lot of problems with air quality. So I'm checking and reading your information here and also talking to the staff.

Another thing that I experienced was repeat crime victimization. Now, we're talking about jobs here and different organizations. One of the things that needs to be done is having safety for those of us who are in this area.

I'm still being repeatedly victimized by crime. My father's picture and information was displayed at LAX in a mural during the time that I lived in this area. I was victimized by stalking, illegal harassment, mail fraud, identity theft, theft, a lot of crimes, and I lived in the area of the Manchester Square area.

The address was 93112 Glasgow Place, a complex owned by Jesus Lozano, managed by Lillian Fogelback and also Maria Estrada. They all lied to me about receiving a relocation award, staying, prolonging my stay here in this area, continued to lie to me about receiving the award, and did nothing about the crime victimization and also the problems we had in living in this area with the fumes and other problems.

So one of the things I'm requesting is public community safety. We have information here about air quality and traffic control, all the other issues. We have received information that LAX is one of the most dangerous airports.

One of the things I'm also experiencing is repeat illegal corruption of my clear background record. It also includes harassment by officers, which is illegal.

Thank you.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Response to Comment SPAS-PH300028-1 regarding relocation assistance. The commentor provides no substantiation for the claim that LAX is "one of the most dangerous airports." The comment regarding fumes and problems with air quality pertains to conditions in existence when the commentor resided in Manchester Square and does not pertain to the SPAS Draft EIR or the environmental impacts of the SPAS alternatives. Existing air quality at LAX is characterized in Section 4.2.3 of the SPAS Draft EIR.

No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PH100029 Eggers, Craig Neighborhood Council of Westchester Playa 8/25/2012

SPAS-PH100029-1

Comment:

My name is Craig Eggers. I represent the Neighborhood Council Westchester Playa del Rey and I chair the Airport Relations Committee and I wanted to dispel a few myths that seem to be floating around concerning our community.

The first myth is that we do not support modernization. That is absolutely incorrect. I agree with previous statements that the airport currently is an eyesore and a bit of an embarrassment. When you think about the passenger traveler experience, with the amount of money that's being invested in downtown Los Angeles and the revitalization there, I would think we'd really want to modernize this place within an inch of its life.

The second myth is that we do not support -- excuse me. We do support the environmentally superior alternative and the issues concerning the operational efficiency. There is no justification in operational efficiency or in safety as it's associated with the Runway Separation Plan that's currently there.

And most importantly, we're going to be hosting a town hall meeting for our Neighborhood Council on September 25th and we'd like to invite everyone to come out for that as well. We hope to have several high-level elected officials, including Councilman Rosendahl, join us and we welcome the opportunity to get your input and perceptions and feedback.

Thank you.

Response:

The commentor's support for the environmentally superior alternative (i.e., Alternative 2) is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Chapter 2 of this Final EIR regarding the LAWA Staff-Recommended Alternative, which couples the airfield and terminal improvements associated with Alternative 1 with the ground access components associated with Alternative 9, including a discussion of the rationale behind the selection of these alternatives over the other alternatives evaluated in the SPAS Draft EIR.

Regarding enhancements to the safety and efficiency of the airfield under each alternative, please see Table 4.7.2-16 on pages 4-569 and 4-570 in Section 4.7.2 of the SPAS Draft EIR. As indicated in that table, the SPAS alternatives achieve substantial enhancements to safety and efficiency; the degree to which safety and efficiency is enhanced varies between the alternatives. Please also see Response to Comment SPAS-PC00089-1 regarding efficiency associated with Alternative 2 compared to other airfield alternatives. In addition, please see Response to Comment SPAS-PC00149-2 regarding safety related to the north airfield.

Please see Response to Comment PH200025-1 regarding the town hall meeting held by the Neighborhood Council of Westchester/Playa.

SPAS-PH100030 Cavalier, Richard None Provided 8/25/2012

SPAS-PH100030-1

Comment:

My name is Richard Cavalier and I live in Inglewood. I want to say that for modernization, yes; to move the runways north, no. We're talking about jobs. Nobody's talking about closing the airport. The jobs are already there. Many of the jobs for the modernization are temporary jobs, but the impact on the community is permanent and the way this airport operates, forever and ever, far outlasting me, I'm sure.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PH100030-2

Comment:

There are a couple of major problems. One is that the airlines right now stack everything over the city. All of the airplanes are dropping pollution over the city.

Response:

The SPAS Draft EIR addressed air quality impacts, including emissions from aircraft, in Section 4.2, Air Quality. Please also see Response to Comment SPAS-PC00043-2 regarding pollutant deposition. The analysis includes the impact from aircraft located approximately five miles from the airport property line both east and west of the airport.

SPAS-PH100030-3

Comment:

There's an ocean to the west, and I don't know whether anyone has noticed it. Yes, sound carries over the ocean.

Share the wealth. The important things after our medical problems from what's being done and because the runways already let planes come in from the west, there's very, very little of a problem here.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project.

Regarding impacts to health, as indicated in Section 4.7.1 of the SPAS Draft EIR, incremental cancer risks and incremental chronic non-cancer health hazards within the study area under all the alternatives would be less than significant for all receptor types (i.e., child resident, school child, adult resident, adult worker). Additionally, under all the alternatives, health effects to on-airport workers would be less than significant. Incremental acute non-cancer health hazards at small areas at or near the LAX fence-line under all the alternatives would be slightly above the threshold of significance and are considered to be significant and unavoidable for all analyzed receptor types (i.e., residents, recreational users, school child, off-site adult workers). The primary toxic air contaminant of concern contributing to this impact is associated with emissions of acrolein from aircraft operations, which would occur in 2025 even in the absence of SPAS. It should be noted that, with the exception of Alternative 3, acute non-cancer health

hazard impacts in 2025 would be lower under the SPAS alternatives than if no airfield improvements were implemented. Moreover, these significant impacts would occur at or near the fence-line; it is expected that actual impacts in the community would be less than significant.

Please refer to Topical Response TR-SPAS-REG-1 regarding the fact that LAWA, through the LAX Master Plan, the SPAS process, and other efforts, supports a regional approach to accommodating air travel demands in Southern California.

SPAS-PH100030-4

Comment:

Now, what we're not talking about is grandfathering. There was one time a small airport for propeller planes. The jets arrived. That's fine.

The important thing is that I've also heard that someone said longer, wider aircraft. Yes, these aircraft are not here by the demands of the traveler. They're here by the demands of the bean counters who don't care what happens to anybody on the ground. Okay.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PH100030-5

Comment:

I have traveled in more than 40 countries. I've been in a lot of airports and they all around the world do more to take care of the people who are near the airport than is done here. People are being molested, and this is a matter of unilateral taking of the quiet enjoyment of home for everybody if the runway is moved north.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project.

Aircraft noise impacts for the alternatives are presented in Sections 4.9 and 4.10.1 of the SPAS Draft EIR. This includes discussion of existing noise-related programs in Sections 4.9.3.3 and 4.9.5, such as the Aircraft Noise Mitigation Program, and the Voluntary Residential Acquisition/Relocation Program. As discussed in greater detail in Response to Comment SPAS-PC00034-18, LAWA has spent in excess of $1 billion for soundproofing or acquiring homes. LAWA also implements a number of operational measures to reduce noise which hare described starting on page 1-86 of the SPAS Draft EIR. As discussed therein, LAWA implements policies to (1) use preferred inboard runways for departures, (2) use Over-Ocean procedures, (3) conduct westward departures, (4) ban the use of SuperSonic Transport (SST), (5) restrict run-up activities, (6) reduce departure thrust on west flow operations, (7) discourage the use of reduced thrust departures during east flow operations, (8) use departure cutback procedures, and (9) use tug and tow procedures.

As summarized in Section 4.9.7 of the SPAS Draft EIR, those noise-sensitive uses newly exposed to noise levels of 65 CNEL or higher would be eligible for sound insulation under the Aircraft Noise Mitigation Program (ANMP) and through implementation of LAX Master Plan Mitigation Measure MM-LU-1, which would reduce interior noise levels to 45 CNEL. As concluded in Section 4.9.8 of the SPAS Draft EIR, interim impacts prior to completion of sound insulation and noise-sensitive areas newly exposed to outdoor noise levels of 75 CNEL or higher would be significant and unavoidable.

SPAS-PH100030-6

Comment:

Okay? So modernization, yes; north runways, no. And now let's make sense out of the airport that is here. They don't have unlimited rights.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PH100031 Sambrano, Diane HSCV 8/25/2012

SPAS-PH100031-1

Comment:

Good afternoon. I've been here for a very long time. I've attended so many of these meetings, it's impossible to count them, and one thing is consistent. There seems to be a lack of understanding of the genuine impact that this airport has on the people who live around it. We're constantly hearing about those people who come in for a couple of months and get a job and then they leave and go back way far away.

We are always hearing about how important it is for the traveler who's here maybe four whole hours, but you know what? There are people who actually try to continue to live here and what we have experienced is not just horrific noise but all that black goo that lands on top of our lemons, our cars, on our mini blinds, and here's the surprise. We actually breathe the stuff.

And you know what? No matter how much I look at charts, wherever they are, there doesn't seem to be that adequate resultant determination about what's happening to our lives and yet I can tell you that this year, I've had to write six obituaries.

There are definite cancer clusters in the areas of Inglewood. Most of the women, roughly 65 in certain areas, are now either without breasts or dead. That's pretty significant, but we don't see that anywhere, and then there's those other pesky little cancers that leave your breasts but just eat you away everywhere else and we don't hear about that because either someone wants a job, someone wants an aircraft, somebody wants to sell another trinket. And I've got to tell you somewhere along the line, people's lives should outweigh that dollar bill. By the way, we're still impacted, even when those dollars actually go way far away to downtown L.A.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project.

The SPAS Draft EIR addresses impacts associated with aircraft noise, road traffic noise, construction traffic and equipment noise, in Sections 4.10.1, 4.10.2, and 4.10.3, respectively. The impacts associated with each of these categories of noise are summarized below.

As indicated in Section 4.10.1 of the SPAS Draft EIR, Alternatives 1 through 7 would result in some residential uses and non-residential noise-sensitive facilities being newly exposed to noise levels of 65 CNEL or higher or increases of 1.5 CNEL or higher within the 65 CNEL or higher noise contours. With implementation of LAX Master Plan mitigation measures, these impacts would be less than significant. However, interim impacts prior to the completion of mitigation, impacts on residential uses with outdoor

habitable areas, and impacts on parks would remain significant and unavoidable. Alternatives 8 and 9 focus on ground access improvements that, in themselves, would not result in aircraft noise exposure but would be coupled with the airfield improvements proposed under Alternatives 1, 2, 5, 6, or 7, the impacts of which are summarized above. None of the alternatives would result in a significant impact relative to sleep awakenings.

Concerning road traffic noise, as indicated in Section 4.10.2 of the SPAS Draft EIR, impacts related to ground access improvements proposed under Alternatives 1, 2, 3, 4, 8, and 9 would be less than significant as the incremental changes in road traffic noise levels under each of these alternatives would be less than a 3 dBA increase in CNEL. Alternatives 5, 6, and 7 do not include ground access improvements and would therefore not affect road traffic noise levels at off-site noise-sensitive uses.

Regarding construction traffic and equipment noise, as indicated in Section 4.10.3 of the SPAS Draft EIR, due to the periodic nature and limited incremental increase on area roadways, none of the alternatives would result in significant impacts related to construction traffic noise. However, all of the alternatives would result in significant impacts from construction equipment noise with the potential to effect sensitive receptors such as residential and school uses. The sources of those impacts differ by alternative, but can be generally characterized as temporary impacts associated with airfield improvements, ground access system improvements, and construction staging areas. While LAX Master Plan commitments and mitigation measures would reduce construction equipment noise impacts associated with all of the SPAS alternatives, it cannot be definitively concluded that all construction equipment noise impacts would be reduced to levels that are less than significant and these impacts are considered to be significant and unavoidable.

The SPAS Draft EIR addresses air quality impacts associated with the SPAS alternatives, including Alternatives 1, 5, and 6 which propose a northward relocation of Runway 6L/24R, in Sections 4.2. As indicated therein, even after mitigation, construction activities would result in significant and unavoidable air quality impacts under all of the alternatives. Specifically, under all of the alternatives except for Alternative 4, construction emissions of carbon monoxide (CO), volatile organic compounds (VOC), oxides of nitrogen (NOx), particulate matter with an equivalent aerodynamic diameter of 10 micrometers (PM10), and particulate matter with an equivalent aerodynamic diameter of 2.5 micrometers (PM2.5) would be significant and unavoidable. Under Alternative 4, significant and unavoidable construction emissions would occur for NOx and PM10. Under all of the alternatives, even after mitigation, construction-related concentrations of nitrogen dioxide (NO2) and PM10 would be significant and unavoidable.

Operation of the airport would also result in significant and unavoidable impacts to air quality. Even after mitigation, operational emissions of sulfur dioxide (SO2), PM10, and PM2.5 would be significant and unavoidable under all of the alternatives. Operational concentrations of NO2, PM10, and PM2.5 would also be significant and unavoidable under all of the alternatives.

The commentor provides no evidence to support the claim that "There are definite cancer clusters in the areas of Inglewood. Most of the women, roughly 65 in certain areas, are now either without breasts or dead. That's pretty significant, but we don't see that anywhere, and then there's those other pesky little cancers that leave your breasts but just eat you away everywhere else." Please note that Section 4.7.1 of the SPAS Draft EIR addresses cancer risk and chronic and acute non-cancer health hazards associated with construction and operational activities that would occur under the SPAS alternatives. As indicated in Section 4.7.1 of the SPAS Draft EIR, incremental cancer risks and incremental chronic non-cancer health hazards within the study area under all the alternatives would be less than significant for all receptor types (i.e., child resident, school child, adult resident, adult worker). Incremental acute non-cancer health hazards at small areas at or near the LAX fence-line under all the alternatives would be slightly above the threshold of significance and are considered to be significant and unavoidable for all analyzed receptor types (i.e., residents, recreational users, school child, off-site adult workers). The primary toxic air contaminant of concern contributing to this impact is associated with emissions of acrolein from aircraft operations, which would occur in 2025 even in the absence of SPAS. It should be noted that, with the exception of Alternative 3, acute non-cancer health hazard impacts in 2025 would be lower under the SPAS alternatives than if no airfield improvements were implemented. Moreover, these significant impacts would occur at or near the fence-line; it is expected that actual impacts in the community would be less than significant.

With respect to the "black goo that lands on top of our lemons, our cars, on our mini-blinds," it is assumed that the commentor is referring to "deposition," (i.e., the gravitational fallout of material--both solid and liquid--from the atmosphere). Commonly, this material, called particulate matter, consists of dust and soot that can form deposits or cause discoloration on outdoor surfaces (i.e., building materials, motor vehicles, small water bodies, etc.). Please see Response to Comment SPAS-PC00043-2 regarding pollutant deposition. As indicated in Response to Comment SPAS-PC00043-2, to date, the research results indicate that aircraft do not contribute substantially to deposition.

SPAS-PH100032 Ouellet, Jim None Provided 8/25/2012

SPAS-PH100032-1

Comment:

Yeah. One of the information that's up on some of these bulletin boards says that LAX North Airfield was designed in the 1960s for 1960s aircraft. The Boeing 747 was also designed in the 1960s and began flying in 1970, just about the time that the North Airfield opened, so it was plainly designed to accommodate the 747.

Now, that 747 had a wingspan of 197 feet. Boeing's latest large jet, the 787-9, has a wingspan of exactly the same, 197 feet. The 747, the largest 747 has a wingspan of roughly 25 feet taller.

In terms of flying Airbus, which is the largest aircraft in and out, so far Airbus has something like about 240 orders for that jet, one-third of them from Emirates Airlines which flies, as far as I know, one flight in and out of LAX a day on a Boeing 777.

By contrast, the Boeing 787 has 824 orders. There will not be that many category VI jets flying in and out of LAX to justify moving all those runways.

Response:

As indicated at the top of page 2-2 of the SPAS Draft EIR, LAX does not have an airfield, in either the north complex or the south complex, that is fully designed for ADG V aircraft, such as the Boeing 747, or ADG VI aircraft, such as the Airbus A380. As also indicated, the primary departure runway on the north airfield, Runway 6R/24L, is too short for certain aircraft (e.g., fully-loaded Boeing 747-400) on long-haul flights, requiring those aircraft to taxi to the south airfield for departure.

The aircraft fleet mix used in the SPAS planning and analysis for future (2025) conditions takes into account the anticipated number of Boeing 787 as well as Airbus A380 and other aircraft types operating at that time. The fleet mix information is summarized in Appendix F-1 of the Preliminary LAX SPAS Report and additional details are contained in Appendix J1-1 of the SPAS Draft EIR. As described in Appendix F-1 of the Preliminary LAX SPAS Report, it is expected that operations of ADG VI aircraft will increase at LAX by the year 2025.

SPAS-PH100032-2

Comment:

The data in the EIR also suggests that moving the runways -- Runway 24R north either 260 feet or 340 feet will result in minimal efficiency gains. So it will create -- well, basically, it will create an awful lot of noise around the area, additional noise around the area with minimal gains in efficiency and a horrible expense in digging up a runway and moving it a few feet north.

That's all. Thank you.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Chapter 2 of this Final

EIR regarding the LAWA Staff-Recommended Alternative, which couples the airfield and terminal improvements associated with Alternative 1 with the ground access components associated with Alternative 9, including a discussion of the rationale behind the selection of these alternatives over the other alternatives evaluated in the SPAS Draft EIR. Please see Table 4.7.2-16 in Section 4.7.2 of the SPAS Draft EIR regarding gains in efficiency associated with the SPAS alternatives, including Alternatives 1 and 5. Please also see Response to Comment SPAS-PC00089-1 regarding efficiency associated with the airfield alternatives.

Please see Response to Comment SPAS-PC00149-2 regarding the SPAS Draft EIR conclusions relative to aircraft noise impacts on surrounding communities.

SPAS-PH200001 Durazo, Maria E LA County Federation at Labor, AFL-C10 8/28/2012

SPAS-PH200001-1

Comment:

Good evening. Yes, Maria Elena Durazo and I am secretary-treasurer of the L.A. Federation of Labor.

You know, as passengers travel through LAX, there are thousands of very dedicated men and women who work hard to make sure that the experience of the passengers is safe, it's comfortable, and it's reliable, and I mean everyone from the flight attendants to the baggage screeners to the food, retail workers, the concession workers, cabin cleaners, customer service reps. The workers at LAX deserve to have a voice on the job. That's what we strive for and we want to ensure also that they have the tools, the training, and good, safe working conditions that they need to carry out their jobs.

LAX is a treasured asset for all of us. 300,000 people raise their families through the jobs, directly and indirectly, related to LAX. Every corner of the city and county is touched by economic vitality from this airport. So for us, the sooner we finalize a process that has been going on for over eight years, then an additional 8 and a half billion dollars in projects can begin and another 10,000 more good-paying jobs are created.

So in addition to the economic impact, we are glad that modernization will also address the safety issues on the runway that affect workers. So this time, let's refer to LAX as not as "the airport" but as "our airport" because it belongs to all of us. Our airport is long overdue for modernization. Therefore, alongside a coalition of LAX workers, residents, community and business allies, we urge a swift delivery of the Final EIR.

Thank you very much.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PH200002 Hathaway, Karen Los Angeles Area Chamber of Commerce 8/28/2012

SPAS-PH200002-1

Comment:

Thank you. My name is Karen Hathaway and I am the President of LAACO, Ltd./Los Angeles Athletic Club. I'm also the chairman of the Board of Los Angeles Area Chamber of Commerce.

Modernization of LAX is long overdue. In fact, LAX modernization is essential to the future of our city and now is the time to do it.

The economic impact of LAX on L.A. County is very well documented. It generates tens of billions of dollars and hundreds of thousands of jobs annually. It's not just an economic asset. Actually, it's an essential component in the financial stability of our entire region.

The citizens of our region have a huge stake in the global economy. Growing our tourism and exports are key to L.A.'s long-term economic health. A modern, safe, and efficient LAX is essential to keep visitor and business travelers coming here and to keep commerce flowing. Therefore, improving LAX is the most important economic project in our region today.

Significant improvements are under way; however, the Los Angeles Chamber of Commerce has partnered with labor and citizens to form the Coalition to Fix LAX Now because we see the financial implications of the job that's only half done. In these troubled times, our region faces many intractable problems with no obvious solutions and this is not one of them. The path is very clear.

LAX needs a complete package, a state-of-the-art terminal, a safe and efficient North Airfield, and good ground transportation access. All three elements are absolutely required and we are calling for the passage of the Specific Plan Amendment Study and its corresponding EIR. We urge the Board to aggressively proceed through the SPAS EIR process and move us forward into the 21st century.

Thank you.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PH200003 — Simon, David — Southern California Committee for the Olympic Games — 8/28/2012

SPAS-PH200003-1

Comment:

Thank you.

I am here representing the Southern California Committee for the Olympic Games, of which I serve as president of.

When the London Olympics ended two weeks ago, City Councilman Tom LeBonge introduced a motion in Council inviting our organization to recommend to the City whether Los Angeles might be able to bid again for the Olympic games in the near future. And while that has not worked its way through Council, I can tell you the answer is yes, there is an opportunity.

The 2016 games have been awarded to Rio. 2020 will be awarded next year to either Madrid, Tokyo, or Istanbul; and the 2024 games will be after that and the United States Olympic Committee will have to decide whether Los Angeles is the candidate to advance internationally to put that bid forward. But we could be on the verge of the best opportunity Los Angeles has had for 40 years to have a successful bid for the Olympic games. And just as the last Olympic games in 1984 was a tremendous catalyst for a major overhaul of the airport, so could a bid for the Olympic games in 2024 be a catalyst for the airport again.

So I am here just to let you know that this is being talked about. It's not yet broken into the news, but if it does and if we're successful, this could be something very significant for the airport.

I would invite you to consider in your planning the date of 2024 as a deadline. If there is an Olympic bid, an improved airport would obviously enhance it; but just as important, if there is an Olympic bid, it could be a tremendous catalyst for you and that deadline could be something that we could work together on.

Thank you very much.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PH200004 Norton, Kevin IBEW Local #11 8/28/2012

SPAS-PH200004-1

Comment:

Norton, with bad penmanship apparently.

Kevin Norton, IBEW Local 11, Electrical Workers Union. We represent about 500 workers who work at the airport on construction, as well as permanent employees of the airport. We're also a community stakeholder and have an office at 8333 Airport Boulevard, right down the street in Westchester.

LAX -- the modernization of LAX is critical. Anybody who does any air travel whatsoever would be hard-pressed to find an airport that is less impressive to a visitor than LAX, certainly not because of their lack of effort of the folks that run the airport, but because it's been very difficult to get any kind of modernization program under way with all of the considerable lawsuits and opposition.

The modernization program needs to move forward. We need to have jobs. About several hundred thousand people rely on the airport, whether it's from cargo jobs, airport-related jobs, whatnot, construction jobs, permanent jobs at the airport. It's critical for the area, for the region, and we really need a world-class airport.

Los Angeles is one of the greatest cities in the world, but you would never know it if you flew into LAX. You'd -- again, you'd be hard-pressed to find a less impressive airport, less modern. There's no connection to transit. There needs to be a connection to the light-rail line and we need a modern LAX. That's it.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PH200005 Broderick, Aaron IBEW Local #11 8/28/2012

SPAS-PH200005-1

Comment:

Hello. Aaron Broderick, IBEW, Local 11. An apprenticeship just started for me. My previous career, I did a lot of traveling with rock-and-roll bands and I traveled the world, five continents, 112 countries. I've seen a lot of airports and Los Angeles alone is a brilliant city, but to fly into it, it's somewhat tragic.

I think modernization of Los Angeles Local International Airport would be great for the community, bring us up to date with the rest of the world and actually give us competitive value. It's fairly difficult to look at it in its current state and see its value on an international level. It's really just behind the times and modernization is key.

Thank you.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PH200006 Sanchez, Maria USWW 8/28/2012

SPAS-PH200006-1

Comment:

Good evening. My name is Maria Sanchez. I have two children -- boys and two girls.

Good evening. My name is Maria Sanchez and I am the mother of two boys and two girls. I have been working for more than six years at the airport for the company SASIG (sic) and I've lived in the city of Compton for more than ten years.

I am here to support the modernization of the airport and to let them know that hardworking people like myself could escape poverty thanks to contractors from the airport -- people like myself that will not be able to escape poverty thanks to contractors, the airport contractors that are violating the law. MR. OSWALD: So if I can just interrupt for a second, what I'd like to do, since this gentleman knows the content, maybe he can go ahead and do that, translate for her. Thank you very much. I'm so sorry.

Good evening. My name is Maria Sanchez. I am a mother of two -- two sons and two daughters. I have more than six years working at the airport for the company ASIG and I have worked -- I lived and worked in the LAX area for ten years.

I am here to support the modernization of LAX but to also let you know that there are many of us who can not escape poverty because of companies like Aviation Safeguards.

It's important to know that -- so that everybody at the airport can prosper that LAWA needs to do something to protect the workers against some of these dirty and irresponsible contractors. I only ask you this so that everybody can progress, workers and their families as well.

LAX could make new terminals. LAX could fix the runways, but it is the workers that make the airport work. If you want to, you could fix the outside and have a very nice-looking airport, but if you don't fix

the issues with the contractors inside the airport, it will look beautiful on the outside, but it will be dirty on the inside.

Thank you very much.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PH200007 Lobera, Jose USWW 8/28/2012

SPAS-PH200007-1

Comment:

I am Jose Lobera. I am 77 years old. I have worked at LAX for 32 years and I have done this for many years to support my family, my children, my wife, and my grandchildren, who I'm very proud of.

I am a resident of the area of LAX and I work for a company called Aviation Safeguards, but it is difficult to sustain myself economically. Like all the workers at the airport, I feel that the modernization of the airport could be something very positive. I say that it could be something positive because I am worried that in the modernization of our airport, there is not enough consideration to the health and safety and to the well-being of the workers in the airport.

Nonetheless, I am here very faithfully saying that I am here to -- I am here to express support for the modernization of LAX, but only if it includes the thought to the prosperity of us, the workers at the airport.

Part of the modernization of LAX should be the removal of irresponsible contractors who are currently operating at the airport. Just such is the case of Aviation Safeguards, which owes 2.5 million dollars to our medical care. They keep violating the living wage and they do not listen to federal agents that supervise work at the airport. As long as you have contractors like this treating our contract like a joke, we can't talk about full prosperity.

Thank you for your attention. Together, employers, communities and workers can prosper.

Thank you.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PH200008 Underwood, Brenda None Provided 8/28/2012

SPAS-PH200008-1

Comment:

I'm mike [sic] shy, but it sounds like everybody is kind of thinking it's a good thing and it probably is, but I live in Manchester Square so I'll be uprooted and that's a scary thing.

But in the meantime, I live there and the airport promised to water the place and I need it to be rehooked up and watered because it's been three years and they have not watered it.

Also, we have a problem with -- there is 30 people living in vehicles there, which is kind of getting a little out of control, and we'll see what's going to happen. Okay. Bye.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PH200009 Hunter, Robbie LA/OC Building Trades Council 8/28/2012

SPAS-PH200009-1

Comment:

My name is Robbie Hunter. I'm the Executive Secretary of the Los Angeles and Orange County Construction Trades Council, and some of the comments are like to me sad. It's not just about the construction jobs. It's really the airport itself.

LAX as it exists today is dysfunctional, antiquated. It's unfriendly to the neighbors who surround it. It's also unfriendly to the aviation industry.

An LAX modernization program will cut congestion and pollution, runway work will make a safer airport for aviation, the central location of all the rental cars will relieve traffic and is a very welcome new fixture to the airport itself.

Eventually, passengers will arrive at LAX by mass transit instead of automobile. This will make the neighborhood around LAX more liveable. We would like to see the transit lines go directly into the airport itself and we hope that that's going to be added to the plan.

The environmental footprint of LAX will greatly be reduced by the new heating and air-conditioning and electrical systems that's being installed and we're glad to see that both from environmental aspects and for saving on electricity and water.

Thank you.

Response:

The commentor's support for a CONRAC (i.e., Alternatives 3, 4, 8, and 9) is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Chapter 2 of this Final EIR regarding the LAWA Staff-Recommended Alternative, which couples the airfield and terminal improvements associated with

Alternative 1 with the ground access components associated with Alternative 9. Please see Topical Response TR-SPAS-T-1 regarding transit options into LAX.

As indicated in Section 4.12.1 of the Draft EIR, on-airport traffic impacts related to curbsides and to departures and arrivals level roadways would be less than significant for Alternatives 1, 2, 4, 8, and 9. All of these alternatives would, however, result in a significant and unavoidable impact related to the volume to capacity level at one intersection within the CTA. Alternatives 1, 2, 8, and 9 would also result in significant and unavoidable construction-related impacts to the on-airport transportation system. No on-airport traffic impacts would occur under Alternative 3 because, under that scenario, the CTA would be closed to private vehicles. Alternatives 5, 6, and 7 focus on airfield and terminal improvements that, in themselves, would not affect on-airport traffic, but would be coupled with the ground transportation improvements proposed under Alternatives 1, 2, 8, or 9, the impacts of which are summarized above.

Relative to off-airport traffic impacts, as addressed in Section 4.12.2 of the Draft EIR, the majority of the 200 intersections evaluated within the SPAS off-airport transportation study area would not be significantly impacted under Alternatives 1, 2, 3, 4, 8, and 9; however, significant impacts to some off-airport intersections and/or Congestion Management Plan (CMP) facilities would occur under each of these alternatives. The total number of significantly-impacted intersections and/or CMP facilities would vary slightly among those alternatives. Alternatives 5, 6, and 7 focus on airfield and terminal improvements that, in themselves, would not affect off-airport traffic, but would be coupled with the ground transportation improvements proposed under Alternatives 1, 2, 8, or 9, the impacts of which are summarized above.

As indicated in Section 4.2 of the SPAS Draft EIR, even after mitigation, construction activities would result in significant and unavoidable air quality impacts under all of the alternatives. Specifically, under all of the alternatives except for Alternative 4, construction emissions of carbon monoxide (CO), volatile organic compounds (VOC), oxides of nitrogen (NOx), particulate matter with an equivalent aerodynamic diameter of 10 micrometers (PM10), and particulate matter with an equivalent aerodynamic diameter of 2.5 micrometers (PM2.5) would be significant and unavoidable. Under Alternative 4, significant and unavoidable construction emissions would occur for NOx and PM10. Under all of the alternatives, even after mitigation, construction-related concentrations of nitrogen dioxide (NO2) and PM10 would be significant and unavoidable.

Operation of the airport would also result in significant and unavoidable impacts to air quality. Even after mitigation, operational emissions of sulfur dioxide (SO2), PM10, and PM2.5 would be significant and unavoidable under all of the alternatives. Operational concentrations of NO2, PM10, and PM2.5 would also be significant and unavoidable under all of the alternatives.

SPAS-PH200010 Mitchell, Michael Mickey's Disneyland & Orange County Bus Co. 8/28/2012

SPAS-PH200010-1

Comment:

Hello. I'm Michael Mitchell. I own Mickey's Spaceship Shuttle. We're a small scheduled service company in LAX.

I represent like eight small companies, and we are very -- we go 35 miles before our first stop out of LAX. The FlyAway has come in and it's lost 40 million dollars. It's a complete failure except for the Valley, and they spent 6 million to make about $100,000 since 2006 to come downtown, but this is owned really by an overseas company and that 60 million that actually went to the company and people paying that could have gone to local people here that are minorities, Super Shuttle and Prime Time and taxis and stuff. The FlyAway's a completely ridiculous thing to have done in the first place, but everybody says it's losing 40 million and all this stuff but they can't stop it because it's all agreed to, which is -- Mr. Lawson says why we shouldn't keep doing something that's failing and that we have to keep doing this is ridiculous.

But anyway, with the Plan, I'm for Plan Number 4. Clifton Moore designed that airport exceptional. He worked in the sewer all the way up to where he drained the Richter and that's the best design you've got is Number 4. And even -- see, those big companies from overseas, they've constantly tried to kick the little companies out that are local so that they don't have any competition and this intermodal facility outside is really part of that. So if you do put the FlyAway and the Super Shuttle outside, let the small scheduled companies stay in the CTA and go around because we go 35 miles out, but the intermodal thing is a completely ridiculous design in the first place and it's in order to monopolize it for the overseas Fortune 500 company that's come in here -- that calls itself Coach USA -- which is actually going to Bay State Worth, Limited (phonetic) overseas to Ireland, and it's hidden from you all.

Thank you very much.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PH200011 Bashem, Greg Teamsters 986 8/28/2012

SPAS-PH200011-1

Comment:

And you did pronounce that correct. Thank you.

My name is Greg Bashem. I'm with Teamsters Local 986 and our Local represents several hundred workers directly in LAX or at least around the LAX area doing business with LAX. We represent airline pilots. We represent the jet mechanics. We represent the customer service reps. We represent jet refuelers. We represent the shuttle drivers that take customers in and out of the airport, out to the remote parking lots and hotels and stuff. We also represent the people that bring in the food for the flights, so -- and I'm sure I'm forgetting some others. But we also represent construction workers, ready-mix drivers, people that would benefit by this modernization of the airport.

The airline pilots are flying bigger and bigger jets and so those runways need to be expanded. I'm not saying to, you know, encroach on housing and stuff like that. I'm sure it can be done within the boundaries of LAX right now. But they do need to make those runways bigger to support those larger jets. That's a safety concern.

The rental area would help in the congestion that's surrounding LAX by having people go to several different places to drop off cars.

So you want to modernize LAX. That builds jobs. Those jobs will improve the economy in Los Angeles, and I'd like to see the Olympics here in 2024. So please do whatever you can to start green-lighting these yellow-lighted projects.

Thank you.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PH200012 Kelly, Michael The Los Angeles Coalition for the Economy of Jobs 8/28/2012

SPAS-PH200012-1

Comment:

Good evening. Michael Kelly. I'm the Executive Director for the L.A. Coalition for the Economy and Jobs.

We're strongly committed to working with regional policy makers to produce economic and income growth for this region and we're particularly focused on our cities' chief economic assets such as LAX, the ports, and our transportation network because they are most closely linked to economic growth in today's 21st century economy.

We're strongly supportive of L.A.'s current proposals to maintain and modernize LAX because, first and foremost, they're going to create a better environment with the airport's tens of thousands employees. They can work more safely and efficiently in meeting demands of a rising consumer demand to travel and trade grids and services around the world.

You know, secondly and more specifically, a realignment of the North Airfield, the building of the consolidated rental car facility and an automated people mover are all economically justified projects that are going to create tens of thousands of jobs. They're going to support new trade and tourism opportunities, improve the air quality in surrounding communities and throughout the region.

Most importantly, these projects are going to create a safer airport that's going to connect all of us to our family and friends around the world.

As we all know, the majority of the time, LAX is the very first impression of L.A. that California travelers see and experience.

Since roughly three-fourths of the world's purchasing power and almost 95 percent of the world's consumers are outside of the United States, L.A. should be our region's global business card that truly symbolizes our standing as a leading economic opportunity in the 21st century.

Thank you.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PH200013 O'Callaghan, Elsa None Provided 8/28/2012

SPAS-PH200013-1

Comment:

Hi, everyone. My name is Elsa and I love L.A. except that our airport is super depressing. I'm really excited to be here tonight to talk about modernization but specifically to support Alternatives 2 and 9.

An independent study from NASA has shown that no increased separation of the runways in the North Airfield is needed for safety and also maintains that there is no compelling case on safety grounds alone

for reconfiguring the airfield. The North Airfield should instead be adjusted, combining Alternative 2 and Alternative 9.

Appendix F2 of the Specific Plan Amendment Study shows that Alternative 2 will reduce delays more than any other alternative. The same appendix displays Alternative 2 creating the highest operational efficiency. The Draft Environmental Impact Study additionally concludes that Alternative 2 would have the lowest environmental impact. These two alternatives will further provide long-term, sustainable and diverse job growth, which is super important, to the residents of the city. Other alternatives do not provide the same investment in long-term jobs.

So, listen, we're all really excited to make these changes to LAX to make it more functional for Los Angeles residents and our visitors. We should really make this change that we are proud of that serves the community the best, creates jobs, and is super awesome.Alternative 2 and Alternative 9 are the best ways to make this happen.

Thank you.

Response:

The commentor's support for Alternatives 2 and 9 is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Chapter 2 of this Final EIR regarding the LAWA Staff-Recommended Alternative, which couples the airfield and terminal improvements associated with Alternative 1 with the ground access components associated with Alternative 9, including a discussion of the rationale behind the selection of these alternatives over the other alternatives evaluated in the SPAS Draft EIR.

Please see Response to Comment SPAS-PC00149-2 regarding the conclusions of NASS relative to north airfield safety. Please see Response to Comment SPAS-PC00089-1 regarding efficiency associated with Alternative 2 compared to other airfield alternatives, including a discussion of delay associated with the alternatives. Please see Response to Comment SPAS-PC00089-1 for an explanation of why Alternative 2 coupled with the ground access components of Alternative 9 would not have the lowest environmental impact.

In addition, please see Response to Comment SPAS-PC00130-730 regarding the treatment of economic impacts in an EIR, including job creation. The comment that the other alternatives do not provide the same investment in long-term jobs is unsupported by facts or evidence. In fact, all of the alternatives would provide an investment in long-term jobs, although fewer jobs would be associated with Alternative 4 than with the other alternatives.

SPAS-PH200014 Hosmer, Liz None Provided 8/28/2012

SPAS-PH200014-1

Comment:

Hi. My name is Liz and I'm a resident of Los Angeles.

This community wants a modernized, revitalized LAX that it can be proud of. Alternative 2 combined with Alternative 9 meets the SPAS goals by combining airfield, terminal, and transportation improvements.

Alternative 2 is a superior alternative in regard to operational efficiency and it also has the least environmental impact.

An independent study conducted by NASA has shown that no increased separation of the runways in the North Airfield is needed for safety.

Jobs are very important and LAX is a huge engine of economic growth in the Los Angeles region. It is important that the alternatives show and support long-term, sustainable and diverse job growth.

Honestly, an alternative that is too focused on airfield improvements alone will only create short-term, construction-focused jobs, not what we need to support in long-range planning. Please consider Alternative 2 combined with Alternative 9.

Thank you.

Response:

The commentor's support for Alternatives 2 and 9 is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Chapter 2 of this Final EIR regarding the LAWA Staff-Recommended Alternative, which couples the airfield and terminal improvements associated with Alternative 1 with the ground access components associated with Alternative 9, including a discussion of the rationale behind the selection of these alternatives over the other alternatives evaluated in the SPAS Draft EIR.

Regarding enhancements to the safety and efficiency of the airfield under each alternative, please see Table 4.7.2-16 on page 4-570 in Section 4.7.2 of the SPAS Draft EIR. As indicated in that table, the SPAS alternatives achieve substantial enhancements to safety and efficiency; the degree to which safety and efficiency is enhanced varies between the alternatives. Please also see Response to Comment SPAS-PC00089-1 regarding efficiency associated with Alternative 2 compared to other airfield alternatives. Please see Response to Comment SPAS-PC00089-1 for an explanation of why Alternative 2 coupled with the ground access components of Alternative 9 would not have the lowest environmental impact.

Please see Response to Comment SPAS-PC00149-2 regarding the conclusions of NASS relative to north airfield safety. In addition, please see Response to Comment SPAS-PC00130-730 regarding the treatment of economic conditions in an EIR, including job creation. It should be noted that none of the SPAS alternatives includes airfield improvements alone. Please see Response to Comment SPAS-AL00007-6 regarding the fact that alternatives that only include airfield and terminal components (i.e., Alternatives 5 through 7) would only address all of the problems that the Yellow Light Projects were designed to address in conjunction with another alternative or portion thereof. Please see Response to Comment SPAS-PC00130-725 regarding the economic benefits of terminal improvements versus runway improvements.

SPAS-PH200015 Evans, Kathryn Neighborhood Council of Westchester Playa 8/28/2012

SPAS-PH200015-1

Comment:

Hello. My name is Kathryn Evans. I'm a resident of Westchester and I'm a local leader also of the Neighborhood Council of Westchester/Playa, and a member of the Airport Relations Committee.

I am very excited about the possibility of modernization and improvement at LAX. After considering the possible options for improvements, I'm excited to support a combination of Alternative 2 and Alternative 9 for the following reasons: The combination of Alternative 2 and Alternative 9 fulfills SPAS goals to have airfield, terminal, and transportation improvements.

The analysis in the DEIR and supporting documents show Alternative 2 to be superior to all others in airport operational efficiency. Appendix F2 of the LAX SPAS report shows that Alternative 2 reduces delays by 1.7 hours each day compared to the next most efficient alternative.

Analysis in the DEIR also shows Alternative 2 to be the superior alternative when air quality and environmental impacts are considered. Only Alternative 4 gets minimal improvements with lower conceptual emissions than Alternative 2, and Alternative 2 would have lower aircraft emissions than Alternatives 1, 3, 4, 5, 6 and 7.

In addition, Alternative 2 has less than half the amortized total greenhouse gas emissions than any other alternative that includes airfield improvements.

An independent evaluation by NASA has shown that no increased separation of the runways is needed to allow for safe operation of all aircraft at LAX.

The review panel said that it does not see a compelling reason on safety grounds alone for reconfiguring the North Airfield and that because the baseline will only pose a risk that is so low, they said reducing the risk further is of limited practical importance.

Jobs are very important and LAX is a huge engine of economic growth in the Los Angeles region and it is important that the alternatives chosen support long-term, sustainable and diverse job growth. Alternatives 2 and 9 do this.

As the first line of welcome to travelers of Los Angeles, I want to see a modern, state-of-the-art LAX connected to a leading transportation system so that we can reclaim the title of the nation's number one origination/destination and third-busiest airport in the country. Selecting Alternative 2 and Alternative 9 will be a solid investment in the Los Angeles regional economy and result in an airport that we can all be proud of.

Response:

The commentor's support for Alternatives 2 and 9 is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Chapter 2 of this Final EIR regarding the LAWA Staff-Recommended Alternative, which couples the airfield and terminal improvements associated with Alternative 1 with the ground access components associated with Alternative 9, including a discussion of the rationale behind the selection of these alternatives over the other alternatives evaluated in the SPAS Draft EIR.

Please see Response to Comment SPAS-PC00130-725 regarding the economic benefits of terminal improvements versus runway improvements.

Regarding enhancements to the efficiency of the airfield under each alternative, please see Table 4.7.2-16 on page 4-570 in Section 4.7.2 of the SPAS Draft EIR. As indicated in that table, the SPAS alternatives achieve substantial enhancements to safety and efficiency; the degree to which safety and efficiency is enhanced varies between the alternatives. Please also see Response to Comment SPAS-PC00089-1 regarding efficiency associated with Alternative 2 compared to other airfield alternatives, including a discussion of delay associated with the alternatives.

Please see Response to Comment SPAS-PC00089-1 for an explanation of why Alternative 2 coupled with the ground access components of Alternative 9 is not the environmentally superior alternative. Regarding the comment that Alternative 2 would have lower aircraft-related emissions than Alternatives 1, 2, 3, 5, 6, and 7, please see Response to Comment SPAS-PH200016-1. The comment that Alternative 2 would have less than half the total amortized greenhouse gas than any other alternative that includes airfield improvements is not entirely accurate. While the comment is correct to a certain extent, the analysis of total amortized greenhouse gas reflects only a small portion of the total greenhouse gas emissions associated with the alternatives, since amortized greenhouse gas applies to construction-related GHG emissions only, which are only approximately 1 percent of the total incremental GHG emissions associated with Alternative 2. As indicated in Table 4.6-6 of the SPAS Draft EIR, while Alternative 2 would have less than half the amortized greenhouse gas emissions (GHG) associated with construction, total incremental GHG emissions associated with Alternative 2, which include both operational and construction emissions, would only be approximately 4 percent lower than the total GHG emissions of Alternative 1 (i.e., 465,374 MTCO2e/year versus 485,002 MTCO2e/year). Moreover, when coupled with Alternative 9, the construction-related GHG emissions associated with Alternative 2 would be greater than the emissions associated with Alternative 2 alone. Please see Response to Comment SPAS-PC00149-2 regarding the conclusions of NASS relative to the safety enhancements associated with reconfiguration of the north airfield. Please see Topical Response TR-SPAS-T-1 regarding transit options into LAX.

SPAS-PH200016 Evans, Scott None Provided 8/28/2012

SPAS-PH200016-1

Comment:

Good evening. My name is Scott Evans and I am a member of the Westchester LAX community.

In my line of work, I travel through LAX at least once a month. I've seen what works at the best airports around the world and, frankly, LAX is an embarrassment. I wholeheartedly support LAWA's efforts to improve the airport and passenger experience.

As a taxpayer and a frequent customer of the airport, however, I believe improvements should be efficient and effective use of funds. Alternatives 2 and 9 in the SPAS report will provide the greatest benefit per dollar spent. According to LAWA's own studies, moving the North Runway is an unnecessary expense.

A NASA study Commissioned by LAWA found that the North Airfield is, quote, "extremely safe in its current configuration." Alternative 2's taxiway improvements will make it even safer. LAWA recently released the Environmental Impact Report, which reaches similar conclusions. They found Alternative 2 will have lower aircraft emissions than all other airfield-including alternatives and lower construction emissions than all but Alternative 4, which does simply nothing.

Alternative 2 would even lower aircraft emissions from today's levels, something that no other alternative does. The SPAS report, likewise, shows that Alternative 2, without moving the runways, is the most operational and efficient option, reducing delays more than any other alternative.

We've heard a lot about jobs this evening. Let's be clear. All of these alternatives will create jobs. The question we must ask is, "Which will provide good and sustainable jobs and not just temporary work?" Alternatives 2 and 9 create both short-term and long-term jobs that will better benefit the community and regional economy.

Everybody agrees that LAX needs to be fixed. Doing so will cost billions of dollars and that money needs to be spent wisely. Alternatives 2 and 9 are the most operationally efficient and environmentally friendly. They improve safety, they improve the passenger experience, and they create good, sustainable jobs. They are the most effective use of funds and will provide the greatest benefit to the airport, the customer, the community, and the economy.

Thank you.

Response:

The commentor's support for Alternatives 2 and 9 is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Chapter 2 of this Final EIR regarding the LAWA Staff-Recommended Alternative, which couples the airfield and terminal improvements associated with Alternative 1 with the ground access components associated with Alternative 9, including a discussion of the rationale behind the selection of these alternatives over the other alternatives evaluated in the SPAS Draft EIR.

The comment that Alternative 2 would have "lower aircraft emissions than all other airfield-including alternatives" is incorrect. As indicated in Table 4.2-13 of the SPAS Draft EIR, although Alternative 2 would have the lowest aircraft-related emissions under good weather conditions among the alternatives with airfield improvements (i.e., Alternatives 1 through 7), emissions associated with this alternative would be higher than Alternatives 1, 5, 6, and 7 for all pollutants under poor weather conditions, with the exception of PM10 and PM2.5, where the emissions associated with Alternative 2 would be the equivalent to Alternative 7, but would be higher than Alternatives 1, 5, and 6. The comment that Alternative 2 would lower aircraft emissions from today's levels is also incorrect. As indicated in Table 4.2-13 of the SPAS Draft EIR, aircraft-related emissions associated with all of the alternatives would be

higher when compared to baseline (2009) conditions. Total emissions of CO, VOC, NOx, associated with all of the alternatives, not just Alternative 2, would be lower compared to baseline (2009) conditions. As explained on page 4-121 of the SPAS Draft EIR, this is primarily due to reductions in emission from on-road motor vehicles, and reflects the fact that emission standards for motor vehicles will be more stringent in 2025 as compared to baseline conditions, thereby reducing daily emissions from these sources.

Please see Response to Comment SPAS-PC00149-2 regarding the conclusions of NASS relative to the safety enhancements associated with reconfiguration of the north airfield. Regarding enhancements to the safety of the airfield under each alternative, please see Table 4.7.2-16 on pages 4-569 and 4-570 in Section 4.7.2 of the SPAS Draft EIR. As indicated in that table, the SPAS alternatives achieve substantial enhancements to safety and efficiency; the degree to which safety and efficiency is enhanced varies between the alternatives. Please also see Response to Comment SPAS-PC00089-1 regarding efficiency associated with Alternative 2 compared to other airfield alternatives, including a discussion of delay associated with the alternatives. Please see Response to Comment SPAS-PC00089-1 for an explanation of why Alternative 2 coupled with the ground access components of Alternative 9 is not the environmentally superior alternative.

Please see Response to Comment SPAS-PC00130-730 regarding the treatment of economic impacts in an EIR. As noted in that response, CEQA does not require an analysis of cost or project funding. (State CEQA Guidelines Section 15131; Pub. Resources Code Section 21068.) Nevertheless, it should be noted that the combination of Alternatives 2 and 9 is not the lowest cost design option (see Table 8-2 in Chapter 8 of the Preliminary LAX SPAS Report).

SPAS-PH200017 Amano, Robert Hotel Association of Los Angeles 8/28/2012

SPAS-PH200017-1

Comment:

Robert Amano, Executive Director for Hotel Association of Los Angeles, representing the lodging industry here in the Greater Los Angeles region.

How do hotels tie into this formula? The statistics are staggering or sometimes hard to define at least, but what is easily obvious and easy to understand is that our primary facilities at LAX serves as a gateway to the world.

Tourism is a global industry. Not only does the airport provide accommodations to our national and domestic travelers, but we are the doormat, welcome mat for millions of tourists and visitors from around the globe annually, not to mention the tons of air, freight, and cargo which passes through our terminals.

Our hotels remain competitive and rely heavily on major meetings and conventions to fill our rooms; hence, the competitive infrastructure required for that is the Convention Center. LAX is no exception to the avid competition, which currently airport facilities locally, nationally, and globally are remodeling or remodernizing. Other airports are being constantly upgraded, enhanced facilities off of rebranded strategies and state-of-the-art technology and trend-setting services to attract not only the airline services, but to provide the ambient hospitality experience to the travelers.

It's been almost, I would say, three decades until the recent TBIT changes of modernization. So within that time, you know, LAX has never seen a meaningful upgrade. It's about time. The time is now. Otherwise, we're going to miss the flight into sustaining the City's visibility and vitality as an attractive building and tourism destination.

Thank you.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required

because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PH200018 Gat, Jonathan None Provided 8/28/2012

SPAS-PH200018-1

Comment:

Good evening. My name is Jonathan Gatt [sic]. I live in West L.A. and I'm here tonight representing no one other than myself. I use the airport every month and one in every four or five trips is an international trip, but I usually come in through the Bradley building. I think obviously there's consensus here tonight -- I think there's a consensus with anyone who's ever used the airport even once that it is time to do something and just about anything from the user perspective would be welcome.

Looking at some of these alternatives, I'm not going to try and say that I'm an expert on these sort of things, but I have seen consolidated rental facilities pop up at airports around the country and around the world. Again, as someone who rents cars at airports, that seems to work pretty well and the hodgepodge of facilities that we have near LAX is not particularly functional. I would welcome more mass transit links to the airport, although I doubt that many of my fellow Angelinos actually know what a bus is.

Now, just in closing, let me just say this: I picked up my mother, who came here from New York last week, at the airport and as we were turning onto Sepulveda heading towards where I live in West L.A., my mother looks over at me and says just out of the blue, "You know, Jon, Kennedy isn't so bad these days." Now, if that's not a wake-up calls, ladies and gentlemen, I don't know what is.

Thank you.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PH200019 Gonzalez, Ruben Los Angeles Area Chamber of Commerce 8/28/2012

SPAS-PH200019-1

Comment:

Thank you very much. My name is Ruben Gonzalez. I'm with the L.A. Area Chamber of Commerce. I am going to read into the record a letter on behalf of The Boeing Company.

"Boeing's Commercial Airplane Division manufactures the 747-800, the largest commercial aircraft built in the United States and the longest passenger aircraft in the world. The 747-800 has a wingspan of 224 feet, 7 inches, and is 250 feet, 2 inches, in length. This aircraft requires a Group VI airfield.

"Currently, Boeing customers have begun flying 747-800s into Los Angeles International Airport, which is not a Group VI airfield, nor is it even a Group V airfield in all weather conditions. Operating a 747-800 today at LAX requires special airfield operational accommodations. LAX will continue to see more and more 747-800s, as Boeing has had a robust sale of these aircraft worldwide; and as a major international hub, we anticipate a number of these aircraft transiting through LAX.

"We recently reviewed a report which stated that the Los Angeles International Airport generated 37.9 billion dollars in direct economic impact to the Southern California economy. This underlines the importance of commercial aviation from international trade to passenger spending. Given this background, we have a significant interest in the current Specific Plan Amendment Study process under way at LAX and specifically the reconfiguration of the North Airfield.

"Boeing urges Los Angeles Airport and City officials to select the necessary alternatives under SPAS to make LAX a Group V and Group VI airfield in all weather conditions. We understand that to do this requires moving the northern runway closer to existing businesses and residents. We trust that the City will work to find a balance with these interests while ensuring that LAX doesn't lose its position as a major international airport able to accommodate the world's newest aircraft.

"Sincerely, Shaunta Hyde, Director, Global Aviation Policy, Boeing Commercial Airplanes."

Thank you.

Response:

The commentor presented the letter that was later submitted as comment SPAS-PC00092-1; please refer to Response to Comment SPAS-PC00092-1.

SPAS-PH200020 Lambros, Richard Southern California Leadership Council 8/28/2012

SPAS-PH200020-1

Comment:

Thank you. Good evening. Richard Lambres [sic]. I'm the Managing Director of the Southern California Leadership Council. It's a pleasure to be here tonight.

Our organization includes membership -- our membership includes three former California governors, Governors Davis, Deukmejian, and Wilson, and our organization is a nonpartisan, nonprofit partnership focused on the long-term issues of Southern California, specifically issues that affect our economic development, job creation, and quality of life. And we have the pleasure often that other organizations don't, to be able to look at the long term and when you look at the long term for our region, it's essential that we have a modernized LAX. It's critical.

In fact, there is no business -- it would be hard to find a business in our region that is not benefited by a highly-effective, well-functioning Los Angeles International Airport.

The economic impacts have already been stated well by both the labor and business community. I would just add a couple thoughts. One is competitiveness. We sometimes think in Southern California that certain industries are sort of insulated from competitiveness. We thought that about film and television and now we find production moving throughout the world.

We're currently challenged in the same way with our ports. You know, we've had a new challenge because of the expansion of the Panama Canal and now we're seeing the same thing with air travel and goods movement and what is going on with our international airport. So it's critically important that we never lose sight of competitiveness, and that's where the long-term vision comes in. You've embarked on a long-term planning process. To your credit, you've done it well. You've taken your time. We support your process and we encourage you to move rapidly to completion of the process and move forward with the modernization that LAX needs. We know it will be critically important for the long-term benefit of our region, so thank you.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required

because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PH200021 Rodine, Robert L The Polaris Group 8/28/2012

SPAS-PH200021-1

Comment:

I'm Robert Rodine. My firm is The Polaris Group. I'm speaking on behalf of myself and the Valley Industry and Commerce Association tonight.

In an April 2012 survey performed by Travel and Leisure Magazine, LAX ranked one above the anchor in the survey for La Guardia Airport. In this ranking of 22 airports, LAX was ranked at the bottom of the list for impression of safety standards, 21st in terms of security and check-in and cleanliness, and was generally characterized as worn out, having outdated infrastructure, and being overcrowded and subject to delays. We need to step up and make LAX modernization our mantra, not just in appearance, but in functionality as well.

In the words of Commissioner Torres-Gil, we can't forget that we are not just serving the community and stakeholders around the airport. LAX is serving 20-million-plus residents in Southern California as well as uncounted millions that depend on us internationally and this airport is critical as an economic engine.

The June 18, 2012 SPAS report to the DOAC [sic] enumerated seven integrated and stand-alone airfield alternatives. Alternative Number 5 was noted as being the one that does the most in meeting all planning objectives to the greatest extent. Alternative 5 -- it is my request that Alternative 5 be designated as the preferred alternative in the Final EIR.

Thank you.

Response:

The content of this comment is similar to comment SPAS-PC00026-1; please refer to Response to Comment SPAS-PC00026-1.

SPAS-PH200022 Schneider, Denny ARSAC 8/28/2012

SPAS-PH200022-1

Comment:

I'm Denny Schneider speaking to you as president of ARSAC and we've been working to have the airport fixed for years. LAX is unfriendly on several levels: getting to it, getting through it, getting out of it, and navigating the terminals in between. This Master Plan is a failure in fully solving those issues. It does help and we need to get moving, many years ago and now.

Now, I support and we support Alternative 2 for three reasons: It's the lowest cost, it results in the most efficient aircraft ground movement, and it is labeled the environmentally superior. And I can go on into all the other issues, including the fact that you need to make sure that the train goes into the airport, that you have mass transit in general to support this and avoid gridlock; but most of all, we need the most bang for our buck and there is never going to be enough money to do everything and you need to set your priorities.

The priorities must be as shown in Number 2, that you're going to fix the taxiways, that you're going to fix the terminals, and economic studies show that 80 percent -- I'm sorry -- 8 times better jobs and improvements by doing those land-side projects.

Now, there's no reason why some of those couldn't have been started many years ago and I just want to urge you to get going and do it already.

Response:

The content of this comment is similar to comment SPAS-PH300012-1; please refer to Response to Comment SPAS- PH300012-1. Please see Topical Response TR-SPAS-T-1 regarding transit options to LAX. Regarding the comment that taxiway and terminal projects should have been started many years ago, the Crossfield Taxiway Project was completed in 2010 and the Bradley West Project, which includes major terminal improvements, is underway. Other terminal improvements have been completed or are underway throughout the airport, including substantial interior improvements to Terminal 6, which were completed in spring 2012, terminal improvements to Terminal 5, which are underway, and improvements to Terminals 7 and 8, which are anticipated to be completed in 2015. These, and other completed, ongoing, or planned taxiway and terminal-related projects are identified in Section 5.3 of the SPAS Draft EIR.

SPAS-PH200022-2

Comment:

I'm not going to harp on the issues of what it does to the local communities, because it really is a regional issue and if you do the wrong choices, it's going to affect everybody and that's why I'm so strongly telling you that we've dodged a bullet before. With the earthquakes a couple weeks ago, they were small ones. If it's a big one, we're in trouble. So, please, get on with it.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project.

Please refer to Topical Response TR-SPAS-REG-1 regarding the fact that LAWA, through the LAX Master Plan, the SPAS process, and other efforts, supports the regionalization of air travel demand in Southern California. As indicated therein, the LAX Specific Plan amendment proposed as part of SPAS further supports such regionalization. As also noted therein, there are six major airports, not just LAX, serving the region.

Regarding earthquake risks at LAX, the 2010 Revised NOP and Initial Study for the SPAS Draft EIR explained why these risks for the SPAS alternatives are less than significant.

SPAS-PH200023 Herbst, David Mercury Air Group 8/28/2012

SPAS-PH200023-1

Comment:

Good evening. My name is David Herbst. I'm Chief Corporate Officer of Mercury Air Group and the past chairman of the Board of Westchester LAX Chamber of Commerce, which is now the LAX Coastal Chamber.

I have been a Westchester/Playa del Rey resident since 1987. Mercury has continually operated at LAX since 1955. My company will not profit from any decision that follows the SPAS.

I'm here today to speak in support of SPAS and specifically to ensure that the North Airfield is finally configured in such a way as to accommodate the next generation of longer and wider aircraft. It's hard to believe that LAX doesn't operate as a fully functional, approved Group V airport under FAA guidelines

when there are Group VI aircraft landing there today. LAX modernization needs to include its North Airfield.

My family and I live in Westchester. We bought our home. We remodeled it there, knowing we're next to one of the nation's largest airports. If the North Airway [sic] is moved 350 feet, it stays within the existing fence line. LAX is not talking about moving a runway to Manchester Boulevard, and moving a runway within LAX's footprint to me is not expansion. It's part of modernization.

I have worked hard to make Westchester a great place to live. I don't want to see LAX stomp out our community and I can support SPAS including moving the runway because I know it will not have the devastating effects some claim; and by making a decision, we can finally move on with our lives and allow LAX to have an airport that works for the next 50 years.

Thank you.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PH200024 McOsker, Tim Central City Association 8/28/2012

SPAS-PH200024-1

Comment:

Good evening. Tim McOsker, Mayer Brown law firm. I am an attorney here at downtown. I have no clients or financial interest or business related to this topic. I'm actually here as the past chair of the Central City Association and one of the members of the Coalition, one of the charter members of the Coalition urging you to move forward with modernization of the airport.

I also have had a small role over the years in City government, in that I had the pleasure of serving Mayor Hahn; and before serving Mayor Hahn, I had the pleasure of being in the City Attorney's office being an attorney to Mayor Riordan, and another story here is that the great Mayor Riordan worked very hard on this issue. My boss and friend, Mayor Hahn, worked very hard on this issue, and I really commend you and everyone working with Gina Marie Lindsey and with Mayor Villaraigosa to bring this modernization to a reality. It's really, really very important.

Not only from my CCA perspective is this important for economic development and for jobs and to bring our airport and our region forward and to remain, you know, on the cutting edge and on the rim of this -- of the Pacific; but this is also very, very important environmentally. I mean, you are going to be creating, you know, safety with separation of the airport. We're going to be creating opportunities to deal with traffic and congestion and I really commend everyone involved in this effort on behalf of CCA.

I thank you and I urge you to move forward.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PH200025	Eggers, Craig	Neighborhood Council of Westchester Playa	8/28/2012

SPAS-PH200025-1

Comment:

Thank you. My name is Craig Eggers. I'm a 30-year resident of Playa del Rey. I serve on the Neighborhood Council of Westchester/Playa and I chair our Airport Relations Committee. I'm speaking here today to support both Alternatives 2 and 9. These alternatives will bring billions of dollars in investment to LAX and the surrounding areas of the City of Los Angeles.

Alts 2 and 9 combined are the most affordable, cost-effective design option that ensures the capacity needs of the airport are ready to serve both the economy and tourism well in the future. Alts 2 and 9 will provide substantial permanent benefit, long-term jobs by modernizing the passenger facilities and transport systems.

Alts 2 and 9 do allow for safe airfield operations at LAX and Alt 2 is superior when it comes to the operational efficiency of the airport, and that's per your EIR, as well as demonstrated as the environmentally superior alternative EIR as well. Alt 9 reduces central terminal traffic and creates a consolidated rental car facility on property that's already owned by LAWA.

Our Neighborhood Council is hosting a community town hall meeting on September 27th at 7:00 p.m. It will be held in the auditorium at Westchester Enriched Science Magnet School, a.k.a. Westchester High School, and our moderator will be Richard Katz.

So today I want to personally invite Gina Marie Lindsey and her LAWA team to join us -- that's all of you guys. I'm also extending an invitation to our electeds, including Councilman Rosendahl; Congresswomen Waters and Hahn, Senators Feinstein and Boxer; Supervisors Knabe and Ridley-Thomas; Representatives Lieu and Bradford, and any other concerned elected that might be interested. And we don't want to forget that we are also inviting our Mayoral candidates for their input as well.

We are the first line of welcome through Bradley to Los Angeles and we want to see a modern, state-of-the-art LAX connected to reenriched transport system so we can reclaim the title as nation's number one origination/destination airport, one that as neighbors we can be proud of.

Thank you.

Response:

The commentor's support for Alternatives 2 and 9 is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Chapter 2 of this Final EIR regarding the LAWA Staff-Recommended Alternative, which couples the airfield and terminal improvements associated with Alternative 1 with the ground access components associated with Alternative 9, including a discussion of the rationale behind the selection of these alternatives over the other alternatives evaluated in the SPAS Draft EIR.

Please see Response to Comment SPAS-PC00130-730 regarding the treatment of economic impacts in an EIR. As noted in that response, CEQA does not require an analysis of project costs. (State CEQA Guidelines Section 15131; Pub. Resources Code Section 21068.) Nevertheless, it should be noted that the combination of Alternatives 2 and 9 is not the lowest cost design option (see Table 8-2 in Chapter 8 of the Preliminary LAX SPAS Report). Regarding enhancements to the safety and efficiency of the airfield under each alternative, please see Table 4.7.2-16 on pages 4-569 and 4-570 in Section 4.7.2 of the SPAS Draft EIR. As indicated in that table, the SPAS alternatives achieve substantial enhancements to safety and efficiency; the degree to which safety and efficiency is enhanced varies between the alternatives. Please also see Response to Comment SPAS-PC00089-1 regarding efficiency associated with Alternative 2 compared to other airfield alternatives.

Please see Response to Comment SPAS-PC00089-1 for an explanation of why Alternative 2 coupled with the ground access components of Alternative 9 is not the environmentally superior alternative. It is noted that a town hall meeting held by the Neighborhood Council of Westchester/Playa (NCWP) to discuss the SPAS Draft EIR was held at the Westchester Enriched Sciences Magnets School on Thursday, September 27, 2012. In addition to presentations provided by representatives of community groups, at the invitation of the NCWP, LAWA staff were present at this town hall meeting and gave a presentation providing an overview of the SPAS project and associated Draft EIR. Please see Topical Response TR-SPAS-T-1 regarding transit options into LAX.

SPAS-PH200026 Jackson, Stephen None Provided 8/28/2012

SPAS-PH200026-1

Comment:

Thank you.

Good evening. I'm Stephen Jackson. I'm a citizen of over 30 years of Los Angeles. I continue to play docent to the continuing stream of visitors of family and friends who keep visiting me.

My comments are basically transit related. Direct, dependable transportation to and from LAX is imperative for this city and it's long overdue. I love Los Angeles. We're a world-class city with a very busy airport that's working toward being first class itself.

Cars have long been the dominant mode of transportation and we all know who how minor incident on the 405, the 105, or any connecting freeway can ruin the best-laid plans. Even on off hours it's not safe. I once landed at 12:30 a.m., figured a straight shot on the 405 would get me home, but no. There was an incident and I didn't get home until the middle of the morning.

The existing transit options for getting to and from LAX are much improved over what they were in years past. The FlyAway buses are excellent, but they are susceptible to the vagaries of our famous L.A. traffic. The Green Line avoids traffic, but it only goes near the airport and the subsequent shuttle vans have to navigate the same upper- and lower-level terminal congestion as everyone else.

As well, unless one lives near a Green Line station, connection from other transit routes is required, making a rail trip from popular destinations such as Hollywood a multiple-transfer and time-consuming affair. I doubt that any of this is news to anyone in this room, nor is the fact that in most of the world-class cities, there exist very efficient and reliable transit from downtown to the airports. New York, Boston, Washington National, Chicago come to mind. Even smaller cities such as St. Louis, Philadelphia, and Baltimore have direct rail access to their airports.

I'm going to cut to the chase because I'm running out of time. All the options for transit improvements are valid, but whichever one is chosen must have direct, dedicated rights-of-way into the airport or they're going to be stuck in traffic like everyone else.

Thank you.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Topical Response TR-SPAS-T-1 regarding transit options into LAX.

As noted by the commentor, all transit options presented in the SPAS Draft EIR alternatives, with the exception of Alternative 4, provide a direct, dedicated right-of-way into the airport via either an elevated busway or an Automated People Mover (APM) system to allow transit customers to avoid surface street congestion when accessing or departing the airport.

SPAS-PH200027 Kanter, Karen None Provided 8/28/2012

SPAS-PH200027-1

Comment:

Good evening. My name is Karen Kanter and I'm a long-time resident of Playa del Rey. I'm imploring LAWA to improve LAX by using Alternative 2.

What I think that we heard here tonight is that there is many, many areas of agreement of what needs to be done at LAX and the surrounding communities completely agree that, as Denny says, it needs to be modernized.

What we are adamantly opposed to, those of us who live in the Westchester/Playa del Rey area, is moving the northern runway closer to our business and our residential community. It has been shown over and over and over and over again that there is no compelling safety issue to demand the movement of the northern runway.

By insisting that it be proven that there is no safety issue, we have been called NIMBYs, those of us who live in the community. Moving the northern runway will disrupt the Westchester business community, threaten six neighboring schools, pose a threat to the health and the mental well-being of the surrounding communities, as well as subject an already beleaguered community with additional congestion and traffic, all of this to accommodate less than two percent of flights envisioned for years from now. For pointing this out, people keep calling us NIMBYs.

If anyone wonders why the middle class is being hollowed out in the City of Los Angeles, this is a prime example. To insist that the northern runway be moved closer to business and residential communities is an attack on a middle class neighborhood by an unholy alliance. We are being told over and over again that our neighborhood interests in our health, our safety, and our quality of life doesn't matter and is a testament to our selfish and unsophisticated interests.

Unlike those who are seeking to move the runway north, none of us who are here to oppose the movement of the north runway have a financial interest in doing so. Are community concerns of less value because we are middle class neighbors instead of hired guns? It has often been said that your rights end at my nose. There is simply no compelling reason to further degrade my community when there are other acceptable alternatives like Alternative 2.

Response:

The commentor's support for Alternative 2 is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Chapter 2 of this Final EIR regarding the LAWA Staff-Recommended Alternative, which couples the airfield and terminal improvements associated with Alternative 1 with the ground access components associated with Alternative 9, including a discussion of the rationale behind the selection of these alternatives over the other alternatives evaluated in the SPAS Draft EIR. Please see Response to Comment SPAS-PC00149-2 regarding safety related to the north airfield. As noted in Response to Comment SPAS-PC00130-931, no acquisition is proposed within the Westchester Business District.

Related to health concerns, as indicated in Section 4.7.1 of the SPAS Draft EIR, incremental cancer risks and incremental chronic non-cancer health hazards within the study area under all the alternatives would be less than significant for all receptor types (i.e., child resident, school child, adult resident, adult worker). Additionally, under all the alternatives, health effects to on-airport workers would be less than significant. Incremental acute non-cancer health hazards at small areas at or near the LAX fence-line under all the alternatives would be slightly above the threshold of significance and are considered to be significant and unavoidable for all analyzed receptor types (i.e., residents, recreational users, school child, off-site adult workers). The primary toxic air contaminant of concern contributing to this impact is associated with emissions of acrolein from aircraft operations, which would occur in 2025 even in the absence of SPAS. It should be noted that, with the exception of Alternative 3, acute non-cancer health

hazard impacts in 2025 would be lower under the SPAS alternatives than if no airfield improvements were implemented. Moreover, these significant impacts would occur at or near the fence-line; it is expected that actual impacts in the community would be less than significant.

Relative to off-airport traffic impacts, as addressed in Section 4.12.2 of the SPAS Draft EIR, the majority of the 200 intersections evaluated within the SPAS off-airport transportation study area would not be significantly impacted under Alternatives 1, 2, 3, 4, 8, and 9; however, significant impacts to some off-airport intersections and/or Congestion Management Plan (CMP) facilities would occur under each of these alternatives. The total number of significantly-impacted intersections and/or CMP facilities would vary slightly among those alternatives. Alternatives 5, 6, and 7 focus on airfield and terminal improvements that, in themselves, would not affect off-airport traffic, but would be coupled with the ground transportation improvements proposed under Alternatives 1, 2, 8, or 9, the impacts of which are summarized above.

SPAS-PH200028 Hamilton, Jacqueline — Tuskegee Airmen, Inc. — 8/28/2012

SPAS-PH200028-1

Comment:

I'm Jacqueline Hamilton of the Tuskegee Airmen organization and other organizations. I actually moved to the Manchester Square area of LAX during 2001 and lived there until 2006. At that time, I was working for a company called Unicom Systems, Incorporated and moved to the area -- actually, relocated to the area -- because we were also doing a time share with a company called Axiom. And working for Unicom Systems, Incorporated, I worked as a manager, software engineer, and also a consultant working on merger and acquisitions projects.

During this time, there was a mural painted at LAX with each of the Tuskegee Airmen, which included my father and his military group, and this was painted by Stan Stokes, commissioned by the City of Los Angeles Cultural Affairs Department. I state this because I know there were revenues generated in regards to that mural.

The problem was that several of us who lived in the Manchester Square area were severely victimized by crime, which included illegal stalking, harassment, theft, mail fraud, identity theft, criminal identity theft, and other crimes.

During this time, I was in contact with an officer by the name of Thomas Wigs (phonetic). I hear he is retired from LAPD, so I am seeking other officers who handled some of the crimes that we were victimized by in living in the Manchester Square area.

As the other woman spoke, there were people living in cars, trying to reside in empty vacant apartment buildings that are now demolished, and we need to know the status of all of that. I also speak because I was also falsely accused of having a bomb in one of my bags in the downtown area in October of 2007. These are ongoing crimes that a lot of us are being victimized by in living in the Manchester Square area.

I think the airport should be redesigned. We should go ahead with the project, especially in the Manchester Square area, because a lot of us were victimized and we don't know why.

Thank you.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the

adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PH200029 Ouellet, Jim None Provided 8/28/2012

SPAS-PH200029-1

Comment:

Good evening. My name is Jim Ouellet. I'm a resident of Playa del Rey. I want to encourage L.A. World Airports and the City to pursue Alternative 2, which would leave the northernmost runway in place but improve the exits from the runway.

At an estimated cost of 205 million for airfield improvements, Alternative 2 is the most cost-effective means of improving the efficiency of airfield operations. Pursuing Alternative 2 allows L.A. World Airports to focus money where it will get the most bang for the buck on improving the terminals and moving passengers quickly and comfortably on to their destinations.

I've been trying to do a little math to figure out how many years it will take before improvements and efficiency from the various runway alternatives will pay off the cost of the improvements. However, in the 30 summer days since the proposal was released, I've been unable to find any place in the 6,000-page EIR where L.A. World Airports estimates how much money can be saved each year by improvements in efficiency under the various alternative proposals.

LAWA's rough estimate of the cost of moving the northernmost runway further north runs from 517 million to 717 million. Add in a few hundred million for rerouting and tunneling Lincoln Boulevard and you could be looking at a tab of a billion dollars.

The 2010 North Airfield Safety Study by NASA and a team of university professors estimated that LAX might save 15 million per year in improved operational efficiency by moving the northernmost runway further north. Recouping 700 million to 1 billion at the rate of 15 million per year means that moving the runway could take 50 to 65 years just to break even. Folks, we don't even invest in our children with that kind of time line.

Response:

The commentor's support for Alternative 2 is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Chapter 2 of this Final EIR regarding the LAWA Staff-Recommended Alternative, which couples the airfield and terminal improvements associated with Alternative 1 with the ground access components associated with Alternative 9, including a discussion of the rationale behind the selection of these alternatives over the other alternatives evaluated in the SPAS Draft EIR.

Please see Response to Comment SPAS-PC00130-730 regarding the treatment of economic impacts in an EIR. As noted in that response, CEQA does not require an analysis of cost or project funding. (State CEQA Guidelines Section 15131; Pub. Resources Code Section 21068.)

SPAS-PH300001 Stevens, Mike Councilman (Inglewood) 8/29/2012

SPAS-PH300001-1

Comment:

Thank you very much.

Hello, ladies and gentlemen. My name is Mike Stevens. Many of you probably do not remember me, maybe you do, but back about 1993, we fought together when we fought LAX expansion. We were able

to push back, then Mayor, Richard Riordan. People in this room, Westchester residents teamed up with El Segundo and Inglewood. And together, we combined, and we were able to stop that plan.

I'm only here tonight to say that I understand Labor's position, but I also continue to be very sympathetic to the resident's position, which is that even if you are a worker, you have to come home sometime. You have to come home, and you have to have a certain quality of life.

I would suggest, as we learned back in the day, the reason why they measure traffic by mean annual passengers, it all has to do with transportation. If you stop the transportation projects, you stop the project itself, because they must mitigate traffic. They must mitigate traffic.

They measure it not in number of flights, they measure according to passengers. So that gets into vehicle trips. So this is something for you to remember. So when we start talking that, then what are we really talking about? Well, you have a light rail line that's being proposed to come across into the airfield and various alternatives.

And I've only glanced at this. I haven't studied it as I have in the past, but I am going to once again. But what I must tell is this, if you stop -- if you stop the transportation project, you will stop this project. You have the interchange. You have the Sepulveda Boulevard Project. All these projects, but they come through a different entity, MTA, SCAG.

When we stopped Riordan, we had to go to all these different meetings. You have to become more involved.

Now, Alternative 4, of course, is the no alternative. And that's where basically they do slight extension on the runway. It was just pointed to me just a moment ago by one of LAX's staff people.

All I want to say to you is this, in closing, you can -- we together, the people together, if you -- if you approach this from the direct dynamic, you can stop it. And the dynamic is, in fact transportation.

You have Madison Square Garden, they now have a light rail line traveling down Prairie in Inglewood with the Green Line. You stopped that portion of the transportation project.

With that I'm going to conclude, and I like to see friendly faces here. And thank you very much.

Yes, I know, sir. I must say this. The great thing about it is that now I'm an elected official. I used to be just like you. And I sat there, and there would be no one to come forward. And I just want you to know that my office is here to support you in whatever you need.

Thank you very much.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PH300002 Rothenberg, Alan LA Chamber 8/29/2012

SPAS-PH300002-1

Comment:

I'm Alan Rothenberg, President of the LAWAC from 2005 to 2010, and incoming chair of the LA Chamber.

Modernizing LAX and separating the north airfield runways 350 feet to the north is essential for safety, operational efficiency, and competitive reasons.

You heard much last night about the NASA Ames Study, but what you didn't hear was that that study concluded that safety could be enhanced 40 to 55 percent by separating the runways.

Those academics gratuitously stated that in their opinion since LAX was already safe, based on their statistical probability study, it would not be cost effective to separate the runways.

Today is the 7th anniversary of Katrina.

Today is the 7th anniversary of Katrina. Years before that disaster, the Army Corps or Engineers recommended improving the levees. That recommendation was rejected because it would take a 100-year flood to overrun the levees, and therefore would not be cost effective. We know what happened.

I sure would not want to be a member of the Board of Airport Commissioner or on the City Council rejecting a chance to enhance safety of LAX by 40 to 55 percent, later having blood on the hands when a subsequent crash takes the lives of hundreds, maybe thousands of people.

By the way, upon receiving the NASA Ames Report, the FAA gave a scathing rebuttal of it, and was so incensed they sent a letter to Mayor Villarigosa [sic] admonishing LA -- LAWA to quote, "Reconfigure the north airfield to address safety risks and to improve efficiency."

Response:

The content of this comment is similar to comment SPAS-PC00034-1; please refer to Response to Comment SPAS- PC00034-1.

SPAS-PH300002-2

Comment:

Also, we heard last night that Alternative 5 would not be cost effective. I know you know, but I want to remind you LAX is financially self-sufficient. It doesn't take a penny from the taxpayers. It operates entirely on fees paid by airlines, passengers, concessionaires, and other non-airline revenues.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)). Please see Response to Comment SPAS-PC00096-2 regarding funding sources for SPAS improvements.

SPAS-PH300002-3

Comment:

While the Draft EIR contains many options, there's only one that totally maximizes safety, efficiency, and competitiveness. Alternative 5 separates the runways 350 feet. Doing nothing dooms LAX to be less safe, antiquated, inefficient, and uncompetitive for yet another generation.

And make no mistake, Alternative 2 means, do nothing. In face of the unanimous comments that LAX must be modernized, doing nothing is simply unacceptable.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the

adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PH300002-4

Comment:

One last item to clarify from last night. Alternative 5 does not move the boundaries of LAX an inch. No home or business will be taken. And initial assessments by the FAA indicate that the RPZ will not require taking any homes or businesses with the possible exception an HVAC unit on the top of one office building.

Thank you.

Response:

The content of this comment is essentially the same as comment SPAS-PC00034-4; please refer to Response to Comment SPAS-PC00034-4.

SPAS-PH300003 Herbst, David None Provided 8/29/2012

SPAS-PH300003-1

Comment:

Yes, sir. Good evening. I'm here to read a statement on behalf of Former Mayor, Richard Riordan, who apologizes that he could not be here this evening.

Mayor Riordan writes, "I love LA, and I'm proud what our teamwork accomplished during my two terms in office."

"One item I was not able to complete was the modernization of Los Angeles International Airport. Today, I am pleased to see the positive progress being made on the new Tom Bradley International Terminal, adding new gates for the latest large aircraft as well as other improvements that will enhance the positive experience for visitors to Los Angeles, but this is not enough."

"The Los Angeles City Council approved the LAX Master Plan in 2004. Now, 8 years later, the approval process is just getting under way after a long delay of critically needed additional improvements to LAX."

"During my Administration, I proposed a Master Plan that would take the Airport to 2015, and the clock continues to tick for much needed LAX modernization."

"We still have yet to address moving the north airfield to accommodate today's modern aircraft, properly connecting LAX to our City's mass transit, and further enhancing overall airport safety and security."

"We've planned long enough. The time for action at LAX is now. As the LAX Specific Plan Amendment study process winds its way through public hearings and action by our Airport Commission and City Council, I call on our leaders to make the tough decisions necessary to ensure that LAX becomes a world class airport through the 21st Century."

"Thank you, Mayor Richard Riordan."

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the

adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PH300004 Stacey, Pam None Provided 8/29/2012

SPAS-PH300004-1

Comment:

Thank you. Good evening. My name is Pam Stacey, and I've lived in the Blind Hill area for the past 27 years. I'm here tonight to advocate for the adoption of Alternative 2 combined with the transportation features of Alternative 9.

I oppose and will move to obstruct adoption of any other plans, most especially any plan to move the north runways. Concerning the expansion, people often ask us, "What did you expect when you moved near the airport?" We all did our homework. We expected an improvement in technology and proper management and governance.

For the most part, as evidenced by how many of us have been here for so long, the Airport has been a decent neighbor. Only Alternative 2 allows that to continue.

Everybody in our neighborhood wants to see LAX revitalized and improved. We, too, use the Airport and know its ranking, but want it to be 21st century standards, which include green technology, the promotion of clean air, and minimal vehicle traffic.

Other plans are turning LA into a lumbering, oversized dinosaur. The people of Southern California and travelers to LAX deserve better. Most important to me, only Alternative 2 states that there will be minimal or no increase in pollution.

Making the -- moving the runway north will spew more toxins over more homes, that are even now compromised. It doesn't improve safety or air traffic to move the runway north. It does harm people. In only 2 blocks where I live, there are six cases of cancer, in only 2 blocks.

I know the complications, legitimate ones, to proving cause and effect of cancer clusters, but you all know, including our elected officials, Council Members and LAWA power brokers, that increased noise and pollution put people at greater harm and risk of cancerous toxins.

There comes a time when common sense has to rule while the science weighs in. That time is now, and that decision has to be Alternative 2.

Thank you.

Response:

The content of this comment is similar to comment SPAS-PC00172-1; please refer to Response to Comment SPAS-PC00172-1.

SPAS-PH300005 Andrade, Ricardo Laborers Local 300 8/29/2012

SPAS-PH300005-1

Comment:

Good evening. My name is Ricardo Andrade. I'm a Field Representative for Labor's Local 300. And I'm here on behalf of our Business Manager, Cesar Pascal. Our 450 members live in the immediate area of the Airport. And our 9,000 member utilize this airport or work at the Airport.

We stand firm on modernization of this airport. It's not expansion, it's modernization, and we support it.

Thank you.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PH300006 Billy, Dan IUOE Local #12 8/29/2012

SPAS-PH300006-1

Comment:

Good evening, ladies and gentlemen. My name is Dan Billy. I'm with the Operating Engineer Local 12, but I'm here on behalf of our Business Manager, William C. Wagner.

We represent 20,000 members of men and women, and operate heavy equipment. We're inspectors and also surveyors. And I'm here -- we've been in support of the LAX expansion from the beginning. And we're going to continue to support the modernization of this airport.

Thank you.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PH300007 Miller, Ron LA/OC Building Trades Council 8/29/2012

SPAS-PH300007-1

Comment:

Good evening. I'm Ron Miller, Representative of Los Angeles/Orange County Building Construction Trades Council. We represent 140,000 crafts men and women, many thousands that live around the Airport in the surrounding area.

We are here today so support the specific plan. LAX as it exists today is dysfunctional, antiquated, and unfriendly to the neighbors who surround it.

Our goal is to make the neighborhoods around LAX more livable, not less, and to give Los Angeles a truly world class airport that serves local, national and international passengers.

This specific plan gives us the ability to do both. LAX modernization is an efficiency program that will cut congestion and pollution, and will make the Airport safer. The central location for all car rentals will relieve traffic and is a long overdue improvement.

Eventually many passengers will arrive at LAX by mass transit instead of the automobile. And we'd like to see light rail go into LAX. These are improvements that will help the neighbors of LAX while serving passengers.

We all have a stake in reducing environmental impact of LAX. Our members are currently on the job at the Airport doing work that greatly reduces pollution. We are installing new systems for electricity, for heating and cooling.

We'd like to continue our work in making LAX more efficient and a good neighbor. We support the specific plan and urge you to move ahead.

Thank you.

Response:

The commentor's support for a CONRAC (i.e., Alternatives 3, 4, 8, and 9) is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Chapter 2 of this Final EIR regarding the LAWA Staff-Recommended Alternative, which couples the airfield and terminal improvements associated with Alternative 1 with the ground access components associated with Alternative 9. Please see Topical Response TR-SPAS-T-1 regarding transit options into LAX.

As indicated in Section 4.12.1 of the Draft EIR, on-airport traffic impacts related to curbsides and to departures and arrivals level roadways would be less than significant for Alternatives 1, 2, 4, 8, and 9. All of these alternatives would, however, result in a significant and unavoidable impact related to the volume to capacity level at one intersection within the CTA. Alternatives 1, 2, 8, and 9 would also result in significant and unavoidable construction-related impacts to the on-airport transportation system. No on-airport traffic impacts would occur under Alternative 3 because, under that scenario, the CTA would be closed to private vehicles. Alternatives 5, 6, and 7 focus on airfield and terminal improvements that, in themselves, would not affect on-airport traffic, but would be coupled with the ground transportation improvements proposed under Alternatives 1, 2, 8, or 9, the impacts of which are summarized above.

Relative to off-airport traffic impacts, as addressed in Section 4.12.2 of the Draft EIR, the majority of the 200 intersections evaluated within the SPAS off-airport transportation study area would not be significantly impacted under Alternatives 1, 2, 3, 4, 8, and 9; however, significant impacts to some off-airport intersections and/or Congestion Management Plan (CMP) facilities would occur under each of these alternatives. The total number of significantly-impacted intersections and/or CMP facilities would vary slightly among those alternatives. Alternatives 5, 6, and 7 focus on airfield and terminal improvements that, in themselves, would not affect off-airport traffic, but would be coupled with the ground transportation improvements proposed under Alternatives 1, 2, 8, or 9, the impacts of which are summarized above.

As indicated in Section 4.2 of the SPAS Draft EIR, even after mitigation, construction activities would result in significant and unavoidable air quality impacts under all of the alternatives. Specifically, under all of the alternatives except for Alternative 4, construction emissions of carbon monoxide (CO), volatile organic compounds (VOC), oxides of nitrogen (NOx), particulate matter with an equivalent aerodynamic diameter of 10 micrometers (PM10), and particulate matter with an equivalent aerodynamic diameter of 2.5 micrometers (PM2.5) would be significant and unavoidable. Under Alternative 4, significant and unavoidable construction emissions would occur for NOx and PM10. Under all of the alternatives, even after mitigation, construction-related concentrations of nitrogen dioxide (NO2) and PM10 would be significant and unavoidable.

Operation of the airport would also result in significant and unavoidable impacts to air quality. Even after mitigation, operational emissions of sulfur dioxide (SO2), PM10, and PM2.5 would be significant and unavoidable under all of the alternatives. Operational concentrations of NO2, PM10, and PM2.5 would also be significant and unavoidable under all of the alternatives.

SPAS-PH300008 Rothenberg, Alan Contrarian Group, Inc. 8/29/2012

SPAS-PH300008-1

Comment:

Obviously, I'm not Peter Ueberroth. But Peter asked me to read the following.

I enthusiastically support the effort to continue the overall modernization of LAX. For the millions of visitors who come to Los Angeles each year, our airport offers the first, and often lasting, impression of our City now.

As a world class City, we should offer our visitors a world class, unforgettable experience. This was our goal in 1984 when Mayor Tom Bradley with the successful modernization effort at LAX. The Olympic Games in 1984 showcased Los Angeles to the rest of the world.

At LAX that meant the construction of a new, state-of-the-art international terminal, renovation of existing terminals, and construction of a roadway.

Simply put, the Olympic Games provided us a tremendous and rare opportunity to restore LAX as a show piece.

Nearly 30 years later, Los Angeles has once again embarked on a massive renovation of our landmark airport. And I solute Mayor Villarigosa [sic], and the Airport Commission, and the staff for embarking on a multi-billion dollar program.

While the projects are underway, especially the rebuilding of the Tom Bradley International Terminal, are greatly important to restoring the passenger experience, I know it is only the beginning in your efforts to fully modernize LAX.

It is our sincere hope to return the Olympic Games to Los Angeles for a third time. Preliminary plans are already underway for such an endeavor.

In the consideration most city's bid, decision makers will look at a city's airport and other infrastructure as one of the determining factors for consideration.

I encourage and urge you to continue your efforts to fully modernize LAX now, keeping the Olympic hopes alive. Once again, we're provided with a tremendous opportunity as what happened a generation ago when LAX accommodated those who came to experience the 1984 Olympics.

Like then, it will take the courage and perseverance of our elected officials and the Airport Commission to make this dream a reality. Now is that time again.

Best regards, Peter Ueberroth.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PH300009	**Morrison, Nancy-Gene W**	**None Provided**	**8/29/2012**

SPAS-PH300009-1

Comment:

I was here Saturday. And this past Monday, something occurred that has great concern to me. That's just 2 days ago. Monday afternoon, at approximately 1:35 p.m., I was driving south on Sepulveda Boulevard through the tunnel. And as I approached it, the sign said, "Danger. Fire in tunnel. Do not enter."

There was no warning that it was safe to enter. I called 911 on my cell phone using speaker. And after talking to 911, going to LAPD, LA Fire, LAX Fire, who had no idea that there was any sign saying, "Do not enter the tunnel," I got to LAX PD, who knew there was a malfunction with the sign, did not have anybody out there, any sign put up, any change. There is no place after Century Boulevard to turn to stop to do anything.

I am very concerned that you cannot communicate within the Airport at this point and are doing more. And if there were a fire in the tunnel, we need to have another way of doing things, which leads to needing more regionalization, and using Ontario and Palmdale, and having more of a regional system going on here.

Thank you.

Response:

The comment regarding a specific sign malfunction is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. This comment does not relate to the SPAS project and is beyond the scope of the SPAS EIR. No further response is required because that comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Please see Topical Response SPAS-TR-REG-1 regarding regionalization.

SPAS-PH300010	**Machado-Essex, Christina**	**None Provided**	**8/29/2012**

SPAS-PH300010-1

Comment:

My name is Christina Machado-Essex. I have been resident of Playa del Rey since 1995. And before that, I was brought up in Manhattan Beach. I lived there for 45 years, and I'm 65 years old.

And my family has been in this region of Southern California and Santa Barbara since the 1700s. And my ancestors and I have watched the Airport for a long time. And it has become a monster, and it should not be here.

It was also part of the original rancho of my family, our land grant. And there is plaque there designating that. But I'm embarrassed to say that the Airport has got to stop. We do not need the runway moved 350 feet. We just don't.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PH300010-2

Comment:

I do agree on Alternate 2 and 9, but not the moving of the runway.

Response:

The commentor's support for Alternatives 2 and 9 is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Chapter 2 of this Final EIR regarding the LAWA Staff-Recommended Alternative, which couples the airfield and terminal improvements associated with Alternative 1 with the ground access components associated with Alternative 9, including a discussion of the rationale behind the selection of these alternatives over the other alternatives evaluated in the SPAS Draft EIR.

SPAS-PH300010-3

Comment:

I live in Playa del Rey, and we have to have our house power washed. We have to wash off all the soot that is everywhere. And it's just not healthful in this area.

Response:

The content of this comment is similar to comment SPAS-PC00043-2; please refer to Response to Comment SPAS-PC00043-2.

SPAS-PH300010-4

Comment:

We will never have the marvelous airport that the Mayor, the Chamber of Commerce, and everyone here wants us to have unless we start devoting our resources to putting an airport where there is space for it.

The City should follow the lead of Denver and Dallas and also Sacramento, which put their airports way out in the country, but now have popular, efficient, and thriving airports that are well-used. We should do the same here.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Relocation of LAX is not a feasible alternative because it fails to meet the fundamental SPAS project objectives as described in Section 2.2 of the SPAS Draft EIR. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PH300011 Cope, Danna None Provided 8/29/2012

SPAS-PH300011-1

Comment:

I'm Danna Cope. I've lived in Westchester for many, many years. I'd like to speak, first, following up on what Ms. Morrison said, because it goes to the safety of the of north airfield. And this incident of having a warning sign -- warning sign malfunction is just one of the dangers of having the main LA basin airport in such a congested area.

Why wasn't someone, either Caltrans or LAWA, at the site with signs saying that the tunnel actually was safe. Why wasn't somebody covering the sign up, so that more people didn't get confused. Why wasn't the warning sign connection into the LAWA Fire Department? They would be the first responders if there's a fire. This is ridiculous.

Response:

The comment regarding a specific sign malfunction is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. This comment does not relate to the SPAS project and is beyond the scope of the SPAS EIR. No further response is required because that comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PH300011-2

Comment:

They need to develop other airports. And actually, it's one of the goals as listed in the Draft EIR. So where is the discussion and outline of plans for Ontario included in the Draft EIR. And where is the listing of the many, many jobs in the multitude of trades that would be created to benefit all of Southern California.

The time to develop an alternative airport is now. Why does LAWA want to wait many years from now when LAX reaches 75.

Response:

Please see Topical Response TR-SPAS-REG-1 regarding the role of LA/Ontario International Airport, Palmdale Regional Airport, and other airports in the region for meeting future air travel demands in Southern California.

The comment also raises employment issues. Employment is a purely economic impact not required to be analyzed under CEQA. (State CEQA Guidelines Section 15064(e).)

SPAS-PH300011-3

Comment:

LAWA needs to develop better, clearer communication with other agencies over a jurisdiction and corrective action that needs to be taken when a structure or roadway near or adjacent to LAX is malfunctioning.

Where are these safety plans in the Draft EIR? If LAWA does not receive an immediate response from another agency during an emergency, then LAWA should have an action plan that is launched. Where is this plan in the Draft EIR?

Response:

The SPAS Draft EIR addresses safety impacts of the SPAS project in Section 4.7.2 and addresses impacts to fire protection and law enforcement in Sections 4.11.1 and 4.11.2, respectively. The questions in the comment regarding the potential for malfunctions in the signage for the Sepulveda tunnel do not relate to the SPAS project and are beyond the scope of the SPAS EIR. Please see Response to Comment SPAS-PC00148-2 regarding emergency preparedness/response planning at LAX. No further response is required because that comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PH300011-4

Comment:

As to the alternatives, Alternative 2, plus the CONRAC and real train service to the whole central terminal area is the most economic, environmentally safe, and it is the most efficient.

Thank you.

Response:

The content of this comment is similar to comment SPAS-PC00128-5; please refer to Response to Comment SPAS-PC00128-5.

SPAS-PH300012 Schneider, Denny ARSAC 8/29/2012

SPAS-PH300012-1

Comment:

I'm Denny Schneider, President of ARSAC. I have spoken before, and I've continued to say, there are only four things that need to be fixed at LAX; getting to it, getting around it, getting between the terminals, and getting out of it.

Now, with that said, Alternative 2 is our preferred, because it's the least costly. It is the superior environmental, and it also the most efficient on the airfield.

Now, some of my friends would like to see the airfield changed, and I would question whether it's a safety issue at this time. They can handle those planes adequately now. The safety study from NASA was from the top academic experts in the country, handpicked by LAWA. And that is not the issue that we are faced with right now.

The issue that we're faced with is we have an airport that's falling apart. And it needs to be fixed. Everybody agrees to that, that it needs to be done now, not yesterday.

So in order to get that done, we don't have an unlimited supply of money. Regardless of whether most of it comes from the Airport itself, through various sources of income, or whether it comes from the community, which it is impacting as a general rule, the fact is that we have to set our priorities.

And if you don't fix the Airport land side first, you're not going to have any money left to do that. And you're going to lose out on all the jobs. And you're going to be telling the people who come here that they don't matter. So you need to fix that first.

Thank you.

Response:

The commentor's support for Alternative 2 is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project.

Please see Chapter 2 of this Final EIR regarding the LAWA Staff-Recommended Alternative, which couples the airfield and terminal improvements associated with Alternative 1 with the ground access components associated with Alternative 9, including a discussion of the rationale behind the selection of these alternatives over the other alternatives evaluated in the SPAS Draft EIR. Please see Response to Comment SPAS-PC00089-1 regarding efficiency associated with Alternative 2 compared to other airfield alternatives.

Please see Response to Comment SPAS-PC00130-68 regarding conclusions of the NASS relative to north airfield safety. Please see Response to Comment SPAS-PC00130-725 regarding the economic benefits of terminal improvements versus runway improvements.

SPAS-PH300013 Ivy, George None Provided 8/29/2012

SPAS-PH300013-1

Comment:

My name is George Ivy, and looking around the room, I realize that I may be speaking as a relative new-comer to the LAX area. I've lived in Westchester for over 30 years. I've owned a home here for 30 years. I've raised two boys here, who are in their 20s now.

I've worked within 2 miles of my home here for the last 30 years. And I travel to and from LAX at least once a month, and have for the last 30 years, traveling about 2,000,000 miles. So I spend a lot of time in airports.

So given that, I understand the traffic and noise as a busy local resident, who spends a lot of time outdoors. I understand LAX access and facility improvements are necessary because I'm a very frequent user of those facilities.

And given that, and the various alternatives that have been proposed, I -- I want to support Alternative Number 2, with some additions from Alternative 9.

And I believe that combined they fulfill the SPAS goal of airfield, terminal, and transportation improvements for the benefits of the travelers and the residents.

Obviously, these alternatives will bring lots of investment, billions probably, to the LAX area and the City of Los Angeles. I think they are affordable and cost effective. I'm sure that they'll provide permanent, substantial, long-term jobs. And I think that's true of any of the alternatives.

They do -- I believe they do allow for safe airfield operations, in spite of some of the things I've heard. They certainly will help the Airport efficiency. I think they're environmentally the best.

And finally, I think the combined -- centralizing the rental car facilities will certainly help our traffic problems here.

Thank you.

Response:

The commentor's support for Alternatives 2 and 9 is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Chapter 2 of this Final EIR regarding the LAWA Staff-Recommended Alternative, which couples the airfield and terminal improvements associated with Alternative 1 with the ground access components associated with Alternative 9, including a discussion of the rationale behind the selection of these alternatives over the other alternatives evaluated in the SPAS Draft EIR.

Regarding enhancements to the safety and efficiency of the airfield under each alternative, please see Table 4.7.2-16 on pages 4-569 and 4-570 in Section 4.7.2 of the SPAS Draft EIR. As indicated in that table, the SPAS alternatives achieve substantial enhancements to safety and efficiency; the degree to

which safety and efficiency is enhanced varies between the alternatives. Please also see Response to Comment SPAS-PC00089-1 regarding efficiency associated with Alternative 2 compared to other airfield alternatives.

SPAS-PH300014 Papana, Titus Aviation Safeguards Org. 8/29/2012

SPAS-PH300014-1

Comment:

Good evening. My name is Titus Papana, and I work for Aviation Safeguards for 19 years now. I personally, and my employer does as well, support the modernization efforts at LAX, and the projects presented tonight.

Without the Airport, my quality of life would not be what it is today. Reinvesting in LAX is the best thing we could do for working families in the region.

I'm also here tonight because of the many false statements regarding Aviation Safeguards made by the SEIU at the public hearings. For the record, Aviation Safeguard is one of the best and safest employers at LAX, otherwise they would not have one of the lowest employee turnover, rates as 12 percent in the industry.

They also have 30 percent of employees that have been with them in excess of 10 years. SEIU makes false statements at your hearings and at LA City Council, and Airport Commission meetings because they can't get anyone to listen to them. Why? Also, because the SEIU is not a certified union at LAX or any airport in California.

They have no legal or labor law standing at LAX. So SEIU uses their extensive political influence to pressure companies at LAX to sign collective bargaining agreements instead of getting the vote of the workers to authorize this union -- this union.

Since the workers at Aviation Safeguard threw out SEIU, 93 percent of us have since received a pay increase, and health care of our choosing. Aviation Safeguard has spent 2 million more in wages each year for the employees, instead of forced to give that to the union.

All full-time employees level at LAX and Aviation Safeguards and other companies not represented by SEIU make a guaranteed living wage of $32,000 per year, otherwise only $18,000. Clearly, we have too much union at LAX.

Thank you.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PH300015 Fleming, Matthew None Provided 8/29/2012

SPAS-PH300015-1

Comment:

Hi. Good evening. My name is Matt Fleming. I'm a 22-year resident of Westchester and Playa del Rey. I actually graduated at Loyola Marymount, which brought me to the area originally.

I come at this meeting from a unique perspective. I'm a resident of 91st Street, which is the first street north of the Airport. I actually overlook the runways.

I have a view out of my kitchen of abandoned streets and light posts from the most recent expansion, where the promises at that time were, there's going to be green belts, it will be beautiful and all will be well.

Well, I don't have that. I have a view of concrete and abandoned streets, and now, being told a big commercial building behind my house. So I'm -- I'm a little dubious about hearing about promises with expansion.

Response:

Under the previously approved LAX Northside Plan, a 50-foot setback is required along 91st Street. The existing setback does not allow buildings, but will allow parking up to the property line. As part of the LAX Northside Plan Update currently underway, a number of community outreach meetings have been held with residents who live along West 91st Street and with the Westchester community at large. To respond to community concerns, LAWA is proposing, as part of the LAX Northside Plan Update, to increase the existing setback along West 91st Street from 50 feet to 100 feet and prohibit activity within the 100 foot area. Buildings and parking would not be allowed within the setback, creating an increased buffer zone between residences and future commercial development. The buffer zone would be landscaped with native plantings and would be secured with a fence to prevent access by the public. As part of the LAX Northside Plan Update, LAWA is also proposing to reduce building height limits to 45 feet, orient buildings along Westchester Parkway, and require surface parking lots to include robust landscaping plans and many shaded trees. Please also see Response to Comment SPAS-PC00108-2 regarding the LAX Northside Plan Update. Additional information regarding the LAX Northside Update, including a copy of the Notice of Preparation and Initial Study as well as a link to stay informed about the project, can be found at the following location: http://www.lawa.org/GDZ/projectDocuments.aspx.

No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PH300015-2

Comment:

Now, that being said, I also, for a living, I fly 800,000 miles a year. So I do understand the problems at LAX and what needs to be done. We need to have a consolidated rental car center. It's an embarrassment that when people come to this city, they have to be on shuttles, and go to Airport Boulevard to these awful rental car sites. We need that.

We need a rail into the Airport. We need to connect the terminals. It's embarrassing to be on a flight at LAX, and someone asks me for help when we land. And say, "Well, you dash and get your bags, and then walk three terminals around the horseshoe to go to your international flight." That's antiquated. That needs to be fixed.

Response:

The commentor's support for a CONRAC is noted, as is the commentor's support for rail into the terminals, and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Chapter 2 of this Final EIR regarding the LAWA Staff-Recommended Alternative, which couples the airfield and terminal improvements associated with Alternative 1 with the ground access components associated with Alternative 9, which includes a CONRAC. Please see Topical Response TR-SPAS-T-1 regarding transit, including the Airport Metro Connector Project, which is evaluating options for extending transit to the airport. LAX currently has a circulator system in the CTA. The system provides frequent, free shuttle service between terminals (approximately every 12 to 15 minutes, 24 hours a day), to assist passengers in getting from one terminal to another for airline connections.

SPAS-PH300015-3

Comment:

But anyone that says that moving the runways north is not expanding the blueprint of the Airport is a lie. You can't tell me that moving the runway that much closer to my kitchen is not going to be louder or more of an eyesore. It's just not a possibility.

So I ask for this. We need to have these jobs. We need to modernize the Airport. We need to do the projects that make sense, but don't move the runways north into Westchester and Playa del Rey, because that is -- that really is -- that's expansion of the Airport outside of its current boundaries. It is.

It will never ever withstand a court challenge. Let's do the projects we can do. Let's make everyone happy and get the thing done.

Thank you.

Response:

This comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project.

The SPAS Draft EIR addresses impacts associated with aircraft noise in Section 4.10.1. As indicated in that section, Alternatives 1 through 7 would result in some residential uses and non-residential noise-sensitive facilities being newly exposed to noise levels of 65 CNEL or higher or increases of 1.5 CNEL or higher within the 65 CNEL or higher noise contours. With implementation of LAX Master Plan mitigation measures, these impacts would be less than significant. However, interim impacts prior to the completion of mitigation, impacts on residential uses with outdoor habitable areas, and impacts on parks would remain significant and unavoidable. Alternatives 8 and 9 focus on ground access improvements that, in themselves, would not result in aircraft noise exposure but would be coupled with the airfield improvements proposed under Alternatives 1, 2, 5, 6, or 7, the impacts of which are summarized above. None of the alternatives would result in a significant impact relative to sleep awakenings.

Aesthetic impacts associated with the SPAS alternatives are addressed in Section 4.1 of the SPAS Draft EIR. As indicated in that section, LAX Master Plan Commitment DA-1, Provide and Maintain Airport Buffer Areas, and LAX Master Plan Commitment LU-4, Neighborhood Compatibility Program, would reduce impacts to aesthetic and visual resources along the northern boundary of the airport. In particular, LAX Master Plan Commitment DA-1 requires the provision and maintenance of landscaped buffer areas that will include setbacks, landscaping, screening, or other appropriate view-sensitive improvements with the goals of avoiding land use conflicts, shielding lighting, enhancing privacy, and screening views of airport facilities from adjacent residential areas. LAX Master Plan Commitment LU-4 addresses all issues relating to compatible land use, including landscape buffer issues as well as noise, light spill-over, odor, and vibration. In light of these applicable LAX Master Plan commitments, impacts on aesthetic and visual resources associated with the SPAS alternatives would be less than significant.

SPAS-PH300016 Carpio, Cecil None Provided 8/29/2012

SPAS-PH300016-1

Comment:

My name is Cecil Carpio, C-e-c-i-l, C-a-r-p-i-o. I'm from Inglewood, 90302. I've lived in the same location in my sacred home since 1973. We've talked about 1984 and the improvements that came to the Airport. Well, I've been around since '73, so I saw the improvements. And I also saw that nearly 30 years later, all of Inglewood is now impacted by LAX operations.

Once upon a time there was an Airport noise mitigation plan of the 1990s. And it was written in the program to protect the community surrounding LAX, especially Inglewood. Well, now that is a farcical and impotent document that does nothing to constrain the effects of LAX operations.

Response:

The commentor states that "all of Inglewood is now impacted by LAX operations." Existing conditions, while important to LAWA, are not impacts of the proposed SPAS project (see CEQA Guidelines Section 15125(a) and 15126.2(a)), and the comment does not address the SPAS Draft EIR or the SPAS project.

The commentor also suggests that impacts have accrued over the last 30 years. As discussed on page 4-796, footnote 570, of the SPAS Draft EIR, "the commercial aircraft fleet now operating in the United States is generally much quieter than the earlier aircraft fleets…the 65 CNEL contours for LAX under current and future conditions are generally smaller than the 65 CNEL [contours] for LAX from two decades ago."

The commentor also suggests that the airport noise mitigation measures are "farcical and impotent." Existing aircraft noise mitigation measures are discussed in Sections 4.9.3.3 and 4.9.5 of the SPAS Draft EIR, such as the Aircraft Noise Mitigation Program and the Voluntary Residential Acquisition/Relocation Program. As discussed in greater detail in Response to Comment SPAS-PC00034-18, LAWA has spent in excess of $1 billion for soundproofing or acquiring homes. To ensure that interior noise levels have been reduced to 45 CNEL or less after soundproofing (in conformance with Title 21), post-construction noise tests are conducted on a random sampling of homes to verify the efficacy of sound insulation. To date, all post-testing has confirmed that interior noise levels meet this requirement.

LAWA also implements a number of operational measures to reduce noise which are described starting on page 1-86 of the SPAS Draft EIR. As discussed therein, LAWA implements policies to (1) use preferred inboard runways for departures, (2) use Over-Ocean procedures, (3) conduct westward departures, (4) ban the use of SuperSonic Transport (SST), (5) restrict run-up activities, (6) reduce departure thrust on west flow operations, (7) discourage the use of reduced thrust departures during east flow operations, (8) use departure cutback procedures, and (9) use tug and tow procedures.

Please see Response to Comment SPAS-PH100025-1 regarding Inglewood's residential soundproofing program.

SPAS-PH300016-2

Comment:

Once upon a time there was big talk about having a regional solution to airport congestion. I'm still waiting for that thing to happen. I wonder how long that's going to take.

Considering all of the scare talk that we've had over the decades, ever since September 9th -- excuse me, September 11, it really seems that nothing has changed.

Let's talk about earthquakes. Let's talk about putting all of our eggs in one basket. There's a lot to be said about going regional. I'm still waiting. I'm hoping it happens.

Response:

Please refer to Topical Response TR-SPAS-REG-1 regarding the fact that LAWA, through the LAX Master Plan, the SPAS process, and other efforts, supports the regionalization of air travel demand in Southern California. As indicated therein, the potential LAX Specific Plan amendment to Section 7.H further supports such regionalization. As also noted therein, there are six major airports, not just LAX, serving the region.

SPAS-PH300016-3

Comment:

I have 30 seconds left, a lot more to say. But at this point, I'm disgusted with the process. I continue to be part of the process. And hallelujah, here we are. Let's keep on coming until we die.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PH300017 Mitchell, Michael Mickey's Space Ship Shuttle 8/29/2012

SPAS-PH300017-1

Comment:

Hi. I'm Michael Mitchell. I own a bus company here. And we go 35 miles out on our first stop down in -- and 75 miles down to the Marine Base. And I represent 8 other companies, smaller companies. And we schedule services and we go on the loop and pick up people and go long distances.

Now the 98th Street Intermodal Transportation Facility, we're completely against that, because if you have a Christmas weekend with a million-and-a-half people leaving, to take them to another place outside the Airport on a bus for them to load the transportation companies is completely ridiculous. It will not work. It's completely ridiculous.

Clifton Moore designed the Airport to be able to get in there in 45 seconds at a curb, goes to 8 terminals. If you have car bomb, and blow up at one terminal, it's not as bad as having this place you take everybody. It will blow up everybody in one spot, just on the sense of security.

But now, we'd like to see the contracts being given to local people for all these different things that the Airport does. But, you know, just -- to if you do have big money making you somehow put this in to pick up people, please let us stay in the central area and go around and pick up, because we're going 75 miles out, you know.

If you want to super shuttle and them back there, go ahead and do that. But, you know, it's ridiculous to spend all that money for the buses to load your bags on one bus and go out there and unload and get on another vehicle versus right now, people can hardly find where to go when it's outside the baggage area, right now, you know. You have to get on the phone and tell them, "It's right in front of you."

To force them to do that is like Texas, where you get on and you spend like an hour going around trying to find out where you're at, you know. So please leave it like Clifton did it. He did -- he was a genius.

Thank you.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

Notwithstanding the above, it is unclear whether the commentor understands that for those SPAS alternatives that propose the Intermodal Transportation Facility near 98th Street, specifically, Alternatives 1, 2, 8, and 9, the vehicles and passengers would still have direct access to and within the CTA and could also access the CTA from Manchester Square via the elevated busway proposed under Alternatives 1, 2, and 8, or via the APM under Alternative 9. Only under Alternative 3 would the CTA be closed to private vehicles; however, even under that alternative, passengers would have multiple facilities providing access to the CTA, including the Ground Transportation Center, the Intermodal Transportation Center, and the consolidated rental car facility. In short, none of the SPAS alternatives proposed a ground transportation system with "this place you take everybody" as suggested by the commentor.

SPAS-PH300018 Solorzano, Isidro Unite Here Local 11 8/29/2012

SPAS-PH300018-1

Comment:

Okay. My name is Isidro Solorzano. I live in the City of Paramount. I have worked for a year at the Airport at an in-flight catering company called Sky Chef. My coworkers and I make sure the flights leave on time with all the foods and liquor.

It's very important for me to have more good union jobs at the Airport. We need a modern airport that will provide jobs with a living wage. This will help the community and the many people I know that are out of work.

Thank you.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PH300019 Reeg, Kristin Unite Here Local 11 8/29/2012

SPAS-PH300019-1

Comment:

Hi. My name is Kristin Reeg, and I'm the Director for Airports and Food Service for Unite Here Local 11. And we have 20,000 members that all work in the tourism industry in different capacities, either in hotels or in the Airport, or at stadiums.

And so tourism in general is very, very important to our members. And we've, over -- over the years have really developed a good relationship with a number of businesses, concessionaires inside the Airport to really make sure that our members have a great standard of living.

And a lot of our members live right in Lennox, right in Hawthorne, right extremely close to the Airport. Some of them, I'll be talking to them in their house, and we stop for a minute and wait for the airplane to go over before we continue our conversations. It's just a part of everyone's lives.

And people really stay in these jobs for a long time, because they do provide a very good standard of living. There are often times the very first person that people see when get off their plane. They go straight to that favorite bartender of theirs. Or they go to the duty-free shop, you know, for a lot of foreign visitors.

We're working on a training program now, that, you know, now that the new west field, that the terminal has opened up -- that's going to be opening up in Tom Bradley. A training program so that our members have the new skills that they're going to need to succeed at the Airport, like, specialized kinds of cooking. We're not going to just have grill cooks anymore. We're going to have fine dining cooks inside the Airport, and a lot of fancy restaurants.

And we want to make sure that our members have those skills, have the language skills that they need, Japanese, whatever that is.

So, you know, we really do support having a modern airport that is going to provide many more good, quality jobs. We think just for our industry alone, including beverage and retail there will be at least 1,000 new jobs created. And so it's very important to us, and we support that.

Thank you.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PH300020 Saifi, Sean Central Coast Shuttle Services 8/29/2012

SPAS-PH300020-1

Comment:

Good evening, ladies and gentlemen. My name is Sean. I'm a representative of Central Coast Shuttle. We're a long distance transportation company that picks up underneath the green sign at LAX. It says buses and long distance trans.

We leave 6 times a day, 7 days a week. And first of all, we're here to commend the Committee for organizing such an event like this. You know, there's an old saying called NIMBY, not in my backyard.

So obviously, for everyone here, these new rules affect everyone in a different way. For us, I believe -- I think that modernization is definitely a correct way to go. I personally love LAX. I want to leave it the way it is.

I mean, I go to Dallas. I go to -- and a lot of other airports. JFK, I hate that train system, where you have to go to other terminals. I love how it's just a simple circle that connects the way it is.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PH300020-2

Comment:

If there was anything I would like to propose is maybe -- the car rental agency, I understand that. They do have the larger buses. They do cause a little bit more emission. I'm not too sure about that. I'm not a scientist or anything.

They do take up a lot of room. They can go to a parking lot. That could save up a lot of room. But as for long distance transportation companies, for them it's just, you know, travelers are coming from foreign places. For them it's really hard to communicate to them, where to stand. So another improvement could be better signage. That could also help improve -- address the message -- or addressing the modernization of LAX.

And I just want to thank you for your time.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PH300021 Marmol, Douglas Unite Here Local 11 8/29/2012

SPAS-PH300021-1

Comment:

Good evening. My name is Douglas Marmol. I work as cook at the Airport. I live in Hawthorne. I have worked at the Airport for 20 years.

Many of my coworkers have 30, 40 years working at the Airport as a bartender, server, cashier. We live in the neighborhoods near the Airport. Our good union jobs are very important to us. We support the modernization at LAX.

Thank you.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PH300022 Hanscom, Marcia Wetlands Defense Fund and Ballona Institute 8/29/2012

SPAS-PH300022-1

Comment:

Good evening. I'm Marcia Hanscom. I'm representing the Ballona Institute and Wetlands Defense Fund. And I guess this is really appropriate here at the Proud Bird, how wonderful that humans have learned to fly like the birds.

We all know, though, that there are public safety issues related to birds. And LAWA has spent a lot of money and effort to prevent bird strikes. And so I just want to point out that a short distance to the north is the Ballona Wetlands Ecological Preserve. Tens of thousands of birds winter there at Ballona each year.

So it makes no sense to me to move the runway north toward more birds. It seems to me that that needs to be studied. I didn't see anything in the Draft EIR about that. And we all know that that would have some devastating tragic consequences. So that seems to be important.

Response:

The potential for birdstrikes associated with the SPAS alternatives, including Alternatives 1, 5, and 6 which proposed a northward shift of Runway 6L/24R 260, 350, and 100 feet, respectively, is addressed in Section 4.7.2 of the SPAS Draft EIR. As indicated on page 4-484 of the SPAS Draft EIR, LAX uses anti-perching devices on structures such as signs, lights, fences, and building edges. In accordance with FAA Advisory Circular 150/5200-33B, Hazardous Wildlife Attractants on or Near Airports, the airfield is maintained to avoid the ponding of water, the growth of vegetation, and the development of other conditions that may serve as attractants to nuisance wildlife, including birds. As indicated on page 4-569 of the SPAS Draft EIR, under all of the alternatives, no new facilities would be constructed or operational conditions implemented that would serve as attractants to birds. In accordance with FAA requirements, the airfield would continue to be maintained to avoid the ponding of water, the growth of vegetation, and the development of other conditions that may serve as attractants to nuisance wildlife, including birds. Therefore, impacts under all of the alternatives with respect to birdstrikes would be less than significant.

It is acknowledged that the separation distance would be approximately one to two miles between Runway 6L/24R under Alternative 5 and the Ballona Wetlands Ecological Preserve, as measured from the southern and northern edges of the wetlands, respectively. In light of LAWA's ongoing measures to deter nuisance wildlife, including birds, in accordance with FAA requirements, the decrease of 350 feet between the Ballona Wetlands Ecological Preserve and the northernmost runway at LAX (Runway 6L/24R) would not result in an increase in the risk of birdstrikes and, therefore, impacts under all of the alternatives, including Alternatives 1, 5, and 6, with respect to birdstrikes would be less than significant.

SPAS-PH300022-2

Comment:

I also, you know, want to just point out that when LAX was built, there really were few homes around, not that much traffic. And I know when I lived in Huntington Beach, I would -- I never would come to LAX. I would go all the way to Ontario, which was much further from my home, but I just didn't want to get in the middle of all this congestion.

So it seems to me that now that we have so much more density here, that we really do need to start thinking about moving a larger -- if we're talking about expanding anything, it should be in another area, like Palmdale.

I mean, we have land there, and I just don't understand why the airlines and LAWA doesn't embrace that idea. It would mean way more jobs, just add them all up. And we still would have something livable here.

Response:

Please refer to Topical Response TR-SPAS-REG-1 regarding the fact that LAWA, through the LAX Master Plan, the SPAS process, and other efforts, supports the regionalization of air travel demand in Southern California. As indicated therein, the potential LAX Specific Plan amendment to Section 7.H further supports such regionalization. The topical response also discusses efforts to develop air service at Palmdale Regional Airport. Please also see Response to Comment SPAS-PC00096-24 regarding the suggestion to develop a major airport at an alternative location without the geographic constraints (i.e., surrounding densities) of those at LAX.

SPAS-PH300022-3

Comment:

So finally, I'd just like to say that in -- in conjunction with my comments, I would support Number 2.

Thank you.

Response:

The commentor's support for Alternative 2 is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Chapter 2 of this Final EIR regarding the LAWA Staff-Recommended Alternative, which couples the airfield and terminal improvements associated with Alternative 1 with the ground access components associated with Alternative 9, including a discussion of the rationale behind the selection of these alternatives over the other alternatives evaluated in the SPAS Draft EIR.

SPAS-PH300023 Peterson, Linda None Provided 8/29/2012

SPAS-PH300023-1

Comment:

My name is Linda Peterson, and I've been a resident of Playa del Rey for more than 15 years. First, let me say that I was dismayed by the fact that you're enumerated project objectives did not include the goal of regionalization of Southern California air traffic, which was at least a one time a goal of our current mayor of Los Angeles.

Only an aggressive regional approach to air transportation will mitigate the safety concerns, noise, congestion, and air pollution currently impacting all of us who live and are neighbors of LAX.

Only if the air traffic burden can be spread throughout the Southern California Region will we continue to see the jobs and economic benefits of a vibrant transportation system without unduly impacting any one portion of the Southern California community.

Response:

Please refer to Topical Response TR-SPAS-REG-1 regarding the fact that LAWA, through the LAX Master Plan, the SPAS process, and other efforts, supports the regionalization of air travel demand in Southern California. As indicated therein, the potential LAX Specific Plan amendment to Section 7.H further supports such regionalization.

SPAS-PH300023-2

Comment:

I really haven't had enough time to study all of the objectives, but at this -- all of the proposals, but at this time I -- I favor Alternative 2, combined with some aspects of either 8 or 9.

Certainly, the consolidated car rental facility makes sense, because it would remove traffic from the central terminal area.

Alternative 2 appears to be the best for modernization of LAX. I favor Alternative 2 because I'm convinced, not by Alan Rothenberg's scare tactics, but instead by the knowledgeable NASA experts, who studied the issue and determined that the disruption to local communities that would be caused by moving the runway north is completely unnecessary for either safety or operational efficiency.

The cost is also more reasonable in terms of the cost demolishing terminals or moving runways or putting Lincoln Boulevard below ground.

Response:

The commentor's support for Alternatives 2 and 9 is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Chapter 2 of this Final EIR regarding the LAWA Staff-Recommended Alternative, which couples the airfield and terminal improvements associated with Alternative 1 with the ground access components associated with Alternative 9, including a discussion of the rationale behind the selection of these alternatives over the other alternatives evaluated in the SPAS Draft EIR.

Please see Response to Comment SPAS-PC00149-2 regarding a summary of the project objectives associated with the north airfield improvements, as well as the conclusions of NASS relative to the safety enhancements associated with reconfiguration of the north airfield. Please also see Response to Comment SPAS-PC00089-1 regarding efficiency associated with Alternative 2 compared to other airfield alternatives. As noted in Responses to Comments SPAS-PC00130-931 and SPAS-PC00173-3, no residential acquisition is proposed under any of the SPAS alternatives, and no acquisition is proposed within the Westchester Business District. Please see Response to Comment SPAS-PC00130-730 regarding the treatment of economic impacts in an EIR. As noted in that response, CEQA does not require an analysis of cost or project funding. (State CEQA Guidelines Section 15131; Pub. Resources Code Section 21068.) Nevertheless, it should be noted that the combination of Alternatives 2 and 9 is not the lowest cost design option (see Table 8-2 in Chapter 8 of the Preliminary LAX SPAS Report).

SPAS-PH300023-3

Comment:

I want to tell the Chamber of Commerce and LAWA that all of us want a first class airport, but you're never going to have that in the current LAX location, given its geographic constraints. You're just going to keep applying band-aid solutions.

So bite the bullet and start building somewhere where there is room for a world class airport.

Thank you.

Response:

The content of this comment is similar to that of comment SPAS-PC00096-24; please refer to Response to Comment SPAS-PC00096-24.

SPAS-PH300024 Topal, Jack Westchester/Playa del Rey Neighborhood Council 8/29/2012

SPAS-PH300024-1

Comment:

Hi. I'm Jack Topal. I'm a member and director of the Westchester Playa del Rey Neighborhood Council. When I moved into our house 29 years ago, I knew I was near the Airport. We're half a block from Manchester and Foreman. And that was fine with me. Being near the Airport didn't bother me.

Now, it seems like the Airport is getting closer to me. In the middle of the night, I'll get up, and I'll turn off my cell phone, because I hear the stewardess say, "Turn off your cell phone." That's how close we're getting.

But seriously, I -- I really believe -- I don't want a north boundary expansion. And I move for Alternative 2 and 9. I don't want to have to get up one night and say, "Okay. I'll have a vegetarian meal when the stewardess announces that."

So let's have the Airport stay south, not north of the runway.

Thank you.

Response:

The commentor's support for Alternatives 2 and 9 is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Chapter 2 of this Final EIR regarding the LAWA Staff-Recommended Alternative, which couples the airfield and terminal improvements associated with Alternative 1 with the ground access components associated with Alternative 9, including a discussion of the rationale behind the selection of these alternatives over the other alternatives evaluated in the SPAS Draft EIR.

SPAS-PH300025 Klein, Ellen None Provided 8/29/2012

SPAS-PH300025-1

Comment:

Hi. I'm Ellen Klein. I live two -- I live two short blocks -- I live two short blocks north of LAX. I heard somebody say NIMBY. I don't look at it that way at all. I -- I run up and down Westchester Parkway. I look at the Airport. I watch the planes land. I use the Airport. I sometimes work at the Airport. I'm glad it's nearby when I have to fly.

And I want to be a good neighbor. And I want the Airport to be a good neighbor to me. I don't see -- I do believe in modernization. Modernization will give us jobs. Everybody is talking about jobs. There are plenty of jobs in modernization, but it doesn't need to be expanded. What's there needs to be fixed.

If we're going to expand, we need to expand regionally. That's -- they want -- they want -- the neighbors there want us there. They want airports, not like here. There is a geographical boundary here. And it just won't work to go north or in any other direction.

Response:

The commentor's support of airport modernization but opposition to airport expansion is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please refer to Topical Response TR-SPAS-REG-1 regarding the fact that LAWA, through the LAX Master Plan, the SPAS process, and other efforts, supports the regionalization of air travel demand in Southern California. As indicated therein, the potential LAX Specific Plan amendment to Section 7.H further supports such regionalization.

SPAS-PH300025-2

Comment:

I support Alternative 2. I would like to see less traffic in the central terminal. It's efficient. It's environmentally sound. It's cost effective. It has low impact on the neighborhood. And it will modernize the Airport, and make it the kind of airport it should be for tourists coming to LA, and not just a horrible experience for them.

Response:

The commentor's support for Alternative 2 is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Chapter 2 of this Final EIR regarding the LAWA Staff-Recommended Alternative, which couples the airfield and terminal improvements associated with Alternative 1 with the ground access components associated with Alternative 9, including a discussion of the rationale behind the selection of these alternatives over the other alternatives evaluated in the SPAS Draft EIR.

SPAS-PH300026 Ouellet, Jim None Provided 8/29/2012

SPAS-PH300026-1

Comment:

Good evening. My name is Jim Ouellet. I'm a resident of Playa del Rey. I want to encourage LAWA to pursue Alternative 2 and Alternative 9.

There's four reasons for that. The first is that Alternative 2 has the lowest runway north airfield construction cost.

Secondly, it results in the most airfield efficiency for LAX.

Third, it will result in the fewest delays in getting that work done.

And fourth, it will allow more money to be devoted to improving the experience and moving passengers through the terminals and onto their destinations.

The main reason for moving the runways north is to accommodate the L3080 made by Airbus. That plane is failing. It's falling far behind its sales targets. Airbus set a target for 2012 sales of 30. They only have 26 more to go.

Now, the main reasons that I can tell that LA Airports gives for expanding the runways north is safety and efficiency. The north airfield safety study said that the airfield is extremely safe at -- in its current configuration, if we do nothing to it.

They estimated the risk of a crash. They did everything they could to pump up the numbers, estimated the risk of a crash at once every 200 years. Now, 50 percent improvement that Mr. Rothenberg referred to means we might have a crash -- I don't know, it's either once every 300 years or once every 400 years, really.

The other reason is efficiency. The north airfield safety study estimated that -- that moving the runway north by 340 feet might result in cost efficiency savings of 15 million a year. That's not much.

The FAA sent an angry letter refuting the north airfield safety study. And the academic panel that prepared it, simply said, "This is bologna," my words.

Thank you.

Response:

The commentor's support for Alternatives 2 and 9 is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Chapter 2 of this Final EIR regarding the LAWA Staff-Recommended Alternative, which couples the airfield and terminal improvements associated with Alternative 1 with the ground access components associated with Alternative 9, including a discussion of the rationale behind the selection of these alternatives over the other alternatives evaluated in the SPAS Draft EIR.

Although Alternative 2 has the lowest north airfield construction cost of all of the alternatives except for Alternative 4, as identified in Table 8-2 of the Preliminary LAX SPAS Report, the combination of Alternatives 2 and 9 is not the lowest cost alternative. Please see Response to Comment SPAS-PC00130-730 regarding the treatment of economic impacts in an EIR. As noted in that response, CEQA does not require an analysis of cost. (State CEQA Guidelines Section 15131; Pub. Resources Code Section 21068.) The comment that Alternative 2 "would result in the fewest delays in getting that work done" is noted. It would be speculative to estimate the number and length of delays associated with construction of each alternative. Because of the programmatic nature of the SPAS Draft EIR, the relative construction time for each alternative is not currently known. As indicated on page 2-57 of the

SPAS Draft EIR, the nine SPAS alternatives were formulated at a conceptual level only and there are no specific planning, design, or engineering studies or construction plans for any of the alternatives. In conjunction with the preparation of more detailed design and engineering plans for airfield improvements, it is anticipated that several potential options for construction approaches and phasing will be explored.

Please see Response to Comment SPAS-PC00149-2 regarding a summary of the project objectives associated with the north airfield improvements, as well as the conclusions of NASS relative to the safety enhancements associated with reconfiguration of the north airfield. FAA's response to NASS's report is discussed on pages 4-505 and 4-506 in Section 4.7.2 of the SPAS Draft EIR. Regarding enhancements to the safety and efficiency of the airfield under each alternative, please see Table 4.7.2-16 on pages 4-569 and 4-570 in Section 4.7.2 of the SPAS Draft EIR. As indicated in that table, the SPAS alternatives achieve substantial enhancements to safety and efficiency; the degree to which safety and efficiency is enhanced varies between the alternatives. Please also see Response to Comment SPAS-PC00089-1 regarding efficiency associated with Alternative 2 compared to other airfield alternatives.

Please see Response to Comment SPAS-PC00130-643 regarding fleet mix assumptions and information on why assumptions on aircraft fleet mixes in the 2009 and 2025 Design Day Flight Schedules were reasonable and supported by substantial evidence.

SPAS-PH300027 Bashem, Greg Teamsters Local 986 8/29/2012

SPAS-PH300027-1

Comment:

Good evening. My name is Greg Bashem.

I'm here as a representative, Teamsters Local 986. We represent several hundred workers here at LAX; airline pilots, aircraft mechanics. We represent the customer service representatives. We represent the jet refuelers. We represent shuttle drivers. We represent several hundred workers that directly work at LAX. All of those employee deserve a modernized revitalized LAX.

We also represent construction workers, ready mix drivers that pour the concrete for these runways, keep them repaired and everything else. We also have pipeline construction workers. LAWA needs fuel out to those terminal areas where those planes sit and drop off passengers. We represent the jet refuelers.

So all of these people would benefit with LAX being modernized, revitalized. And hopefully, I would hope that -- that all of these here people here want the best for LAX.

We're here for that. I would -- I looked at all the different alternatives. I want an alternative that doesn't displace people that live around the Airport, or at least minimalizes (sic) that. And I'd also like to have an airport that I could be proud of, because I do use LAX. And it's not up to par with other airports that I've traveled in and out of.

So please, you know, it's a -- it's an emotional opinion, you know, meetings here. We just want to make sure that LAX gets what it deserves, and that's a face lift.

Thanks.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PH300028 Underwood, Brenda None Provided 8/29/2012

SPAS-PH300028-1

Comment:

Okay. So I live in Manchester Square. Anybody else here in Manchester Square?

Yeah so, we wanted to be well-informed -- well-informed -- well-informed of how it's going to work for us, how is our property getting appraised, how much time do we have to move, are we getting our taxes rolled over, are we getting moving expenses. We want private meetings with LAWA about our situation, because we are actually going to be uprooted and thrown out into the cold.

Although, I really think that an airport should be outside the city, just like every other city I've been to in Europe and in the United States. It's kind of, like, right in the underfoot here.

But it is what it is, and you guys are going to put a car rental, I'm pretty sure about that, in -- on my house. So can we have meetings with Manchester Square, and not, you know, with other people who are like, "Yay, Airport." We want to know where we're going and how we're going to maneuver through this.

Thank you.

Response:

Acquisition of property and relocation of residents by federally-funded airports such as LAX is governed by the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (codified as amended at 42 USC 4601-4655), its implementing regulations (49 CFR Part 24), FAA Order 5100.37A, and Acquisition and Relocation Assistance for Airport Projects (April 4, 1994, P.L. 91-646). The statute and its implementing regulations are referred to jointly as the Uniform Act. To address relocation associated with the LAX Master Plan, the LAX Master Plan Final EIR included Master Plan Commitment RBR-1, which required preparation of a Residential and Business Relocation Plan in compliance with the Uniform Act, state and local regulations, and FAA Advisory Circular 150/1500-17. This commitment outlines the steps LAWA would undertake to address residential and business relocations, which includes fully informing eligible residential occupants and business owners of the nature of and procedures for obtaining relocation assistance and benefits. In fulfillment of this LAX Master Plan Commitment, LAWA prepared the LAX Master Plan Program Alternative D Draft Relocation Plan.1

No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

1. City of Los Angeles, Los Angeles World Airports, LAX Master Plan Program Alternative D Draft Relocation Plan, April 2004.

SPAS-PH300029 Roten, Rusty IBEW Local #11 8/29/2012

SPAS-PH300029-1

Comment:

Hi. My name is Rusty Roten. I'm a business representative for the International Brotherhood Electrical Workers, Local Union 11. I've been an electrician for 32 years. And before I became an electrician, I actually worked out at LAX for Delta Airlines when I was 17, a summer job. It was pretty cool.

Throughout my career, I've had the benefit of working at LAX. And in following the game plan of modernizing and always trying to make it a world class place, a show piece for Los Angeles. And most of Los Angeles has benefited from it. Los Angeles has grown and prospered and so have we all.

This -- this Airport needs to continue to modernize, do the right thing. As jet liners get bigger, you know, we need more room between them so that safety protocol can be adhered to.

And it's an appropriate modernization project as well as, you know, traffic mitigation, relocating some of the car rental agencies to a central location. Everything will better for all. And the money that everybody works and generates in this Airport goes to and is infused right back into the local economy. And these are definitely desperately needed jobs in this time in this economy.

Thank you for your time.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PH300030 Eggers, Craig NCWP-ARC 8/29/2012

SPAS-PH300030-1

Comment:

My name is Craig Eggers. I'm a 30-year resident of Playa del Rey. I don't have any financial interest in this -- in this project. I serve on the Neighborhood Council for Westchester Playa. And I chair our Airport Relations Committee.

I'm speaking today in support of both Alternatives 2 and 9. Combined they fulfill the SPAS goal of airfield, terminal, and transportation improvements, and that benefits the traveler.

These alternatives will bring billions of dollars of income investment into LAX and surrounding areas in the City of Los Angeles. Alts 2 and 9 combined are the most affordable and cost effective design options.

Alts 2 and 9 provide substantial, permanent, long-term jobs. Alts 2 and 9 do allow for safe airfield operations. And Alt 2 is superior when it comes to airport operational efficiency and is environmentally superior in its alternatives in air quality and other at environmental impacts.

Alt 9 reduces central terminal traffic and creates a consolidated rental car facility on property already owned by LAWA.

Our Neighborhood Council is hosting a community town hall meeting on September 27th at 7:00 p.m. It will be held in the auditorium at Westchester Enriched Sciences Magnate School AKA Westchester High. Our moderator will be Richard Katz.

So today, as yesterday, I want to personally invite Gina Marie and her team to participate in our town hall. And I also want to extend the invitation to Councilman Rosendhal [sic], Congresswomen Waters and Hahn, Senators Feinstein and Boxer, Supervisor Knabe and Riddley-Thomas, Representatives Lou and Bradford, and any other concerned electives.

Also, we want to invite the Mayoral candidates to weigh in on their opinions. We're the first line of welcome for travelers to Los Angeles. And we want a modern, state-of-the-art facility, too. One that, as neighbors, we can be proud of.

Thank you.

Response:

The commentor's support for Alternatives 2 and 9 is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Chapter 2 of this Final EIR regarding the LAWA Staff-Recommended Alternative, which couples the airfield and terminal improvements associated with Alternative 1 with the ground access components associated with Alternative 9, including a discussion of the rationale behind the selection of these alternatives over the other alternatives evaluated in the SPAS Draft EIR.

Please see Response to Comment SPAS-PC00130-730 regarding the treatment of economic impacts in an EIR. As noted in that response, CEQA does not require an analysis of cost. (State CEQA Guidelines Section 15131; Pub. Resources Code Section 21068.) Nevertheless, it should be noted that the combination of Alternatives 2 and 9 is not the lowest cost alternative (see Table 8-2 in Chapter 8 of the Preliminary LAX SPAS Report).

Regarding enhancements to the safety and efficiency of the airfield under each alternative, please see Table 4.7.2-16 on pages 4-569 and 4-570 in Section 4.7.2 of the SPAS Draft EIR. As indicated in that table, the SPAS alternatives achieve substantial enhancements to safety and efficiency; the degree to which safety and efficiency is enhanced varies between the alternatives. Please also see Response to Comment SPAS-PC00089-1 regarding efficiency associated with Alternative 2 compared to other airfield alternatives.

Please see Response to Comment SPAS-PC00089-1 for an explanation of why Alternative 2 coupled with the ground access components of Alternative 9 is not the environmentally superior alternative. Please see Response to Comment SPAS-PH200025-1 regarding the town hall meeting held by The Neighborhood Council of Westchester/Playa.

SPAS-PH300031 Singh, Donna None Provided 8/29/2012

SPAS-PH300031-1

Comment:

Good evening. My name is Donna Singh, and I live in the Briarwood Town House Complex in Inglewood I've been there about a year-and-a-half. And when I moved in, they told me the unit was insulated, and essentially, I would not hear any noise. Big lie.

I was here Saturday, and I listened to everyone say they had a right to a job, a right to a job with great benefits, and a right to a living wage. I'm here to tell you I have a right of peace and quiet. I have a right to clean air. I have a right to not have to clean my car every morning before I use it.

In the evening, when I go for my evening walk, so that I can exercise, I have my head phones on and try to listen to the radio. I can't do it because the jets are flying overhead.

Saturday when I left, I went home. And between 4:03 p.m. and 5:05 p.m., 24 jets flew directly overhead my unit. That doesn't include the jets that I could hear, but not see. Those jets are so low, I can almost reach out and touch them. I can read the letters on some of the wings. I can tell you which ones were United. I can tell you which ones were Southwestern (sic). And I can tell you which ones were American.

Now, I know LAX is here to stay. It's not going anywhere, but you need to do something about the noise. You need to do something about our right to have clean air and just being able to live a clean healthy life.

Thank you.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. This comment addresses alleged issues with existing conditions and does not comment on the analysis provided in the SPAS Draft EIR.

The commentor is referring in part to soundproofing associated with LAWA's Aircraft Noise Mitigation Program (ANMP) described on pages 4-664 through 4-667 in Section 4.9.3.3 of the SPAS Draft EIR. Under the ANMP incompatible uses (including residential) located within the noise impact area (i.e., exposed to 65 CNEL or higher noise levels) are eligible for sound insulation pursuant to the land use compatibility requirements of the California Airport Noise Standards (California Code of Regulations, Title 21, Subchapter 6, Section 5000 et seq.). To ensure that interior noise levels have been reduced to 45 CNEL or less after soundproofing (in conformance with Title 21), post-construction noise tests are conducted on a random sampling of homes to verify the efficacy of sound insulation. To date, all post-testing has confirmed that interior noise levels meet this requirement. Furthermore, with implementation of the SPAS project and as stated in LAX Master Plan Mitigation Measure MM-LU-1, LAWA will continue post-insulation noise monitoring to ensure achievement of interior noise levels at or below 45 CNEL.

Please also see Response to Comment SPAS-PC00008-1 regarding current programs to address existing high aircraft noise levels. The SPAS Draft EIR addresses impacts associated with aircraft noise in Section 4.10.1. As indicated in that section, Alternatives 1 through 7 would result in some residential uses and non-residential noise-sensitive facilities being newly exposed to noise levels of 65 CNEL or higher or increases of 1.5 CNEL or higher within the 65 CNEL or higher noise contours. With implementation of LAX Master Plan mitigation measures, these impacts would be less than significant. However, interim impacts prior to the completion of mitigation, impacts on residential uses with outdoor habitable areas, and impacts on parks would remain significant and unavoidable. Alternatives 8 and 9 focus on ground access improvements that, in themselves, would not result in aircraft noise exposure but would be coupled with the airfield improvements proposed under Alternatives 1, 2, 5, 6, or 7, the impacts of which are summarized above. None of the alternatives would result in a significant impact relative to sleep awakenings.

Regarding air quality, as indicated in Section 4.2 of the SPAS Draft EIR, even after mitigation, construction activities would result in significant and unavoidable air quality impacts under all of the alternatives. Specifically, under all of the alternatives except for Alternative 4, construction emissions of carbon monoxide (CO), volatile organic compounds (VOC), oxides of nitrogen (NOx), particulate matter with an equivalent aerodynamic diameter of 10 micrometers (PM10), and particulate matter with an equivalent aerodynamic diameter of 2.5 micrometers (PM2.5) would be significant and unavoidable. Under Alternative 4, significant and unavoidable construction emissions would occur for NOx and PM10. Under all of the alternatives, even after mitigation, construction-related concentrations of nitrogen dioxide (NO2) and PM10 would be significant and unavoidable.

Operation of the airport would also result in significant and unavoidable impacts to air quality. Even after mitigation, operational emissions of sulfur dioxide (SO2), PM10, and PM2.5 would be significant and unavoidable under all of the alternatives. Operational concentrations of NO2, PM10, and PM2.5 would also be significant and unavoidable under all of the alternatives.

As indicated in Section 4.7.1 of the SPAS Draft EIR, incremental cancer risks and incremental chronic non-cancer health hazards within the study area under all the alternatives would be less than significant for all receptor types (i.e., child resident, school child, adult resident, adult worker). Additionally, under all the alternatives, health effects to on-airport workers would be less than significant. Incremental acute non-cancer health hazards at small areas at or near the LAX fence-line under all the alternatives would be slightly above the threshold of significance and are considered to be significant and unavoidable for all analyzed receptor types (i.e., residents, recreational users, school child, off-site adult

workers). The primary toxic air contaminant of concern contributing to this impact is associated with emissions of acrolein from aircraft operations, which would occur in 2025 even in the absence of SPAS. It should be noted that, with the exception of Alternative 3, acute non-cancer health hazard impacts in 2025 would be lower under the SPAS alternatives than if no airfield improvements were implemented. Moreover, these significant impacts would occur at or near the fence-line; it is expected that actual impacts in the community would be less than significant.

With respect to the comment that "I have a right to not have to clean my car every morning before I use it," it is assumed that the commentor is referring to "deposition," (i.e., the gravitational fallout of material, both solid and liquid, from the atmosphere). Commonly, this material, called particulate matter, consists of dust and soot that can form deposits or cause discoloration on outdoor surfaces (i.e., building materials, motor vehicles, small water bodies, etc.). Please see Response to Comment SPAS-PC00043-2 regarding pollutant deposition. As indicated in Response to Comment SPAS-PC00043-2, to date, the research results indicate that aircraft do not contribute substantially to deposition.

SPAS-PH300032 Widener, William None Provided 8/29/2012

SPAS-PH300032-1

Comment:

Yeah, I'm William Widener, Bill Widener, and I've lived in the area for last 70 years. And, you know, I've seen a lot of change in LAX. Now, I saw them speak Saturday, on the issue, but last night at the Inglewood City Council Meeting, it was brought to my attention that the Sound Insulation Program isn't going all that well.

You know, it's been 30 years in existence. The house I live in, we bought 60 years ago, and it's not done at this time. So if they move the runway, they're going to have more homes that need to be insulated.

So if they're going to move the runway, then they need to insulate all the houses that are in the sound -- noise barrier area, you know. And if they're going to do that, before they do that, they need to finish where they were.

I understand this program has been in existence for 30 years, and if they haven't got done by 30 years -- if they're going to spend all that money that they're going to spend, especially to move a runway, then they need to figure the other expenses, and -- and maybe get some more contractors, and get in Inglewood and get their job done and pay for it.

Thanks.

Response:

The content of this comment is similar to comment SPAS-PH100025-1; please refer to Response to Comment SPAS-PH100025-1.

SPAS-PH300033 Koefoed, Erik None Provided 8/29/2012

SPAS-PH300033-1

Comment:

Hi. My name is Erik Koefoed. I've lived in Playa del Rey for 40 years. Something is wrong. We don't have the proper vision. I'm thinking -- talking about transportation. If anybody has traveled to Europe, I was born in Denmark, if anybody has been at the airport in Copenhagen, you will see something that phenomenal. Trains go directly into the airport.

When you go outside the airport, what do you see? New Mercedes, Mercedes Benz, BMWs, Volvos.

When you have visitors that come in to Los Angeles Airport, what do they see? Antique cars with bald tires. That ought to be changed.

I support Alternative 2 and 9.

Response:

The commentor's support for Alternatives 2 and 9 is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Chapter 2 of this Final EIR regarding the LAWA Staff-Recommended Alternative, which couples the airfield and terminal improvements associated with Alternative 1 with the ground access components associated with Alternative 9, including a discussion of the rationale behind the selection of these alternatives over the other alternatives evaluated in the SPAS Draft EIR. Please see Topical Response TR-SPAS-T-1 regarding transit options into LAX.

SPAS-PH300033-2

Comment:

And by all means, the Airport out at Ontario, that's where we should go. Let's get the people out of the freeways. Go to Ontario.

Thank you.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PH300034 Aniolek, Gregg None Provided 8/29/2012

SPAS-PH300034-1

Comment:

I'm Gregg Aniolek. I am a resident of Playa del Rey. And I am also an engineer, so I understand that LAWA has to put options out for the expansion or -- for modernization of the airport, but to steal Mr. Rosendhal's [sic] repeated comments, "Modernization. No expansion."

Those expansion ideas really should fall off the table first. If -- to -- we should look to San Francisco Airport and steal those ideas that they've done. I mean, it's an excellent airport. Now, I used to live there. The BART goes right to the airport. It doesn't go into it, it goes to it. It's got an automated people mover to a consolidated rental car facility. Very efficient. Vehicles are off the road. Excellent.

Response:

The comment regarding "Modernization. No Expansion." is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. None of the SPAS project objectives listed in Section 2.2 of the SPAS Draft EIR include expansion.

The commentor describes several features of San Francisco International Airport (SFO) that he recommends for LAX. Regarding rail transit, such as BART having a line to SFO, Los Angeles Metro has approved development of the Crenshaw/LAX Transit Corridor and Station which will provide a new transit line near LAX, in addition to the existing Metro Green Line, and will include a station near the

intersection of Aviation Boulevard and Century Boulevard. As described in Section 2.3 of the SPAS Draft EIR, Alternatives 1, 2, 8, and 9, propose an elevated busway or APM system to the CTA that can be integrated with the new Metro station. The APM system under Alternative 3 could also link to that station. Regarding the automated people mover (APM) to the consolidated rental car (CONRAC) facility at SFO, SPAS Alternatives 3 and 4 propose the same type system, and SPAS Alternative 8 provides essentially the same system using an elevated/dedicated busway instead of an APM. In summary, the very suggestions offered by the commentor are already included in the range of alternatives currently being considered for SPAS.

For these reasons, the commentor's suggested alternative was not evaluated in detail in the SPAS Draft EIR.

Please see Topical Response TR-SPAS-T-1 regarding further discussion of transit options into LAX.

SPAS-PH300034-2

Comment:

And we should also consider Heathrow Airport. If you look -- someone told these stats and I had to look them up myself. In 2011, Heathrow has 2 runways, LAX has 4. Heathrow has got 4.7 square miles, LAX has 5. And they moved more people in 2011 than the -- than LAX did.

Now, granted maybe LAX had more cargo, but nonetheless, there's some European efficiency that we have to capitalize on here. It really needs to be considered and not just the structure of the buildings and everything. So there's some ideas that really need to be taken from elsewhere.

Response:

The comment does not describe a specific potentially feasible alternative that should have been evaluated in the SPAS Draft EIR. Many of the improvements associated with the various SPAS alternatives seek to improve efficiency and quality of service at LAX. These include airfield improvements to improve the safety and efficiency, as summarized in Table 1-12 of the SPAS Draft EIR, and ground transportation system improvements as described in Chapter 2 of the SPAS Draft EIR. While the commentor's comparisons between Heathrow International Airport and LAX suggest that it's possible to "do more with less" (i.e., Heathrow handling more passengers within a smaller footprint and with fewer runways), such simple comparisons are not necessarily a true indicator of airport efficiency. There are many factors that influence the number of passengers accommodated at an airport, not the least of which is air travel market activity. Heathrow handled more passengers in 2011 than LAX not because it was more efficient than LAX, but rather there was comparatively more market demand for air travel through Heathrow. Heathrow has long been the major international airport serving Europe. In 2011, over 97 percent of the passenger activity was international 1, compared to approximately 16 percent for LAX. Another key difference between the airports is approximately 35 percent of the passenger activity at Heathrow was on connecting flights, compared to 30 percent at LAX. While Heathrow operates with fewer runways than LAX (2 at Heathrow compared to 4 at LAX), it has a greater number of aircraft gates to accommodate high volumes of passengers (203 passenger gates at Heathrow compared to 159 passenger gates at LAX). Again as noted above, however, it is not so much the physical layout of the two airports and number of facilities with each that makes the difference between the passenger activity levels at the two airports in 2011, but rather the air travel market demands specific to each airport.

1. Heathrow Airport, Heathrow Facts and Figures, Available: www.heathrowairport.com/about-us/facts-and-figures, accessed November 30, 2012.

SPAS-PH300034-3

Comment:

And as for concerns about the safety, let's face it, LAX has been very good. Since I've been living here, I don't know of any major incidents, unlike the Santa Monica Airport, where hear of a once a year crash.

In fact, to my knowledge, LAX has one rescue. When the Jet Blue airline's wheels rotated, instead of landing back over in Long Beach, bring it to LAX, a much more safer place to land.

Thank you.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PH300035 Ryavec, Mark Venice Stakeholders Association 8/29/2012

SPAS-PH300035-1

Comment:

Mark Ryavec. I'm a resident of Venice. I'm a former staff to the Los Angeles City Council. I have a Master's Degree in Urban Studies. And many years ago, I worked with the Westchester Business District Association on various planning issues here.

I'd like to make two points. One of them is I don't think that this is -- that this review of alternatives is adequate without looking at the possibility of growing Ontario, and thus reducing some of the need for some of the new facilities that you are identifying here.

Response:

Please refer to Topical Response TR-SPAS-REG-1 regarding the suggestion to consider and evaluate the expansion of LA/Ontario International Airport as an alternative to the LAX SPAS project.

SPAS-PH300035-2

Comment:

The other issue I'd point out is that I think that the this whole process should be an opportunity, not just to modernize the Airport, but also to significantly decrease the impact of the Airport on the residents surrounding the Airport.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Because the commentor does not identify any specific impact on residents, this response cannot provide specific responsive detail. However, the SPAS Draft EIR analyzes the potential environmental impacts of the SPAS project, in general, on surrounding residents. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PH300035-3

Comment:

And I would suggest that there is a possibility to take Alternative 3 and create out of it an Alternative 10. And that instead of large commercial developments in the center of the Airport, where the parking is now located, that, in fact, when you rebuild terminals -- under 3, when you rebuild Terminals 1, 2, and 3,

you -- by taking some of this space that's now devoted to parking structures, you could free up space to provide more gates there.

And this would remove the -- this would -- again, it would also move that inbound -- excuse me, the outbound runway, which is the one that's creating so much noise in Playa del Rey, it would move it 300 feet south, so that you would attenuate to some extent, by doing that, the noise you're currently hearing at that location.

Thank you.

Response:

The alternative suggested in the comment is the same as in comment SPAS-PC00078-5; please see Response to Comment SPAS-PC00078-5.

SPAS-PH300036 Leal, Marco None Provided 8/29/2012

SPAS-PH300036-1

Comment:

Hi. My name is Marco Leal. I live on 88th Street. I've lived in the Airport area for 26 years, 15 years in my current house. I studied Airport Planning and Management at Cal State LA. I have a Bachelor's Degree in that. I work on the Airport. I'm an aircraft mechanic. I taxi airplanes back and forth. I'm really tired of seeing this proposal for a centerfield taxiway on the north complex. We rarely use it on the south side. It will never get used on the north side.

Response:

The centerfield taxiway on the south side is used daily for aircraft arriving on Runway 7R/25L that are proceeding north to the passenger terminal area. FAA controllers direct pilots exiting the runway onto the south centerfield taxiway and have them proceed to a connecting taxiway to proceed across Runway 7L/25R to the terminal. See Figures 8 and 10 in Appendix F-2 of the Preliminary LAX SPAS Report for illustrations of the "South Arrival to North CTA" paths assumed under the 2009 conditions.

The same procedure would be utilized on the north side. Controllers would direct pilots exiting Runway 6L/24R onto the north centerfield taxiway and have pilots proceed to a connecting taxiway to cross over Runway 6R/24L to the terminal. See Figures 15 and 17 in Appendix F-2 of the Preliminary LAX SPAS Report for illustrations of the "North Arrival" paths assumed under the 2025 conditions.

SPAS-PH300036-2

Comment:

Also, do not relocate runway 6 left 24 right north even one foot. It's not needed.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PH300036-3

Comment:

I haven't had a chance to totally study every single alternative. You know, on face value, I kind of like Alternative 2.

Response:

The commentor's support for Alternative 2 is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Chapter 2 of this Final EIR regarding the LAWA Staff-Recommended Alternative, which couples the airfield and terminal improvements associated with Alternative 1 with the ground access components associated with Alternative 9, including a discussion of the rationale behind the selection of these alternatives over the other alternatives evaluated in the SPAS Draft EIR.

SPAS-PH300036-4

Comment:

Let's see. What else?

I was looking at the Manchester Square. I heard some of the residents' concerns there. I personally like the way the Orlando Airport is geared. They divided not by -- by arrivals and departures. They divided in four different ways. One of them being taxi cabs and limousines on one level; buses and shuttle vans on another level, rental cars on a another level, and pick up and drop off cars on a totally different level.

Now, if they were saying that, you know, Orlando isn't used as much as LAX, make it 8 levels. But it needs to be separated. And that would streamline it completely. And then, you know, as far as the rail is concerned, that actually would streamline it even more.

Response:

The alternative suggested in the comment is the same as in comment SPAS-PC00102-5; please see Response to Comment SPAS-PC00102-5.

SPAS-PH300036-5

Comment:

Let's see. I guess that's about all. Another issue that's really near and dear to my heart is the TSA. Personally, I'd like to see it abolished. We're never going to get hit by -- by terrorists. I mean, you're more likely to get hit by lightning than terrorists. You know, we don't need to be radiated, and we don't need to be groped. We should do it like the Israelis do. Airport security is not that difficult.

And that's it.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PH300037 Acherman, Robert None Provided 8/29/2012

SPAS-PH300037-1

Comment:

Good evening. My name is Robert Acherman. I'm a resident of the City of Torrance. In Torrance, we are impacted by LAX. We have low-flying planes departing for Asia and Australia flying over our homes late at night. And during the day, we get them from Long Beach Airport.

Our access in and out of Torrance is also affected by the gridlock caused by the LAX traffic on the 405 Freeway. I have family and many, many friends here in Westchester, Playa del Rey, so I'm very sympathetic to everyone who lives next to LAX.

Westchester, Playa del Rey was my home town of 37 years. Westchester, Playa del Rey is a hidden gem in the City of Los Angeles, a great place to live, work, and play, a friendly hometown atmosphere where generations of people have raised their families. I know we'd certainly like to keep it that way.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PH300037-2

Comment:

I have been reading the Draft EIR and SPAS reports, and I found many problems, but 2 minutes is not enough time to go through them in detail. These comments will be submitted later in writing.

From what I have read, it's clear that Alternative 2, combined with some ground access elements in Alternative 9 would be best for the Westchester, Playa del Rey community and the flying public.

This combination will provide the best cost benefits for the airlines and the least environmental impact on the surrounding communities.

We can have a safe, secure, and convenient LAX that does not expand in the surrounding communities of Westchester and Playa del Rey.

Response:

The commentor's support for Alternatives 2 and 9 is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Chapter 2 of this Final EIR regarding the LAWA Staff-Recommended Alternative, which couples the airfield and terminal improvements associated with Alternative 1 with the ground access components associated with Alternative 9, including a discussion of the rationale behind the selection of these alternatives over the other alternatives evaluated in the SPAS Draft EIR. Please see Response to Comment SPAS-PC00130-730 regarding the treatment of economic impacts in an EIR. As noted in that response, CEQA does not require an analysis of cost or project funding. (State CEQA Guidelines Section 15131; Pub. Resources Code Section 21068.) Nevertheless, Chapter 8 of the Preliminary LAX SPAS Report provides a financial analysis of each alternative. As identified in Table 8-2 of the Preliminary LAX SPAS Report, the combination of Alternatives 2 and 9 is not the lowest cost alternative. Please see Response to Comment SPAS-PC00115-1 regarding the commentor's assertion that Alternatives 2 and 9 would present the least environmental impact on local communities.

A discussion of property acquisition that could occur under the SPAS alternatives is provided in Sections 2.3.1.11 and 4.9.6 of the SPAS Draft EIR. Specifically, the property acquisition that would be required under Alternatives 1, 2, 3, 4, 8, and 9 is shown in Figures 2-11, 2-12, 2-13, and 2-14 and listed in Table 2-4 and Table 2-5 in Section 2.3.1.11 of the SPAS Draft EIR. As indicated in these figures and tables, no residential acquisition or acquisition within Westchester or Playa del Rey is proposed.

SPAS-PH300037-3

Comment:

Furthermore, LAWA needs to do more to make good on its legal obligation in the stipulated settlement agreement to promote regionalization of air services in -- at Ontario and Palmdale. LAX cannot and should not be the only major gateway in and out of Southern California.

We had an earthquake today in Orange County. Imagine what one could do to LAX. How will people get in and out of our region if LAX is closed? This is why we need more capacity at Ontario and Palmdale now.

Response:

Please refer to Topical Response TR-SPAS-REG-1 regarding the fact that LAWA, through the LAX Master Plan, the SPAS process, and other efforts, supports the regionalization of air travel demand in Southern California. As indicated therein, the potential LAX Specific Plan amendment to Section 7.H further supports such regionalization. The subject Topical Response also discusses LA/Ontario International Airport and Palmdale Regional Airport. As also described therein, there are six major airports, not just LAX, serving the Southern California region.

Regarding earthquake risks at LAX, the 2010 Revised NOP and Initial Study for the SPAS Draft EIR explained why these risks for the SPAS alternatives are less than significant.

SPAS-PH300037-4

Comment:

And I noticed earlier there were some people reading other people's comments. It would great if those people would present them in person. It would just make that more personable.

Thank you.

Response:

The comment is noted.

SPAS-PH300038 Smith, Garrett None Provided 8/29/2012

SPAS-PH300038-1

Comment:

Hi. Good evening. I'm one of the -- I'm a resident of Westchester. And want to tell the few people that are here from labor that we are your allies. We support a living wage. We support more jobs. And we support modernization.

What we don't support is the runway being moved forward, encroaching into our neighborhood. LAX has not been a good neighbor. They haven't -- their contractors haven't been good employers to you. You know, and -- so you should be our allies in stopping the runway moving forward.

Thank you.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the SPAS Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

SPAS-PH300039 Paxton, Lynne None Provided 8/29/2012

SPAS-PH300039-1

Comment:

Hi. I'm Lynne Paxton. I live in Playa del Rey. I'm recent here. And I'd just like to state that I'm against moving the runway to the north, as it will result in excessive noise spikes affecting the residents living to the north of the area of the Airport, as I do.

The decibel level studies are homogenized in that they represent an averaging of 24 hours per day, and 365 days per year. They don't address the actual noise spikes that come about. It's unknown at this point in time how great those noise spikes will increase if any moving of the runway to the north takes place. And I'm against moving any runway to the north.

Thank you.

Response:

The content of this comment is essentially the same as comment SPAS-PC00035-1; please refer to Response to Comment SPAS-PC00035-1.

SPAS-PH300040 Sambrano, Diane HSCV 8/29/2012

SPAS-PH300040-1

Comment:

Good evening. I live in the community called Inglewood. And I think that it's interesting there were several references made to the beginnings of this Airport.

And as the President of Local Historical Society, I want everyone to keep in mind that when the airport was put way down over there, near Airport Boulevard originally, no one had yet invented the jet aircraft.

And it seems everyone seems to forget that little tiny thing. I also want to remind everyone that the community that has taken the greatest hit is, in fact, that community that gave every single one of us the privilege of aerospace defense. And it is yet these senior adults now who are being impacted the greatest. It is they who are losing their quality life, they who are losing their homes. What a grand insult that is.

And yet, I hear other folks say, "How dare you people who live near the Airport be NIMBYs." Let me correct that. If you're going to call us names, make sure you call us the correct name, that would be CIMBY. For all these many years, the Airport has been "currently" in our backyard.

We are the ones significantly impacted by every negative thing. And yet, we have stood here and said, "We always want the employees to be treated fairly." We believe in regional approach. We believe that in case of some drama, there should be other airports to take that load. And LAWA has gone out of its way to not help Ontario or Palmdale develop as the plans were originally made when those two were purchased.

So I would hope that we do not expand any further and destroy any more of the Westchester and Inglewood communities, but perhaps simply modernize that property which you already own.

Response:

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project.

A discussion of property acquisition that could occur under the SPAS alternatives is provided in Sections 2.3.1.11 and 4.9.6 of the SPAS Draft EIR. Specifically, the property acquisition that would be required under Alternatives 1, 2, 3, 4, 8, and 9 is shown in Figures 2-11, 2-12, 2-13, and 2-14 and listed in Table 2-4 and Table 2-5 in Section 2.3.1.11 of the SPAS Draft EIR. As indicated in these figures and tables, no residential acquisition or acquisition within Westchester or Inglewood is proposed.

Please refer to Topical Response TR-SPAS-REG-1 regarding the fact that LAWA, through the LAX Master Plan, the SPAS process, and other efforts, supports the regionalization of air travel demand in Southern California. As indicated therein, the LAX Specific Plan amendment proposed as part of SPAS further supports such regionalization. The subject Topical Response also discusses LA/Ontario International Airport and Palmdale Regional Airport.

5. CORRECTIONS AND ADDITIONS RELATED TO THE SPAS DRAFT EIR

5.1 Introduction

As a result of clarifications to, and comments received on, the Draft Environmental Impact Report (Draft EIR) for the Specific Plan Amendment Study (SPAS), the following revisions are hereby made to the text of the SPAS Draft EIR. Changes in text are signified by strikeouts where text is removed and by italics where text is added, unless otherwise noted. These changes do not add significant new information to the EIR, nor do they disclose or suggest new or more severe significant environmental impacts of the Specific Plan Amendment Study. Changes to the Preliminary LAX SPAS Report are also identified herein.

5.2 Corrections and Additions to the SPAS Draft EIR Text

Chapter 1, Introduction and Executive Summary

1. Table 1-4 on page 1-48 of the Draft EIR has been revised. These revisions are consistent with the substantive analysis already provided on SPAS Draft EIR pages 4-51 through 4-52, and 4-76. Please see the following revised table.

Table 1-4

Summary of Impacts By Topic

Topic	Alternative								
	Alt. 1	Alt. 2	Alt. 3	Alt. 4	Alt. 5	Alt. 6	Alt. 7	Alt. 8	Alt. 9
Aesthetics	LS	LS	~~LS~~ *SM*	LS	LS	LS	LS	LS	~~LS~~ *SM*
Air Quality	SU	SU	SU	SU	SU	SU	SU	SU	SU
Biological Resources	SM	SM	SM	SM	SM	SM	SM	SM	SM
Coastal Resources	SM	SM	SM	SM	SM	SM	SM	NI	NI
Cultural Resources									
Historical Resources	LS	LS	SM	NI	LS	LS	LS	LS	SM
Archaeological Resources	SM	SM	SM	SM	SM	SM	SM	SM	SM
Greenhouse Gases	SU	SU	SU	SU	SU	SU	SU	SU	SU
Human Health Risk Assessment	SU	SU	SU	SU	SU	SU	SU	SU	SU
Safety	LS	LS	LS	LS	LS	LS	LS	LS	LS
Hazardous Materials	LS	LS	LS	LS	LS	LS	LS	LS	LS
Hydrology/Water Quality	SM	SM	LS	SM	SM	SM	SM	SM	SM
Land Use and Planning									
Plan Consistency	LS	LS	LS	LS	LS	LS	LS	LS	LS
Aircraft Noise Exposure	SU	SU	SU	SU	SU	SU	SU	NA[1]	NA[1]
Aircraft Noise	SU	SU	SU	SU	SU	SU	SU	NA[1]	NA[1]
Road Traffic Noise	LS	LS	LS	LS	NA[2]	NA[2]	NA[2]	LS	LS
Construction Traffic and Equipment Noise	SU	SU	SU	SU	SU	SU	SU	SU	SU
Transit Noise and Vibration	SM	SM	LS	NI	NA[3]	NA[3]	NA[3]	SM	LS
Fire Protection	LS	LS	LS	LS	LS	LS	LS	LS	LS
Law Enforcement	SM	SM	SM	LS	SM	SM	SM	SM	SM
On-Airport Transportation	SU	SU	NI	SU	NA[4]	NA[4]	NA[4]	SU	SU
Off-Airport Transportation	SU	SU	SU	SU	NA[4]	NA[4]	NA[4]	SU	SU
Energy	LS	LS	LS	LS	LS	LS	LS	LS	LS
Solid Waste	LS	LS	LS	LS	LS	LS	LS	LS	LS

Table 1-4

Summary of Impacts By Topic

Topic	Alternative								
	Alt. 1	**Alt. 2**	**Alt. 3**	**Alt. 4**	**Alt. 5**	**Alt. 6**	**Alt. 7**	**Alt. 8**	**Alt. 9**
Wastewater Generation	LS	LS	LS	LS	LS	LS	LS	LS	LS
Water Supply	LS	LS	LS	LS	LS	LS	LS	LS	LS

Notes:

NA = Not Applicable
NI = No Impact
LS = Less Than Significant Impact
SM = Significant Impact (but mitigable to Less Than Significant)
SU = Significant Unavoidable Impact

[1] Alternatives 8 and 9 focus on ground access improvements, which do not pertain to aircraft noise; however, assuming the ground access improvements under those alternatives would be paired with airfield improvements proposed under Alternative 1, 2, 5, 6, or 7, there would be significant unavoidable aircraft noise impacts, as shown for Alternatives 1, 2, 5, 6, and 7.

[2] Alternatives 5, 6, and 7 focus on airfield improvements, which do not pertain to road traffic noise; however, assuming the airfield improvements under those alternatives would be paired with ground access improvements proposed under Alternative 1, 2, 8, or 9, there would be less than significant road traffic noise impacts, as shown Alternatives 1, 2, 8, and 9.

[3] Alternatives 5, 6, and 7 focus on airfield improvements, which do not pertain to transit noise; however, assuming the airfield improvements under those alternatives would be paired with ground access improvements proposed under Alternative 1, 2, 8, or 9, there would be significant but mitigable transit noise impacts or less than significant transit noise impacts, as shown for Alternatives 1, 2, 8, and 9, depending upon which alternatives are paired.

[4] Alternatives 5, 6, and 7 focus on airfield improvements, which do not pertain to on- or -off-airport surface transportation; however, assuming the airfield improvements under those alternatives would be paired with ground access improvements proposed under Alternative 1, 2, 8, or 9, there would be significant unavoidable traffic impacts, as shown for Alternatives 1, 2, 8, and 9.

Source: CDM Smith, 2012.

2. Table 1-5 on page 1-49 of the Draft EIR has been revised. Please see the following revised table.

3. Table 1-6 on pages 1-51 through 1-60 of the Draft EIR has been revised. Please see the following revised table.

4. The note in Table 1-7 on page 1-63 of the Draft EIR Is hereby revised as follows:

   Mitigation measures are LAX Master Plan Mitigation Measures MM-AQ-1, MM-AQ-2, MM-AQ-3, MM-AQ-4; ~~and~~ components from Section X, Air Quality, of the LAX Master Plan Community Benefits Agreement~~.~~*; and SPAS-specific mitigation measures.*

5. The note in Table 1-11 on page 1-74 of the Draft EIR Is hereby revised as follows:

   Mitigation measures are LAX Master Plan Mitigation Measures MM-AQ-1, MM-AQ-2, MM-AQ-3, MM-AQ-4; ~~and~~ components from Section X, Air Quality, of the LAX Master Plan Community Benefits Agreement~~.~~*; and SPAS-specific mitigation measures.*

Table 1-5

Summary Comparison of Unavoidable Significant Impacts

		Impacts Associated With Each Alternative[1]								
		Alt. 1	Alt. 2	Alt. 3	Alt. 4	Alt. 5	Alt. 6	Alt. 7	Alt. 8	Alt. 9
Topic	Basis of Comparison	Value	Value	Value	Value	Value	Value	Value	Value	Value
Air Quality										
Construction-Related Emissions[2]	CO (Threshold = 550 lbs/day)	1,422	568	1,869	191*(LS)*	1,576-1,669	1,259-1,352	1,097-1,190	617-1,625	661-1,669
	VOC (Threshold = 75 lbs/day)	296	117	369	39*(LS)*	328-344	262-279	228-245	125-337	133-345
	NO_x (Threshold = 100 lbs/day)	3,418	1,399	4,765	509	3,782-4,047	3,034-3,299	2,648-2,913	1,540-3,924	1,663-4,047
	PM10 (Threshold = 150 lbs/day)	1,627	638	1,956	222	1,804-1,888	1,438-1,522	1,249-1,333	692-1,858	722-1,888
	PM2.5 (Threshold = 55 lbs/day)	249	98	309	34*(LS)*	276-290	220-234	191-205	107-285	112-290
Construction-Related Concentrations[2]	*NO_2 -CAAQS 1 Hour (Threshold=339 µg/m^3)*	*1,175*	*671*	*1,645*	*535*	*1,297-1,315*	*1,047-1,065*	*923-941*	*797-1,303*	*877-1,315*
	NO_2 - NAAQS 1 Hour (Threshold=188 µg/m^3)	*948*	*474*	*1,056*	*413*	*1,050-1,063*	*842-855*	*738-751*	*550-1,056*	*630,1,063*
	PM10 - 24 Hour (Threshold=10.4 µg/m^3)	*38*	*28*	*58*	*16*	*40-42*	*36-38*	*34-36*	*30-40*	*30-42*
	PM10 - Annual (Threshold=1.0 µg/m^3)	*4*	*4*	*8*	*2*	*4*	*4*	*4*	*4*	*4*
Operations-Related Emissions[3]	SO_2 (Threshold = 150 lbs day)	**893 to 1,036**	**860 to 1,080**	**997 to 1,136**	**921 to 1,272**	**894 to 999**	**865 to 1,019**	**896 to 1,061**	**860 to 1,080**	**860 to 1,080**
	PM10 (Threshold = 150 lbs/day)	**2,767 to 2,776**	**2,765 to 2,779**	**2,527 to 2,538**	**2,610 to 2,634**	**2,510 to 2,776**	**2,508 to 2,777**	**2,511 to 2,781**	**2,515 to 2,530**	**2,510 to 2,525**
	PM2.5 (Threshold = 55 lbs/day)	**203 to 212**	**201 to 216**	**153 to 164**	**173 to 197**	**149 to 210**	**147 to 211**	**149 to 215**	**147 to 162**	**146 to 161**
Operations-Related Concentrations[3]	***NO_2 - CAAQS 1 Hour (Threshold=399 µg/m^3)***	***533 to 863***	***391 to 427***	***489 to 609***	***528 to 641***	***532 to 862***	***531 to 863***	***532 to 864***	***391 to 864***	***391 to 864***
	NO_2 - NAAQS 1 Hour (Threshold=188 µg/m^3)	***280 to 313***	***273 to 310***	***322 to 343***	***329 to 339***	***279 to 313***	***278 to 313***	***279 to 314***	***273 to 314***	***273 to 314***
	PM10 - 24 Hour (Threshold=2.5 µg/m^3)	***2.6 to 3.1***	***2.7 to 2.9***	***70.2 to 70.5***	***4.4***	***2.6 to 3.1***	***2.6 to 3.1***	***3.4***	***2.6 to 3.4***	***2.6 to 3.4***
	PM10 - Annual (Threshold=1.0 µg/m^3)	***1.2***	***1.2***	***37.0***	***2.1***	***1.2***	***1.2***	***1.4***	***1.2 to 1.4***	***1.2 to 1.4***
	PM2.5 - 24-Hour (Threshold=2.5 µg/m^3)	***1.2 to 2.5***	***1.3 to 2.3***	***12.5 to 13.3***	***2.0 to 2.8***	***1.1 to 2.5***	***1.1 to 2.5***	***1.1 to 2.5***	***1.1 to 2.5***	***1.1 to 2.5***

Table 1-5

Summary Comparison of Unavoidable Significant Impacts

		Impacts Associated With Each Alternative[1]								
		Alt. 1	**Alt. 2**	**Alt. 3**	**Alt. 4**	**Alt. 5**	**Alt. 6**	**Alt. 7**	**Alt. 8**	**Alt. 9**
Topic	**Basis of Comparison**	**Value**	**Value**	**Value**	**Value**	**Value**	**Value**	**Value**	**Value**	**Value**
Greenhouse Gas Emissions	Reduction in per capita GHG emissions at project buildout compared to baseline conditions (Threshold = Minimum of 16% reduction)	~~13.06%~~ *12.86%*	~~13.69%~~ *13.47%*	~~13.32%~~ *13.11%*	~~14.29%~~ *14.06%*	~~13.05%-15.00%~~ *12.84%-14.76%*	~~13.44%-15.40%~~ *13.23%-15.15%*	~~13.19%-15.15%~~ *12.99%-14.91%*	~~14.80%-15.61%~~ *14.56%-15.35%*	~~14.83%-15.64%~~ *14.59%-15.39%*
Human Health Risk	Acute Non-Cancer Hazard Index for Overall Off-Airport Receptors Relative to Acrolein From Aircraft Compared to Baseline (2009) Conditions (Threshold = 1.0)	3.0	2.2	3.1	3.9	2.9	2.8	2.4	na	na
Aircraft Noise Exposure	Population Newly Exposed to 65≥ CNEL in 2025 Compared to Baseline (2009) Conditions	**13,160**	**14,039**	**13,156**	**14,404**	**12,861**	**13,607**	**13,891**	**na**	**na**
	Homes Newly Exposed to 65≥ CNEL in 2025 Compared to Baseline (2009) Conditions	**4,370**	**4,531**	**4,508**	**4,603**	**4,315**	**4,462**	**4,485**		
Construction Noise	Types of construction activities posing potential for temporary significant noise impacts to sensitive receptors nearby, including airfield improvements (AI), ground access improvements (GAI), and use of construction staging areas (CSA)	AI, GAI, CSA	GAI, CSA	GAI, CSA	GAI, CSA	AI, ---[4], CSA	AI, ---[4], CSA	---[4], CSA	---[4], GAI, CSA	---[4], GAI, CSA
On-Airport Transportation	Number of on-airport facilities (i.e., CTA curbsides, intersections, or roadway links) significantly impacted in 2025 with no feasible mitigation available	**1 (Intersection of World Way South and Center Way)**	**1 (Intersection of World Way South and Center Way)**	0 (CTA closed to private vehicles)	**1 (Intersection of World Way South and Center Way)**	na	na	na	**1 (Intersection of World Way South and Center Way)**	**1 (Intersection of World Way South and Center Way)**

Table 1-5

Summary Comparison of Unavoidable Significant Impacts

		Impacts Associated With Each Alternative[1]								
		Alt. 1	**Alt. 2**	**Alt. 3**	**Alt. 4**	**Alt. 5**	**Alt. 6**	**Alt. 7**	**Alt. 8**	**Alt. 9**
Topic	**Basis of Comparison**	**Value**	**Value**	**Value**	**Value**	**Value**	**Value**	**Value**	**Value**	**Value**
Off-Airport Transportation	Number of off-airport facilities (i.e., intersections and CMP facilities) significantly impacted relative to Baseline (2010 and no airport growth) conditions with no feasible mitigation available	1 (Intersection)	1 (Intersection)	12 (11 Intersections and 1 CMP facility)	2 (Intersections)	na	na	na	2 (Intersections)	2 (Intersections)
	Number of off-airport facilities (i.e., intersections and CMP facilities) significantly impacted relative to Future (2025 with airport growth) conditions with no feasible mitigation available	**~~43~~*42* (~~39~~*38* Intersections and 4 CMP Facilities)**	**~~43~~*42* (~~39~~*38* Intersections and 4 CMP Facilities)**	**42 (37 Intersections and 5 CMP Facilities)**	**~~45~~*43* (~~40~~*38* Intersections and 5 CMP Facilities)**	na	na	na	**~~48~~*46* (~~44~~*42* Intersections and 4 CMP Facilities)**	**~~48~~*46* (~~44~~*42* Intersections and 4 CMP Facilities)**

Notes:

LS = Less Than Significant Impact

[1] Impacts identified in **Bold** type are primarily attributable to future growth in airport activity that will occur regardless of the SPAS alternatives. Also, relative to off-airport transportation, significant impacts are primarily the result of the combination of increased airport activity levels and increased regional background traffic projected to occur by 2025.

[2] Construction emissions *and concentrations* shown for Alternatives 5 through 9 represent ranges of potential emissions *and concentrations* depending on which set of other airfield, terminal, or ground access improvements each alternative is paired with - see Table*s* 4.2-10*, 4.2-11, and 4.2-12* in Section 4.2, *Air Quality*.

[3] The ranges of emissions *and concentrations* shown for each alternative are based on the analysis of aircraft-related emissions *and concentrations* that accounted for differences in airfield activities under different weather/visibility conditions. The low end of the range typically represents good visibility with less spacing required between aircraft, and the high end of the emission range typically represents poor weather conditions with greater spacing between aircraft and more ground delay time - see Tables 4.2-13*, 4.2-15, and 4.2-16* in Section 4.2, *Air Quality*.

[4] Alternative 5 through 9 focus on airfield improvements or ground access improvements, but are assumed to be paired with the counterpart improvements of other alternatives in order to provide a complete set of improvements. Although no construction noise impacts are noted for Alternatives 5 through 7 relative to ground access improvements, and no impacts are noted for Alternatives 8 and 9 relative to airfield improvements, such impacts would likely occur depending on which other improvements each of those alternatives is paired with.

Source: CDM Smith, 2012.

Table 1-6

LAX Master Plan Commitments, LAX Master Plan Mitigation Measures, and SPAS-Specific Mitigation Measures as Related to the SPAS Alternatives

	Alt. 1	Alt. 2	Alt. 3	Alt. 4	Alt. 5	Alt. 6	Alt. 7	Alt. 8	Alt. 9
Aesthetics									
LAX Master Plan Commitments									
DA-1. Provide and Maintain Airport Buffer Areas	X	X	X	X	X	X	X	X	X
DA-2. Update and Integrate Design Plans and Guidelines	X	X	X	X	X	X	X	X	X
LU-2. Establishment of a Landscape Maintenance Program for Parcels Acquired Due to Airport Expansion	X	X	X	X				X	X
LU-4. Neighborhood Compatibility Program	X	X	X	X	X	X	X	X	X
LI-2. Use of Non-Glare Generating Building Materials	X	X	X	X	X	X	X	X	X
LI-3. Lighting Controls	X	X	X	X	X	X	X	X	X
LAX Master Plan Mitigation Measures									
MM-DA-1. Construction Fencing	X	X	X	X	X	X	X	X	X
SPAS Mitigation Measures									
MM-HA (SPAS)-1. Preservation of Historic Resources: Theme Building and Setting			X						
MM-HA (SPAS)-2. Preservation of Historic Resources: Theme Building and Setting									X
Air Quality									
LAX Master Plan Commitments									
None									
LAX Master Plan Mitigation Measures[1]									
MM-AQ-1. LAX Master Plan Mitigation Plan for Air Quality, Framework	X	X	X	X	X	X	X	X	X
MM-AQ-2. LAX Master Plan Mitigation Plan for Air Quality, Construction-Related Mitigation Measures	X	X	X	X	X	X	X	X	X
MM-AQ-3. LAX Master Plan Mitigation Plan for Air Quality, Transportation-Related Mitigation Measures	X	X	X	X	X[2]	X[2]	X[2]	X	X
MM-AQ-4. LAX Master Plan Mitigation Plan for Air Quality, Operations-Related Mitigation Measures	X	X	X	X	X	X	X	X	X
Community Benefits Agreement, Section X.A., Electrification of Passenger Gates[1]	X	X	X	X	X	X	X	X[3]	X[3]
Community Benefits Agreement, Section X.F., Construction Equipment[1]	X	X	X	X	X	X	X	X	X
Community Benefits Agreement, Section X.K., PM2.5[1]	X	X	X	X	X	X	X	X	X
Community Benefits Agreement, Section X.L., Rock-Crushing Operations and Construction Materials Stockpiles[1]	X	X	X	X	X	X	X	X	X
Community Benefits Agreement, Section X.M., Limits on Diesel Idling[1]	X	X	X	X	X	X	X	X	X
Community Benefits Agreement, Section X.N., Provision of Alternative Fuel[1]	X	X	X	X	X	X	X	X	X
SPAS Mitigation Measures									
~~None~~									
MM-AQ (SPAS)-1. Additional Measures to Supplement the LAX Master Plan for Air Quality - Construction-Related Mitigation Measures	*X*	*X*	*X*	*X*	*X*	*X*	*X*	*X*	*X*
MM-AQ (SPAS)-2. Additional Measures to Supplement the LAX Master Plan for Air Quality - Transportation-Related Mitigation Measures	*X*	*X*	*X*	*X*	*X*[2]	*X*[2]	*X*[2]	*X*	*X*

Table 1-6

LAX Master Plan Commitments, LAX Master Plan Mitigation Measures, and SPAS-Specific Mitigation Measures as Related to the SPAS Alternatives

	Alt. 1	Alt. 2	Alt. 3	Alt. 4	Alt. 5	Alt. 6	Alt. 7	Alt. 8	Alt. 9
MM-AQ (SPAS)-3. Additional Measures to Supplement the LAX Master Plan for Air Quality - Operations-Related Mitigation Measures	*X*	*X*	*X*	*X*	*X*	*X*	*X*	*X*	*X*
Biological Resources									
LAX Master Plan Commitments									
None									
LAX Master Plan Mitigation Measures									
MM-BC-1. Conservation of State-Designated Sensitive Habitat Within and Adjacent to the El Segundo Blue Butterfly Habitat Restoration Area	X	X	X	X	X	X	X		
MM-BC-3. Conservation of Floral Resources: Mature Tree Replacement	X	X	X	X	X	X	X	X	X
MM-ET-3. El Segundo Blue Butterfly Conservation: Dust Control	X	X	X	X	X	X	X		
MM-ET-4. El Segundo Blue Butterfly Conservation: Habitat Restoration	X	X	X	X	X	X	X		
SPAS Mitigation Measures									
MM-BIO (SPAS)-1. Replacement of State-Designated Sensitive Habitats	X	X	X	X	X	X	X		
MM-BIO (SPAS)-2. Conservation of Floral Resources: South Coast Branching Phacelia	X	X	X	X	X	X	X		
MM-BIO (SPAS)-3. Conservation of Floral Resources: Lewis' Evening Primrose	X	X	X	X	X	X	X		
MM-BIO (SPAS)-4. Conservation of Floral Resources: California Spineflower	X	X	X	X	X	X	X		
MM-BIO (SPAS)-5. Conservation of Floral Resources: Mesa Horkelia	X	X	X	X	X	X	X		
MM-BIO (SPAS)-6. Conservation of Floral Resources: Orcutt's Pincushion	X	X	X	X	X	X	X		
MM-BIO (SPAS)-7. Conservation of Floral Resources: Southern Tarplant	X	X	X	X	X	X	X	X	X
MM-BIO (SPAS)-8. Conservation of Faunal Resources: Sensitive Reptiles, Arthropods, and Gastropods	X	X	X	X	X	X	X		
MM-BIO (SPAS)-9. Conservation of Faunal Resources: Loggerhead Shrike	X	X	X	X	X	X	X		
MM-BIO (SPAS)-10. Conservation of Faunal Resources: Burrowing Owl	X	X	X	X	X	X	X	X	X
MM-BIO (SPAS)-11. Conservation of Floral Resources: Mature Tree Replacement - Nesting Raptors	X	X	X	X	X	X	X	X	X
MM-BIO (SPAS)-12. Conservation of Faunal Resources: Nesting Birds/Raptors	X	X	X	X	X	X	X	X	X
MM-BIO (SPAS)-13. Replacement of Jurisdictional Aquatic Features	X				X	X			
MM-BIO (SPAS)-14. Replacement of Habitat Units	X	X	X	X	X	X	X	X	X
Coastal Resources									
LAX Master Plan Commitments									
None									
LAX Master Plan Mitigation Measures									
MM-BC-1. Conservation of State-Designated Sensitive Habitat Within and Adjacent to the El Segundo Blue Butterfly Habitat Restoration Area	X	X	X	X	X	X	X		
MM-ET-3. El Segundo Blue Butterfly Conservation: Dust Control	X	X	X	X	X	X	X		
MM-ET-4. El Segundo Blue Butterfly Conservation: Habitat Restoration	X	X	X	X	X	X	X		

Table 1-6

LAX Master Plan Commitments, LAX Master Plan Mitigation Measures, and SPAS-Specific Mitigation Measures as Related to the SPAS Alternatives

	Alt. 1	Alt. 2	Alt. 3	Alt. 4	Alt. 5	Alt. 6	Alt. 7	Alt. 8	Alt. 9
SPAS Mitigation Measures									
MM-BIO (SPAS)-1. Replacement of State-Designated Sensitive Habitats	X	X	X	X	X	X	X		
MM-BIO (SPAS)-2. Conservation of Floral Resources: South Coast Branching Phacelia	X	X	X	X	X	X	X		
MM-BIO (SPAS)-3. Conservation of Floral Resources: Lewis' Evening Primrose	X	X	X	X	X	X	X		
MM-BIO (SPAS)-4. Conservation of Floral Resources: California Spineflower	X	X	X	X	X	X	X		
MM-BIO (SPAS)-5. Conservation of Floral Resources: Mesa Horkelia	X	X	X	X	X	X	X		
MM-BIO (SPAS)-6. Conservation of Floral Resources: Orcutt's Pincushion	X	X	X	X	X	X	X		
MM-BIO (SPAS)-8. Conservation of Faunal Resources: Sensitive Reptiles and Arthropods	X	X	X	X	X	X	X		
MM-BIO (SPAS)-9. Conservation of Faunal Resources: Loggerhead Shrike	X	X	X	X	X	X	X		
MM-BIO (SPAS)-10. Conservation of Faunal Resources: Burrowing Owl	X	X	X	X	X	X	X		
Cultural Resources									
LAX Master Plan Commitments									
HR-1. Preservation of Historic Resources	X	X	X		X	X	X	X	X
LAX Master Plan Mitigation Measures									
None									
SPAS Mitigation Measures									
MM-HA (SPAS)-1. Preservation of Historic Resources: Theme Building and Setting			X						
MM-HA (SPAS)-2. Preservation of Historic Resources: Theme Building and Setting									X
MM-HA (SPAS)-3. Preservation of Historic Resources: Union Savings and Loan Building			X						
MM-HA (SPAS)-4. Conformance with LAX Master Plan Archaeological Treatment Plan	X	X	X	X	X	X	X	X	X
Greenhouse Gases									
LAX Master Plan Commitments									
None									
LAX Master Plan Mitigation Measures									
MM-AQ-1. LAX Master Plan Mitigation Plan for Air Quality, Framework	X	X	X	X	X	X	X	X	X
MM-AQ-2. LAX Master Plan Mitigation Plan for Air Quality, Construction-Related Mitigation Measures	X	X	X	X	X	X	X	X	X
MM-AQ-3. LAX Master Plan Mitigation Plan for Air Quality, Transportation-Related Mitigation Measures	X	X	X	X	X[2]	X[2]	X[2]	X	X
MM-AQ-4. LAX Master Plan Mitigation Plan for Air Quality, Operations-Related Mitigation Measures	X	X	X	X	X	X	X	X	X
Community Benefits Agreement, Section X.A., Electrification of Passenger Gates[1]	X	X	X	X	X	X	X	X[3]	X[3]
Community Benefits Agreement, Section X.N., Provision of Alternative Fuel[1]	X	X	X	X	X	X	X	X	X
SPAS Mitigation Measures									
~~None~~									
MM-AQ (SPAS)-1. Additional Measures to Supplement the LAX Master Plan for Air Quality - Construction-Related Mitigation Measures	*X*	*X*	*X*	*X*	*X*	*X*	*X*	*X*	*X*

Table 1-6

LAX Master Plan Commitments, LAX Master Plan Mitigation Measures, and SPAS-Specific Mitigation Measures as Related to the SPAS Alternatives

	Alt. 1	Alt. 2	Alt. 3	Alt. 4	Alt. 5	Alt. 6	Alt. 7	Alt. 8	Alt. 9
MM-AQ (SPAS)-2. Additional Measures to Supplement the LAX Master Plan for Air Quality - Transportation-Related Mitigation Measures	*X*	*X*	*X*	*X*	*X*[2]	*X*[2]	*X*[2]	*X*	*X*
MM-AQ (SPAS)-3. Additional Measures to Supplement the LAX Master Plan for Air Quality - Operations-Related Mitigation Measures	*X*	*X*	*X*	*X*	*X*	*X*	*X*	*X*	*X*
Human Health Risk Assessment									
LAX Master Plan Commitments									
None									
LAX Master Plan Mitigation Measures									
MM-AQ-1. LAX Master Plan Mitigation Plan for Air Quality, Framework	X	X	X	X	X	X	X	X	X
MM-AQ-2. LAX Master Plan Mitigation Plan for Air Quality, Construction-Related Mitigation Measures	X	X	X	X	X	X	X	X	X
MM-AQ-3. LAX Master Plan Mitigation Plan for Air Quality, Transportation-Related Mitigation Measures	X	X	X	X	X[2]	X[2]	X[2]	X	X
MM-AQ-4. LAX Master Plan Mitigation Plan for Air Quality, Operations-Related Mitigation Measures	X	X	X	X	X	X	X	X	X
Community Benefits Agreement, Section X.A., Electrification of Passenger Gates[1]	X	X	X	X	X	X	X	X[3]	X[3]
Community Benefits Agreement, Section X.F., Construction Equipment[1]	X	X	X	X	X	X	X	X	X
Community Benefits Agreement, Section X.K., PM2.5[1]	X	X	X	X	X	X	X	X	X
Community Benefits Agreement, Section X.L., Rock-Crushing Operations and Construction Materials Stockpiles[1]	X	X	X	X	X	X	X	X	X
Community Benefits Agreement, Section X.M., Limits on Diesel Idling[1]	X	X	X	X	X	X	X	X	X
Community Benefits Agreement, Section X.N., Provision of Alternative Fuel[1]	X	X	X	X	X	X	X	X	X
SPAS Mitigation Measures									
~~None~~									
MM-AQ (SPAS)-1. Additional Measures to Supplement the LAX Master Plan for Air Quality - Construction-Related Mitigation Measures	*X*	*X*	*X*	*X*	*X*	*X*	*X*	*X*	*X*
MM-AQ (SPAS)-2. Additional Measures to Supplement the LAX Master Plan for Air Quality - Transportation-Related Mitigation Measures	*X*	*X*	*X*	*X*	*X*[2]	*X*[2]	*X*[2]	*X*	*X*
MM-AQ (SPAS)-3. Additional Measures to Supplement the LAX Master Plan for Air Quality - Operations-Related Mitigation Measures	*X*	*X*	*X*	*X*	*X*	*X*	*X*	*X*	*X*
Safety									
LAX Master Plan Commitments									
None									
LAX Master Plan Mitigation Measures									
None									
SPAS Mitigation Measures									
MM-SAF (SPAS)-1. Runway Protection Zone Reviews[4]	X				X	X			

Table 1-6

LAX Master Plan Commitments, LAX Master Plan Mitigation Measures, and SPAS-Specific Mitigation Measures as Related to the SPAS Alternatives

	Alt. 1	Alt. 2	Alt. 3	Alt. 4	Alt. 5	Alt. 6	Alt. 7	Alt. 8	Alt. 9
Hazardous Materials									
LAX Master Plan Commitments									
HM-1. Ensure Continued Implementation of Existing Remediation Efforts	X	X	X	X	X	X	X	X	X
HM-2. Handling of Contaminated Materials Encountered During Construction	X	X	X	X	X	X	X	X	X
C-1. Establishment of a Ground Transportation/Construction Coordination Office	X	X	X	X				X	X
ST-9. Construction Deliveries	X	X	X	X				X	X
ST-12. Designated Truck Delivery Hours	X	X	X	X				X	X
ST-14. Construction Employee Shift Hours	X	X	X	X				X	X
ST-17. Maintenance of Haul Routes	X	X	X	X				X	X
ST-18. Construction Traffic Management Plan	X	X	X	X				X	X
ST-19. Closure Restrictions of Existing Roadways	X	X	X	X				X	X
ST-21. Construction Employee Parking Locations	X	X	X	X				X	X
ST-22. Designated Truck Routes	X	X	X	X				X	X
LAX Master Plan Mitigation Measures									
None									
SPAS Mitigation Measures									
None									
Hydrology/Water Quality									
LAX Master Plan Commitments									
HWQ-1. Conceptual Drainage Plan			X						
LAX Master Plan Mitigation Measures									
None									
SPAS Mitigation Measures									
MM-HWQ (SPAS)-1. Conceptual Drainage Plan Revision and Update	X	X		X	X	X	X	X	X
Land Use and Planning									
LAX Master Plan Commitments									
LU-2. Establishment of a Landscape Maintenance Program for Parcels Acquired Due to Airport Expansion	X	X	X	X				X	X
LU-4. Neighborhood Compatibility Program	X	X	X	X	X	X	X	X	X
LU-5. Comply with City of Los Angeles Transportation Element Bicycle Plan	X	X	X	X	X	X	X	X	X
RBR-1. Residential and Business Relocation Program	X	X	X	X				X	X
LAX Master Plan Mitigation Measures									
MM-LU-1. Implement Revised Aircraft Noise Mitigation Program	X	X	X	X	X	X	X		
MM-LU-3. Conduct Study of the Relationship Between Aircraft Noise Levels and the Ability of Children to Learn	*X*	*X*	*X*	*X*	*X*	*X*	*X*		
MM-LU-4. Provide Additional Sound Insulation for Schools Shown by MM-LU-3 to be Significantly Impacted by Aircraft Noise	*X*	*X*	*X*	*X*	*X*	*X*	*X*		

Table 1-6

LAX Master Plan Commitments, LAX Master Plan Mitigation Measures, and SPAS-Specific Mitigation Measures as Related to the SPAS Alternatives

	Alt. 1	Alt. 2	Alt. 3	Alt. 4	Alt. 5	Alt. 6	Alt. 7	Alt. 8	Alt. 9
MM-RBR-1. Phasing for Business Relocations	X	X	X	X				X	X
MM-RBR-2. Relocation Opportunities through Aircraft Noise Mitigation Program	X	X	X	X				X	X
SPAS Mitigation Measures									
None									
Aircraft Noise ~~(in addition to noise-related measures listed above in Land Use)~~									
LAX Master Plan Commitments									
N-1. Maintenance of Applicable Elements of Existing Aircraft Noise Abatement Program	X	X	X	X	X	X	X		
LAX Master Plan Mitigation Measures									
MM-LU-1. Implement Revised Aircraft Noise Mitigation Program	*X*	*X*	*X*	*X*	*X*	*X*	*X*		
MM-LU-3. Conduct Study of the Relationship Between Aircraft Noise Levels and the Ability of Children to Learn	*X*	*X*	*X*	*X*	*X*	*X*	*X*		
MM-LU-4. Provide Additional Sound Insulation for Schools Shown by MM-LU-3 to be Significantly Impacted by Aircraft Noise	*X*	*X*	*X*	*X*	*X*	*X*	*X*		
MM-N-4. Update the Aircraft Noise Abatement Program Elements as Applicable to Adapt to the Future Airfield Configuration	X	X	X	X	X	X	X		
MM-N-5. Conduct Part 161 Study to Make Over-Ocean Procedures Mandatory	X	X	X	X	X	X	X		
SPAS Mitigation Measures									
None									
Road Traffic Noise									
LAX Master Plan Commitments									
None									
LAX Master Plan Mitigation Measures									
None									
SPAS Mitigation Measures									
None									
Construction Traffic and Equipment Noise									
LAX Master Plan Commitments									
ST-16. Designated Haul Routes	X	X	X	X	X	X	X	X	X
ST-18. Construction Traffic Management Plan	X	X	X	X	X	X	X	X	X
ST-22. Designated Truck Routes	X	X	X	X	X	X	X	X	X
LAX Master Plan Mitigation Measures									
MM-N-7. Construction Noise Control Plan	X	X	X	X	X	X	X	X	X
MM-N-8. Construction Staging	X	X	X	X	X	X	X	X	X
MM-N-9. Equipment Replacement	X	X	X	X	X	X	X	X	X
MM-N-10. Construction Scheduling	X	X	X	X	X	X	X	X	X

Table 1-6

LAX Master Plan Commitments, LAX Master Plan Mitigation Measures, and SPAS-Specific Mitigation Measures as Related to the SPAS Alternatives

	Alt. 1	Alt. 2	Alt. 3	Alt. 4	Alt. 5	Alt. 6	Alt. 7	Alt. 8	Alt. 9
SPAS Mitigation Measures									
None									
Transit Noise									
LAX Master Plan Commitments									
None									
LAX Master Plan Mitigation Measures									
MM-N-11. Automated People Mover (APM) Noise Assessment and Control Plan			X						
SPAS Mitigation Measures									
MM-N (SPAS)-1. Elevated/Dedicated Busway Noise Assessment and Control Plan	X	X						X	
Fire Protection									
LAX Master Plan Commitments									
FP-1. LAFD Design Recommendations	X	X	X	X	X	X	X	X	X
PS-1. Fire and Police Facility Relocation Plan	X	X	X	X	X	X	X	X	X
PS-2. Fire and Police Facility Space and Siting Requirements	X	X	X	X	X	X	X	X	X
C-1. Establishment of a Ground Transportation/Construction Coordination Office	X	X	X	X	X	X	X	X	X
ST-9. Construction Deliveries	X	X	X	X	X	X	X	X	X
ST-12. Designated Truck Delivery Hours	X	X	X	X	X	X	X	X	X
ST-14. Construction Employee Shift Hours	X	X	X	X	X	X	X	X	X
ST-17. Maintenance of Haul Routes	X	X	X	X	X	X	X	X	X
ST-18. Construction Traffic Management Plan	X	X	X	X	X	X	X	X	X
ST-19. Closure Restrictions of Existing Roadways	X	X	X	X	X	X	X	X	X
ST-21. Construction Employee Parking Locations	X	X	X	X	X	X	X	X	X
ST-22. Designated Truck Routes	X	X	X	X	X	X	X	X	X
LAX Master Plan Mitigation Measures									
None									
SPAS Mitigation Measures									
None									
Law Enforcement									
LAX Master Plan Commitments									
LE-1. Routine Evaluation of Manpower and Equipment Needs	X	X	X	X	X	X	X	X	X
LE-2. Plan Review	X	X	X	X	X	X	X	X	X
PS-1. Fire and Police Facility Relocation Plan	X	X	X		X	X	X	X	X
PS-2. Fire and Police Facility Space and Siting Requirements	X	X	X		X	X	X	X	X
C-1. Establishment of a Ground Transportation/Construction Coordination Office	X	X	X	X	X	X	X	X	X

Table 1-6

LAX Master Plan Commitments, LAX Master Plan Mitigation Measures, and SPAS-Specific Mitigation Measures as Related to the SPAS Alternatives

	Alt. 1	Alt. 2	Alt. 3	Alt. 4	Alt. 5	Alt. 6	Alt. 7	Alt. 8	Alt. 9
ST-9. Construction Deliveries	X	X	X	X	X	X	X	X	X
ST-12. Designated Truck Delivery Hours	X	X	X	X	X	X	X	X	X
ST-14. Construction Employee Shift Hours	X	X	X	X	X	X	X	X	X
ST-17. Maintenance of Haul Routes	X	X	X	X	X	X	X	X	X
ST-18. Construction Traffic Management Plan	X	X	X	X	X	X	X	X	X
ST-19. Closure Restrictions of Existing Roadways	X	X	X	X	X	X	X	X	X
ST-21. Construction Employee Parking Locations	X	X	X	X	X	X	X	X	X
ST-22. Designated Truck Routes	X	X	X	X	X	X	X	X	X
LAX Master Plan Mitigation Measures	~~X~~	~~X~~	~~X~~	~~X~~	~~X~~	~~X~~	~~X~~	~~X~~	~~X~~
None									
SPAS Mitigation Measures									
MM-LE (SPAS)-1. LAWAPD Replacement Facilities	X	X	X		X	X	X	X	X
On-Airport Transportation									
LAX Master Plan Commitments									
ST-2. Non-Peak CTA Deliveries	X	X		X				X	X
ST-8. Limited Short-Term Lane Closures	X	X		X				X	X
ST-9. Construction Deliveries	X	X		X				X	X
ST-18. Construction Traffic Management Plan	X	X		X				X	X
ST-19. Closure Restrictions of Existing Roadways	X	X		X				X	X
LAX Master Plan Mitigation Measures									
MM-ST-1. Require CTA Construction Vehicles to Use Designated Lanes	X	X		X				X	X
MM-ST-2. Modify CTA Signage	X	X		X				X	X
MM-ST-3. Develop Designated Shuttle Stops for Labor Buses and ITC-CTA Buses	X	X		X				X	X
Bradley West Project Mitigation Measures									
MM-ST (BWP)-2. Improve the Intersection of Center Way and World Way South	X	X		X				X	X
MM-ST (BWP)-3. Widen World Way Across from TBIT	X	X		X				X	X
SPAS Mitigation Measures									
MM-ST*(OA)* (SPAS)-1. Relocate Existing Taxi Loading Zone at TBIT	X	X		X				X	X
MM-ST*(OA)* (SPAS)-2. Change Departures and Arrivals Level Commercial Vehicle Curbside Operations	X	X		X				X	X
Off-Airport Transportation									
LAX Master Plan Commitments									
ST-9. Construction Deliveries	X	X	X	X				X	X
ST-12. Designated Truck Delivery Hours	X	X	X	X				X	X
ST-14. Construction Employee Shift Hours	X	X	X	X				X	X
ST-17. Maintenance of Haul Routes	X	X	X	X				X	X

Table 1-6

LAX Master Plan Commitments, LAX Master Plan Mitigation Measures, and SPAS-Specific Mitigation Measures as Related to the SPAS Alternatives

	Alt. 1	Alt. 2	Alt. 3	Alt. 4	Alt. 5	Alt. 6	Alt. 7	Alt. 8	Alt. 9
ST-18. Construction Traffic Management Plan	X	X	X	X				X	X
ST-19. Closure Restrictions of Existing Roadways	X	X	X	X				X	X
ST-20. Stockpile Locations	X	X	X	X				X	X
ST-21. Construction Employee Parking Locations	X	X	X	X				X	X
ST-22. Designated Truck Routes	X	X	X	X				X	X
ST-24. Fair Share Contribution to CMP Improvements	X	X	X	X				X	X
LAX Master Plan Mitigation Measures									
MM-ST-14. Ground Transportation/Construction Coordination Office Outreach Program	X	X	X	X				X	X
SPAS Mitigation Measures									
MM-ST (SPAS)-1. Transportation Demand Management Program	X	X	X	X				X	X
MM-ST (SPAS)-2. Modify the Intersection of Airport Boulevard and Arbor Vitae Street/Westchester Parkway (Intersection 6)	X	X	X	X				X	X
MM-ST (SPAS)-3. Modify the Intersection of Airport Boulevard and Century Boulevard (Intersection 7)	X	X		X				X	X
MM-ST (SPAS)-4. Modify the Intersection of Arbor Vitae Street and Inglewood Avenue (Intersection 11)	X	X		X				X	X
MM-ST (SPAS)-5. La Brea Avenue and Arbor Vitae Street (Intersection 12)	X	X						X	X
MM-ST (SPAS)-6. Modify the Intersection of Aviation Boulevard and El Segundo Boulevard (Intersection 15)			X						
MM-ST (SPAS)-7. Modify the Intersection of Aviation Boulevard and Imperial Highway (Intersection 16)			X	X					
MM-ST (SPAS)-8. Modify the Intersection of Aviation Boulevard/Florence Avenue and Manchester Avenue (Intersection 17)	X	X	X	X				X	X
MM-ST (SPAS)-9. Modify the Intersection of La Brea Avenue and Centinela Avenue (Intersection 25)	X	X	X					X	X
MM-ST (SPAS)-10. Modify the Intersection of La Cienega Boulevard and Centinela Avenue (Intersection 26)	X	X	X	X				X	X
MM-ST (SPAS)-11. Modify the Intersection of Sepulveda Boulevard and Centinela Avenue (Intersection 28)			X						
MM-ST (SPAS)-12. La Brea Avenue/Hawthorne Boulevard and Century Boulevard (Intersection 34)	X	X		X				X	X
MM-ST (SPAS)-13. Inglewood Avenue and Century Boulevard (Intersection 35)	X	X	X	X				X	X
MM-ST (SPAS)-14. Prairie Avenue and Century Boulevard (Intersection 37)	X	X		X				X	X
MM-ST (SPAS)-15. Modify the Intersection of Sepulveda Boulevard and Century Boulevard (Intersection 38)	X	X	X	X				X	X
MM-ST (SPAS)-16. Modify the Intersection of La Cienega Boulevard and El Segundo Boulevard (Intersection 53)			X						
MM-ST (SPAS)-17. Modify the Intersection of La Brea Avenue and Florence Avenue (Intersection 57)	X	X	X	X				X	X
MM-ST (SPAS)-18. Modify the Intersection of La Cienega Boulevard and Florence Avenue (Intersection 58)	X	X	X	X				X	X
MM-ST (SPAS)-19. Modify the Intersection of Sepulveda Boulevard and Grand Avenue (Intersection 60)	X	X						X	X
MM-ST (SPAS)-20. Modify the Intersection of Hawthorne Boulevard and Imperial Avenue (Intersection 62)	X	X	X	X				X	X
MM-ST (SPAS)-21. Modify the Intersection of Inglewood Avenue and Imperial Highway (Intersection 66)	X	X	X	X				X	X
MM-ST (SPAS)-22. Prairie Avenue and Imperial Highway (Intersection 70)			X						
MM-ST (SPAS)-23. Modify the Intersection of Sepulveda Boulevard and Imperial Highway (Intersection 71)	X	X	X	X				X	X
MM-ST (SPAS)-24. Modify the Intersection of I-105 Ramps (east of Aviation Boulevard) and Imperial Highway (Intersection 74)			X						
MM-ST (SPAS)-25. Modify the Intersection of La Brea Avenue and Manchester Boulevard (Intersection 85)			X					X	X

Table 1-6

LAX Master Plan Commitments, LAX Master Plan Mitigation Measures, and SPAS-Specific Mitigation Measures as Related to the SPAS Alternatives

	Alt. 1	Alt. 2	Alt. 3	Alt. 4	Alt. 5	Alt. 6	Alt. 7	Alt. 8	Alt. 9
MM-ST (SPAS)-26. Modify the Intersection of La Brea Avenue and Slauson Avenue (Intersection 87)	X	X	X	X				X	X
MM-ST (SPAS)-27. Modify the Intersection of La Cienega Boulevard and Manchester Boulevard (Intersection 90)			X					X	X
MM-ST (SPAS)-28. Modify the intersection of La Cienega Boulevard and Southbound I-405 Ramps (north of Century Boulevard) (Intersection 96)	X	X						X	X
MM-ST (SPAS)-29. Modify the Intersection of Sepulveda Boulevard and La Tijera Boulevard (Intersection 101)			X	X					
MM-ST (SPAS)-30. Modify the Intersection of Lincoln Boulevard and Manchester Boulevard (Intersection 105)			X						
MM-ST (SPAS)-31. Modify the Intersection of Ash Avenue and Manchester Avenue (Intersection 115)	X	X						X	X
MM-ST (SPAS)-32. Vicksburg Avenue and 96th Street (Intersection 143)	X	X						X	X
MM-ST (SPAS)-33. Modify the Intersection of Sepulveda Eastway and Westchester Parkway (Intersection 146)			X	X					
MM-ST (SPAS)-34. Modify the Intersection of Hindry Avenue and Manchester Boulevard (Intersection 159)	X	X	X	X				X	X
MM-ST (SPAS)-35. Modify the Intersection of Prairie Avenue and Manchester Boulevard (Intersection 169)	X	X	X	X				X	X
MM-ST (SPAS)-36. Modify the Intersection of Prairie Avenue and Lennox Boulevard (Intersection 197)	X	X	X	X				X	X
MM-ST (SPAS)-37. Modify the intersection of Arbor Vitae Street and Aviation Boulevard (Intersection 10)	*X*	*X*		*X*				*X*	*X*
MM-ST (SPAS)-38. Modify the Intersection of La Tijera Boulevard and Centinela Avenue (Intersection 27)	*X*	*X*		*X*				*X*	*X*
MM-ST (SPAS)-39. Fair Share Contribution to a Traffic Signal at the Intersection of Overland Avenue and Kelmore Street/Ranch Road (Intersection 153)			*X*						
MM-ST (SPAS)-40. Fair Share Contribution to a Traffic Signal at the Intersection of Overland Avenue and Sawtelle Boulevard (Intersection 154)	*X*	*X*	*X*	*X*				*X*	*X*
MM-ST (SPAS)-41. Fair Share Contribution to a Traffic Signal at the Intersection of Walgrove Avenue and Washington Boulevard (Intersection 156)	*X*	*X*	*X*	*X*				*X*	*X*
MM-ST (SPAS)-42. Contribute to ITS Improvements at 11 Study Intersections Within the Jurisdiction of Los Angeles County (Intersections 27, 36, 52, 63, 76, 86, 87, 93, 95, 119, and 173)	*X*	*X*	*X*	*X*				*X*	*X*
Energy									
LAX Master Plan Commitments									
E-1. Energy Conservation and Efficiency Program	X	X	X		X	X	X	X	X
LAX Master Plan Mitigation Measures									
None									
SPAS Mitigation Measures									
None									
Solid Waste									
LAX Master Plan Commitments									
SW-1. Implement an Enhanced Recycling Program	X	X	X	X	X	X	X	X	X
LAX Master Plan Mitigation Measures									
MM SW-1. Provide Landfill Capacity[5]	X	X	X	X	X	X	X	X	X

Table 1-6

LAX Master Plan Commitments, LAX Master Plan Mitigation Measures, and SPAS-Specific Mitigation Measures as Related to the SPAS Alternatives

	Alt. 1	Alt. 2	Alt. 3	Alt. 4	Alt. 5	Alt. 6	Alt. 7	Alt. 8	Alt. 9
SPAS Mitigation Measures									
None									
Wastewater Generation									
LAX Master Plan Commitments									
W-2. Enhance Existing Water Conservation Program	X	X	X	X	X	X	X	X	X
LAX Master Plan Mitigation Measures									
None									
SPAS Mitigation Measures									
None									
Water Supply									
LAX Master Plan Commitments									
W-1. Maximize Use of Reclaimed Water	X	X	X	X	X	X	X	X	X
W-2. Enhance Existing Water Conservation Program	X	X	X	X	X	X	X	X	X
LAX Master Plan Mitigation Measures									
None									
SPAS Mitigation Measures									
None									

[1] LAWA and the LAX Coalition for Economic, Environmental and Educational Justice (LAX Coalition) have developed and entered into an agreement, the Community Benefits Agreement (CBA), to ensure that communities adversely affected by the LAX Master Plan Program also receive benefits as a result of implementation of the Program. The benefits and mitigations included in the CBA were negotiated independently from, and are not a part of, the LAX Master Plan Mitigation Monitoring and Reporting Program. The CBA contains a number of air quality mitigation measures, of which Sections X.A., X.F., X.K., X.L., X.M., and X.N. are applicable to SPAS.

[2] Alternatives 5, 6, and 7 focus on airfield improvements, and would not have any impacts related to ground transportation; however, assuming the airfield improvements under those alternatives would be paired with ground access improvements proposed under Alternative 1, 2, 8, or 9, there would be impacts to ground transportation that would subject to this mitigation measure.

[3] Alternatives 8 and 9 focus on ground access improvements, and would not have any impacts associated with aircraft gates; however, assuming the ground access improvements under those alternatives would be paired with airfield improvements proposed under Alternative 1, 2, 5, 6, or 7, there would be impacts to gates that would be subject to this mitigation measure.

[4] This measure would reduce the cumulatively considerable contribution to impacts to aviation safety from building/structural penetrations of FAR Part 77 imaginary surfaces.

[5] This measure would address cumulatively significant impacts associated with solid waste generation and disposal.

Source: CDM Smith, 2012.

6. The first sentence in the first paragraph following the bullets on page 1-75 of the Draft EIR is hereby revised as follows:

   LAX Master Plan mitigation measures *and SPAS-specific mitigation measures* would reduce TAC emissions associated with all of the SPAS alternatives.

7. The first sentence of the second paragraph on page 1-84 of the Draft EIR is hereby revised as follows:

   Table 1-*17*~~18~~ provides a summary of the population, dwellings, and non-residential noise-sensitive facilities that would be within the 65 CNEL or higher noise exposure contour with the implementation of the various alternatives compared to baseline (2009) conditions. Alternative 5 would result in the least change in number of dwellings exposed to 65 CNEL or higher noise levels (4,315), followed in order by the Alternative 1 (4,370), Alternative 6 (4,462), Alternative 7 (4,485), Alternative 3 (4,508), Alternative 2 (4,531), and Alternative 4 (4,603).

8. The last paragraph on page 1-99 of the Draft EIR is hereby revised as follows:

   Table 1-24 identifies the impacts associated with each alternative following the implementation of the recommended SPAS-specific mitigation measures identified in Section 4.12.2.7.2. As illustrated in **Table 1-24**, Alternative 1, 2, 3, 4, 8, and 9 would all have significant and unavoidable impacts to intersections when compared to either Baseline (2010) Without Alternative conditions or Future (2025) conditions. When comparing to Baseline (2010) Without Alternative conditions, Alternative 3 would have the greatest number of significant, unavoidable impacts (11 intersections) after mitigation, whereas Alternatives 1 and 2 would have the fewest (1 intersection each). When comparing to Future (2025) conditions, Alternatives 8 and 9 would have the greatest number of significant, unavoidable impacts (~~44~~ *42* intersections) after mitigation, and Alternative 3 would have the fewest (37). Alternatives 1, ~~and~~ 2*, and 4* would have ~~39~~ *38* significant and unavoidable impacts after mitigation. ~~Alternative 4 would have significant, unavoidable impacts to 40 intersections after mitigation.~~

8. Table 1-24 on page 1-100 of the Draft EIR has been revised. Please see the following revised table.

Table 1-24

Summary of Off-Airport Transportation Impacts After Mitigation

	Alt. 1	Alt. 2	Alt. 3	Alt. 4	Alt. 8	Alt. 9
Impacts Relative to Baseline (2010) Without Alternative Conditions						
Intersections	SU(1)	SU(1)	SU(11)	SU(2)	SU(2)	SU(2)
CMP Facilities - Arterial Monitoring Intersections	LS	LS	SU(1)	LS	LS	LS
CMP Facilities - Freeway Monitoring Stations	LS	LS	LS	LS	LS	LS
CMP Facilities - Transit Demand	LS	LS	LS	LS	LS	LS
Impacts Relative to Future (2025) Conditions						
Intersections	SU (~~39~~*38*)	SU (~~39~~*38*)	SU(37)	SU (~~40~~*38*)	SU (~~44~~*42*)	SU (~~44~~*42*)
CMP Facilities - Arterial Monitoring Intersections	SU(1)	SU(1)	SU(2)	SU(2)	SU(1)	SU(1)
CMP Facilities - Freeway Monitoring Stations	SU(3)	SU(3)	SU(3)	SU(3)	SU(3)	SU(3)
CMP Facilities - Transit Demand	LS	LS	LS	LS	LS	LS
Construction Impacts[1]	SU	SU	SU	SU	SU	SU

Notes:

LS = Less Than Significant Impact
SU = Significant Unavoidable Impact

Numbers in parentheses indicate the number of affected intersections/facilities.

Table 1-24

Summary of Off-Airport Transportation Impacts After Mitigation

[1] The nine alternatives currently being considered for the SPAS project are only at a conceptual level of planning. No construction plans, programs, or schedules have been formulated for any of the alternatives. It would be speculative to estimate construction-related vehicle trip generation and distribution onto the local roadway network in order to evaluate traffic impacts on specific streets and intersections during peak and non-peak traffic periods. As such, the total number of intersections that may be temporarily significantly impacted during construction cannot be determined at this time.

Source: Fehr & Peers, 2012.

Chapter 2, Project Description

1. The second bullet on page 2-37 of the Draft EIR is hereby revised as follows:

   As a result of moving the APLL south to meet ADG VI standards, several gates would be eliminated *or downsized (i.e., would accommodate smaller aircraft types)*

2. The second sentence under the Disposition of Facility/Use column for the Taxi Holding Lot in Table 2-3 on page 2-50 of the Draft EIR is hereby revised as follows:

   Under Alternatives 1, 2, *8,* and ~~5 through~~ 9, the lot would move to the eastern portion of the Park One facility.

3. The fourth sentence of the third paragraph on page 2-55 of the Draft EIR is hereby revised as follows:

   Under Alternatives 1, 2, *8,* and ~~5 through~~ 9, the taxi and commercial holding lots for the shared-ride vans and charter buses/limousines would be relocated to the easternmost portion of the area currently occupied by the Park One parking facility.

Chapter 4, Environmental Impact Analysis

1. Table 4.2-4 on page 4-101 of the Draft EIR has been revised. The revisions to this table represent corrections to on-airport emissions to correct typographical errors for several on-airport sources. Regarding off-airport emissions, Table 4.2-4 in the SPAS Draft EIR contained a typographical error with respect to baseline (2009) emissions associated with off-airport roadways. The correct values are shown in the following table. Although reflected incorrectly in Table 4.2-4 of the SPAS Draft EIR, the correct values were used in all of the calculations of impacts that were completed for the SPAS Draft EIR. Therefore, the correct values were accounted for in the SPAS Draft EIR impact analysis and the corrections to the typographical error in the baseline (2009) emissions do not constitute significant new information to the EIR, nor do they disclose or suggest a new or more severe environmental impact. Please see the following revised table.

Table 4.2-4

Baseline (2009) Airport Emissions

	Peak Daily Emissions, lbs/day					
Emission Sources	**CO**	**VOC**	**NO_x**	**SO_2**	**PM10**	**PM2.5**
On-Airport Sources						
Aircraft	~~12,650~~ *13,740*	~~2,056~~ *2,182*	~~18,968~~ *19,159*	~~1,644~~ *1,707*	~~173~~ *178*	~~173~~ *178*
Auxiliary Power Units	~~658~~ *657*	59	612	~~85~~ *84*	97	97

Table 4.2-4

Baseline (2009) Airport Emissions

Emission Sources	Peak Daily Emissions, lbs/day					
	CO	VOC	NO_x	SO_2	PM10	PM2.5
Ground Support Equipment	4,746	383	2,240	<1	62	60
On-Airport Roadways	1,829	174	726	<1	~~30~~	~~27~~
					168	*53*
Parking Facilities	~~3,425~~	~~527~~	~~1,790~~	<1	~~71~~	~~65~~
	3,125	*481*	*1,594*		*134*	*80*
On-Airport Stationary[1]	~~379~~	~~12~~	~~313~~	~~2~~	~~37~~	~~37~~
	<1	*<1*	*<1*	*<1*	*<1*	*<1*
On-Airport Subtotal	~~**23,687**~~	~~**3,211**~~	~~**24,649**~~	~~**1,730**~~	~~**470**~~	~~**459**~~
	24,096	***3,279***	***24,330***	***1,791***	***639***	***468***
Off-Airport Sources						
Off-Airport Roadways	55,888	3,322	20,366	<1	~~689~~	~~632~~
					7,598	*1,860*
Off-Airport Stationary[2]	~~41~~	~~3~~	~~7~~	<1	~~4~~	~~4~~
	7	*<1*	*1*		*1*	*1*
Off-Airport Subtotal	~~**55,929**~~	~~**3,325**~~	~~**20,373**~~	**<1**	~~**693**~~	~~**636**~~
	55,895	***3,323***	***20,368***		***7,598***	***1,861***
Total Baseline Emissions	~~**79,616**~~	~~**6,536**~~	~~**45,022**~~	~~**1,730**~~	~~**1,163**~~	~~**1,095**~~
	79,991	***6,602***	***44,698***	***1,791***	***8,237***	***2,328***

Notes:

Totals may not add due to rounding.

[1] On-airport stationary sources are natural gas combustion units for space heating and water heating.

[2] Off-airport stationary sources are natural gas combustion electric power generators supplying electricity to project facilities. Estimated that 22% of LADWP power is produced in the South Coast Air Basin (LADWP, 2011).

Sources: CDM Smith, 2012.

2. The fourth bullet on page 4-108 of the Draft EIR is hereby revised as follows:

- **LAX Master Plan Community Benefits Agreement; X.M., Limits on Diesel Idling.**

  This provision requires LAWA to prohibit idling or queuing of diesel-fueled vehicles and equipment for more than ten consecutive minutes on-site*, unless CARB adopts a stricter standard, in which case LAWA shall enforce that standard*. This requirement would be included in specifications for any SPAS alternative requiring on-site construction. *Subsequent to the adoption of the CBA, CARB has adopted a five-minute idling limit for diesel vehicles and equipment, so that limit is applicable to the SPAS alternatives.*

3. Table 4.2-11 on page 4-115 of the Draft EIR has been revised. Please see the following revised table.

4. Table 4.2-12 on page 4-117 of the Draft EIR has been revised. Please see the following revised table.

5. Table 4.2-13 on page 4-122 of the Draft EIR has been revised. Please see the following revised table.
6. Figure 4.2-2 on page 4-137 of the Draft EIR has been revised with respect to the NO_2 Annual concentration location. Please see the following revised figure.
7. Table 4.2-15 on page 4-139 of the Draft EIR has been revised. Please see the following revised table.
8. Footnote 1 in Table 4.2-16 on page 4-142 of the Draft EIR is hereby revised as follows:

   [1] The significance thresholds for PM10 and PM2.5 are based on project incremental thresholds developed by SCAQMD. Therefore, future ~~construction~~ *operational* concentrations are the values under a given alternative to be compared to the thresholds.

9. The note in Table 4.2-17 on page 4-156 of the Draft EIR Is hereby revised as follows:

   Mitigation measures are LAX Master Plan Mitigation Measures MM-AQ-1, MM-AQ-2, MM-AQ-3, MM-AQ-4; ~~and~~ components from Section X, Air Quality, of the LAX Master Plan Community Benefits Agreement~~.~~*; and SPAS-specific mitigation measures.*

10. Section 4.2.7 on page 4-160 of the Draft EIR is hereby revised as follows:

Table 4.2-11

Peak Construction Concentrations for CO, NO_2, and SO_2

Pollutant/ Source[1]	Averaging Period	Alt. 1 (µg/m³)	Alt. 2 (µg/m³)	Alt. 3 (µg/m³)	Alt. 4 (µg/m³)	Alt. 5[2] (µg/m³)	Alt. 6[2] (µg/m³)	Alt. 7[2] (µg/m³)	Alt. 8[3] (µg/m³)	Alt. 9[3] (µg/m³)
CO	CAAQS									
Alternative	1-Hour	646	396	856	176	726-734	560-570	480-508	410-730	440-734
Background	1-Hour	4,581	4,581	4,581	4,581	4,581	4,581	4,581	4,581	4,581
Total	1-Hour	5,227	4,977	5,437	4,757	5,307-5,315	5,141-5,151	5,061-5,089	4,991-5,311	5,021-5,315
Threshold[4]	1-Hour	23,000	23,000	23,000	23,000	23,000	23,000	23,000	23,000	23,000
Significant?	1-Hour	**No**	**No**	**No**	**No**	**No**	**No**	**No**	**No**	**No**
	CAAQS/NAAQS									
Alternative	8-Hour	452	278	600	124	508-514	394-400	336-356	286-510	308-514
Background	8-Hour	2,897	2,897	2,897	2,897	2,897	2,897	2,897	2,897	2,897
Total	8-Hour	3,349	3,175	3,497	3,021	3,405-3,411	3,291-3,297	3,233-3,253	3,183-3,407	3,205-3,411
Threshold[5]	8-Hour	9,000	9,000	9,000	9,000	9,000	9,000	9,000	9,000	9,000
Significant?	8-Hour	**No**	**No**	**No**	**No**	**No**	**No**	**No**	**No**	**No**
NO_2	CAAQS									
Alternative	1-Hour	998	494	1,468	358	1,120-1,138	870-888	746-764	620-1,126	700-1,138
Background	1-Hour	177	177	177	177	177	177	177	177	177
Total	1-Hour	1,175	671	1,645	535	1,297-1,315	1,047-1,065	923-941	797-1,303	877-1,315
Threshold[6]	1-Hour	339	339	339	339	339	339	339	339	339
Significant?	1-Hour	**Yes**	**Yes**	**Yes**	**Yes**	**Yes**	**Yes**	**Yes**	**Yes**	**Yes**
	NAAQS									
Alternative	1-Hour	824	348	932	288	924-938	718-730	612-626	424-932	506-938
Background	1-Hour	~~76~~ *125*	~~76~~ *125*	~~76~~ *125*	~~76~~ *125*	~~76~~ *125*	~~76~~ *125*	~~76~~ *125*	~~76~~ *125*	~~76~~ *125*
Total	1-Hour	~~900~~ *948*	~~424~~ *474*	~~1,008~~ *1,056*	~~364~~ *413*	~~1,000-1,014~~ *1,050-1,063*	~~794-806~~ *842-855*	~~688-702~~ *738-751*	~~500-1,008~~ *550-1,056*	~~582-1,014~~ *630-1,063*
Threshold[7]	1-Hour	188	188	188	188	188	188	188	188	188
Significant?	1-Hour	**Yes**	**Yes**	**Yes**	**Yes**	**Yes**	**Yes**	**Yes**	**Yes**	**Yes**
	CAAQS									
Alternative	Annual	8	8	17	4	8-9	8-9	8-9	9	9
Background	Annual	26	26	26	26	26	26	26	26	26
Total	Annual	34	34	43	30	34-35	34-35	34-35	35	35
Threshold[8]	Annual	57	57	57	57	57	57	57	57	57
Significant?	Annual	**No**	**No**	**No**	**No**	**No**	**No**	**No**	**No**	**No**
SO_2	CAAQS									
Alternative	1-Hour	2	2	2	<0.5	2	2	2	2	2

Table 4.2-11

Peak Construction Concentrations for CO, NO_2, and SO_2

Pollutant/ Source[1]	Averaging Period	Alt. 1 ($\mu g/m^3$)	Alt. 2 ($\mu g/m^3$)	Alt. 3 ($\mu g/m^3$)	Alt. 4 ($\mu g/m^3$)	Alt. 5[2] ($\mu g/m^3$)	Alt. 6[2] ($\mu g/m^3$)	Alt. 7[2] ($\mu g/m^3$)	Alt. 8[3] ($\mu g/m^3$)	Alt. 9[3] ($\mu g/m^3$)
Background	1-Hour	65	65	65	65	65	65	65	65	65
Total	1-Hour	67	67	67	65	67	67	67	67	67
Threshold[9]	1-Hour	655	655	655	655	655	655	655	655	655
Significant?	1-Hour	**No**	**No**	**No**	**No**	**No**	**No**	**No**	**No**	**No**
	NAAQS									
Alternative	1-Hour	2	2	2	<0.5	2	2	2	2	2
Background	1-Hour	37	37	37	37	37	37	37	37	37
Total	1-Hour	39	39	39	37	39	39	39	39	39
Threshold[10]	1-Hour	196	196	196	196	196	196	196	196	196
Significant?	1-Hour	**No**	**No**	**No**	**No**	**No**	**No**	**No**	**No**	**No**
	CAAQS									
Alternative	24-Hour	0.2	<0.05	0.2	<0.05	0.2	0.2	0.2	0.2	0.2
Background	24-Hour	16	16	16	16	16	16	16	16	16
Total	24-Hour	16	16	16	16	16	16	16	16	16
Threshold[11]	24-Hour	105	105	105	105	105	105	105	105	105
Significant?	24-Hour	**No**	**No**	**No**	**No**	**No**	**No**	**No**	**No**	**No**

Notes:

Totals may not add due to rounding.

1 The significance thresholds for CO, NO_2, and SO_2 are based on California and/or National Ambient Air Quality Standards (CAAQS and/or NAAQS) which are absolute thresholds. Therefore, future operational concentrations are determined by adding existing background concentrations to the calculated future airport-related concentrations under a given alternative for comparison to the thresholds.

2 Alternatives 5 through 7 focus primarily on airfield improvements and related terminal and roadway improvements. Those improvements are compatible with the ground access improvements proposed under Alternatives 1, 2, 8, and 9. The range of peak concentrations presented for Alternatives 5 through 7 include the concentrations associated with construction of the alternative-specific airfield/terminal improvements plus the range of concentrations associated with construction of different ground access options under Alternatives 1, 2, 8, or 9. The total concentrations for Alternatives 5 through 7 would fall within the range shown for each depending on which set of ground access improvements is assumed.

3 Alternatives 8 and 9 focus primarily on ground access improvements; however, those improvements are compatible with the airfield improvements, and related terminal and roadway improvements, proposed under Alternatives 1, 2, 5, 6, and 7. The range of peak concentrations presented for Alternatives 8 and 9 include the concentrations associated with construction of the alternative-specific ground access improvements plus the range of concentration associated with construction of different airfield/terminal options under Alternatives 1, 2, 5, 6, or 7. The total concentrations for Alternatives 8 and 9 would fall within the range shown for each depending on which set of airfield improvements is assumed.

4 The 1-Hour CO threshold is the 1-Hour CO CAAQS since this standard is more stringent than the 1-Hour CO NAAQS.

5 The 8-Hour CO threshold is equivalent to both the 8-Hour CO CAAQS and 8-Hour CO NAAQS.

6 The 1-Hour NO_2 CAAQS is not *to be* exceeded.

7 The 1-Hour NO_2 NAAQS is based on the 3-year average of the 98th percentile of daily maximum 1-hour concentrations.

Table 4.2-11

Peak Construction Concentrations for CO, NO_2, and SO_2

Pollutant/ Source[1]	Averaging Period	Alt. 1 ($\mu g/m^3$)	Alt. 2 ($\mu g/m^3$)	Alt. 3 ($\mu g/m^3$)	Alt. 4 ($\mu g/m^3$)	Alt. 5[2] ($\mu g/m^3$)	Alt. 6[2] ($\mu g/m^3$)	Alt. 7[2] ($\mu g/m^3$)	Alt. 8[3] ($\mu g/m^3$)	Alt. 9[3] ($\mu g/m^3$)

[8] The annual NO_2 threshold is the annual NO_2 CAAQS since this standard is more stringent than the annual NO_2 NAAQS.
[9] The 1-Hour SO_2 CAAQS is not *to be* exceeded.
[10] The 1-Hour SO_2 NAAQS is based on the 3-year average of the 99th percentile of daily maximum 1-hour concentrations.
[11] The ~~1~~*24*-Hour SO_2 CAAQS is not *to be* exceeded.

Source: CDM Smith, 2012.

Table 4.2-12

Peak Construction Concentrations for PM10 and PM2.5

Pollutant/ Source[1]	Averaging Period	Alt. 1 ($\mu g/m^3$)	Alt. 2 ($\mu g/m^3$)	Alt. 3 ($\mu g/m^3$)	Alt. 4 ($\mu g/m^3$)	Alt. 5[2] ($\mu g/m^3$)	Alt. 6[2] ($\mu g/m^3$)	Alt. 7[2] ($\mu g/m^3$)	Alt. 8[3] ($\mu g/m^3$)	Alt. 9[3] ($\mu g/m^3$)
PM10										
Alternative	24-Hour	38	28	~~50~~ *58*	16	40-42	36-38	34-36	30-40	30-42
Threshold	24-Hour	10.4	10.4	10.4	10.4	10.4	10.4	10.4	10.4	10.4
Significant?	**24-Hour**	**Yes**	**Yes**	**Yes**	**Yes**	**Yes**	**Yes**	**Yes**	**Yes**	**Yes**
Alternative	Annual	4	4	~~6~~ *8*	2	4	4	4	4	4
Threshold	Annual	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0
Significant?	**Annual**	**Yes**	**Yes**	**Yes**	**Yes**	**Yes**	**Yes**	**Yes**	**Yes**	**Yes**
PM2.5										
Alternative	24-Hour	6	4	~~8~~ *10*	2	6	6	6	4-6	4-6
Threshold	24-Hour	10.4	10.4	10.4	10.4	10.4	10.4	10.4	10.4	10.4
Significant?	**24-Hour**	**No**	**No**	**No**	**No**	**No**	**No**	**No**	**No**	**No**

Notes:

Totals may not add due to rounding.

[1] The significance thresholds for PM10 and PM2.5 are based on project incremental thresholds developed by SCAQMD. Therefore, future construction concentrations are the values under a given alternative to be compared to the thresholds.

Table 4.2-12

Peak Construction Concentrations for PM10 and PM2.5

Pollutant/ Source[1]	Averaging Period	Alt. 1 (µg/m^3)	Alt. 2 (µg/m^3)	Alt. 3 (µg/m^3)	Alt. 4 (µg/m^3)	Alt. 5[2] (µg/m^3)	Alt. 6[2] (µg/m^3)	Alt. 7[2] (µg/m^3)	Alt. 8[3] (µg/m^3)	Alt. 9[3] (µg/m^3)

[2] Alternatives 5 through 7 focus primarily on airfield improvements and related terminal and roadway improvements. Those improvements are compatible with the ground access improvements proposed under Alternatives 1, 2, 8, and 9. The range of peak concentrations presented for Alternatives 5 through 7 include the concentrations associated with construction of the alternative-specific airfield/terminal improvements plus the range of concentrations associated with construction of different ground access options under Alternatives 1, 2, 8, or 9. The total concentrations for Alternatives 5 through 7 would fall within the range shown for each depending on which set of ground access improvements is assumed.

[3] Alternatives 8 and 9 focus primarily on ground access improvements; however, those improvements are compatible with the airfield improvements, and related terminal and roadway improvements, proposed under Alternatives 1, 2, 5, 6, and 7. The range of peak concentrations presented for Alternatives 8 and 9 include the concentrations associated with construction of the alternative-specific ground access improvements plus the range of concentration associated with construction of different airfield/terminal options under Alternatives 1, 2, 5, 6, or 7. The total concentrations for Alternatives 8 and 9 would fall within the range shown for each depending on which set of airfield improvements is assumed.

Source: CDM Smith, 2012.

Table 4.2-13

Incremental Project Operational Emissions Compared to Baseline (2009) Conditions

Pollutant/ Source[1]	Alt. 1 lbs/day	Alt. 2 lbs/day	Alt. 3 lbs/day	Alt. 4 lbs/day	Alt. 5[2] lbs/day	Alt. 6[2] lbs/day	Alt. 7[2] lbs/day	Alt. 8[3] lbs/day	Alt. 9[3] lbs/day
CO									
Aircraft[4]	7,649 to 10,222	7,088 to 10,960	9,585 to 11,839	8,148 to 14,260	7,674 to 9,582	7,172 to 9,926	7,714 to 10,656	7,088 to 10,960	7,088 to 10,960
APU[4]	157 to 166	158 to 166	137 to 134	160 to 167	157 to 166	157 to 166	157 to 166	157 to 166	157 to 166
GSE[5]	1,223	1,223	1,223	1,223	1,223	1,223	1,223	1,223	1,223
On-Airport Parking	-1,953	-1,953	-1,954	-1,973	-2,031 to -1,953	-2,031 to -1,953	-2,031 to -1,953	-2,031	-2,031
On-Airport Roadways	-1,359	-1,359	-1,204	-1,357	-1,370 to -1,358	-1,370 to -1,358	-1,370 to -1,358	-1,358	-1,370
On-Airport Stationary[6]	<1	<1	2	<1	<1	<1	<1	<1	<1
Total On-Airport	5,727 to 8,290	5,165 to 9,030	7,785 to 10,043	6,208 to 12,314	5,663 to 7,652	5,161 to 7,996	5,702 to 8,726	5,088 to 8,953	5,075 to 8,940
Off-Airport Roadways	-34,569	-34,569	-35,662	-34,953	-35,133 to -34,569	-35,133 to -34,569	-35,133 to -34,569	-35,133	-35,133
Off-Airport Stationary[7]	7	7	45	1	6 to 7	7 to 8	5 to 6	6 to 8	6 to 8
Total Off-Airport	-34,562	-34,562	-35,616	-34,952	-35,127 to	-35,126 to	-35,128 to	-35,127 to	-35,127 to

Table 4.2-13

Incremental Project Operational Emissions Compared to Baseline (2009) Conditions

Pollutant/ Source[1]	Alt. 1 lbs/day	Alt. 2 lbs/day	Alt. 3 lbs/day	Alt. 4 lbs/day	Alt. 5[2] lbs/day	Alt. 6[2] lbs/day	Alt. 7[2] lbs/day	Alt. 8[3] lbs/day	Alt. 9[3] lbs/day
					-34,562	-34,561	-34,563	-35,125	-35,125
Grand Total	-28,835 to -26,272	-29,397 to -25,532	-27,831 to -25,574	-28,743 to -22,638	-29,464 to -26,910	-29,965 to -26,565	-29,426 to -25,837	-30,040 to -26,173	-30,051 to -26,185
Threshold	550	550	550	550	550	550	550	550	550
Significant?	**No**	**No**	**No**	**No**	**No**	**No**	**No**	**No**	**No**
VOC									
Aircraft[4]	1,358 to 1,695	1,284 to 1,787	1,643 to 1,946	1,445 to 2,227	1,361 to 1,614	1,299 to 1,658	1,364 to 1,753	1,284 to 1,787	1,284 to 1,787
APU[4]	15 to 16	15 to 16	13	15 to 16	15 to 16	15 to 16	15 to 16	15 to 16	15 to 16
GSE[5]	-187	-187	-187	~~-186~~ *-187*	-187	-187	-187	-187	-187
On-Airport Parking	-319	-319	-416	-337	-375 to -319	-375 to -319	-375 to -319	-375	-375
On-Airport Roadways	-134	-134	-137	-134	-135 to -134	-135 to -134	-135 to -134	-134	-135
On-Airport Stationary[6]	<1	<1	<1	<1	<1	<1	<1	<1	<1
Total On-Airport	735 to 1,071	661 to 1,163	917 to 1,220	804 to 1,585	680 to 990	617 to 1,033	683 to 1,129	604 to 1,106	603 to 1,105
Off-Airport Roadways	-2,304	-2,304	-2,412	-2,327	-2,363 to -2,304	-2,363 to -2,304	-2,363 to -2,304	-2,363	-2,363
Off-Airport Stationary[7]	<1	<1	3	<1	<1	0 to 1	<1	0 to 1	0 to 1
Total Off-Airport	-2,304	-2,304	-2,409	-2,327	-2,363 to -2,304	-2,363 to -2,304	-2,363 to -2,304	-2,363	-2,363
Grand Total	-1,569 to -1,233	-1,643 to -1,141	-1,492 to -1,188	-1,523 to -742	-1,683 to -1,314	-1,746 to -1,270	-1,680 to -1,175	-1,759 to -1,257	-1,760 to -1,258
Threshold	55	55	55	55	55	55	55	55	55
Significant?	**No**	**No**	**No**	**No**	**No**	**No**	**No**	**No**	**No**
NO_x									
Aircraft[4]	9,585 to 10,034	9,484 to 10,183	9,815 to 10,366	9,704 to 10,843	9,590 to 9,916	9,506 to 9,994	9,597 to 10,116	9,484 to 10,183	9,484 to 10,183
APU[4]	275 to 280	275 to 280	263 *to 266*	*277 to* 281	275 to 280	275 to 280	275 to 280	275 to 280	275 to 280
GSE[5]	-1,149	-1,149	-1,149	~~-1,133~~ *-1,149*	-1,149	-1,149	-1,149	-1,149	-1,149
On-Airport Parking	-1,190	-1,190	-1,480	-1,239	-1,356 to -1,190	-1,356 to -1,190	-1,356 to -1,190	-1,356	-1,356
On-Airport Roadways	-567	-567	-572	-572	-575 to -567	-575 to -567	-575 to -567	-570	-575
On-Airport Stationary[6]	<1	<1	2	<1	<1	<1	<1	<1	<1
Total On-Airport	6,960 to 7,405	6,859 to 7,554	6,880 to 7,434	~~7,041~~ *7,025* to	6,789 to 7,286	6,705 to 7,364	6,796 to 7,486	6,689 to 7,384	6,683 to 7,378

Table 4.2-13

Incremental Project Operational Emissions Compared to Baseline (2009) Conditions

Pollutant/ Source[1]	Alt. 1 lbs/day	Alt. 2 lbs/day	Alt. 3 lbs/day	Alt. 4 lbs/day	Alt. 5[2] lbs/day	Alt. 6[2] lbs/day	Alt. 7[2] lbs/day	Alt. 8[3] lbs/day	Alt. 9[3] lbs/day
				8,161					
Off-Airport Roadways	-14,707	-14,707	-15,123	-14,815	-14,982 to -14,707	-14,982 to -14,707	-14,982 to -14,707	-14,982	-14,982
Off-Airport Stationary[7]	1	1	8	0	1	1	1	1	1
Total Off-Airport	-14,706	-14,706	-15,115	-14,815	-14,981 to -14,706	-14,981 to -14,706	-14,982 to -14,706	-14,981	-14,981
Grand Total	-7,746 to -7,302	-7,847 to -7,153	-8,236 to -7,681	~~-7,773~~ *-7,789* to -6,654	-8,192 to -7,420	-8,276 to -7,342	-8,185 to -7,221	-8,292 to -7,597	-8,298 to -7,603
Threshold	55	55	55	55	55	55	55	55	55
Significant?	**No**	**No**	**No**	**No**	**No**	**No**	**No**	**No**	**No**
SO_2									
Aircraft[4]	859 to 1,003	826 to 1,047	967 to 1,106	887 to 1,239	860 to 966	832 to 986	863 to 1,028	826 to 1,047	826 to 1,047
APU[4]	33 to 34	33	30 to 31	33 to 34	33 to 34	33 to 34	33 to 34	33 to 34	33 to 34
GSE[5]	0	0	0	0	0	0	0	0	0
On-Airport Parking	< 1	< 1	< 1	< 1	< 1	< 1	< 1	< 1	< 1
On-Airport Roadways	< 1	< 1	< 1	< 1	< 1	< 1	< 1	< 1	< 1
On-Airport Stationary[6]	< 1	< 1	< 1	< 1	< 1	< 1	< 1	< 1	< 1
Total On-Airport	893 to 1,036	860 to 1,080	997 to 1,136	921 to 1,272	894 to 999	865 to 1,019	896 to 1,061	860 to 1,080	860 to 1,080
Off-Airport Roadways	< 1	< 1	< 1	< 1	< 1	< 1	< 1	< 1	< 1
Off-Airport Stationary[7]	< 1	< 1	< 1	< 1	< 1	< 1	< 1	< 1	< 1
Total Off-Airport	0	0	0	0	< 1	< 1	< 1	0	0
Grand Total	893 to 1,036	860 to 1,080	997 to 1,136	921 to 1,272	894 to 999	865 to 1,019	896 to 1,061	860 to 1,080	860 to 1,080
Threshold	150	150	150	150	150	150	150	150	150
Significant?	**Yes**	**Yes**	**Yes**	**Yes**	**Yes**	**Yes**	**Yes**	**Yes**	**Yes**
PM10									
Aircraft[4]	97 to 107	94 to 110	105 to 115	99 to 124	97 to 105	95 to 106	97 to 110	94 to 110	94 to 110
APU[4]	27 to 28	27 to 28	24 to 25	27 to 29	27 to 28	27 to 28	27 to 28	27 to 28	27 to 28
GSE[5]	-37	-37	-37	-37	-37	-37	-37	-37	-37
On-Airport Parking	-30	-30	52	-6	-30 to -28	-30 to -28	-30 to -28	-28	-28
On-Airport Roadways	11	11	100	7	2 to 11	2 to 11	2 to 11	8	2

Table 4.2-13

Incremental Project Operational Emissions Compared to Baseline (2009) Conditions

Pollutant/ Source[1]	Alt. 1 lbs/day	Alt. 2 lbs/day	Alt. 3 lbs/day	Alt. 4 lbs/day	Alt. 5[2] lbs/day	Alt. 6[2] lbs/day	Alt. 7[2] lbs/day	Alt. 8[3] lbs/day	Alt. 9[3] lbs/day
On-Airport Stationary[6]	<1	<1	<1	<1	<1	<1	<1	<1	<1
Total On-Airport	69 to 78	66 to 81	244 to 255	91 to 115	60 to 77	58 to 79	60 to 82	65 to 80	60 to 74
Off-Airport Roadways	2,698	2,698	2,279	2,519	2,450 to 2,698	2,450 to 2,698	2,450 to 2,698	2,450	2,450
Off-Airport Stationary[7]	1	1	4	0	1	1	0 to 1	1	1
Total Off-Airport	2,698	2,698	2,283	2,519	2,450 to 2,698	2,450 to 2,698	2,450 to 2,698	2,450	2,450
Grand Total	2,767 to 2,776	2,765 to 2,779	2,527 to 2,538	2,610 to 2,634	2,510 to 2,776	2,508 to 2,777	2,511 to 2,781	2,515 to 2,530	2,510 to 2,525
Threshold	150	150	150	150	150	150	150	150	150
Significant?	**Yes**	**Yes**	**Yes**	**Yes**	**Yes**	**Yes**	**Yes**	**Yes**	**Yes**
PM2.5									
Aircraft[4]	97 to 107	94 to 110	105 to 115	99 to 124	97 to 105	95 to 106	97 to 110	94 to 110	94 to 110
APU[4]	27 to 28	27 to 28	24 to 25	27 to 29	27 to 28	27 to 28	27 to 28	27 to 28	27 to 28
GSE[5]	-36	-36	-36	-36	-36	-36	-36	-36	-36
On-Airport Parking	-40	-40	-27	-36	-41 to -40	-41 to -40	-41 to -40	-41	-41
On-Airport Roadways	-16	-16	-1	-17	-18 to -16	-18 to -16	-18 to -16	-17	-18
On-Airport Stationary[6]	<1	<1	<1	<1	<1	<1	<1	<1	<1
Total On-Airport	32 to 41	30 to 45	65 to 75	38 to 61	30 to 39	28 to 40	31 to 44	29 to 43	28 to 42
Off-Airport Roadways	170	170	85	135	118 to 170	118 to 170	118 to 170	118	118
Off-Airport Stationary[7]	1	1	4	0	1	1	0 to 1	1	1
Total Off-Airport	171	171	89	135	119 to 171	119 to 171	119 to 171	119	119
Grand Total	203 to 212	201 to 216	153 to 164	173 to 197	149 to 210	147 to 211	149 to 215	147 to 162	146 to 161
Threshold	55	55	55	55	55	55	55	55	55
Significant?	**Yes**	**Yes**	**Yes**	**Yes**	**Yes**	**Yes**	**Yes**	**Yes**	**Yes**

[1] Project operational emissions are determined by subtracting existing airport emissions (see Table 4.2-~~104~~) from future airport emissions for each alternative. Totals may not add exactly due to rounding.

Table 4.2-13

Incremental Project Operational Emissions Compared to Baseline (2009) Conditions

Pollutant/ Source[1]	Alt. 1 lbs/day	Alt. 2 lbs/day	Alt. 3 lbs/day	Alt. 4 lbs/day	Alt. 5[2] lbs/day	Alt. 6[2] lbs/day	Alt. 7[2] lbs/day	Alt. 8[3] lbs/day	Alt. 9[3] lbs/day

[2] Alternatives 5 through 7 focus primarily on airfield improvements and related terminal and roadway improvements. Those improvements are compatible with the ground access improvements proposed under Alternatives 1, 2, 8, and 9. The emissions presented relative to airfield operations (i.e., aircraft, APU, and GSE) under Alternatives 1, 2, 5, 6, and 7 are specific to characteristics of each of these alternatives; however, the non-airfield emissions (i.e., roadways, parking, stationary, and off-airport) shown for Alternatives 5 through 7 reflect the range of those types of emissions for Alternatives 1, 2, 8, and 9. The total emissions for Alternatives 5 through 7 would fall within the range shown for each, depending on which set of ground access improvements is assumed. The emissions presented relative to both airfield and non-airfield operations for Alternatives 3 and 4 are specific to the characteristics of each of these alternatives, which still provide a basis for comparison with the other alternatives.

[3] Alternatives 8 and 9 focus primarily on ground access improvements; however, those improvements are compatible with the airfield improvements, and related terminal and roadway improvements, proposed under Alternatives 1, 2, 5, 6, and 7. The emissions presented relative to non-airfield operations (i.e., roadways, parking, stationary, and off-airport) under Alternatives 1, 2, 8, and 9 are specific to characteristics of each of these alternatives; however, the airfield emissions (i.e., aircraft, APU, and GSE) shown for Alternatives 8 and 9 reflect the range of those types of emissions for Alternatives 1, 2, 5, 6, and 7. The total emissions for Alternatives 8 and 9 would fall within the range shown for each, depending on which set of airfield/terminal improvements is assumed. The emissions presented relative to both airfield and non-airfield operations for Alternatives 3 and 4 are specific to the characteristics of each of these alternatives, which still provide a basis for comparison with the other alternatives.

[4] In addition to the emission ranges associated with alternative airfield and ground access development discussed in table notes 2 and 3 above, ranges in aircraft and APU emissions were developed from various weather conditions that impact airfield activity. The low end of the range typically represents good visibility with less spacing required between aircraft, and the high end of the emission range typically represents poor weather conditions with greater spacing between aircraft and more ground delay time.

[5] GSE operations and activity levels are assumed to be directly related to aircraft activity levels; therefore, GSE emissions are the same for all future alternatives since aircraft activity is the same for all alternatives in 2025.

[6] On-airport stationary sources are natural gas combustion units for space heating and water heating.

[7] Off-airport stationary sources are natural gas combustion electric power generators supplying electricity to project facilities. It is estimated that 22 percent of LADWP power is produced in the South Coast Air Basin (Los Angeles Department of Water and Power, 2011 Power Integrated Resource Plan, December 22, 2011).

Source: CDM Smith, 2012.

Table 4.2-15

Peak Operational Concentrations including Background

Pollutant/ Source[1]	Averaging Period	Alt. 1 (µg/m^3)	Alt. 2 (µg/m^3)	Alt. 3 (µg/m^3)	Alt. 4 (µg/m^3)	Alt. 5[2,14] (µg/m^3)	Alt. 6[2,14] (µg/m^3)	Alt. 7[2,14] (µg/m^3)	Alt. 8[3] (µg/m^3)	Alt. 9[3] (µg/m^3)
CO	CAAQS									
Alternative	1-Hour	1,225 to 1,856	1,068 to 1,325	1,995 to 2,000	2,120 to 3,182	1,301 to 1,888	1,109 to 1,657	1,155 to 1,816	1,068 to 1,888	1,068 to 1,888

Table 4.2-15

Peak Operational Concentrations including Background

Pollutant/ Source[1]	Averaging Period	Alt. 1 (µg/m^3)	Alt. 2 (µg/m^3)	Alt. 3 (µg/m^3)	Alt. 4 (µg/m^3)	Alt. 5[2,14] (µg/m^3)	Alt. 6[2,14] (µg/m^3)	Alt. 7[2,14] (µg/m^3)	Alt. 8[3] (µg/m^3)	Alt. 9[3] (µg/m^3)
Background	1-Hour	4,581	4,581	4,581	4,581	4,581	4,581	4,581	4,581	4,581
Total	1-Hour	5,806 to 6,437	5,649 to 5,906	6,576 to 6,581	6,701 to 7,763	5,882 to 6,469	5,689 to 6,237	5,736 to 6,397	5,649 to 6,469	5,649 to 6,469
Threshold[4]	1-Hour	23,000	23,000	23,000	23,000	23,000	23,000	23,000	23,000	23,000
Significant?	1-Hour	**No**	**No**	**No**	**No**	**No**	**No**	**No**	**No**	**No**
	CAAQS/NAAQS									
Alternative	8-Hour	303 to 490	275 to 419	555 to 631	384 to 914	303 to 459	294 to 482	299 to 510	275 to 510	275 to 510
Background[5]	8-Hour	2,897	2,897	2,897	2,897	2,897	2,897	2,897	2,897	2,897
Total	8-Hour	3,201 to 3,387	3,172 to 3,317	3,452 to 3,528	3,282 to 3,812	3,201 to 3,357	3,191 to 3,379	3,197 to 3,407	3,172 to 3,407	3,172 to 3,407
Threshold[6]	8-Hour	10,000	10,000	10,000	10,000	10,000	10,000	10,000	10,000	10,000
Significant?	8-Hour	**No**	**No**	**No**	**No**	**No**	**No**	**No**	**No**	**No**
NO_2	CAAQS									
Alternative	1-Hour	356 to 686	214 to 250	313 to 432	351 to 464	355 to 686	354 to 686	355 to 687	~~250~~ *214* to 687	~~250~~ *214* to 687
Background	1-Hour	177	177	177	177	177	177	177	177	177
Total	1-Hour	533 to 863	391 to 427	489 to 609	528 to 641	532 to 862	531 to 863	532 to 864	~~427~~ *391* to 864	~~427~~ *391* to 864
Threshold[7]	1-Hour	339	339	339	339	339	339	339	339	339
Significant?	1-Hour	**Yes**	**Yes**	**Yes**	**Yes**	**Yes**	**Yes**	**Yes**	**Yes**	**Yes**
	NAAQS									
Alternative	1-Hour	155 to 189	148 to 186	197 to 218	204 to 214	154 to 188	153 to 189	154 to 189	148 to 189	148 to 189
Background	1-Hour	~~76~~ *125*	~~76~~ *125*	~~76~~ *125*	~~76~~ *125*	~~76~~ *125*	~~76~~ *125*	~~76~~ *125*	~~76~~ *125*	~~76~~ *125*
Total	1-Hour	~~231 to 265~~ *280 to 314*	~~224 to 262~~ *273 to 311*	~~272 to 294~~ *322 to 343*	~~280 to 290~~ *329 to 339*	~~230 to 264~~ *279 to 313*	~~229 to 265~~ *278 to 314*	~~230 to 265~~ *279 to 314*	~~224 to 265~~ *273 to 314*	~~224 to 265~~ *273 to 314*
Threshold[8]	1-Hour	188	188	188	188	188	188	188	188	188
Significant?	1-Hour	**Yes**	**Yes**	**Yes**	**Yes**	**Yes**	**Yes**	**Yes**	**Yes**	**Yes**
	CAAQS/NAAQS									
Alternative	Annual	17	17	12	14	17	17	12	12 to 17	12 to 17
Background	Annual	26	26	26	26	26	26	26	26	26
Total	Annual	43	43	38	40	43	43	39	39 to 43	39 to 43
Threshold[9]	Annual	57	57	57	57	57	57	57	57	57
Significant?	Annual	**No**	**No**	**No**	**No**	**No**	**No**	**No**	**No**	**No**
SO_2	CAAQS									
Alternative	1-Hour	158 to 273	105 to 140	158 to 206	135 to 243	157 to 273	154 to 273	155 to 276	105 to 276	105 to 276
Background	1-Hour	65	65	65	65	65	65	65	65	65
Total	1-Hour	224 to 339	170 to 206	223 to 272	200 to 308	222 to 338	219 to 339	221 to 341	170 to 341	170 to 341
Threshold[10]	1-Hour	655	655	655	655	655	655	655	655	655

Table 4.2-15

Peak Operational Concentrations including Background

Pollutant/ Source[1]	Averaging Period	Alt. 1 ($\mu g/m^3$)	Alt. 2 ($\mu g/m^3$)	Alt. 3 ($\mu g/m^3$)	Alt. 4 ($\mu g/m^3$)	Alt. 5[2,14] ($\mu g/m^3$)	Alt. 6[2,14] ($\mu g/m^3$)	Alt. 7[2,14] ($\mu g/m^3$)	Alt. 8[3] ($\mu g/m^3$)	Alt. 9[3] ($\mu g/m^3$)
Significant?	1-Hour	**No**	**No**	**No**	**No**	**No**	**No**	**No**	**No**	**No**
SO_2	NAAQS									
Alternative	1-Hour	82 to 104	98 to 105	145 to 152	94 to 150	82 to 99	81 to 103	101 to 131	81 to 131	81 to 131
Background	1-Hour	37	37	37	37	37	37	37	37	37
Total	1-Hour	119 to 140	134 to 142	181 to 188	130 to 187	119 to 136	118 to 140	137 to 168	118 to 168	118 to 168
Threshold[11]	1-Hour	196	196	196	196	196	196	196	196	196
Significant?	1-Hour	**No**	**No**	**No**	**No**	**No**	**No**	**No**	**No**	**No**
	NAAQS									
Alternative	3-Hour	81 to 92	58 to 72	84 to 97	87 to 101	80 to 92	78 to 92	79 to 93	58 to 93	58 to 93
Background	3-Hour	10	10	10	10	10	10	10	10	10
Total	3-Hour	91 to 103	68 to 82	94 to 107	97 to 112	90 to 102	89 to 103	90 to 104	68 to 104	68 to 104
Threshold[12]	3-Hour	1,300	1300	1300	1300	1300	1300	1300	1300	1300
Significant?	3-Hour	**No**	**No**	**No**	**No**	**No**	**No**	**No**	**No**	**No**
	CAAQS/NAAQS									
Alternative	24-Hour	14 to 19	14 to 18	19 to 25	18 to 23	14 to 19	14 to 19	14 to 19	14 to 19	14 to 19
Background	24-Hour	16	16	16	16	16	16	16	16	16
Total	24-Hour	30 to 35	30 to 34	35 to 41	33 to 38	30 to 34	30 to 35	29 to 35	29 to 35	29 to 35
Threshold[13]	24-Hour	105	105	105	105	105	105	105	105	105
Significant?	24-Hour	**No**	**No**	**No**	**No**	**No**	**No**	**No**	**No**	**No**
	NAAQS									
Alternative	Annual	6	6	7	6	6	6	5	5 to 6	5 to 6
Background	Annual	3	3	3	3	3	3	3	3	3
Total	Annual	9	9	9	9	9	9	8	8 to 9	8 to 9
Threshold[13]	Annual	80	80	80	80	80	80	80	80	80
Significant?	Annual	**No**	**No**	**No**	**No**	**No**	**No**	**No**	**No**	**No**

Notes:

Totals may not add due to rounding.

1 The significance thresholds for CO, NO_2, and SO_2 are based on California and/or National Ambient Air Quality Standards (CAAQS and/or NAAQS) which are absolute thresholds. Therefore, future operational concentrations are determined by adding existing background concentrations to the calculated future airport-related concentrations under a given alternative for comparison to the thresholds. Totals may not add exactly due to rounding.

2 On-airport roadway and parking-related concentrations for Alternatives 5, 6, and 7 are assumed to be equal to the roadway and parking-related concentrations for Alternatives 1 and 2 for comparative purposes only. Alternatives 5, 6, and 7 are airfield/terminal improvement options only and do not impact on-airport roadway and parking configurations. See Appendix C for summaries of source contributions to peak receptors.

Table 4.2-15

Peak Operational Concentrations including Background

Pollutant/ Source[1]	Averaging Period	Alt. 1 ($\mu g/m^3$)	Alt. 2 ($\mu g/m^3$)	Alt. 3 ($\mu g/m^3$)	Alt. 4 ($\mu g/m^3$)	Alt. 5[2,14] ($\mu g/m^3$)	Alt. 6[2,14] ($\mu g/m^3$)	Alt. 7[2,14] ($\mu g/m^3$)	Alt. 8[3] ($\mu g/m^3$)	Alt. 9[3] ($\mu g/m^3$)

[3] Aircraft and APU-concentrations for Alternatives 8 and 9 are assumed to be within the range of aircraft and APU-related concentrations for Alternatives 1, 2, 5, 6, and 7. Alternatives 8 and 9 are ground access (i.e., on-airport roadway and parking options) only and do not impact airfield or terminal configurations. See Appendix C for summaries of source contributions to peak receptors.

[4] The 1-Hour CO threshold is the 1-Hour CO CAAQS since this standard is more stringent than the 1-Hour CO NAAQS.

[5] Although the CAAQS and NAAQS background design value are different, because the standards are the same and CAAQS background is higher, this represents a more conservative value.

[6] The 8-Hour CO threshold is equivalent to both the 8-Hour CO CAAQS and 8-Hour CO NAAQS. Although the CAAQS and NAAQS background design value are different, because the standards are the same and CAAQS background is higher, this represents a more conservative value.

[7] The 1-Hour NO_2 CAAQS is not to be exceeded.

[8] The 1-Hour NO_2 NAAQS is based on the 3-year average of the 98th percentile of daily maximum 1-hour concentrations.

[9] The annual NO_2 threshold is the annual NO_2 CAAQS since this standard is more stringent than the annual NO_2 NAAQS.

[10] The 1-Hour SO_2 CAAQS is not to be exceeded.

[11] The 1-Hour SO_2 NAAQS is based on the 3-year average of the 99th percentile of daily maximum 1-hour concentrations.

[12] The 3-Hour SO_2 NAAQS is not to be exceeded more than once per year.

[13] The 24-Hour SO_2 NAAQS and CAAQS, and annual SO_2 NAAQS, are not to be exceeded.

[14] Concentrations from Alternatives 5 through 7 may vary slightly from the values shown depending on the ground access option that is selected. However, the aircraft are the major contributor to the peak concentrations, therefore this variation would be minor.

Source: CDM Smith, 2012.

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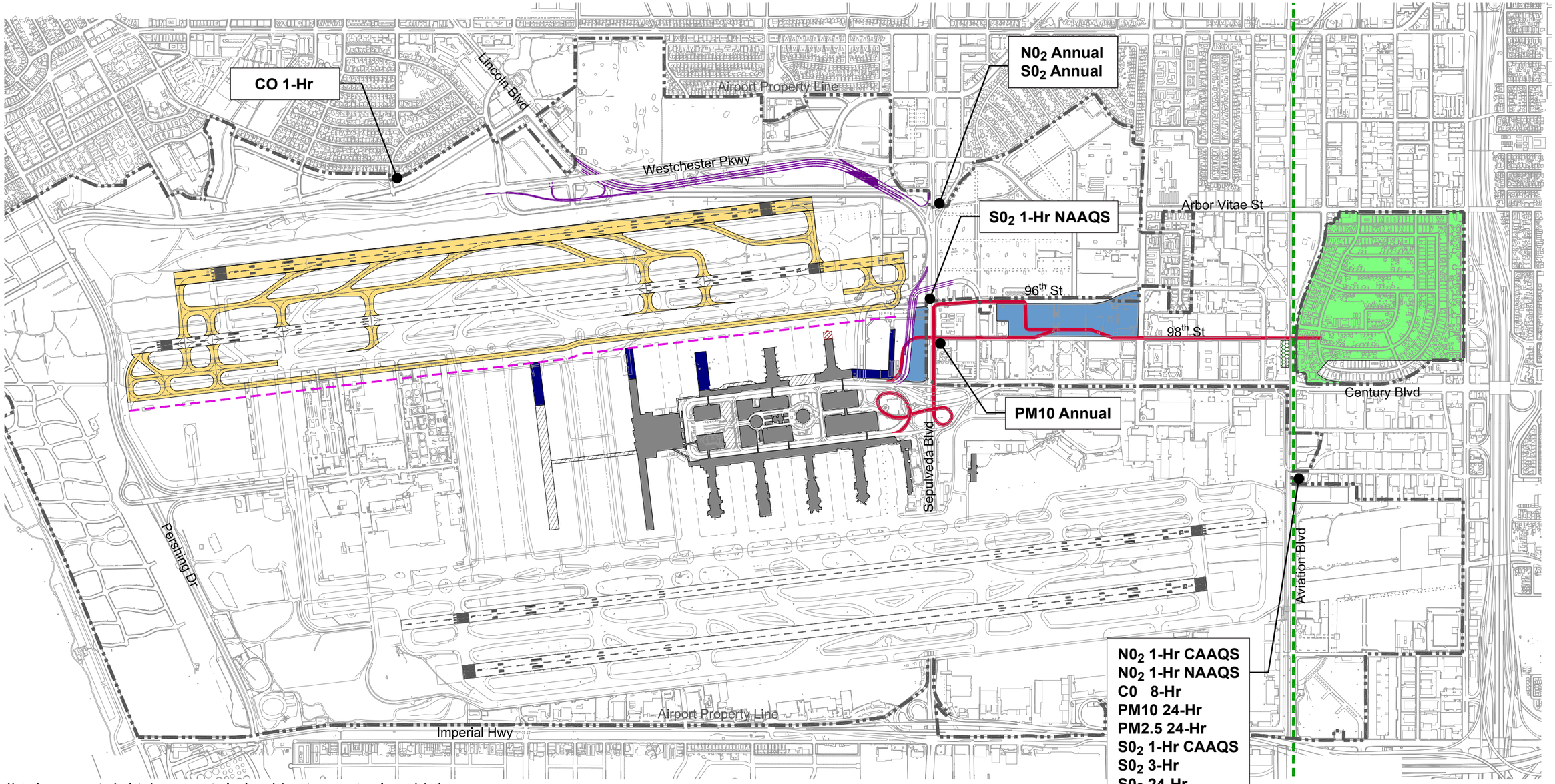

Note: Improvements depicted are conceptual only and do not represent engineered design.

0 1,500 ft
Scale

north

Source: CDM Smith, 2012.

LAX Specific Plan Amendment Study Draft EIR	**Peak Operational Concentrations Locations Alternative 1**	Figure **4.2-2**

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4.2.7 Mitigation Measures

With respect to all construction-related impacts from air emissions associated with the SPAS project, LAWA is committed to mitigating temporary construction-related emissions to the maximum extent feasible and has established some of the most aggressive construction emissions reduction measures in Southern California, particularly with regard to requiring construction equipment to be equipped with emissions control devices. The framework identified in the MPAQ for reducing air emissions associated with construction of the Master Plan and the specific means for implementing the mitigation measures described in Section 4.2.5, as well as all of the measures identified in Table 4.2-8, would be used to reduce air emissions associated with implementation of the SPAS project. These mitigation measures establish a commitment and process for incorporating all technically feasible air quality mitigation measures into each component of the SPAS project as each element of that project is constructed. At a programmatic level, this provides the most comprehensive means of ensuring air emissions will be reduced to the maximum extent feasible. In addition, the *LAWA Sustainable Airport Planning, Design and Construction Guidelines* encourages contractors to implement a number of voluntary measures that would reduce criteria pollutant and greenhouse gas emissions. Through the sustainability program, contractors are encouraged to implement such measures as: further reduce vehicle and equipment idling times; comply with Tier 4 emission standards for non-road diesel equipment; retrofit existing diesel equipment with particulate filters and oxidation catalysts; replace aging equipment with new low-emission models; and consider the use of alternative fuels for construction equipment. ~~There are no feasible measures that could be adopted at this time to reduce air emissions further. Therefore, no additional project-specific mitigation measures are recommended in connection with SPAS.~~ *To address construction-related air quality impacts associated with Alternatives 1 through 9, the following mitigation measure specific to SPAS is proposed:*

- ***MM-AQ (SPAS)-1. Additional Measures to Supplement the LAX Master Plan Mitigation Plan for Air Quality - Construction-Related Mitigation Measures (Alternatives 1 through 9).***

  For purposes of SPAS, LAWA will expand the existing LAX Master Plan Mitigation Plan for Air Quality Construction-Related Mitigation Measures to include the following specific actions:

  - *On-road trucks used on SPAS construction projects with a gross vehicle weight rating of at least 19,500 pounds shall, at a minimum, comply with USEPA 2007 on-road emissions standards for PM10 and NO_x.*
  - *Prior to January 1, 2015, all off-road diesel-powered construction equipment greater than 50 horsepower used on SPAS construction projects shall meet USEPA Tier 3 off-road emission standards. After December 31, 2014, all off-road diesel-power construction equipment greater than 50 horsepower used on SPAS construction projects shall meet USEPA Tier 4 off-road emissions standards. Tier 4 equipment shall be considered based on availability at the time the construction bid is issued. LAWA will encourage construction contractors to apply for SCAQMD "SOON" funds to accelerate clean up of off-road diesel engine emissions.*

It is estimated that all of the alternatives would have significant impacts relative to operational emissions of SO_2*, PM10, and PM2.5; and* operational concentrations of NO_2, *PM10, and PM2.5* ~~and operational concentrations of SO_2~~. As indicated in the impacts discussion above, the vast majority (over 95 percent) of the emissions contributing to those significant impacts (i.e., causing exceedances of the applicable 1-hour CAAQS and NAAQS) would occur from aircraft during takeoff. Other than potential future improvements in aircraft engine technology and associated reductions in air pollutant emissions, there are no feasible means to mitigate emissions during

aircraft takeoff because the only measures are related to aircraft operational options, such as reduced thrust take-off, which are at the sole discretion of the pilot. However, as noted above, LAWA is committed to mitigating operational air quality impacts to the maximum extent feasible. The specific measures (i.e., MM-AQ-3, Transportation-Related Mitigation Measures, and MM-AQ-4, Operations-Related Mitigation Measures) described in Section 4.2.5 would also be applied to the SPAS project. ~~Although these measures would not mitigate operational impacts to a level that is less than significant, they would reduce impacts associated with the SPAS alternatives to the maximum extent feasible.~~ *To address operational air quality impacts associated with Alternatives 1 through 9, the following mitigation measures specific to SPAS are proposed:*

- ***MM-AQ (SPAS)-2. Additional Measures to Supplement the LAX Master Plan Mitigation Plan for Air Quality - Transportation-Related Mitigation Measures (Alternatives 1 through 9).***

  For purposes of SPAS, LAWA will expand the existing LAX Master Plan Mitigation Plan for Air Quality Transportation-Related Mitigation Measures to include the following specific actions:

  - *LAWA will develop an information technology system that LAWA employees and the general public can utilize with consumer electronics that will provide real-time information regarding local and regional traffic conditions for travel to and from LAX.*
  - *LAWA will incorporate quick entry and exit parking systems in the project level design of future parking lots/structures associated with the SPAS project.*
  - *LAWA will include advanced signage in the design of future parking structures that could advise airport users of available parking spaces within the structure.*

- ***MM-AQ (SPAS)-3. Additional Measures to Supplement the LAX Master Plan Mitigation Plan for Air Quality - Operations-Related Mitigation Measures (Alternatives 1 through 9).***

  For purposes of SPAS, LAWA will expand the existing LAX Master Plan Mitigation Plan for Air Quality Operations-Related Mitigation Measures to include the following specific actions:

  - *Although the SPAS project does not alter air cargo handling at LAX, LAWA will provide the appropriate electrical infrastructure for those cargo handling tenants that have a need for such facilities and request them from LAWA. LAWA will monitor the development of electric truck engines and the design standards for these engines and associated charging infrastructure. The selection of appropriate infrastructure for installation at LAX will be made when air cargo facilities are updated.*
  - *LAWA will require the use of electric lawn mowers and leaf blowers, as these units become available for commercial use, for landscape maintenance associated with the SPAS project.*
  - *LAWA will require the conversion of sweepers to alternative fuels or electric power for ongoing airfield and roadway maintenance. In the 2006 GSE inventory, two of ten sweepers were electric powered and one was either CNG or LPG fueled. HEPA filters will be installed on airport sweepers where the use of HEPA filters is technologically and financially feasible and does not pose a safety hazard to airport operations.*
  - *LAWA will conduct a comprehensive GSE inventory update to identify and assess the current fuel type composition of GSE operating at LAX, to help to guide next steps in supporting and encouraging the use of alternative fueled GSE at LAX.*

When the specific elements of the SPAS project are implemented, additional project-specific mitigation measures may be identified to further reduce air quality impacts.

11. The first sentence of the second paragraph on page 4-179 of the Draft EIR is hereby revised as follows:

    Within the north airfield, this vegetation association occurs on a long narrow remnant slope along the northern edge of the north airfield, with component native species including ~~bush lupine (*Lupinus chamissonis*), coast buckwheat (*Eriogonum parvifolium*),~~ *deerweed (Acmispon glaber), beach evening primrose (Camissonia cheiranthifolia), annual bur-sage (Ambrosia acanthicarpa), white everlasting (Pseudognaphalium canescens), and* telegraph weed (*Heterotheca grandiflora*), and non-native species including *wavy sea lavender (Limonium perezii), filaree (Erodium spp.), pampas grass (Cortadaria selloana), fountain grass (Pennisetum setaceum), veldt grass (Ehrharta spp.), hottentot fig (Carpobrotus edulis), English plantain (Plantago lanceolata), wild oats (Avena fatua),* yellow starthistle (*Centaurea solstitialis*), summer mustard (*Brassica geniculata*), and acacia (*Acacia cyclops* and *A. retinoides*).

12. The third sentence of the third paragraph on page 4-185 of the Draft EIR is hereby revised as follows:

    Subsequent surveys did not detect any additional sensitive species; however, wildlife species previously detected are assumed to still occur, with the exception of the ~~San Diego~~ *Riverside* fairy shrimp, spadefoot toad, and San Diego black-tailed jackrabbit, as discussed below.

13. The first sentence of the fifth paragraph on page 4-199 of the Draft EIR is hereby revised as follows:

    As indicated in Section 4.3.2.3, the ~~analysis of indirect effects from~~ *discussion of existing conditions and biological resource sensitivity related to* light emissions, air pollutant emissions, and noise is based upon the ~~evaluation~~ *information* contained within the LAX Master Plan EIR, which is incorporated by reference into this EIR.

14. The paragraph under the heading "Ground Support Equipment and Auxiliary Power Units" on page 4-390 of the Draft EIR is hereby revised as follows:

    Data on the specific GSE types and times-in-mode[1] used for servicing several common aircraft types were obtained from a survey at LAX. ~~Although operations of APUs are expected to contribute to GHG emissions, EDMS does not estimate CO_2 emissions or fuel consumption; therefore, APUs are not included in the emissions inventory.~~ Default GSE information included in EDMS, along with emission factors taken from the CARB OFFROAD2007 model,[2,3] were used to supplement the site-specific data. The use of alternative-fueled GSE (e.g., gasoline- and propane-fueled GSE) under baseline conditions was also determined. The future (2025) year inventories of alternative-fueled GSE were based on these evaluations; the annual operating hours for the GSE in the future year inventories were scaled upwards based on the ratio of landing/takeoff operations in 2025 and 2009.

    GHG emissions were estimated from operation of APUs when an aircraft is on the ground with its engines shutdown. APUs burn Jet A fuel and create exhaust emissions like the engines that power flight. EDMS does not estimate GHG emissions from APUs, nor does it estimate fuel usage from APUs. As a result, it was necessary to estimate GHG emissions separately from EDMS.

    EDMS assigns APUs to specific airframes; therefore, it was possible to identify the types of APUs used by aircraft at the airport. A 1995 report entitled Technical Data to Support FAA's Advisory Circular on Reducing Emissions from Commercial Aviation[3a] contains fuel flow data that were used to translate an APU's minutes of operation per landing/takeoff operation (LTO) into fuel consumption data. Professional judgment was used to assign APUs from the 1995 report when there was not an exact match with the type of APU assigned in EDMS. Although the 1995 report was never finalized by the FAA and would therefore only contain draft fuel flow values, these values were used because APU fuel consumption data are otherwise not readily available.

Total annual fuel consumption was ultimately calculated from each aircraft's annual LTOs, the surrogate APU's fuel flow (pounds per hour), and the APU operating time per LTO. A density of 6.74 pounds per gallon was assumed, which is the average density from the ASTM International Standard for Jet A (Specification D1655-04a).[3b] The density was used to convert the fuel flow data from pounds to gallons. Emission factors for Jet A were obtained from The Climate Registry's 2012 Climate Registry Default Emission Factors.[3c]

[1] Time-in-mode is the time that an emission source spends in a specific mode of operation.

[2] California Air Resources Board, OFFROAD2007 Model, Available: http://www.arb.ca.gov/msei/offroad/offroad.htm.

[3] Although CARB no longer maintains the OFFROAD2007 model for GSE and has replaced it with the category-specific emission inventory models and databases, the 2011 Inventory Model for In-Use Off-Road Equipment (Construction, Industrial, Ground Support, and Oil Drilling), available at http://www.arb.ca.gov/msei/categories.htm#offroad_motor_vehicles, does not estimate GHG emissions. As a result, OFFROAD2007 was used to estimate emissions of CO2, CH4, and N2O from GSE.

[3a] *Energy and Environmental Analysis, Inc., Technical Data to Support FAA's Advisory Circular on Reducing Emissions from Commercial Aviation, prepared for U.S. Environmental Protection Agency and U.S. Department of Transportation, Federal Aviation Administration, September 29, 1995, Available: http://www.epa.gov/otaq/regs/nonroad/aviation/faa-ac.pdf, accessed December 17, 2012.*

[3b] *ExxonMobil Aviation. 2005. World Jet Fuel Specifications with Avgas Supplement. Available: http://www.exxonmobil.com/AviationGlobal/Files/WorldJetFuelSpecifications2005.pdf, accessed December 17, 2012.*

[3c] *The Climate Registry, 2012 Climate Registry Default Emission Factors, January 6, 2012, Available: http://www.theclimateregistry.org/downloads/2012/01/2012-Climate-Registry-Default-Emissions-Factors.pdf, accessed December 17, 2012.*

15. Table 4.6-2 on page 4-396 of the Draft EIR has been revised. Please see the following revised table.

Table 4.6-2

Baseline Conditions - Operational Emissions

Emission Source	Annual Emissions, metric tons CO_2e[1,2] per year				Percent of Total Baseline Emissions
	CO_2[3]	CH_4[4]	N_2O[5]	Total	
Aircraft[6]	625,910	2,098	6,416	634,424	~~27.99%~~ *27.46%*
Ground Support Equipment	59,778	192	581	60,551	~~2.67%~~ *2.62%*
Auxiliary Power Units[7]	~~N/A~~ *43,922*	~~N/A~~ *26*	~~N/A~~ *433*	~~0~~ *44,380*	~~NA~~ *1.92%*
Parking Facilities[6]	104,740	1,285	2,759	108,784	~~4.80%~~ *4.71%*
On-Airport Roadways[6]	47,049	577	1,239	48,865	~~2.16%~~ *2.11%*
On-Airport Stationary	~~7,738~~ *66*	~~4~~ *<1*	~~22~~ *<1*	~~7,763~~ *66*	~~0.34%~~ *<0.01%*
On-Airport Subtotal	~~**845,215**~~ ***881,465***	~~**4,155**~~ ***4,177***	~~**11,017**~~ ***11,428***	~~**860,387**~~ ***897,070***	~~**37.97%**~~ ***38.82%***
Building Electricity	~~66~~ *7,738*	~~<1~~ *4*	~~<1~~ *22*	~~66~~ *7,763*	~~<0.01%~~ *0.34%*
Solid Waste Disposal	154	191	<1	345	~~0.02%~~ *0.01%*
Indoor/Outdoor Water Usage	597	35	16	646	0.03%
Off-Airport Roadways	1,315,179	18,577	71,021	1,404,778	~~61.99%~~ *60.80%*

Table 4.6-2

Baseline Conditions - Operational Emissions

Emission Source	Annual Emissions, metric tons CO_2e[1,2] per year				Percent of Total Baseline Emissions
	CO_2[3]	CH_4[4]	N_2O[5]	Total	
Off-Airport Subtotal	~~**1,315,996**~~	~~**18,803**~~	~~**71,037**~~	~~**1,405,835**~~	~~**62.03%**~~
	1,323,668	***18,807***	***71,058***	***1,413,532***	***61.18%***
Total Baseline Emissions	~~**2,161,211**~~	~~**22,959**~~	~~**82,053**~~	~~**2,266,222**~~	**100.00%**
	2,205,133	***22,984***	***82,486***	***2,310,602***	

Notes:

Totals may not add due to rounding.

1 CO_2e = carbon dioxide equivalent
2 CO_2e emissions are determined by multiplying the individual pollutant emissions by its respective GWP. The GWPs used in this analysis are from the IPCC's Second Assessment Report (1995). The GWP for CH_4 is 21 and the GWP for N_2O is 310.
3 CO_2 = carbon dioxide
4 CH_4 = methane
5 N_2O = nitrous oxide
6 CH_4 and N_2O emissions were estimated from the Los Angeles World Airports GHG Emissions Inventory (CDM, 2008).
7 EDMS does not provide GHG emissions or fuel consumption data for APUs; therefore, GHG emissions cannot be estimated.

Source: CDM Smith, 2012.

16. The third sentence of the first paragraph on page 4-398 of the Draft EIR is hereby revised as follows:

> As shown above in **Table 4.6-2**, approximately ~~30~~ *32* percent of the total GHG emissions in baseline conditions for SPAS are associated with aircraft *and ground support* operations and another ~~69~~ *68* percent of the total GHG emissions are associated with on-airport and off-airport vehicle travel *and parking*.

17. The third bullet on page 4-402 of the Draft EIR is hereby revised as follows:

- **LAX Master Plan Community Benefits Agreement; X.M., Limits on Diesel Idling.**

  This provision requires LAWA to prohibit idling or queuing of diesel-fueled vehicles and equipment for more than ten consecutive minutes on-site*, unless CARB adopts a stricter standard, in which case LAWA shall enforce that standard*. This requirement would be included in specifications for any SPAS alternative requiring on-site construction. *Subsequent to the adoption of the CBA, CARB has adopted a five-minute idling limit for diesel vehicles and equipment, so that limit is applicable to the SPAS alternatives.*

18. The first sentence of the last paragraph on page 4-404 of the Draft EIR is hereby revised as follows:

> On a per capita (per passenger) basis, the GHG emissions associated with implementation of Alternative 1 would be approximately ~~13.06~~ *12.86* percent less than the per capita (per passenger) GHG emissions for baseline conditions.

19. Table 4.6-6 on pages 4-405 and 4-406 of the Draft EIR has been revised. Please see the following revised table.

20. The first sentence of the third paragraph on page 4-407 of the Draft EIR is hereby revised as follows:

    On a per capita (per passenger) basis, the GHG emissions associated with implementation of Alternative 2 would be approximately ~~13.69~~ *13.47* percent less than the per capita (per passenger) GHG emissions for baseline conditions.

21. The first sentence of the second paragraph on page 4-408 of the Draft EIR is hereby revised as follows:

    On a per capita (per passenger) basis, the GHG emissions associated with implementation of Alternative 3 would be approximately ~~13.32~~ *13.11* percent less than the per capita (per passenger) GHG emissions for baseline conditions.

22. The first sentence of the first paragraph on page 4-409 of the Draft EIR is hereby revised as follows:

    On a per capita (per passenger) basis, the GHG emissions associated with implementation of Alternative 4 would be approximately ~~14.29~~ *14.06* percent less than the per capita (per passenger) GHG emissions for baseline conditions.

23. The first sentence of the fourth paragraph on page 4-409 of the Draft EIR is hereby revised as follows:

    On a per capita (per passenger) basis, the GHG emissions associated with implementation of Alternative 5 would be between approximately ~~13.05~~ *12.84* and ~~15.00~~ *14.76* percent less than the per capita (per passenger) GHG emissions for baseline conditions, depending on which set of ground access improvements this alternative is paired with.

24. The first sentence of the second paragraph on page 4-410 of the Draft EIR is hereby revised as follows:

    On a per capita (per passenger) basis, the GHG emissions associated with implementation of Alternative 6 would be between approximately ~~13.44~~ *13.23* and ~~15.40~~ *15.15* percent less than the per capita (per passenger) GHG emissions for baseline conditions, depending on which set of ground access improvements this alternative is paired with.

25. The first sentence of the last paragraph on page 4-410 of the Draft EIR is hereby revised as follows:

    On a per capita (per passenger) basis, the GHG emissions associated with implementation of Alternative 7 would be between approximately ~~13.19~~ *12.99* and ~~15.15~~ *14.91* percent less than the per capita (per passenger) GHG emissions for baseline conditions, depending on which set of ground access improvements this alternative is paired with.

26. The first sentence of the last paragraph on page 4-411 of the Draft EIR is hereby revised as follows:

    On a per capita (per passenger) basis, the GHG emissions associated with implementation of Alternative 8 would be between approximately ~~14.80~~ *14.56* and ~~15.61~~ *15.35* percent less than the per capita (per passenger) GHG emissions for baseline conditions, depending on which set of airfield improvements this alternative is paired with.

27. The first sentence of the third paragraph on page 4-412 of the Draft EIR is hereby revised as follows:

    On a per capita (per passenger) basis, the GHG emissions associated with implementation of Alternative 9 would be between approximately ~~14.83~~ *14.59* and ~~15.64~~ *15.39* percent less than the per capita (per passenger) GHG emissions for baseline conditions, depending on which set of airfield improvements this alternative is paired with.

    asures would reduce TAC emissions associated with all of the SPAS alternatives.

Table 4.6-6

Incremental Changes in GHG Emissions Compared to Baseline Conditions

Source	Baseline[1] $MTCO_2e$/year[4]	Incremental Increase or Decrease Compared to Baseline: Alt. 1 $MTCO_2e$/year[4]	Alt. 2 $MTCO_2e$/year[4]	Alt. 3 $MTCO_2e$/year[4]	Alt. 4 $MTCO_2e$/year[4]	Alt. 5[2] $MTCO_2e$/year[4]	Alt. 6[2] $MTCO_2e$/year[4]	Alt. 7[2] $MTCO_2e$/year[4]	Alt. 8[3] $MTCO_2e$/year[4]	Alt. 9[3] $MTCO_2e$/year[4]
Aircraft	634,424	322,013	309,695	362,422	332,648	322,570	311,742	323,335	309,695 to 323,335	309,695 to 323,335
Ground Support Equipment[5]	60,551	18,287	18,287	18,287	18,287	18,287	18,287	18,287	18,287	18,287
Auxiliary Power Units	~~0~~	~~0~~	~~0~~	~~0~~	~~0~~	~~0~~	~~0~~	~~0~~	~~0~~	~~0~~
	44,380	*16,160*	*16,160*	*16,160*	*16,160*	*16,160*	*16,160*	*16,160*	*16,160*	*16,160*
Parking Facilities	108,784	-618	-618	-7,528	-3,268	-9,985 to -618	-9,985 to -618	-9,985 to -618	-9,985	-9,985
On-Airport Roadways	48,865	-3,797	-3,797	-845	-4,353	-5,583 to -3,797	-5,583 to -3,797	-5,583 to -3,797	-4,128	-5,583
On-Airport Stationary	~~7,763~~	~~7,389~~	~~7,389~~	~~47,263~~	~~956~~	~~5,670~~	~~6,584~~	~~4,457~~	~~6,175 to 9,107~~	~~6,175 to 9,107~~
	66	*63*	*63*	*402*	*8*	*48*	*56*	*38*	*52 to 77*	*52 to 77*
On-Airport Subtotal	~~852,690~~	~~335,947~~	~~323,630~~	~~372,738~~	~~343,322~~	~~325,338 to 336,490~~	~~314,518 to 325,670~~	~~326,092 to 337,244~~	~~320,044 to 336,616~~	~~318,590 to 335,161~~
	897,070	*352,107*	*339,790*	*388,898*	*359,482*	*341,498 to 352,650*	*330,678 to 341,830*	*342,252 to 353,404*	*330,082 to 343,746*	*328,627 to 342,292*
Building Electricity	~~66~~	~~63~~	~~63~~	~~402~~	~~8~~	~~48~~	~~56~~	~~38~~	~~52 to 77~~	~~52 to 77~~
	7,763	*7,389*	*7,389*	*47,263*	*956*	*5,670*	*6,584*	*4,457*	*6,175 to 9,107*	*6,175 to 9,107*
Solid Waste Disposal	345	329	329	2,103	43	252	293	198	275 to 405	275 to 405
Indoor/Outdoor Water Usage	646	615	615	3,933	80	472	548	371	514 to 758	514 to 758
Off-Airport Roadways	1,404,778	128,677	128,677	35,851	100,450	78,560 to 128,677	78,560 to 128,677	78,560 to 128,677	78,560	78,560
Off-Airport Subtotal	1,413,532	137,010	137,010	89,150	101,528	84,954 to 135,072	85,985 to 136,102	83,586 to 133,703	~~79,401 to 79,801~~	~~79,401 to 79,801~~
									85,523 to 88,830	*85,523 to 88,830*
Amortized Construction		12,045	4,735	15,125	1,534	13,368 to 14,060	10,653 to 11,346	9,268 to 9,960	5,095 to 13,729	5,427 to 14,060
Total Incremental Emissions		~~485,002~~	~~465,374~~	~~477,013~~	~~446,384~~	~~423,660 to 485,622~~	~~411,155 to 473,117~~	~~418,946 to 480,908~~	~~404,540 to 430,145~~	~~403,418 to 429,022~~
		501,162	*481,534*	*493,173*	*462,544*	*439,820 to 501,782*	*427,315 to 489,277*	*435,106 to 497,068*	*420,700 to 446,305*	*419,578 to 445,182*
Total Emissions (Baseline + Increment)	~~**2,266,222**~~	~~**2,751,224**~~	~~**2,731,596**~~	~~**2,743,235**~~	~~**2,712,606**~~	~~**2,689,882 to 2,751,844**~~	~~**2,677,377 to 2,739,339**~~	~~**2,685,168 to 2,747,130**~~	~~**2,670,762 to 2,696,367**~~	~~**2,669,640 to 2,695,244**~~
	2,310,602	***2,811,764***	***2,792,136***	***2,803,775***	***2,773,146***	***2,750,422 to 2,812,384***	***2,737,917 to 2,799,879***	***2,745,708 to 2,807,670***	***2,731,302 to 2,756,906***	***2,730,179 to 2,755,784***
Per Capita Emissions ($MTCO_2e$/year)	~~0.04011~~	~~0.03487~~	~~0.03462~~	~~0.03477~~	~~0.03438~~	~~0.03409 to 0.03488~~	~~0.03393 to 0.03472~~	~~0.03403 to 0.03482~~	~~0.03385 to 0.03417~~	~~0.03384 to 0.03416~~
	0.04090	*0.03564*	*0.03539*	*0.03554*	*0.03515*	*0.03486 to 0.03564*	*0.03470 to 0.03549*	*0.03480 to 0.03559*	*0.03462 to 0.03494*	*0.03460 to 0.03493*
Percent Reduction Compared to Baseline Conditions	**NA**	~~**13.06%**~~	~~**13.69%**~~	~~**13.32%**~~	~~**14.29%**~~	~~**15.00% to 13.05%**~~	~~**15.40% to 13.44%**~~	~~**15.15% to 13.19%**~~	~~**15.61% to 14.80%**~~	~~**15.64% to 14.83%**~~
		12.86%	***13.47%***	***13.11%***	***14.06%***	***14.76% to 12.84%***	***15.15% to 13.23%***	***14.91% to 12.99%***	***15.35% to 14.56%***	***15.39% to 14.59%***
Significance Threshold		>16%	>16%	>16%	>16%	>16%	>16%	>16%	>16%	>16%
Significant Impact?		**Yes**	**Yes**	**Yes**	**Yes**	**Yes**	**Yes**	**Yes**	**Yes**	**Yes**

Table 4.6-6

Incremental Changes in GHG Emissions Compared to Baseline Conditions

Notes:

[1] Emissions totals may not add due to rounding.
[2] Alternatives 5 through 7 focus primarily on airfield improvements and related terminal and roadway improvements. Those improvements are compatible with the ground access improvements under Alternatives 1, 2, 8, and 9. The emissions presented relative to airfield operations (i.e., aircraft, APU, and GSE) under Alternatives 1, 2, 5, 6, and 7 are specific to characteristics of each of these alternatives; however, the non-airfield emissions (i.e., roadways, parking, stationary, and off-airport) shown for Alternatives 5 through 7 reflect the range of those types of emissions for Alternatives 1, 2, 8, and 9. The total emissions for Alternatives 5 through 7 would fall within the range shown for each, depending on which set of ground access improvements is assumed. The emissions presented relative to both airfield and non-airfield operations for Alternatives 3 and 4 are specific to the characteristics of each of these alternatives, which still provide a basis for comparison with the other alternatives.
[3] Alternatives 8 and 9 focus primarily on ground access improvements; however, those improvements are compatible with the airfield improvements, and related terminal and roadway improvements, under Alternatives 1, 2, 5, 6, and 7. The emissions presented relative to non-airfield operations (i.e., roadways, parking, stationary, and off-airport) under Alternatives 1, 2, 8, and 9 are specific to characteristics of each of these alternatives; however, the airfield emissions (i.e., aircraft, APU, and GSE) shown for Alternatives 8 and 9 reflect the range of those types of emissions for Alternatives 1, 2, 5, 6, and 7. The total emissions for Alternatives 8 and 9 would fall within the range shown for each, depending on which set of airfield/terminal improvements is assumed. The emissions presented relative to both airfield and non-airfield operations for Alternatives 3 and 4 are specific to the characteristics of each of these alternatives, which still provide a basis for comparison with the other alternatives.
[4] $MTCO_2e$/year = metric tons carbon dioxide equivalent per year
[5] GSE operations and activity levels are assumed to be directly related to aircraft activity levels; therefore, GSE emissions are the same for all future alternatives since aircraft activity is the same for all alternatives in 2025.

Source: CDM Smith, 2012.

28. The second bullet on page 4-443 of the Draft EIR is hereby revised as follows:

- **LAX Master Plan Community Benefits Agreement; X.M., Limits on Diesel Idling.**

  This provision requires LAWA to prohibit idling or queuing of diesel-fueled vehicles and equipment for more than ten consecutive minutes on-site*, unless CARB adopts a stricter standard, in which case LAWA shall enforce that standard*. This requirement would be included in specifications for any SPAS alternative requiring on-site construction. *Subsequent to the adoption of the CBA, CARB has adopted a five-minute idling limit for diesel vehicles and equipment, so that limit is applicable to the SPAS alternatives.*

29. The note in Table 4.7.1-10 on page 4-479 of the Draft EIR is hereby revised as follows:

Mitigation measures are LAX Master Plan Mitigation Measures MM-AQ-1, MM-AQ-2, MM-AQ-3, MM-AQ-4*;* ~~and~~ components from Section X, Air Quality, of the LAX Master Plan Community Benefits Agreement~~.~~*; and SPAS-specific mitigation measures.*

30. The fifth sentence of the first paragraph on page 4-481 of the Draft EIR is hereby revised as follows:

Regarding acute non-cancer health hazard impacts, the comprehensive mitigation program developed as part of the LAX Master Plan Final EIR and the specific means for implementing the mitigation measures, described in Section 4.2.5*, in addition to the SPAS-specific mitigation measures identified in Section 4.2.7,* provide the most comprehensive means of ensuring impacts will be reduced to the maximum extent feasible.

31. The first sentence of the second paragraph on page 4-481 of the Draft EIR is hereby revised as follows:

LAX Master Plan mitigation measures *and SPAS-specific mitigation measures* would reduce TAC emissions associated with all of the SPAS alternatives.

32. The following text is hereby added to page 4-687 of the Draft EIR following the first bullet:

- ***MM-LU-3: Conduct Study of the Relationship Between Aircraft Noise Levels and the Ability of Children to Learn.***

  Current studies of aircraft noise and the ability of children to learn have not resulted in the development of a statistically reliable predictive model of the relative effect of changes in aircraft noise levels on learning. Therefore a comprehensive study shall be initiated by LAWA to determine what, if any, measurable relationship may be present between learning and the disruptions caused by aircraft noise at various levels. An element of the evaluation shall be the setting of an acceptable replacement threshold of significance for classroom disruption by both specific and sustained aircraft noise events.[533a]

[533a] *A study entitled Evaluating the Impact of Aviation Noise on Learning is currently underway to determine when aircraft noise impacts student learning and what noise metric(s) best defines impact on learning. The final study is expected to be completed mid- to late-2013. The implementation of LAX Master Plan Mitigation Measure MM-LU-4 is contingent upon the results of this study.*

- ***MM-LU-4: Provide Additional Sound Insulation for Schools Shown by MM-LU-3 to be Significantly Impacted by Aircraft Noise.***

  Prior to completion of the study required by Mitigation Measure MM-LU-3, Conduct Study of the Relationship Between Aircraft Noise Levels and the Ability of Children to Learn, and within six months of the commissioning of any relocated runways associated with

implementation of the LAX Master Plan, LAWA shall conduct interior noise measurements at schools that could be newly exposed to noise levels that exceed the interim LAX interior noise thresholds for classroom disruption of 55 dB Lmax, 65 dB Lmax, or 35 Leq(h), as presented in Section 4.1 Noise, of the Final EIS/EIR. All school classroom buildings (except those within schools subject to an avigation easement) that are found through the noise measurements to exceed the interim interior noise thresholds, as compared to the 1996 baseline conditions presented in the Final EIS/EIR, would become eligible for soundproofing under the ANMP.

Upon completion of the study required by Mitigation Measure MM-LU-3 and acceptance of its results by peer review of industry experts, any schools found to exceed a newly established threshold of significance for classroom disruption based on comparison with 1996 baseline conditions due to implementation of the LAX Master Plan, shall be eligible for participation in the ANMP administered by LAWA, unless they are subject to an existing avigation easement. A determination of which schools become eligible will be made following application of the new threshold based on measured data.

33. The last sentence of footnote 570 on page 4-796 of the Draft EIR is hereby revised as follows:

This is evidenced by the fact that the 65 CNEL contours for LAX under current and future conditions are generally smaller than the 65 CNEL for LAX from two decades ago~~ even though the number of daily aircraft operations back then were comparatively lower~~.

34. The following text is hereby added following the first full paragraph on page 4-828 of the Draft EIR:

Also, as part of the MMRP, LAWA adopted three mitigation measures pertaining to Land Use and designed to address the ANMP and aircraft noise impacts and classroom disruption. These mitigation measures are also applicable to the SPAS alternatives and were considered in the aircraft noise analysis herein.

- ***MM-LU-1. Implement Revised Aircraft Noise Mitigation Program.***

  LAWA shall expand and revise the existing ANMP in coordination with affected neighboring jurisdictions, the state, and the FAA.[585a] The expanded Program shall mitigate land uses that would be rendered incompatible by noise impacts associated with implementation of the LAX Master Plan, unless such uses are subject to an existing avigation easement and have been provided with noise mitigation funds. LAWA shall accelerate the ANMP's timetable for achieving full compatibility of all land uses within the existing noise impact area pursuant to the requirements of the California Airport Noise Standards (California Code of Regulations, Title 21, Subchapter 6) and current Noise Variance. With the exception of a possible new interior noise level standard for schools to be established through the study required by Mitigation Measure MM-LU-3, Conduct Study of the Relationship Between Aircraft Noise Levels and the Ability of Children to Learn, the relevant performance standard to achieve compatibility for land uses that are incompatible due to aircraft noise (i.e., residences, schools, hospitals and churches) is adequate acoustic performance (sound insulation) to ensure an interior noise level of 45 CNEL or less. As an alternative to sound insulation, incompatible property may also achieve compatibility if the incompatible use is converted to a noise-compatible use.

  LAWA shall revise the ANMP to incorporate new, or expand existing measures, including, but not necessarily limited to, the following:

  - *Continued implementation of successful programs to convert existing incompatible land uses to compatible land uses through sound insulation of structures and the acquisition and conversion of incompatible land use to compatible land use.*

- *Ongoing monitoring and provision of annual updates in support of the requirements of the current LAX Noise Variance pursuant to the California Airport Noise Standards, with the updates made available (upon request) to affected local jurisdictions, the ALUC of Los Angeles County, and other interested parties.*
- *Continue the current pre- and post-insulation noise monitoring to ensure achievement of interior noise levels at or below 45 CNEL.*
- *Accelerated rate of land use mitigation to eliminate noise impact areas in the most timely and efficient manner possible through:*
  - *Increased annual funding by LAWA for land use mitigation;*
  - *Reevaluating avigation easements requirements with sound insulation mitigation;*
  - *Provision by LAWA of additional technical assistance, where needed, to local jurisdictions to support more rapid and efficient implementation of their land use mitigation programs;*
  - *Reduction or elimination, to the extent feasible, of structural and building code compliance constraints to mitigation of sub-standard housing.*
- *Revised criteria and procedures for selection and prioritization of properties to be sound insulated or acquired in consideration of the following:*
  - *Insulation or acquisition of properties within the highest CNEL measurement zone;*
  - *Acceleration of the fulfillment of existing commitments to owners wishing to participate within the current ANMP boundaries prior to proceeding with newly eligible properties;*
  - *Insulation or acquisition of incompatible properties with high concentrations of residents or other noise-sensitive occupants such as those housed in schools or hospitals.*
- *Amend ANMP to include libraries as noise-sensitive uses eligible for aircraft noise mitigation.*

Upon completion of acquisition and/or soundproofing commitment under the current Program, expand the boundaries of the ANMP as necessary over time. LAWA will continue preparing quarterly reports that monitor any expansion of the 65 CNEL noise contours beyond the current ANMP boundaries. Based upon these quarterly reports, LAWA will evaluate and adjust the ANMP boundaries, periodically as appropriate, so that as the 65 CNEL noise contours expand, residential and noise-sensitive uses newly impacted by 65 CNEL noise levels would be included within the Program.

[585a] *Subsequent to the approval of the LAX Master Plan, LAWA completed a revised Aircraft Noise Mitigation Program in accordance with the provisions of LAX Master Plan Mitigation Measure MM-LU-1. LAWA continues to implement the ANMP and operate under a variance to achieve compatibility of all land uses within the noise impact area. In addition, LAWA has removed the requirement for an avigation easement in most cases, and has identified places of worship eligible for soundproofing.*

- ***MM-LU-3. Conduct Study of the Relationship Between Aircraft Noise Levels and the Ability of Children to Learn.***

  Current studies of aircraft noise and the ability of children to learn have not resulted in the development of a statistically reliable predictive model of the relative effect of changes in

aircraft noise levels on learning. Therefore, a comprehensive study shall be initiated by LAWA to determine what, if any, measurable relationship may be present between learning and the disruptions caused by aircraft noise at various levels. An element of the evaluation shall be the setting of an acceptable replacement threshold of significance for classroom disruption by both specific and sustained aircraft noise events.[585b]

[585b] *A study entitled Evaluating the Impact of Aviation Noise on Learning is currently underway to determine when aircraft noise impacts student learning and what noise metric(s) best defines impact on learning. The final study is expected to be completed mid- to late-2013. The implementation of LAX Master Plan Mitigation Measure MM-LU-4 is contingent upon the results of this study.*

- ***MM-LU-4. Provide Additional Sound Insulation for Schools Shown by MM-LU-3 to be Significantly Impacted by Aircraft Noise.***

  Prior to completion of the study required by Mitigation Measure MM-LU-3, Conduct Study of the Relationship Between Aircraft Noise Levels and the Ability of Children to Learn, and within six months of the commissioning of any relocated runway associated with implementation of the LAX Master Plan, LAWA shall conduct interior noise measurements at schools that could be newly exposed to noise levels that exceed the interim LAX interior noise thresholds for classroom disruption of 55 dBA Lmax, 65 dBA Lmax, or 35 Leq(h), as presented in Section 4.1, Noise, of this Final EIS/EIR. All school classroom buildings (except those within schools subject to an avigation easement) that are found through the noise measurements to exceed the interim interior noise thresholds, as compared to the 1996 baseline conditions presented in the Final EIS/EIR, would become eligible for soundproofing under the ANMP.

  Upon completion of the study required by Mitigation Measure MM-LU-3 and acceptance of its results by peer review of industry experts, any schools found to exceed a newly established threshold of significance for classroom disruption based on comparison with 1996 baseline conditions due to implementation of the LAX Master Plan, shall be eligible for participation in the ANMP administered by LAWA, unless they are subject to an existing avigation easement. A determination of which schools become eligible will be made following application of the new threshold based on measured data.

35. The seventh sentence of the first paragraph under the heading "Airport Facilities" on page 4-930 of the Draft EIR is hereby revised as follows:

    Alternatives 1, 2, 3, 5, 6, and 7 include high-speed *exits* ~~exists~~ for arriving aircraft to exit from the runway and transition onto a taxiway that directs aircraft away from noise-sensitive uses located to the north.

36. The last sentence of the first paragraph under the heading "Curbside Impacts" on page 4-1139 of the Draft EIR is hereby revised as follows:

    Mitigation Measure MM-ST*(OA)* (SPAS)-1, defined in Section 4.12.1.10.2, is proposed to mitigate this impact.

37. The last sentence of the second paragraph under the heading "CTA Roadway Link Impacts" on page 4-1140 of the Draft EIR is hereby revised as follows:

    Mitigation Measure MM-ST*(OA)* (SPAS)-2, defined in Section 4.12.1.10.2, is proposed to mitigate this impact.

38. The last sentence of the first paragraph under the heading "Curbside Impacts" on page 4-1140 of the Draft EIR is hereby revised as follows:

    Mitigation Measure MM-ST*(OA)* (SPAS)-1, defined in Section 4.12.1.10.2, is proposed to mitigate this impact.

39. The last sentence of the second paragraph under the heading "CTA Roadway Link Impacts" on page 4-1149 of the Draft EIR is hereby revised as follows:

    Mitigation Measure MM-ST*(OA)* (SPAS)-2, defined in Section 4.12.1.10.2, is proposed to mitigate this impact.

40. The last sentence of the first paragraph under the heading "Curbside Impacts" on page 4-1149 of the Draft EIR is hereby revised as follows:

    Mitigation Measure MM-ST*(OA)* (SPAS)-1, defined in Section 4.12.1.10.2, is proposed to mitigate this impact.

41. The last sentence of the second paragraph under the heading "CTA Roadway Link Impacts" at the top of page 4-1150 of the Draft EIR is hereby revised as follows:

    Mitigation Measure MM-ST*(OA)* (SPAS)-2, defined in Section 4.12.1.10.2, is proposed to mitigate this impact.

42. The last sentence of the first paragraph under the heading "Curbside Impacts" on page 4-1150 of the Draft EIR is hereby revised as follows:

    Mitigation Measure MM-ST*(OA)* (SPAS)-1, defined in Section 4.12.1.10.2, is proposed to mitigate this impact.

43. The last sentence of the first paragraph under the heading "CTA Roadway Link Impacts" at the bottom of page 4-1150 of the Draft EIR is hereby revised as follows:

    Mitigation Measure MM-ST*(OA)* (SPAS)-2, defined in Section 4.12.1.10.2, is proposed to mitigate this impact.

44. Table 4.12.1-40 on page 4-1167 of the Draft EIR has been revised. Please see the following revised table.

45. The following text under the heading "Recommended Mitigation Program" on page 4-1178 of the Draft EIR is hereby revised as follows:

    - **MM-ST*(OA)* (SPAS)-1. Relocate Existing Taxi Loading Zone at TBIT (Alternatives 1, 2, 4, 8, and 9).**

      LAWA will relocate the existing taxi loading zone at TBIT to the curve located between TBIT and Terminal 4. This change would provide a larger passenger loading area for the private vehicles along the TBIT inner curbside.

    - **MM-ST*(OA)* (SPAS)-2. Change Departures and Arrivals Level Commercial Vehicle Curbside Operations (Alternatives 1, 2, 4, 8, and 9).**

      LAWA will implement operational changes to commercial modes such that SPAS-related impacts to roadway links would not exceed the threshold of significance. LAWA will determine at the time of implementation which commercial mode(s) should be relocated. LAWA will consider options such as changing hotel and rental car shuttle operations from their current dual loop operation to a single loop operation on the departures and arrivals level curbsides respectively, while the employee shuttle operation could be changed from its existing single level operation on the departures level to a dual loop operation.

46. The last paragraph on page 4-1178 of the Draft EIR is hereby revised as follows:

> **Table 4.12.1-44** shows the results of the analysis for the proposed mitigation on the TBIT arrivals level inner curbsides while **Table 4.12.1-45** provides the results for the proposed mitigation of the CTA roadways. As indicated in **Table 4.12.1-44**, implementation of Mitigation Measure MM-ST*(OA)* (SPAS)-1, Relocate Existing Taxi Loading Zone at TBIT, would reduce impacts to curbsides associated with Alternatives 1, 2, 4, 8, and 9 to a level that is less than significant. As indicated in **Table 4.12.1-45**, implementation of Mitigation Measure MM-ST*(OA)* (SPAS)-2, Change Departures and Arrivals Level Commercial Vehicle Curbside Operations, would reduce impacts to all departures and arrivals level roadways under Alternatives 1, 2, 4, 8, and 9 in the future (2025) condition to a level that is less than significant. The results of the analysis are presented in Appendix K1, *On-Airport Transportation*.

Table 4.12.1-40

Public Parking Demand - Capacity

		Baseline (2009) Spaces			Future (2025) Spaces		Future (2025) Airport Parking Space Supply			
Airport Public Parking Lot	**Facility**	**Supply**	**Demand**	**Requirements**	**Demand**	**Requirements**	**Alts. 1-2**	**Alt. 4**	**Alt. 8**	**Alt. 9**
Airport (CTA)[1,2]	Parking Structures P-1 to P-7	8,577	5,268	6,184	5,268	6,184	7,041	7,041	7,041	7,41
	Percent Occupied (CTA Spaces)						87.8%	87.8%	87.8%	87.8%
Airport (Remote)[3]										
	Park One							2,728	~~7,300~~	~~7,300~~
	Lot C						7,300	-	~~4,200~~	~~4,200~~
									7,300	*7,300*
	Manchester Square						4,200		~~4,900~~	~~4,900~~
									4,200	*4,200*
	ITF						4,900		*4,900*	*4,900*
	ITC							9,127		
	Sub-Total	**10,028**	**10,251**	**11,390**	**10,251**	**11,390**	**16,400**	**11,855**	**16,400**	**16,400**
	Percent Occupied (Remote Spaces)						69.5%	96.1%	69.5%	69.5%
All Airport Parking Facilities	**TOTAL**	**18,605**	**15,519**	**17,574**	**15,519**	**17,574**	**23,441**	**18,896**	**23,441**	**23,441**
	Percent Occupied (Total Spaces)						75.0%	93.0%	75.0%	75.0%

1 On-airport parking demand is assumed to be 85 percent of the parking requirements.
2 Assumes 2% of on-airport parkers are long-term.
3 Off-airport parking demand is assumed to be 90 percent of the parking requirements.

Source: LAWA, 2011.

47. The fourth sentence of the first paragraph following Table 4.12.1-44 on page 4-1179 of the Draft EIR is hereby revised as follows:

    However, Mitigation Measure MM-ST*(OA)* (SPAS)-2, while developed to address impacts to roadway links, would improve the level of service at this intersection from LOS D to LOS C.

48. Table 4.12.2-11 on pages 4-1219 through 4-1224 of the Draft EIR has been revised. Please see the following revised table.

49. Table 4.12.2-14 on pages 4-1233 through 4-1236 of the Draft EIR has been revised. Please see the following revised table.

50. Table 4.12.2-15 on pages 4-1237 through 4-1240 of the Draft EIR has been revised. Please see the following revised table.

51. Table 4.12.2-16 on pages 4-1243 through 4-1246 of the Draft EIR has been revised. Please see the following revised table.

52. Table 4.12.2-17 on pages 4-1247 through 4-1250 of the Draft EIR has been revised. Please see the following revised table.

53. Table 4.12.2-18 on pages 4-1251 through 4-1254 of the Draft EIR has been revised. Please see the following revised table.

54. Table 4.12.2-19 on pages 4-1255 through 4-1256 of the Draft EIR has been revised. Please see the following revised table.

55. Table 4.12.2-21 on pages 4-1261 through 4-1264 of the Draft EIR has been revised. Please see the following revised table.

56. Table 4.12.2-22 on pages 4-1265 through 4-1268 of the Draft EIR has been revised. Please see the following revised table.

57. Table 4.12.2-23 on pages 4-1269 through 4-1272 of the Draft EIR has been revised. Please see the following revised table.

58. Table 4.12.2-24 on pages 4-1273 through 4-1276 of the Draft EIR has been revised. Please see the following revised table.

59. Table 4.12.2-25 on pages 4-1277 through 4-1280 of the Draft EIR has been revised. Please see the following revised table.

Table 4.12.2-11

Baseline (2010) Without Alternative Intersection Level of Service Analysis

Int. #	Intersection	Jurisdiction	ATSAC	ATCS	Baseline (2010) Without Alternative A.M. V/C or Delay	A.M. LOS	M.D. V/C or Delay	M.D. LOS	P.M. V/C or Delay	P.M. LOS
1	Admiralty Way & Bali Way	LA County	X	X	0.566	A	0.530	A	0.696	B
2	Admiralty Way & Fiji Way	LA County	X	X	0.297	A	0.276	A	0.443	A
3	Admiralty Way & Mindanao Way	LA County	X	X	0.549	A	0.537	A	0.623	B
4	Palawan Way & Admiralty Way	LA County	X		0.518	A	0.424	A	0.599	A
5	Via Marina & Admiralty Way	LA County	X	X	0.414	A	0.440	A	0.641	B
6	Airport Boulevard & Arbor Vitae Street/Westchester Parkway	City of LA	X	X	0.299	A	0.485	A	0.579	A
7	Airport Boulevard & Century Boulevard	City of LA	X	X	0.516	A	0.552	A	0.517	A
8	La Tijera Boulevard & Airport Boulevard	City of LA	X	X	0.377	A	0.323	A	0.363	A
9	Airport Boulevard & Manchester Avenue	Caltrans/City of LA	X	X	0.563	A	0.681	B	0.786	C
10	Aviation Boulevard & Arbor Vitae Street	Inglewood/City of LA	X	X	0.427	A	0.420	A	0.551	A
11	Inglewood Avenue & Arbor Vitae Street	Inglewood			0.423	A	0.495	A	0.689	B
12	La Brea Avenue & Arbor Vitae Street	Inglewood			0.392	A	0.480	A	0.669	B
13	La Cienega Boulevard & Arbor Vitae Street	Inglewood/City of LA	X	X	0.354	A	0.397	A	0.491	A
14	Aviation Boulevard & Century Boulevard	City of LA	X	X	0.738	C	0.664	B	0.892	D
15	Aviation Boulevard & El Segundo Boulevard	El Segundo			0.851	D	0.584~~9~~	A	0.746~~1~~	C
16	Aviation Boulevard & Imperial Highway	City of LA	X	X	0.630	B	0.370	A	0.595	A
17	Aviation Boulevard/Florence Avenue & Manchester Avenue	Caltrans/Inglewood	X	X	0.589	A	0.591	A	0.653	B
18	Aviation Boulevard & Rosecrans Avenue	El Segundo/Hawthorne/Manhattan Beach			0.684	B	0.760	C	0.827	D
19	Aviation Boulevard & 111th Street	City of LA	X	X	0.520	A	0.402	A	0.477	A
20	Aviation Boulevard & West 120th Street	El Segundo/LA County			0.592	A	0.365	A	0.516	A
21	Lincoln Boulevard & Bali Way	Caltrans/City of LA/LA County	X	X	0.449	A	0.497	A	0.696	B
22	Lincoln Boulevard & Bluff Creek Drive	Caltrans/City of LA	X	X	0.351	A	0.211	A	0.334	A
23	Centinela Avenue & Jefferson Boulevard	City of LA/LA County	X	X	0.459	A	0.420	A	0.600	A
24	Centinela Avenue & Culver Boulevard	City of LA	X	X	0.669	B	0.451	A	0.698	B
25	La Brea Avenue & Centinela Avenue	Inglewood			0.778	C	0.706	C	0.874	D
26	La Cienega Boulevard & Centinela Avenue	Inglewood/City of LA	X	X	0.933	E	0.590	A	0.973	E
27	La Tijera Boulevard & Centinela Avenue	City of LA/LA County	X	X	0.538	A	0.475	A	0.690	B
28	Sepulveda Boulevard & Centinela Avenue	Culver City	X		0.710	C	0.561	A	0.736	C
29	Centinela Avenue & Venice Boulevard	Caltrans/City of LA	X	X	0.955	E	0.800	C	0.893	D
30	Centinela Avenue & Washington Boulevard	Culver City	X		0.733	C	0.626	B	0.849	D
31	Centinela Avenue & Washington Place	Culver City/City of LA	X		0.721	C	0.589	A	0.754	C
32	Centinela Avenue & SR 90 Eastbound On-/Off-Ramps	Caltrans/City of LA	X	X	0.291	A	0.216	A	0.409	A
33	Centinela Avenue & Sandford/SR 90 Westbound Ramps	Caltrans/City of LA	X	X	0.351	A	0.216	A	0.454	A
34	La Brea Avenue/Hawthorne Boulevard & Century Boulevard	Inglewood			0.574	A	0.605	B	0.746	C

Table 4.12.2-11

Baseline (2010) Without Alternative Intersection Level of Service Analysis

					Baseline (2010) Without Alternative					
					A.M.		M.D.		P.M.	
Int. #	Intersection	Jurisdiction	ATSAC	ATCS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS
35	Inglewood Avenue & Century Boulevard	Inglewood			0.558	A	0.562	A	0.800	C
36	La Cienega Boulevard & Century Boulevard	Inglewood/City of LA/LA County	X	X	0.515	A	0.582	A	0.682	B
37	Prairie Avenue & Century Boulevard	Inglewood			0.583	A	0.681	B	0.783	C
38	Sepulveda Boulevard & Century Boulevard	Caltrans/City of LA	X	X	0.546	A	0.473	A	0.620	B
39	I-405 Northbound Ramps & Century Boulevard	Caltrans/Inglewood			0.643	B	0.544	A	0.641	B
40	Duquesne Avenue & Culver Boulevard	Culver City	X		0.539	A	0.358	A	0.592	A
41	Culver Boulevard & Jefferson Boulevard	City of LA	X	X	0.687	B	0.299	A	0.652	B
42	Nicholson Street & Culver Boulevard	City of LA	X	X	0.541	A	0.337	A	0.737	C
43	Overland Avenue & Culver Boulevard	Culver City	X		1.070	F	0.574	A	0.849	D
44	Sawtelle Boulevard & Culver Boulevard	Culver City	X		0.601	B	0.417	A	0.787	C
45	Sepulveda Boulevard & Culver Boulevard	Culver City	X		0.677	B	0.477	A	0.642	B
46	Douglas Street & El Segundo Boulevard	El Segundo			0.657	B	0.511	A	0.864	D
47	Douglas Street & Imperial Highway	El Segundo/City of LA	X	X	0.292	A	0.230	A	0.387	A
48	Douglas Street & Mariposa Avenue	El Segundo			0.324	A	0.365	A	0.514	A
49	Douglas Street & Rosecrans Avenue	El Segundo/Manhattan Beach			0.587	A	0.638	B	0.662	B
50	Duquesne Avenue & Jefferson Boulevard	Culver City	X		0.514	A	0.475	A	0.625	B
51	Hawthorne Boulevard & El Segundo Boulevard	Hawthorne			0.597	A	0.654	B	1.157	F
52	Inglewood Avenue & El Segundo Boulevard	Hawthorne/LA County			0.582	A	0.632	B	0.961	E
53	La Cienega Boulevard & El Segundo Boulevard	Hawthorne/LA County			0.620	B	0.508	A	0.917	E
54	Nash Street & El Segundo Boulevard	El Segundo			0.524	A	0.402	A	0.634	B
55	Sepulveda Boulevard & El Segundo Boulevard	Caltrans/El Segundo			0.754	C	0.732	C	0.947	E
56	Lincoln Boulevard & Fiji Way	Caltrans/City of LA/LA County	X	X	0.550	A	0.544	A	0.752	C
57	La Brea Avenue & Florence Avenue	Inglewood			0.670	B	0.638	B	0.844	D
58	La Cienega Boulevard & Florence Avenue	Inglewood			0.667	B	0.658	B	0.895	D
59	Nash Street & Grand Avenue	El Segundo			0.422	A	0.324	A	0.426	A
60	Sepulveda Boulevard & Grand Avenue	Caltrans/El Segundo			0.753	C	0.695	B	0.828	D
61	Vista del Mar & Grand Avenue	City of LA	X	X	0.495	A	0.226	A	0.326	A
62	Hawthorne Boulevard & Imperial Avenue	Hawthorne			0.551	A	0.549	A	0.839	D
63	Hawthorne Boulevard & Lennox Boulevard	LA County			0.397	A	0.544	A	0.724	C
64	Highland Avenue/Vista del Mar & Rosecrans Avenue	Manhattan Beach			0.770	C	0.523	A	0.685	B
65	Sepulveda Boulevard & Howard Hughes Parkway	City of LA	X	X	0.388	A	0.365	A	0.540	A
66	Inglewood Avenue & Imperial Highway	Hawthorne			0.614	B	0.647	B	1.153	F
67	La Cienega Boulevard & Imperial Highway	City of LA/LA County	X	X	0.397	A	0.246	A	0.540	A
68	Main Street & Imperial Highway	El Segundo/City of LA	X	X	0.683	B	0.440	A	0.547	A

Table 4.12.2-11

Baseline (2010) Without Alternative Intersection Level of Service Analysis

					Baseline (2010) Without Alternative					
					A.M.		M.D.		P.M.	
Int. #	Intersection	Jurisdiction	ATSAC	ATCS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS
69	Pershing Drive & Imperial Highway	City of LA	X	X	0.515	A	0.368	A	0.354	A
70	Prairie Avenue & Imperial Highway	Hawthorne/Inglewood			0.611	B	0.581	A	0.820	D
71	Sepulveda Boulevard & Imperial Highway	Caltrans/El Segundo/City of LA	X	X	0.650	B	0.674	B	1.013	F
72	Vista del Mar & Imperial Highway	City of LA	X	X	0.403	A	0.205	A	0.363	A
73	Nash Street/I-105 Westbound Ramps & Imperial Highway	Caltrans/El Segundo/City of LA	X	X	0.575	A	0.279	A	0.332	A
74	I-105 Ramps (e/o Aviation Boulevard) & Imperial Highway	Caltrans/City of LA	X	X	0.544	A	0.308	A	0.534	A
75	I-405 Northbound Ramps (e/o La Cienega Boulevard) & Imperial Highway	Caltrans/Hawthorne/LA County			0.440	A	0.309	A	0.614	B
76	Inglewood Avenue & Lennox Boulevard	LA County			0.424	A	0.490	A	0.703	C
77	Inglewood Avenue & Manchester Boulevard	Caltrans/Inglewood			0.529	A	0.489	A	0.645	B
78	Lincoln Boulevard & Jefferson Boulevard	Caltrans/City of LA	X	X	0.610	B	0.487	A	0.624	B
79	Overland Avenue & Jefferson Boulevard	Culver City	X		0.630	B	0.468	A	0.687	B
80	Sepulveda Boulevard & Jefferson Boulevard	Culver City	X		0.384	A	0.336	A	0.406	A
81	Sepulveda Boulevard & Jefferson Boulevard & Playa Street	Culver City	X		0.666	B	0.601	B	0.785	C
82	Slauson Avenue & Jefferson Boulevard	Culver City	X		0.278	A	0.401	A	0.416	A
83	I-405 Northbound Ramps & Jefferson Boulevard	Caltrans/Culver City/City of LA	X	X	0.382	A	0.366	A	0.678	B
84	I-405 Southbound Ramps & Jefferson Boulevard	Caltrans/Culver City/City of LA	X	X	0.275	A	0.322	A	0.365	A
85	La Brea Avenue & Manchester Boulevard	Caltrans/Inglewood			0.678	B	0.670	B	0.714	C
86	La Brea Avenue/Overhill Drive & Stocker Street	LA County			0.694	B	0.611	B	1.071	F
87	La Brea Avenue & Slauson Avenue	LA County			0.753	C	0.629	B	0.917	E
88	La Cienega Boulevard & La Tijera Boulevard	Inglewood/City of LA	X	X	0.780	C	0.689	B	0.871	D
89	La Cienega Boulevard & Lennox Boulevard	City of LA/LA County	X	X	0.346	A	0.280	A	0.371	A
90	La Cienega Boulevard & Manchester Boulevard	Caltrans/Inglewood			0.605	B	0.666	B	0.765	C
91	La Cienega Boulevard Northbound Ramps & Slauson Avenue	LA County			0.664	B	0.525	A	0.648	B
92	La Cienega Boulevard Southbound Ramps & Slauson Avenue	LA County			0.672	B	0.616	B	0.787	C
93	La Cienega Boulevard & Stocker Street	LA County			1.212	F	0.786	C	1.127	F
94	La Cienega Boulevard & 111th Street	City of LA/LA County	X	X	0.290	A	0.277	A	0.413	A
95	La Cienega Boulevard & West 120th Street	LA County			0.358	A	0.282	A	0.696	B
96	La Cienega Boulevard & I-405 Southbound Ramps (n/o Century Boulevard)	Caltrans/Inglewood/City of LA	X	X	0.627	B	0.571	A	0.589	A
97	La Cienega Boulevard & I-405 Southbound Ramps (s/o Century Boulevard)	Caltrans/City of LA/LA County	X	X	0.352	A	0.418	A	0.471	A
98	La Cienega Boulevard & I-405 Southbound Ramps (n/o Imperial Highway)	Caltrans/City of LA/LA County	X	X	0.400	A	0.290	A	0.285	A
99	Lincoln Boulevard & La Tijera Boulevard	Caltrans/City of LA	X	X	0.339	A	0.228	A	0.366	A
100	La Tijera Boulevard & Manchester Avenue	Caltrans/City of LA	X	X	0.445	A	0.460	A	0.507	A
101	Sepulveda Boulevard & La Tijera Boulevard	City of LA	X	X	0.501	A	0.573	A	0.629	B
102	I-405 Northbound Ramps & La Tijera Boulevard	Caltrans/City of LA	X	X	0.534	A	0.631	B	0.536	A

Table 4.12.2-11

Baseline (2010) Without Alternative Intersection Level of Service Analysis

					Baseline (2010) Without Alternative					
					A.M.		M.D.		P.M.	
Int. #	Intersection	Jurisdiction	ATSAC	ATCS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS
103	I-405 Southbound Ramps & La Tijera Boulevard	Caltrans/City of LA	X	X	0.432	A	0.515	A	0.552	A
104	Lincoln Boulevard & Loyola Marymount University Drive	Caltrans/City of LA	X	X	0.427	A	0.320	A	0.525	A
105	Lincoln Boulevard & Manchester Avenue	Caltrans/City of LA	X	X	0.597	A	0.475	A	0.618	B
106	Lincoln Boulevard & Maxella Avenue	Caltrans/City of LA	X	X	0.554	A	0.550	A	0.592	A
107	Lincoln Boulevard & Mindanao Way	Caltrans/City of LA/LA County	X	X	0.624	B	0.697	B	0.771	C
108	Sepulveda Boulevard & Lincoln Boulevard	Caltrans/City of LA	X	X	0.621	B	0.510	A	0.769	C
109	Lincoln Boulevard & Venice Boulevard	Caltrans/City of LA	X	X	0.814	D	0.811	D	0.895	D
110	Lincoln Boulevard & Washington Boulevard	Caltrans/City of LA	X	X	0.746	C	0.816	D	0.936	E
111	Lincoln Boulevard & 83rd Street	Caltrans/City of LA	X	X	0.544	A	0.379	A	0.547	A
112	Lincoln Boulevard & SR 90 Ramps	Caltrans/City of LA	X	X	0.595	A	0.594	A	0.701	C
113	Pershing Drive & Manchester Avenue	Caltrans/City of LA	X	X	0.454	A	0.295	A	0.375	A
114	Sepulveda Boulevard & Manchester Avenue	Caltrans/City of LA	X	X	~~0.747~~ *0.630*	~~C~~ *B*	~~0.648~~ *0.611*	B	~~0.754~~ *0.773*	C
115	Ash Avenue & Manchester Avenue	Caltrans/Inglewood			0.699	B	0.622	B	0.780	C
116	Nash Street & Mariposa Avenue	El Segundo			0.574	A	0.324	A	0.434	A
117	Sepulveda Boulevard & Mariposa Avenue	Caltrans/El Segundo			0.708	C	0.641	B	0.757	C
118	Sawtelle Boulevard & Matteson Street/I-405 Southbound Ramps	Caltrans/Culver City	X		0.760	C	0.523	A	0.778	C
119	Ocean Avenue/Via Marina & Washington Boulevard	City of LA/LA County	X	X	0.531	A	0.476	A	0.694	B
120	Overhill Drive & Slauson Avenue	LA County			0.639	B	0.533	A	0.986	E
121	Overland Avenue & Venice Boulevard	Caltrans/Culver City/City of LA	X		0.819	D	0.657	B	0.873	D
122	Palawan Way & Washington Boulevard	City of LA/LA County			13.4	B	12.1	B	12.8	B
123	Pershing Drive & Westchester Parkway	City of LA	X	X	0.211	A	0.115	A	0.187	A
124	Prairie Avenue & West 112th Street/I-105 Off-Ramp	Caltrans/Inglewood			0.457	A	0.583	A	0.646	B
125	Sepulveda Boulevard & Rosecrans Avenue	Caltrans/El Segundo/Manhattan Beach			0.840	D	0.766	C	1.058	F
126	Sepulveda Boulevard & Sawtelle Boulevard	Culver City	X		0.421	A	0.526	A	0.595	A
127	Sawtelle Boulevard & Venice Boulevard	Caltrans/Culver City/City of LA	X		0.899	D	0.739	C	0.881	D
128	Sawtelle Boulevard & Washington Boulevard	Culver City	X		0.476	A	0.414	A	0.599	A
129	Sawtelle Boulevard & Washington Place	Culver City	X		0.427	A	0.325	A	0.515	A
130	Sepulveda Boulevard & Slauson Avenue	Culver City	X		0.487	A	0.526	A	0.703	C
131	Sepulveda Boulevard & Venice Boulevard	Caltrans/Culver City/City of LA	X	X	0.758	C	0.649	B	0.951	E
132	Sepulveda Boulevard & Washington Boulevard	Culver City	X		0.567	A	0.510	A	0.620	B
133	Sepulveda Boulevard & Washington Place	Culver City	X		0.588	A	0.487	A	0.577	A
134	Sepulveda Boulevard & I-405 Northbound On-/Off-Ramps	Caltrans/Culver City	X		0.824	D	0.565	A	0.762	C
135	Sepulveda Boulevard & Westchester Parkway	City of LA	X	X	0.447	A	0.528	A	0.683	B

Table 4.12.2-11

Baseline (2010) Without Alternative Intersection Level of Service Analysis

					Baseline (2010) Without Alternative					
					A.M.		M.D.		P.M.	
Int. #	Intersection	Jurisdiction	ATSAC	ATCS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS
136	Sepulveda Boulevard & 76th Street	City of LA	X	X	0.663	B	0.422	A	0.628	B
137	Sepulveda Boulevard & 79th Street	City of LA	X	X	0.445	A	0.351	A	0.507	A
138	Sepulveda Boulevard & 83rd Street	City of LA	X	X	0.390	A	0.312	A	0.456	A
139	Sepulveda Boulevard & I-105 Westbound Ramps (n/o Imperial Highway)	Caltrans/City of LA	X	X	0.839	D	0.805	D	0.872	D
140	SR 90 Westbound Ramps & Slauson Avenue	Caltrans/Culver City/LA County	X		0.505	A	0.393	A	0.671	B
141	Airport Boulevard & 96th Street	City of LA	X	X	0.175	A	0.288	A	0.360	A
142	Jenny Avenue & 96th Street	City of LA	X	X	0.129	A	0.154	A	0.115	A
143	Vicksburg Avenue & 96th Street	City of LA	X	X	0.180	A	0.292	A	0.219	A
144	Airport Boulevard & 98th Street	City of LA	X	X	0.292	A	0.381	A	0.439	A
145	Jenny Avenue & Westchester Parkway	City of LA	X	X	0.060	A	0.151	A	0.143	A
146	Sepulveda Eastway & Westchester Parkway	City of LA	X	X	0.221	A	0.340	A	0.423	A
147	Crenshaw Boulevard & Century Boulevard	Inglewood			0.563	A	0.674	B	0.781	C
148	La Cienega Boulevard & Fairview Boulevard	Inglewood/City of LA	X	X	0.834	D	0.603	B	0.851	D
149	Crenshaw Boulevard & Imperial Highway	Inglewood			0.566	A	0.620	B	0.818	D
150	Sepulveda Boulevard & Braddock Drive	Culver City			0.505	A	0.446	A	0.566	A
151	Buckingham Parkway & Slauson Avenue	Culver City			0.646	B	0.451	A	0.778	C
152	Duquesne Avenue & Washington Boulevard	Culver City			0.493	A	0.435	A	0.607	B
153	Overland Avenue & Kelmore Street/Ranch Road	Culver City			21.6	C	13.7	B	28.5	D
154	Overland Avenue & Sawtelle Boulevard	Culver City			20.3	C	15.1	C	27.2	D
155	Overland Avenue & Washington Boulevard	Culver City/City of LA			0.764	C	0.663	B	0.980	E
156	Walgrove Avenue & Washington Boulevard	Culver City			17.1	C	37.0	E	68.1	F
157	La Cienega Boulevard & 104th Street	City of LA/LA County	X	X	0.297	A	0.241	A	0.301	A
158	Vista del Mar & Waterview Street	City of LA	X	X	0.305	A	0.056	A	0.237	A
159	Hindry Avenue & Manchester Boulevard	Caltrans/Inglewood			0.387	A	0.550	A	0.542	A
160	Lincoln Boulevard & Rose Avenue	Caltrans/City of LA	X	X	0.873	D	0.775	C	0.797	C
161	Western Avenue & Century Boulevard	City of LA	X	X	0.440	A	0.509	A	0.637	B
162	Sepulveda Boulevard & Manhattan Beach Boulevard	Caltrans/Manhattan Beach			0.849	D	0.914	E	1.100	F
163	La Cienega Boulevard & Jefferson Boulevard	City of LA	X		0.898	D	0.679	B	1.014	F
164	Crenshaw Boulevard & Manchester Avenue	Caltrans/Inglewood			0.686	B	0.714	C	0.860	D
165	La Cienega Boulevard & Rodeo Road	City of LA	X		0.942	E	0.654	B	0.951	E
166	La Brea Avenue & Rodeo Road	City of LA	X		0.969	E	0.651	B	0.851	D
167	La Brea Avenue & Jefferson Boulevard	City of LA	X		0.980	E	0.578	A	0.866	D
168	Crenshaw Boulevard & Florence Avenue	City of LA	X	X	0.670	B	0.501	A	0.741	C
169	Prairie Avenue & Manchester Boulevard	Inglewood			0.942	E	0.646	B	0.785	C

Table 4.12.2-11

Baseline (2010) Without Alternative Intersection Level of Service Analysis

Int. #	Intersection	Jurisdiction	ATSAC	ATCS	Baseline (2010) Without Alternative A.M. V/C or Delay	A.M. LOS	M.D. V/C or Delay	M.D. LOS	P.M. V/C or Delay	P.M. LOS
170	I-110 Northbound Ramps & Manchester Avenue	Caltrans/City of LA	X	X	0.561	A	0.434	A	0.476	A
171	Western Avenue & Florence Avenue	City of LA	X	X	0.736	C	0.438	A	0.718	C
172	Western Avenue & Manchester Avenue	Caltrans/City of LA	X	X	0.648	B	0.493	A	0.748	C
173	Western Avenue & Imperial Highway	LA County	X	X	0.639	B	0.477	A	0.765	C
174	Vermont Avenue & Florence Avenue	City of LA	X	X	0.619	B	0.426	A	0.599	A
175	Vermont Avenue & Manchester Avenue	Caltrans/LA County/City of LA	X	X	0.661	B	0.471	A	0.611	B
176	Vermont Avenue & Century Boulevard	LA County/City of LA	X	X	0.605	B	0.399	A	0.563	A
177	Vermont Avenue & Imperial Highway	LA County/City of LA	X	X	0.728	C	0.458	A	0.758	C
178	Figueroa Street & Florence Avenue	City of LA	X	X	0.693	B	0.412	A	0.610	B
179	Figueroa Street & Manchester Avenue	Caltrans/City of LA	X	X	0.776	C	0.549	A	0.796	C
180	Figueroa Street & Century Boulevard	City of LA	X	X	0.840	D	0.411	A	0.658	B
181	Figueroa Street & Imperial Highway	City of LA	X	X	0.757	C	0.323	A	0.651	B
182	Inglewood Avenue & Rosecrans Avenue	Hawthorne			0.694	B	0.608	B	0.840	D
183	Hawthorne Boulevard & Rosecrans Avenue	Hawthorne			0.709	C	0.621	B	0.770	C
184	Prairie Avenue & Rosecrans Avenue	Hawthorne/Lawndale			0.776	C	0.673	B	0.856	D
185	Crenshaw Boulevard & Rosecrans Avenue	Gardena/Hawthorne/LA County			0.729	C	0.644	B	0.800	C
186	Western Avenue & Rosecrans Avenue	Gardena			0.737	C	0.603	B	0.838	D
187	Vermont Avenue & Rosecrans Avenue	Gardena/City of LA	X		0.702	C	0.553	A	0.747	C
188	Prairie Avenue & El Segundo Boulevard	Hawthorne			0.883	D	0.627	B	0.889	D
189	Crenshaw Boulevard & El Segundo Boulevard	Hawthorne/Gardena			0.882	D	0.654	B	0.774	C
190	Western Avenue & El Segundo Boulevard	Gardena/LA County			0.798	C	0.518	A	0.759	C
191	Vermont Avenue & El Segundo Boulevard	Gardena/LA County/City of LA	X		0.634	B	0.330	A	0.550	A
192	Aviation Boulevard & Artesia Boulevard	Redondo Beach/Manhattan Beach			1.062	F	0.734	C	1.053	F
193	Aviation Boulevard & Manhattan Beach Boulevard	Redondo Beach/Manhattan Beach			0.895	D	0.724	C	0.979	E
194	Sepulveda Boulevard & Palms Boulevard	City of LA	X		0.766	C	0.552	A	0.929	E
195	Sawtelle Boulevard & Palms Boulevard	City of LA	X		0.769	C	0.401	A	0.757	C
196	Prairie Avenue & Florence Avenue	Inglewood			0.915	E	0.571	A	0.781	C
197	Prairie Avenue & Lennox Boulevard	Inglewood			0.538	A	0.468	A	0.606	B
198	Flower Street (near I-110 Southbound Ramps) & Florence Avenue	Caltrans/City of LA	X	X	0.443	A	0.418	A	0.458	A
199	Grand Avenue (near I-110 Northbound Ramps) & Florence Avenue	Caltrans/City of LA	X	X	0.540	A	0.503	A	0.561	A
200	I-110 Southbound Ramps & Manchester Avenue	Caltrans/City of LA	X	X	0.474	A	0.402	A	0.477	A

Source: Fehr & Peers, 2012.

Table 4.12.2-14

Baseline (2010) With Alternative 1-2 Level of Service Analysis

					Baseline (2010) Without Alternative						Baseline (2010) With Alt. 1-2						Significant Impact?		
					AM		MD		PM		AM		MD		PM				
Int. #	Intersection	Jurisdiction	ATSAC	ATCS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	AM	MD	PM
1	Admiralty Way & Bali Way	LA County	X	X	0.566	A	0.530	A	0.696	B	0.565	A	0.524	A	0.689	B	-	-	-
2	Admiralty Way & Fiji Way	LA County	X	X	0.297	A	0.276	A	0.443	A	0.297	A	0.273	A	0.443	A	-	-	-
3	Admiralty Way & Mindanao Way	LA County	X	X	0.549	A	0.537	A	0.623	B	0.548	A	0.525	A	0.622	B	-	-	-
4	Palawan Way & Admiralty Way	LA County	X		0.518	A	0.424	A	0.599	A	0.518	A	0.424	A	0.599	A	-	-	-
5	Via Marina & Admiralty Way	LA County	X	X	0.414	A	0.440	A	0.641	B	0.413	A	0.431	A	0.641	B	-	-	-
6	Airport Boulevard & Arbor Vitae Street/Westchester Parkway	City of LA	X	X	0.299	A	0.485	A	0.579	A	0.299	A	0.469	A	0.563	A	-	-	-
7	Airport Boulevard & Century Boulevard	City of LA	X	X	0.516	A	0.552	A	0.517	A	0.563	A	0.674	B	0.679	B	-	-	-
8	La Tijera Boulevard & Airport Boulevard	City of LA	X	X	0.377	A	0.323	A	0.363	A	0.448	A	0.373	A	0.366	A	-	-	-
9	Airport Boulevard & Manchester Avenue	Caltrans/City of LA	X	X	0.563	A	0.681	B	0.786	C	0.596	A	0.714	C	0.786	C	-	-	-
10	Aviation Boulevard & Arbor Vitae Street	Inglewood/City of LA	X	X	0.427	A	0.420	A	0.551	A	0.372	A	0.393	A	0.532	A	-	-	-
11	Inglewood Avenue & Arbor Vitae Street	Inglewood			0.423	A	0.495	A	0.689	B	0.436	A	0.501	A	0.703	C	-	-	-
12	La Brea Avenue & Arbor Vitae Street	Inglewood			0.392	A	0.480	A	0.669	B	0.392	A	0.487	A	0.681	B	-	-	-
13	La Cienega Boulevard & Arbor Vitae Street	Inglewood/City of LA	X	X	0.354	A	0.397	A	0.491	A	0.382	A	0.453	A	0.558	A	-	-	-
14	Aviation Boulevard & Century Boulevard	City of LA	X	X	0.738	C	0.664	B	0.892	D	0.771	C	0.701	C	0.895	D	-	-	-
15	Aviation Boulevard & El Segundo Boulevard	El Segundo			0.851	D	~~0.589~~ *0.584*	A	~~0.741~~ *0.746*	C	0.853	D	~~0.590~~ *0.586*	A	~~0.764~~ *0.750*	C	-	-	-
16	Aviation Boulevard & Imperial Highway	City of LA	X	X	0.630	B	0.370	A	0.595	A	0.646	B	0.382	A	0.629	B	-	-	-
17	Aviation Boulevard/Florence Avenue & Manchester Avenue	Caltrans/Inglewood	X	X	0.589	A	0.591	A	0.653	B	0.636	B	0.639	B	0.671	B	-	-	-
18	Aviation Boulevard & Rosecrans Avenue	El Segundo/Hawthorne/ Manhattan Beach			0.684	B	0.760	C	0.827	D	0.688	B	0.763	C	0.828	D	-	-	-
19	Aviation Boulevard & 111th Street	City of LA	X	X	0.520	A	0.402	A	0.477	A	0.525	A	0.457	A	0.526	A	-	-	-
20	Aviation Boulevard & West 120th Street	El Segundo/LA County			0.592	A	0.365	A	0.516	A	0.593	A	0.367	A	0.517	A	-	-	-
21	Lincoln Boulevard & Bali Way	Caltrans/City of LA/LA County	X	X	0.449	A	0.497	A	0.696	B	0.448	A	0.482	A	0.691	B	-	-	-
22	Lincoln Boulevard & Bluff Creek Drive	Caltrans/City of LA	X	X	0.351	A	0.211	A	0.334	A	0.335	A	0.205	A	0.334	A	-	-	-
23	Centinela Avenue & Jefferson Boulevard	City of LA/LA County	X	X	0.459	A	0.420	A	0.600	A	0.460	A	0.420	A	0.602	B	-	-	-
24	Centinela Avenue & Culver Boulevard	City of LA	X	X	0.669	B	0.451	A	0.698	B	0.669	B	0.451	A	0.694	B	-	-	-
25	La Brea Avenue & Centinela Avenue	Inglewood			0.778	C	0.706	C	0.874	D	0.781	C	0.711	C	0.875	D	-	-	-
26	La Cienega Boulevard & Centinela Avenue	Inglewood/City of LA	X	X	0.933	E	0.590	A	0.973	E	0.934	E	0.597	A	0.976	E	-	-	-
27	La Tijera Boulevard & Centinela Avenue	City of LA/LA County	X	X	0.538	A	0.475	A	0.690	B	0.542	A	0.475	A	0.698	B	-	-	-
28	Sepulveda Boulevard & Centinela Avenue	Culver City	X		0.710	C	0.561	A	0.736	C	0.708	C	0.557	A	0.727	C	-	-	-
29	Centinela Avenue & Venice Boulevard	Caltrans/City of LA	X	X	0.955	E	0.800	C	0.893	D	0.957	E	0.805	D	0.900	D	-	-	-
30	Centinela Avenue & Washington Boulevard	Culver City	X		0.733	C	0.626	B	0.849	D	0.730	C	0.624	B	0.848	D	-	-	-
31	Centinela Avenue & Washington Place	Culver City/City of LA	X		0.721	C	0.589	A	0.754	C	0.721	C	0.591	A	0.754	C	-	-	-
32	Centinela Avenue & SR 90 Eastbound On-/Off-Ramps	Caltrans/City of LA	X	X	0.291	A	0.216	A	0.409	A	0.292	A	0.217	A	0.409	A	-	-	-
33	Centinela Avenue & Sandford/SR 90 Westbound Ramps	Caltrans/City of LA	X	X	0.351	A	0.216	A	0.454	A	0.356	A	0.217	A	0.456	A	-	-	-
34	La Brea Avenue/Hawthorne Boulevard & Century Boulevard	Inglewood			0.574	A	0.605	B	0.746	C	0.577	A	0.613	B	0.760	C	-	-	-
35	Inglewood Avenue & Century Boulevard	Inglewood			0.558	A	0.562	A	0.800	C	0.563	A	0.572	A	0.808	D	-	-	-
36	La Cienega Boulevard & Century Boulevard	Inglewood/City of LA/LA County	X	X	0.515	A	0.582	A	0.682	B	0.705	C	0.595	A	0.684	B	Yes	-	-
37	Prairie Avenue & Century Boulevard	Inglewood			0.583	A	0.681	B	0.783	C	0.589	A	0.681	B	0.784	C	-	-	-
38	Sepulveda Boulevard & Century Boulevard	Caltrans/City of LA	X	X	0.546	A	0.473	A	0.620	B	0.580	A	0.515	A	0.659	B	-	-	-
39	I-405 Northbound Ramps & Century Boulevard	Caltrans/Inglewood			0.643	B	0.544	A	0.641	B	0.675	B	0.589	A	0.649	B	-	-	-
40	Duquesne Avenue & Culver Boulevard	Culver City	X		0.539	A	0.358	A	0.592	A	0.545	A	0.365	A	0.594	A	-	-	-
41	Culver Boulevard & Jefferson Boulevard	City of LA	X	X	0.687	B	0.299	A	0.652	B	0.684	B	0.293	A	0.649	B	-	-	-
42	Nicholson Street & Culver Boulevard	City of LA	X	X	0.541	A	0.337	A	0.737	C	0.530	A	0.330	A	0.736	C	-	-	-
43	Overland Avenue & Culver Boulevard	Culver City	X		1.070	F	0.574	A	0.849	D	1.070	F	0.574	A	0.844	D	-	-	-
44	Sawtelle Boulevard & Culver Boulevard	Culver City	X		0.601	B	0.417	A	0.787	C	0.585	A	0.408	A	0.780	C	-	-	-
45	Sepulveda Boulevard & Culver Boulevard	Culver City	X		0.677	B	0.477	A	0.642	B	0.680	B	0.480	A	0.647	B	-	-	-
46	Douglas Street & El Segundo Boulevard	El Segundo			0.657	B	0.511	A	0.864	D	0.655	B	0.508	A	0.858	D	-	-	-
47	Douglas Street & Imperial Highway	El Segundo/City of LA	X	X	0.292	A	0.230	A	0.387	A	0.313	A	0.231	A	0.390	A	-	-	-
48	Douglas Street & Mariposa Avenue	El Segundo			0.324	A	0.365	A	0.514	A	0.321	A	0.358	A	0.514	A	-	-	-
49	Douglas Street & Rosecrans Avenue	El Segundo/Manhattan Beach			0.587	A	0.638	B	0.662	B	0.581	A	0.634	B	0.658	B	-	-	-
50	Duquesne Avenue & Jefferson Boulevard	Culver City	X		0.514	A	0.475	A	0.625	B	0.513	A	0.475	A	0.621	B	-	-	-
51	Hawthorne Boulevard & El Segundo Boulevard	Hawthorne			0.597	A	0.654	B	1.157	F	0.596	A	0.651	B	1.142	F	-	-	-

Table 4.12.2-14

Baseline (2010) With Alternative 1-2 Level of Service Analysis

					Baseline (2010) Without Alternative						Baseline (2010) With Alt. 1-2						Significant Impact?		
					AM		MD		PM		AM		MD		PM				
Int. #	Intersection	Jurisdiction	ATSAC	ATCS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	AM	MD	PM
52	Inglewood Avenue & El Segundo Boulevard	Hawthorne/LA County			0.582	A	0.632	B	0.961	E	0.584	A	0.636	B	0.968	E	-	-	-
53	La Cienega Boulevard & El Segundo Boulevard	Hawthorne/LA County			0.620	B	0.508	A	0.917	E	0.622	B	0.508	A	0.917	E	-	-	-
54	Nash Street & El Segundo Boulevard	El Segundo			0.524	A	0.402	A	0.634	B	0.516	A	0.395	A	0.631	B	-	-	-
55	Sepulveda Boulevard & El Segundo Boulevard	Caltrans/El Segundo			0.754	C	0.732	C	0.947	E	0.756	C	0.732	C	0.949	E	-	-	-
56	Lincoln Boulevard & Fiji Way	Caltrans/City of LA/LA County	X	X	0.550	A	0.544	A	0.752	C	0.549	A	0.541	A	0.752	C	-	-	-
57	La Brea Avenue & Florence Avenue	Inglewood			0.670	B	0.638	B	0.844	D	0.664	B	0.615	B	0.835	D	-	-	-
58	La Cienega Boulevard & Florence Avenue	Inglewood			0.667	B	0.658	B	0.895	D	0.678	B	0.676	B	0.900	D	-	-	-
59	Nash Street & Grand Avenue	El Segundo			0.422	A	0.324	A	0.426	A	0.403	A	0.317	A	0.416	A	-	-	-
60	Sepulveda Boulevard & Grand Avenue	Caltrans/El Segundo			0.753	C	0.695	B	0.828	D	0.760	C	0.702	C	0.832	D	-	-	-
61	Vista del Mar & Grand Avenue	City of LA	X	X	0.495	A	0.226	A	0.326	A	0.489	A	0.226	A	0.326	A	-	-	-
62	Hawthorne Boulevard & Imperial Avenue	Hawthorne			0.551	A	0.549	A	0.839	D	0.560	A	0.554	A	0.853	D	-	-	-
63	Hawthorne Boulevard & Lennox Boulevard	LA County			0.397	A	0.544	A	0.724	C	0.417	A	0.550	A	0.755	C	-	-	-
64	Highland Avenue/Vista del Mar & Rosecrans Avenue	Manhattan Beach			0.770	C	0.523	A	0.685	B	0.766	C	0.522	A	0.685	B	-	-	-
65	Sepulveda Boulevard & Howard Hughes Parkway	City of LA	X	X	0.388	A	0.365	A	0.540	A	0.391	A	0.365	A	0.542	A	-	-	-
66	Inglewood Avenue & Imperial Highway	Hawthorne			0.614	B	0.647	B	1.153	F	0.639	B	0.648	B	1.158	F	-	-	-
67	La Cienega Boulevard & Imperial Highway	City of LA/LA County	X	X	0.397	A	0.246	A	0.540	A	0.369	A	0.234	A	0.533	A	-	-	-
68	Main Street & Imperial Highway	El Segundo/City of LA	X	X	0.683	B	0.440	A	0.547	A	0.703	C	0.444	A	0.549	A	-	-	-
69	Pershing Drive & Imperial Highway	City of LA	X	X	0.515	A	0.368	A	0.354	A	0.496	A	0.339	A	0.347	A	-	-	-
70	Prairie Avenue & Imperial Highway	Hawthorne/Inglewood			0.611	B	0.581	A	0.820	D	0.603	B	0.580	A	0.813	D	-	-	-
71	Sepulveda Boulevard & Imperial Highway	Caltrans/El Segundo/City of LA	X	X	0.650	B	0.674	B	1.013	F	0.674	B	0.677	B	1.018	F	-	-	-
72	Vista del Mar & Imperial Highway	City of LA	X	X	0.403	A	0.205	A	0.363	A	0.397	A	0.192	A	0.360	A	-	-	-
73	Nash Street/I-105 Westbound Ramps & Imperial Highway	Caltrans/El Segundo/City of LA	X	X	0.575	A	0.279	A	0.332	A	0.594	A	0.280	A	0.335	A	-	-	-
74	I-105 Ramps (e/o Aviation Boulevard) & Imperial Highway	Caltrans/City of LA	X	X	0.544	A	0.308	A	0.534	A	0.545	A	0.329	A	0.539	A	-	-	-
75	I-405 Northbound Ramps (e/o La Cienega Boulevard) & Imperial Highway	Caltrans/Hawthorne/LA County			0.440	A	0.309	A	0.614	B	0.444	A	0.314	A	0.614	B	-	-	-
76	Inglewood Avenue & Lennox Boulevard	LA County			0.424	A	0.490	A	0.703	C	0.434	A	0.501	A	0.720	C	-	-	-
77	Inglewood Avenue & Manchester Boulevard	Caltrans/Inglewood			0.529	A	0.489	A	0.645	B	0.531	A	0.492	A	0.658	B	-	-	-
78	Lincoln Boulevard & Jefferson Boulevard	Caltrans/City of LA	X	X	0.610	B	0.487	A	0.624	B	0.609	B	0.485	A	0.616	B	-	-	-
79	Overland Avenue & Jefferson Boulevard	Culver City	X		0.630	B	0.468	A	0.687	B	0.627	B	0.466	A	0.685	B	-	-	-
80	Sepulveda Boulevard & Jefferson Boulevard	Culver City	X		0.384	A	0.336	A	0.406	A	0.387	A	0.348	A	0.409	A	-	-	-
81	Sepulveda Boulevard & Jefferson Boulevard & Playa Street	Culver City	X		0.666	B	0.601	B	0.785	C	0.676	B	0.607	B	0.793	C	-	-	-
82	Slauson Avenue & Jefferson Boulevard	Culver City	X		0.278	A	0.401	A	0.416	A	0.288	A	0.401	A	0.423	A	-	-	-
83	I-405 Northbound Ramps & Jefferson Boulevard	Caltrans/Culver City/City of LA	X	X	0.382	A	0.366	A	0.678	B	0.346	A	0.350	A	0.649	B	-	-	-
84	I-405 Southbound Ramps & Jefferson Boulevard	Caltrans/Culver City/City of LA	X	X	0.275	A	0.322	A	0.365	A	0.275	A	0.315	A	0.363	A	-	-	-
85	La Brea Avenue & Manchester Boulevard	Caltrans/Inglewood			0.678	B	0.670	B	0.714	C	0.696	B	0.705	C	0.743	C	-	-	-
86	La Brea Avenue/Overhill Drive & Stocker Street	LA County			0.694	B	0.611	B	1.071	F	0.694	B	0.612	B	1.071	F	-	-	-
87	La Brea Avenue & Slauson Avenue	LA County			0.753	C	0.629	B	0.917	E	0.743	C	0.623	B	0.913	E	-	-	-
88	La Cienega Boulevard & La Tijera Boulevard	Inglewood/City of LA	X	X	0.780	C	0.689	B	0.871	D	0.774	C	0.664	B	0.860	D	-	-	-
89	La Cienega Boulevard & Lennox Boulevard	City of LA/LA County	X	X	0.346	A	0.280	A	0.371	A	0.353	A	0.299	A	0.382	A	-	-	-
90	La Cienega Boulevard & Manchester Boulevard	Caltrans/Inglewood			0.605	B	0.666	B	0.765	C	0.605	B	0.674	B	0.769	C	-	-	-
91	La Cienega Boulevard Northbound Ramps & Slauson Avenue	LA County			0.664	B	0.525	A	0.648	B	0.664	B	0.519	A	0.646	B	-	-	-
92	La Cienega Boulevard Southbound Ramps & Slauson Avenue	LA County			0.672	B	0.616	B	0.787	C	0.706	C	0.616	B	0.790	C	-	-	-
93	La Cienega Boulevard & Stocker Street	LA County			1.212	F	0.786	C	1.127	F	1.210	F	0.785	C	1.124	F	-	-	-
94	La Cienega Boulevard & 111th Street	City of LA/LA County	X	X	0.290	A	0.277	A	0.413	A	0.269	A	0.270	A	0.361	A	-	-	-
95	La Cienega Boulevard & West 120th Street	LA County			0.358	A	0.282	A	0.696	B	0.368	A	0.281	A	0.694	B	-	-	-
96	La Cienega Boulevard & I-405 Southbound Ramps (n/o Century Boulevard)	Caltrans/Inglewood/City of LA	X	X	0.627	B	0.571	A	0.589	A	0.602	B	0.560	A	0.629	B	-	-	-
97	La Cienega Boulevard & I-405 Southbound Ramps (s/o Century Boulevard)	Caltrans/City of LA/LA County	X	X	0.352	A	0.418	A	0.471	A	0.362	A	0.423	A	0.481	A	-	-	-
98	La Cienega Boulevard & I-405 Southbound Ramps (n/o Imperial Highway)	Caltrans/City of LA/LA County	X	X	0.400	A	0.290	A	0.285	A	0.371	A	0.263	A	0.235	A	-	-	-
99	Lincoln Boulevard & La Tijera Boulevard	Caltrans/City of LA	X	X	0.339	A	0.228	A	0.366	A	0.355	A	0.228	A	0.366	A	-	-	-
100	La Tijera Boulevard & Manchester Avenue	Caltrans/City of LA	X	X	0.445	A	0.460	A	0.507	A	0.414	A	0.444	A	0.487	A	-	-	-
101	Sepulveda Boulevard & La Tijera Boulevard	City of LA	X	X	0.501	A	0.573	A	0.629	B	0.442	A	0.475	A	0.579	A	-	-	-
102	I-405 Northbound Ramps & La Tijera Boulevard	Caltrans/City of LA	X	X	0.534	A	0.631	B	0.536	A	0.537	A	0.678	B	0.546	A	-	-	-
103	I-405 Southbound Ramps & La Tijera Boulevard	Caltrans/City of LA	X	X	0.432	A	0.515	A	0.552	A	0.432	A	0.518	A	0.571	A	-	-	-
104	Lincoln Boulevard & Loyola Marymount University Drive	Caltrans/City of LA	X	X	0.427	A	0.320	A	0.525	A	0.426	A	0.320	A	0.523	A	-	-	-
105	Lincoln Boulevard & Manchester Avenue	Caltrans/City of LA	X	X	0.597	A	0.475	A	0.618	B	0.592	A	0.475	A	0.614	B	-	-	-

Table 4.12.2-14

Baseline (2010) With Alternative 1-2 Level of Service Analysis

					Baseline (2010) Without Alternative						Baseline (2010) With Alt. 1-2						Significant Impact?		
					AM		MD		PM		AM		MD		PM				
Int. #	Intersection	Jurisdiction	ATSAC	ATCS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	AM	MD	PM
106	Lincoln Boulevard & Maxella Avenue	Caltrans/City of LA	X	X	0.554	A	0.550	A	0.592	A	0.553	A	0.549	A	0.587	A	-	-	-
107	Lincoln Boulevard & Mindanao Way	Caltrans/City of LA/LA County	X	X	0.624	B	0.697	B	0.771	C	0.623	B	0.691	B	0.771	C	-	-	-
108	Sepulveda Boulevard & Lincoln Boulevard	Caltrans/City of LA	X	X	0.621	B	0.510	A	0.769	C	0.610	B	0.472	A	0.761	C	-	-	-
109	Lincoln Boulevard & Venice Boulevard	Caltrans/City of LA	X	X	0.814	D	0.811	D	0.895	D	0.813	D	0.811	D	0.891	D	-	-	-
110	Lincoln Boulevard & Washington Boulevard	Caltrans/City of LA	X	X	0.746	C	0.816	D	0.936	E	0.744	C	0.816	D	0.936	E	-	-	-
111	Lincoln Boulevard & 83rd Street	Caltrans/City of LA	X	X	0.544	A	0.379	A	0.547	A	0.541	A	0.379	A	0.543	A	-	-	-
112	Lincoln Boulevard & SR 90 Ramps	Caltrans/City of LA	X	X	0.595	A	0.594	A	0.701	C	0.592	A	0.593	A	0.699	B	-	-	-
113	Pershing Drive & Manchester Avenue	Caltrans/City of LA	X	X	0.454	A	0.295	A	0.375	A	0.451	A	0.288	A	0.371	A	-	-	-
114	Sepulveda Boulevard & Manchester Avenue	Caltrans/City of LA	X	X	~~0.747~~	~~C~~	~~0.648~~	B	~~0.754~~	C	~~0.744~~	~~C~~	~~0.631~~	B	~~0.740~~	C	-	-	-
					0.630	*B*	*0.611*		*0.773*		*0.626*	*B*	*0.603*		*0.763*				
115	Ash Avenue & Manchester Avenue	Caltrans/Inglewood			0.699	B	0.622	B	0.780	C	0.701	C	0.622	B	0.786	C	-	-	-
116	Nash Street & Mariposa Avenue	El Segundo			0.574	A	0.324	A	0.434	A	0.570	A	0.320	A	0.428	A	-	-	-
117	Sepulveda Boulevard & Mariposa Avenue	Caltrans/El Segundo			0.708	C	0.641	B	0.757	C	0.713	C	0.644	B	0.760	C	-	-	-
118	Sawtelle Boulevard & Matteson Street/I-405 Southbound Ramps	Caltrans/Culver City	X		0.760	C	0.523	A	0.778	C	0.741	C	0.510	A	0.762	C	-	-	-
119	Ocean Avenue/Via Marina & Washington Boulevard	City of LA/LA County	X	X	0.531	A	0.476	A	0.694	B	0.527	A	0.476	A	0.694	B	-	-	-
120	Overhill Drive & Slauson Avenue	LA County			0.639	B	0.533	A	0.986	E	0.632	B	0.531	A	0.978	E	-	-	-
121	Overland Avenue & Venice Boulevard	Caltrans/Culver City/City of LA	X		0.819	D	0.657	B	0.873	D	0.817	D	0.655	B	0.873	D	-	-	-
122	Palawan Way & Washington Boulevard	City of LA/LA County			13.4	B	12.1	B	12.8	B	13.4	B	12.1	B	12.8	B	-	-	-
123	Pershing Drive & Westchester Parkway	City of LA	X	X	0.211	A	0.115	A	0.187	A	0.207	A	0.108	A	0.179	A	-	-	-
124	Prairie Avenue & West 112th Street/I-105 Off-Ramp	Caltrans/Inglewood			0.457	A	0.583	A	0.646	B	0.443	A	0.583	A	0.640	B	-	-	-
125	Sepulveda Boulevard & Rosecrans Avenue	Caltrans/El Segundo/Manhattan Beach			0.840	D	0.766	C	1.058	F	0.834	D	0.758	C	1.055	F	-	-	-
126	Sepulveda Boulevard & Sawtelle Boulevard	Culver City	X		0.421	A	0.526	A	0.595	A	0.424	A	0.528	A	0.599	A	-	-	-
127	Sawtelle Boulevard & Venice Boulevard	Caltrans/Culver City/City of LA	X		0.899	D	0.739	C	0.881	D	0.889	D	0.732	C	0.879	D	-	-	-
128	Sawtelle Boulevard & Washington Boulevard	Culver City	X		0.476	A	0.414	A	0.599	A	0.471	A	0.411	A	0.550	A	-	-	-
129	Sawtelle Boulevard & Washington Place	Culver City	X		0.427	A	0.325	A	0.515	A	0.417	A	0.322	A	0.510	A	-	-	-
130	Sepulveda Boulevard & Slauson Avenue	Culver City	X		0.487	A	0.526	A	0.703	C	0.490	A	0.532	A	0.709	C	-	-	-
131	Sepulveda Boulevard & Venice Boulevard	Caltrans/Culver City/City of LA	X	X	0.758	C	0.649	B	0.951	E	0.763	C	0.655	B	0.959	E	-	-	-
132	Sepulveda Boulevard & Washington Boulevard	Culver City	X		0.567	A	0.510	A	0.620	B	0.579	A	0.516	A	0.630	B	-	-	-
133	Sepulveda Boulevard & Washington Place	Culver City	X		0.588	A	0.487	A	0.577	A	0.594	A	0.494	A	0.582	A	-	-	-
134	Sepulveda Boulevard & I-405 Northbound On-/Off-Ramps	Caltrans/Culver City	X		0.824	D	0.565	A	0.762	C	0.785	C	0.536	A	0.733	C	-	-	-
135	Sepulveda Boulevard & Westchester Parkway	City of LA	X	X	0.447	A	0.528	A	0.683	B	0.424	A	0.445	A	0.614	B	-	-	-
136	Sepulveda Boulevard & 76th Street	City of LA	X	X	0.663	B	0.422	A	0.628	B	0.656	B	0.396	A	0.628	B	-	-	-
137	Sepulveda Boulevard & 79th Street	City of LA	X	X	0.445	A	0.351	A	0.507	A	0.431	A	0.327	A	0.506	A	-	-	-
138	Sepulveda Boulevard & 83rd Street	City of LA	X	X	0.390	A	0.312	A	0.456	A	0.383	A	0.289	A	0.453	A	-	-	-
139	Sepulveda Boulevard & I-105 Westbound Ramps (n/o Imperial Highway)	Caltrans/City of LA	X	X	0.839	D	0.805	D	0.872	D	0.825	D	0.785	C	0.850	D	-	-	-
140	SR 90 Westbound Ramps & Slauson Avenue	Caltrans/Culver City/LA County	X		0.505	A	0.393	A	0.671	B	0.502	A	0.391	A	0.643	B	-	-	-
141	Airport Boulevard & 96th Street	City of LA	X	X	0.175	A	0.288	A	0.360	A	0.184	A	0.291	A	0.381	A	-	-	-
142	Jenny Avenue & 96th Street	City of LA	X	X	0.129	A	0.154	A	0.115	A	0.181	A	0.191	A	0.173	A	-	-	-
143	Vicksburg Avenue & 96th Street	City of LA	X	X	0.180	A	0.292	A	0.219	A	0.344	A	0.319	A	0.428	A	-	-	-
144	Airport Boulevard & 98th Street	City of LA	X	X	0.292	A	0.381	A	0.439	A	0.308	A	0.444	A	0.516	A	-	-	-
145	Jenny Avenue & Westchester Parkway	City of LA	X	X	0.060	A	0.151	A	0.143	A	0.040	A	0.149	A	0.128	A	-	-	-
146	Sepulveda Eastway & Westchester Parkway	City of LA	X	X	0.221	A	0.340	A	0.423	A	0.205	A	0.307	A	0.387	A	-	-	-
147	Crenshaw Boulevard & Century Boulevard	Inglewood			0.563	A	0.674	B	0.781	C	0.563	A	0.679	B	0.786	C	-	-	-
148	La Cienega Boulevard & Fairview Boulevard	Inglewood/City of LA	X	X	0.834	D	0.603	B	0.851	D	0.830	D	0.589	A	0.833	D	-	-	-
149	Crenshaw Boulevard & Imperial Highway	Inglewood			0.566	A	0.620	B	0.818	D	0.571	A	0.625	B	0.837	D	-	-	-
150	Sepulveda Boulevard & Braddock Drive	Culver City			0.505	A	0.446	A	0.566	A	0.505	A	0.453	A	0.571	A	-	-	-
151	Buckingham Parkway & Slauson Avenue	Culver City			0.646	B	0.451	A	0.778	C	0.646	B	0.453	A	0.778	C	-	-	-
152	Duquesne Avenue & Washington Boulevard	Culver City			0.493	A	0.435	A	0.607	B	0.495	A	0.437	A	0.615	B	-	-	-
153	Overland Avenue & Kelmore Street/Ranch Road	Culver City			21.6	C	13.7	B	28.5	D	21.6	C	13.7	B	28.5	D	-	-	-
154	Overland Avenue & Sawtelle Boulevard	Culver City			20.3	C	15.1	C	27.2	D	20.3	C	15.1	C	27.2	D	-	-	-
155	Overland Avenue & Washington Boulevard	Culver City/City of LA			0.764	C	0.663	B	0.980	E	0.762	C	0.660	B	0.978	E	-	-	-
156	Walgrove Avenue & Washington Boulevard	Culver City			17.1	C	37.0	E	68.1	F	17.1	C	37.0	E	68.1	F	-	-	-
157	La Cienega Boulevard & 104th Street	City of LA/LA County	X	X	0.297	A	0.241	A	0.301	A	0.259	A	0.241	A	0.293	A	-	-	-
158	Vista del Mar & Waterview Street	City of LA	X	X	0.305	A	0.056	A	0.237	A	0.300	A	0.053	A	0.235	A	-	-	-

Table 4.12.2-14

Baseline (2010) With Alternative 1-2 Level of Service Analysis

					Baseline (2010) Without Alternative						Baseline (2010) With Alt. 1-2						Significant Impact?		
					AM		MD		PM		AM		MD		PM				
Int. #	Intersection	Jurisdiction	ATSAC	ATCS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	AM	MD	PM
159	Hindry Avenue & Manchester Boulevard	Caltrans/Inglewood			0.387	A	0.550	A	0.542	A	0.401	A	0.584	A	0.555	A	-	-	-
160	Lincoln Boulevard & Rose Avenue	Caltrans/City of LA	X	X	0.873	D	0.775	C	0.797	C	0.871	D	0.772	C	0.793	C	-	-	-
161	Western Avenue & Century Boulevard	City of LA	X	X	0.440	A	0.509	A	0.637	B	0.448	A	0.519	A	0.637	B	-	-	-
162	Sepulveda Boulevard & Manhattan Beach Boulevard	Caltrans/Manhattan Beach			0.849	D	0.914	E	1.100	F	0.850	D	0.916	E	1.105	F	-	-	-
163	La Cienega Boulevard & Jefferson Boulevard	City of LA	X		0.898	D	0.679	B	1.014	F	0.898	D	0.680	B	1.016	F	-	-	-
164	Crenshaw Boulevard & Manchester Avenue	Caltrans/Inglewood			0.686	B	0.714	C	0.860	D	0.687	B	0.716	C	0.867	D	-	-	-
165	La Cienega Boulevard & Rodeo Road	City of LA	X		0.942	E	0.654	B	0.951	E	0.941	E	0.653	B	0.950	E	-	-	-
166	La Brea Avenue & Rodeo Road	City of LA	X		0.969	E	0.651	B	0.851	D	0.955	E	0.650	B	0.851	D	-	-	-
167	La Brea Avenue & Jefferson Boulevard	City of LA	X		0.980	E	0.578	A	0.866	D	0.980	E	0.574	A	0.860	D	-	-	-
168	Crenshaw Boulevard & Florence Avenue	City of LA	X	X	0.670	B	0.501	A	0.741	C	0.670	B	0.507	A	0.742	C	-	-	-
169	Prairie Avenue & Manchester Boulevard	Inglewood			0.942	E	0.646	B	0.785	C	0.940	E	0.643	B	0.781	C	-	-	-
170	I-110 Northbound Ramps & Manchester Avenue	Caltrans/City of LA	X	X	0.561	A	0.434	A	0.476	A	0.556	A	0.431	A	0.470	A	-	-	-
171	Western Avenue & Florence Avenue	City of LA	X	X	0.736	C	0.438	A	0.718	C	0.755	C	0.451	A	0.733	C	-	-	-
172	Western Avenue & Manchester Avenue	Caltrans/City of LA	X	X	0.648	B	0.493	A	0.748	C	0.659	B	0.502	A	0.760	C	-	-	-
173	Western Avenue & Imperial Highway	LA County	X	X	0.639	B	0.477	A	0.765	C	0.639	B	0.483	A	0.791	C	-	-	-
174	Vermont Avenue & Florence Avenue	City of LA	X	X	0.619	B	0.426	A	0.599	A	0.625	B	0.450	A	0.608	B	-	-	-
175	Vermont Avenue & Manchester Avenue	Caltrans/LA County/City of LA	X	X	0.661	B	0.471	A	0.611	B	0.672	B	0.473	A	0.611	B	-	-	-
176	Vermont Avenue & Century Boulevard	LA County/City of LA	X	X	0.605	B	0.399	A	0.563	A	0.600	A	0.396	A	0.563	A	-	-	-
177	Vermont Avenue & Imperial Highway	LA County/City of LA	X	X	0.728	C	0.458	A	0.758	C	0.734	C	0.458	A	0.790	C	-	-	-
178	Figueroa Street & Florence Avenue	City of LA	X	X	0.693	B	0.412	A	0.610	B	0.704	C	0.432	A	0.618	B	-	-	-
179	Figueroa Street & Manchester Avenue	Caltrans/City of LA	X	X	0.776	C	0.549	A	0.796	C	0.777	C	0.557	A	0.808	D	-	-	-
180	Figueroa Street & Century Boulevard	City of LA	X	X	0.840	D	0.411	A	0.658	B	0.848	D	0.411	A	0.667	B	-	-	-
181	Figueroa Street & Imperial Highway	City of LA	X	X	0.757	C	0.323	A	0.651	B	0.767	C	0.325	A	0.696	B	-	-	-
182	Inglewood Avenue & Rosecrans Avenue	Hawthorne			0.694	B	0.608	B	0.840	D	0.700	B	0.608	B	0.844	D	-	-	-
183	Hawthorne Boulevard & Rosecrans Avenue	Hawthorne			0.709	C	0.621	B	0.770	C	0.704	C	0.621	B	0.770	C	-	-	-
184	Prairie Avenue & Rosecrans Avenue	Hawthorne/Lawndale			0.776	C	0.673	B	0.856	D	0.789	C	0.676	B	0.860	D	-	-	-
185	Crenshaw Boulevard & Rosecrans Avenue	Gardena/Hawthorne/LA County			0.729	C	0.644	B	0.800	C	0.743	C	0.648	B	0.800	C	-	-	-
186	Western Avenue & Rosecrans Avenue	Gardena			0.737	C	0.603	B	0.838	D	0.737	C	0.609	B	0.839	D	-	-	-
187	Vermont Avenue & Rosecrans Avenue	Gardena/City of LA	X		0.702	C	0.553	A	0.747	C	0.702	C	0.554	A	0.750	C	-	-	-
188	Prairie Avenue & El Segundo Boulevard	Hawthorne			0.883	D	0.627	B	0.889	D	0.883	D	0.629	B	0.897	D	-	-	-
189	Crenshaw Boulevard & El Segundo Boulevard	Hawthorne/Gardena			0.882	D	0.654	B	0.774	C	0.900	D	0.654	B	0.781	C	-	-	-
190	Western Avenue & El Segundo Boulevard	Gardena/LA County			0.798	C	0.518	A	0.759	C	0.798	C	0.520	A	0.761	C	-	-	-
191	Vermont Avenue & El Segundo Boulevard	Gardena/LA County/City of LA	X		0.634	B	0.330	A	0.550	A	0.634	B	0.331	A	0.550	A	-	-	-
192	Aviation Boulevard & Artesia Boulevard	Redondo Beach/Manhattan Beach			1.062	F	0.734	C	1.053	F	1.069	F	0.736	C	1.053	F	-	-	-
193	Aviation Boulevard & Manhattan Beach Boulevard	Redondo Beach/Manhattan Beach			0.895	D	0.724	C	0.979	E	0.900	D	0.726	C	0.981	E	-	-	-
194	Sepulveda Boulevard & Palms Boulevard	City of LA	X		0.766	C	0.552	A	0.929	E	0.781	C	0.559	A	0.929	E	-	-	-
195	Sawtelle Boulevard & Palms Boulevard	City of LA	X		0.769	C	0.401	A	0.757	C	0.756	C	0.393	A	0.741	C	-	-	-
196	Prairie Avenue & Florence Avenue	Inglewood			0.915	E	0.571	A	0.781	C	0.916	E	0.571	A	0.782	C	-	-	-
197	Prairie Avenue & Lennox Boulevard	Inglewood			0.538	A	0.468	A	0.606	B	0.542	A	0.468	A	0.606	B	-	-	-
198	Flower Street (near I-110 Southbound Ramps) & Florence Avenue	Caltrans/City of LA	X	X	0.443	A	0.418	A	0.458	A	0.445	A	0.431	A	0.471	A	-	-	-
199	Grand Avenue (near I-110 Northbound Ramps) & Florence Avenue	Caltrans/City of LA	X	X	0.540	A	0.503	A	0.561	A	0.542	A	0.516	A	0.566	A	-	-	-
200	I-110 Southbound Ramps & Manchester Avenue	Caltrans/City of LA	X	X	0.474	A	0.402	A	0.477	A	0.473	A	0.402	A	0.474	A	-	-	-

Source: Fehr & Peers, 2012.

Table 4.12.2-15

Baseline (2010) With Alternative 3 Level of Service Analysis

					Baseline (2010)						Baseline (2010) With Alt. 3								
					AM		MD		PM		AM		MD		PM		Significant Impact?		
Int. #	Intersection	Jurisdiction	ATSAC	ATCS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	AM	MD	PM
1	Admiralty Way & Bali Way	LA County	X	X	0.566	A	0.530	A	0.696	B	0.568	A	0.531	A	0.698	B	-	-	-
2	Admiralty Way & Fiji Way	LA County	X	X	0.297	A	0.276	A	0.443	A	0.301	A	0.284	A	0.449	A	-	-	-
3	Admiralty Way & Mindanao Way	LA County	X	X	0.549	A	0.537	A	0.623	B	0.562	A	0.537	A	0.628	B	-	-	-
4	Palawan Way & Admiralty Way	LA County	X		0.518	A	0.424	A	0.599	A	0.523	A	0.427	A	0.601	B	-	-	-
5	Via Marina & Admiralty Way	LA County	X	X	0.414	A	0.440	A	0.641	B	0.417	A	0.441	A	0.642	B	-	-	-
6	Airport Boulevard & Arbor Vitae Street/Westchester Parkway	City of LA	X	X	0.299	A	0.485	A	0.579	A	0.264	A	0.380	A	0.563	A	-	-	-
7	Airport Boulevard & Century Boulevard	City of LA	X	X	0.516	A	0.552	A	0.517	A	0.389	A	0.325	A	0.489	A	-	-	-
8	La Tijera Boulevard & Airport Boulevard	City of LA	X	X	0.377	A	0.323	A	0.363	A	0.375	A	0.272	A	0.339	A	-	-	-
9	Airport Boulevard & Manchester Avenue	Caltrans/City of LA	X	X	0.563	A	0.681	B	0.786	C	0.561	A	0.574	A	0.699	B	-	-	-
10	Aviation Boulevard & Arbor Vitae Street	Inglewood/City of LA	X	X	0.427	A	0.420	A	0.551	A	0.424	A	0.317	A	0.460	A	-	-	-
11	Inglewood Avenue & Arbor Vitae Street	Inglewood			0.423	A	0.495	A	0.689	B	0.458	A	0.525	A	0.721	C	-	-	-
12	La Brea Avenue & Arbor Vitae Street	Inglewood			0.392	A	0.480	A	0.669	B	0.401	A	0.480	A	0.676	B	-	-	-
13	La Cienega Boulevard & Arbor Vitae Street	Inglewood/City of LA	X	X	0.354	A	0.397	A	0.491	A	1.395	F	0.859	D	1.522	F	Yes	Yes	Yes
14	Aviation Boulevard & Century Boulevard	City of LA	X	X	0.738	C	0.664	B	0.892	D	0.538	A	0.445	A	0.622	B	-	-	-
15	Aviation Boulevard & El Segundo Boulevard	El Segundo			0.851	D	~~0.589~~ *0.584*	A	~~0.761~~ *0.746*	C	0.851	D	~~0.593~~ *0.588*	A	~~0.772~~ *0.758*	C	-	-	-
16	Aviation Boulevard & Imperial Highway	City of LA	X	X	0.630	B	0.370	A	0.595	A	0.519	A	0.302	A	0.592	A	-	-	-
17	Aviation Boulevard/Florence Avenue & Manchester Avenue	Caltrans/Inglewood	X	X	0.589	A	0.591	A	0.653	B	0.592	A	0.596	A	0.713	C	-	-	Yes
18	Aviation Boulevard & Rosecrans Avenue	El Segundo/Hawthorne/Manhattan Beach			0.684	B	0.760	C	0.827	D	0.685	B	0.765	C	0.828	D	-	-	-
19	Aviation Boulevard & 111th Street	City of LA	X	X	0.520	A	0.402	A	0.477	A	0.472	A	0.246	A	0.470	A	-	-	-
20	Aviation Boulevard & West 120th Street	El Segundo/LA County			0.592	A	0.365	A	0.516	A	0.594	A	0.380	A	0.526	A	-	-	-
21	Lincoln Boulevard & Bali Way	Caltrans/City of LA/LA County	X	X	0.449	A	0.497	A	0.696	B	0.455	A	0.498	A	0.717	C	-	-	-
22	Lincoln Boulevard & Bluff Creek Drive	Caltrans/City of LA	X	X	0.351	A	0.211	A	0.334	A	0.352	A	0.211	A	0.348	A	-	-	-
23	Centinela Avenue & Jefferson Boulevard	City of LA/LA County	X	X	0.459	A	0.420	A	0.600	A	0.460	A	0.422	A	0.602	B	-	-	-
24	Centinela Avenue & Culver Boulevard	City of LA	X	X	0.669	B	0.451	A	0.698	B	0.676	B	0.454	A	0.699	B	-	-	-
25	La Brea Avenue & Centinela Avenue	Inglewood			0.778	C	0.706	C	0.874	D	0.798	C	0.718	C	0.875	D	-	-	-
26	La Cienega Boulevard & Centinela Avenue	Inglewood/City of LA	X	X	0.933	E	0.590	A	0.973	E	0.941	E	0.610	B	1.014	F	-	-	Yes
27	La Tijera Boulevard & Centinela Avenue	City of LA/LA County	X	X	0.538	A	0.475	A	0.690	B	0.542	A	0.477	A	0.690	B	-	-	-
28	Sepulveda Boulevard & Centinela Avenue	Culver City	X		0.710	C	0.561	A	0.736	C	0.717	C	0.563	A	0.757	C	-	-	-
29	Centinela Avenue & Venice Boulevard	Caltrans/City of LA	X	X	0.955	E	0.800	C	0.893	D	0.959	E	0.803	D	0.898	D	-	-	-
30	Centinela Avenue & Washington Boulevard	Culver City	X		0.733	C	0.626	B	0.849	D	0.734	C	0.633	B	0.851	D	-	-	-
31	Centinela Avenue & Washington Place	Culver City/City of LA	X		0.721	C	0.589	A	0.754	C	0.721	C	0.592	A	0.766	C	-	-	-
32	Centinela Avenue & SR 90 Eastbound On-/Off-Ramps	Caltrans/City of LA	X	X	0.291	A	0.216	A	0.409	A	0.293	A	0.217	A	0.414	A	-	-	-
33	Centinela Avenue & Sandford/SR 90 Westbound Ramps	Caltrans/City of LA	X	X	0.351	A	0.216	A	0.454	A	0.362	A	0.219	A	0.456	A	-	-	-
34	La Brea Avenue/Hawthorne Boulevard & Century Boulevard	Inglewood			0.574	A	0.605	B	0.746	C	0.569	A	0.562	A	0.707	C	-	-	-
35	Inglewood Avenue & Century Boulevard	Inglewood			0.558	A	0.562	A	0.800	C	0.558	A	0.514	A	0.771	C	-	-	-
36	La Cienega Boulevard & Century Boulevard	Inglewood/City of LA/LA County	X	X	0.515	A	0.582	A	0.682	B	1.112	F	0.601	B	0.863	D	Yes	-	Yes
37	Prairie Avenue & Century Boulevard	Inglewood			0.583	A	0.681	B	0.783	C	0.582	A	0.618	B	0.781	C	-	-	-
38	Sepulveda Boulevard & Century Boulevard	Caltrans/City of LA	X	X	0.546	A	0.473	A	0.620	B	0.565	A	0.473	A	0.625	B	-	-	-
39	I-405 Northbound Ramps & Century Boulevard	Caltrans/Inglewood			0.643	B	0.544	A	0.641	B	0.699	B	0.559	A	0.658	B	-	-	-
40	Duquesne Avenue & Culver Boulevard	Culver City	X		0.539	A	0.358	A	0.592	A	0.542	A	0.367	A	0.599	A	-	-	-
41	Culver Boulevard & Jefferson Boulevard	City of LA	X	X	0.687	B	0.299	A	0.652	B	0.687	B	0.303	A	0.655	B	-	-	-
42	Nicholson Street & Culver Boulevard	City of LA	X	X	0.541	A	0.337	A	0.737	C	0.559	A	0.339	A	0.742	C	-	-	-
43	Overland Avenue & Culver Boulevard	Culver City	X		1.070	F	0.574	A	0.849	D	1.072	F	0.576	A	0.854	D	-	-	-
44	Sawtelle Boulevard & Culver Boulevard	Culver City	X		0.601	B	0.417	A	0.787	C	0.601	B	0.419	A	0.787	C	-	-	-
45	Sepulveda Boulevard & Culver Boulevard	Culver City	X		0.677	B	0.477	A	0.642	B	0.679	B	0.478	A	0.643	B	-	-	-
46	Douglas Street & El Segundo Boulevard	El Segundo			0.657	B	0.511	A	0.864	D	0.728	C	0.540	A	0.871	D	-	-	-
47	Douglas Street & Imperial Highway	El Segundo/City of LA	X	X	0.292	A	0.230	A	0.387	A	0.272	A	0.197	A	0.344	A	-	-	-
48	Douglas Street & Mariposa Avenue	El Segundo			0.324	A	0.365	A	0.514	A	0.325	A	0.365	A	0.515	A	-	-	-
49	Douglas Street & Rosecrans Avenue	El Segundo/Manhattan Beach			0.587	A	0.638	B	0.662	B	0.653	B	0.639	B	0.699	B	-	-	-
50	Duquesne Avenue & Jefferson Boulevard	Culver City	X		0.514	A	0.475	A	0.625	B	0.515	A	0.477	A	0.626	B	-	-	-
51	Hawthorne Boulevard & El Segundo Boulevard	Hawthorne			0.597	A	0.654	B	1.157	F	0.635	B	0.657	B	1.160	F	-	-	-
52	Inglewood Avenue & El Segundo Boulevard	Hawthorne/LA County			0.582	A	0.632	B	0.961	E	0.668	B	0.637	B	0.979	E	-	-	Yes

Table 4.12.2-15

Baseline (2010) With Alternative 3 Level of Service Analysis

					Baseline (2010)						Baseline (2010) With Alt. 3						Significant Impact?		
					AM		MD		PM		AM		MD		PM				
Int. #	Intersection	Jurisdiction	ATSAC	ATCS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	AM	MD	PM
53	La Cienega Boulevard & El Segundo Boulevard	Hawthorne/LA County			0.620	B	0.508	A	0.917	E	0.639	B	0.520	A	0.944	E	-	-	Yes
54	Nash Street & El Segundo Boulevard	El Segundo			0.524	A	0.402	A	0.634	B	0.525	A	0.403	A	0.638	B	-	-	-
55	Sepulveda Boulevard & El Segundo Boulevard	Caltrans/El Segundo			0.754	C	0.732	C	0.947	E	0.790	C	0.733	C	0.953	E	-	-	-
56	Lincoln Boulevard & Fiji Way	Caltrans/City of LA/LA County	X	X	0.550	A	0.544	A	0.752	C	0.551	A	0.551	A	0.775	C	-	-	-
57	La Brea Avenue & Florence Avenue	Inglewood			0.670	B	0.638	B	0.844	D	0.673	B	0.639	B	0.848	D	-	-	-
58	La Cienega Boulevard & Florence Avenue	Inglewood			0.667	B	0.658	B	0.895	D	0.764	C	0.761	C	0.994	E	Yes	Yes	Yes
59	Nash Street & Grand Avenue	El Segundo			0.422	A	0.324	A	0.426	A	0.425	A	0.324	A	0.426	A	-	-	-
60	Sepulveda Boulevard & Grand Avenue	Caltrans/El Segundo			0.753	C	0.695	B	0.828	D	0.788	C	0.710	C	0.830	D	-	-	-
61	Vista del Mar & Grand Avenue	City of LA	X	X	0.495	A	0.226	A	0.326	A	0.508	A	0.231	A	0.326	A	-	-	-
62	Hawthorne Boulevard & Imperial Avenue	Hawthorne			0.551	A	0.549	A	0.839	D	0.633	B	0.571	A	0.953	E	-	-	Yes
63	Hawthorne Boulevard & Lennox Boulevard	LA County			0.397	A	0.544	A	0.724	C	0.419	A	0.544	A	0.762	C	-	-	-
64	Highland Avenue/Vista del Mar & Rosecrans Avenue	Manhattan Beach			0.770	C	0.523	A	0.685	B	0.772	C	0.526	A	0.702	C	-	-	-
65	Sepulveda Boulevard & Howard Hughes Parkway	City of LA	X	X	0.388	A	0.365	A	0.540	A	0.388	A	0.365	A	0.545	A	-	-	-
66	Inglewood Avenue & Imperial Highway	Hawthorne			0.614	B	0.647	B	1.153	F	0.755	C	0.672	B	1.247	F	Yes	-	Yes
67	La Cienega Boulevard & Imperial Highway	City of LA/LA County	X	X	0.397	A	0.246	A	0.540	A	0.479	A	0.367	A	0.593	A	-	-	-
68	Main Street & Imperial Highway	El Segundo/City of LA	X	X	0.683	B	0.440	A	0.547	A	0.689	B	0.473	A	0.576	A	-	-	-
69	Pershing Drive & Imperial Highway	City of LA	X	X	0.515	A	0.368	A	0.354	A	0.600	A	0.452	A	0.354	A	-	-	-
70	Prairie Avenue & Imperial Highway	Hawthorne/Inglewood			0.611	B	0.581	A	0.820	D	0.651	B	0.584	A	0.822	D	-	-	-
71	Sepulveda Boulevard & Imperial Highway	Caltrans/El Segundo/City of LA	X	X	0.650	B	0.674	B	1.013	F	0.707	C	0.824	D	1.096	F	Yes	Yes	Yes
72	Vista del Mar & Imperial Highway	City of LA	X	X	0.403	A	0.205	A	0.363	A	0.405	A	0.209	A	0.365	A	-	-	-
73	Nash Street/I-105 Westbound Ramps & Imperial Highway	Caltrans/El Segundo/City of LA	X	X	0.575	A	0.279	A	0.332	A	0.582	A	0.282	A	0.347	A	-	-	-
74	I-105 Ramps (e/o Aviation Boulevard) & Imperial Highway	Caltrans/City of LA	X	X	0.544	A	0.308	A	0.534	A	1.244	F	0.962	E	1.118	F	Yes	Yes	Yes
75	I-405 Northbound Ramps (e/o La Cienega Boulevard) & Imperial Highway	Caltrans/Hawthorne/LA County			0.440	A	0.309	A	0.614	B	0.530	A	0.362	A	0.646	B	-	-	-
76	Inglewood Avenue & Lennox Boulevard	LA County			0.424	A	0.490	A	0.703	C	0.441	A	0.490	A	0.752	C	-	-	Yes
77	Inglewood Avenue & Manchester Boulevard	Caltrans/Inglewood			0.529	A	0.489	A	0.645	B	0.545	A	0.492	A	0.647	B	-	-	-
78	Lincoln Boulevard & Jefferson Boulevard	Caltrans/City of LA	X	X	0.610	B	0.487	A	0.624	B	0.627	B	0.488	A	0.626	B	-	-	-
79	Overland Avenue & Jefferson Boulevard	Culver City	X		0.630	B	0.468	A	0.687	B	0.630	B	0.468	A	0.690	B	-	-	-
80	Sepulveda Boulevard & Jefferson Boulevard	Culver City	X		0.384	A	0.336	A	0.406	A	0.390	A	0.343	A	0.412	A	-	-	-
81	Sepulveda Boulevard & Jefferson Boulevard & Playa Street	Culver City	X		0.666	B	0.601	B	0.785	C	0.673	B	0.609	B	0.796	C	-	-	-
82	Slauson Avenue & Jefferson Boulevard	Culver City	X		0.278	A	0.401	A	0.416	A	0.277	A	0.386	A	0.409	A	-	-	-
83	I-405 Northbound Ramps & Jefferson Boulevard	Caltrans/Culver City/City of LA	X	X	0.382	A	0.366	A	0.678	B	0.345	A	0.334	A	0.657	B	-	-	-
84	I-405 Southbound Ramps & Jefferson Boulevard	Caltrans/Culver City/City of LA	X	X	0.275	A	0.322	A	0.365	A	0.251	A	0.307	A	0.360	A	-	-	-
85	La Brea Avenue & Manchester Boulevard	Caltrans/Inglewood			0.678	B	0.670	B	0.714	C	0.764	C	0.765	C	0.782	C	Yes	Yes	Yes
86	La Brea Avenue/Overhill Drive & Stocker Street	LA County			0.694	B	0.611	B	1.071	F	0.697	B	0.615	B	1.073	F	-	-	-
87	La Brea Avenue & Slauson Avenue	LA County			0.753	C	0.629	B	0.917	E	0.771	C	0.636	B	0.918	E	-	-	-
88	La Cienega Boulevard & La Tijera Boulevard	Inglewood/City of LA	X	X	0.780	C	0.689	B	0.871	D	0.786	C	0.689	B	0.876	D	-	-	-
89	La Cienega Boulevard & Lennox Boulevard	City of LA/LA County	X	X	0.346	A	0.280	A	0.371	A	0.580	A	0.310	A	0.525	A	-	-	-
90	La Cienega Boulevard & Manchester Boulevard	Caltrans/Inglewood			0.605	B	0.666	B	0.765	C	0.721	C	0.804	D	0.933	E	Yes	Yes	Yes
91	La Cienega Boulevard Northbound Ramps & Slauson Avenue	LA County			0.664	B	0.525	A	0.648	B	0.664	B	0.527	A	0.652	B	-	-	-
92	La Cienega Boulevard Southbound Ramps & Slauson Avenue	LA County			0.672	B	0.616	B	0.787	C	0.704	C	0.621	B	0.788	C	-	-	-
93	La Cienega Boulevard & Stocker Street	LA County			1.212	F	0.786	C	1.127	F	1.215	F	0.791	C	1.135	F	-	-	-
94	La Cienega Boulevard & 111th Street	City of LA/LA County	X	X	0.290	A	0.277	A	0.413	A	0.287	A	0.196	A	0.393	A	-	-	-
95	La Cienega Boulevard & West 120th Street	LA County			0.358	A	0.282	A	0.696	B	0.436	A	0.306	A	0.767	C	-	-	-
96	La Cienega Boulevard & I-405 Southbound Ramps (n/o Century Boulevard)	Caltrans/Inglewood/City of LA	X	X	0.627	B	0.571	A	0.589	A	0.678	B	0.578	A	0.618	B	-	-	-
97	La Cienega Boulevard & I-405 Southbound Ramps (s/o Century Boulevard)	Caltrans/City of LA/LA County	X	X	0.352	A	0.418	A	0.471	A	0.260	A	0.220	A	0.331	A	-	-	-
98	La Cienega Boulevard & I-405 Southbound Ramps (n/o Imperial Highway)	Caltrans/City of LA/LA County	X	X	0.400	A	0.290	A	0.285	A	0.334	A	0.146	A	0.166	A	-	-	-
99	Lincoln Boulevard & La Tijera Boulevard	Caltrans/City of LA	X	X	0.339	A	0.228	A	0.366	A	0.405	A	0.231	A	0.392	A	-	-	-
100	La Tijera Boulevard & Manchester Avenue	Caltrans/City of LA	X	X	0.445	A	0.460	A	0.507	A	0.448	A	0.463	A	0.509	A	-	-	-
101	Sepulveda Boulevard & La Tijera Boulevard	City of LA	X	X	0.501	A	0.573	A	0.629	B	0.553	A	0.581	A	0.647	B	-	-	-
102	I-405 Northbound Ramps & La Tijera Boulevard	Caltrans/City of LA	X	X	0.534	A	0.631	B	0.536	A	0.571	A	0.642	B	0.605	B	-	-	-
103	I-405 Southbound Ramps & La Tijera Boulevard	Caltrans/City of LA	X	X	0.432	A	0.515	A	0.552	A	0.440	A	0.569	A	0.584	A	-	-	-
104	Lincoln Boulevard & Loyola Marymount University Drive	Caltrans/City of LA	X	X	0.427	A	0.320	A	0.525	A	0.439	A	0.346	A	0.571	A	-	-	-
105	Lincoln Boulevard & Manchester Avenue	Caltrans/City of LA	X	X	0.597	A	0.475	A	0.618	B	0.631	B	0.484	A	0.672	B	-	-	-
106	Lincoln Boulevard & Maxella Avenue	Caltrans/City of LA	X	X	0.554	A	0.550	A	0.592	A	0.554	A	0.555	A	0.600	A	-	-	-

Table 4.12.2-15

Baseline (2010) With Alternative 3 Level of Service Analysis

					Baseline (2010)						Baseline (2010) With Alt. 3								
					AM		MD		PM		AM		MD		PM		Significant Impact?		
Int. #	Intersection	Jurisdiction	ATSAC	ATCS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	AM	MD	PM
107	Lincoln Boulevard & Mindanao Way	Caltrans/City of LA/LA County	X	X	0.624	B	0.697	B	0.771	C	0.629	B	0.699	B	0.784	C	-	-	-
108	Sepulveda Boulevard & Lincoln Boulevard	Caltrans/City of LA	X	X	0.621	B	0.510	A	0.769	C	0.615	B	0.437	A	0.769	C	-	-	-
109	Lincoln Boulevard & Venice Boulevard	Caltrans/City of LA	X	X	0.814	D	0.811	D	0.895	D	0.815	D	0.813	D	0.899	D	-	-	-
110	Lincoln Boulevard & Washington Boulevard	Caltrans/City of LA	X	X	0.746	C	0.816	D	0.936	E	0.746	C	0.816	D	0.939	E	-	-	-
111	Lincoln Boulevard & 83rd Street	Caltrans/City of LA	X	X	0.544	A	0.379	A	0.547	A	0.544	A	0.379	A	0.559	A	-	-	-
112	Lincoln Boulevard & SR 90 Ramps	Caltrans/City of LA	X	X	0.595	A	0.594	A	0.701	C	0.600	A	0.595	A	0.704	C	-	-	-
113	Pershing Drive & Manchester Avenue	Caltrans/City of LA	X	X	0.454	A	0.295	A	0.375	A	0.454	A	0.304	A	0.394	A	-	-	-
114	Sepulveda Boulevard & Manchester Avenue	Caltrans/City of LA	X	X	~~0.747~~	~~C~~	~~0.648~~	B	~~0.754~~	C	~~0.747~~	~~C~~	~~0.648~~	B	~~0.754~~	C	-	-	-
					0.630	*B*	*0.611*		*0.773*		*0.630*	*B*	*0.622*		*0.780*				
115	Ash Avenue & Manchester Avenue	Caltrans/Inglewood			0.699	B	0.622	B	0.780	C	0.710	C	0.623	B	0.789	C	-	-	-
116	Nash Street & Mariposa Avenue	El Segundo			0.574	A	0.324	A	0.434	A	0.574	A	0.326	A	0.436	A	-	-	-
117	Sepulveda Boulevard & Mariposa Avenue	Caltrans/El Segundo			0.708	C	0.641	B	0.757	C	0.716	C	0.657	B	0.772	C	-	-	-
118	Sawtelle Boulevard & Matteson Street/I-405 Southbound Ramps	Caltrans/Culver City	X		0.760	C	0.523	A	0.778	C	0.761	C	0.529	A	0.779	C	-	-	-
119	Ocean Avenue/Via Marina & Washington Boulevard	City of LA/LA County	X	X	0.531	A	0.476	A	0.694	B	0.532	A	0.480	A	0.699	B	-	-	-
120	Overhill Drive & Slauson Avenue	LA County			0.639	B	0.533	A	0.986	E	0.641	B	0.536	A	0.992	E	-	-	-
121	Overland Avenue & Venice Boulevard	Caltrans/Culver City/City of LA	X		0.819	D	0.657	B	0.873	D	0.823	D	0.666	B	0.881	D	-	-	-
122	Palawan Way & Washington Boulevard	City of LA/LA County			13.4	B	12.1	B	12.8	B	13.4	B	12.1	B	12.8	B	-	-	-
123	Pershing Drive & Westchester Parkway	City of LA	X	X	0.211	A	0.115	A	0.187	A	0.211	A	0.124	A	0.188	A	-	-	-
124	Prairie Avenue & West 112th Street/I-105 Off-Ramp	Caltrans/Inglewood			0.457	A	0.583	A	0.646	B	0.470	A	0.608	B	0.650	B	-	-	-
125	Sepulveda Boulevard & Rosecrans Avenue	Caltrans/El Segundo/Manhattan Beach			0.840	D	0.766	C	1.058	F	0.879	D	0.781	C	1.067	F	Yes	-	-
126	Sepulveda Boulevard & Sawtelle Boulevard	Culver City	X		0.421	A	0.526	A	0.595	A	0.421	A	0.526	A	0.599	A	-	-	-
127	Sawtelle Boulevard & Venice Boulevard	Caltrans/Culver City/City of LA	X		0.899	D	0.739	C	0.881	D	0.902	E	0.742	C	0.881	D	-	-	-
128	Sawtelle Boulevard & Washington Boulevard	Culver City	X		0.476	A	0.414	A	0.599	A	0.479	A	0.416	A	0.611	B	-	-	-
129	Sawtelle Boulevard & Washington Place	Culver City	X		0.427	A	0.325	A	0.515	A	0.435	A	0.326	A	0.515	A	-	-	-
130	Sepulveda Boulevard & Slauson Avenue	Culver City	X		0.487	A	0.526	A	0.703	C	0.489	A	0.530	A	0.705	C	-	-	-
131	Sepulveda Boulevard & Venice Boulevard	Caltrans/Culver City/City of LA	X	X	0.758	C	0.649	B	0.951	E	0.758	C	0.656	B	0.959	E	-	-	-
132	Sepulveda Boulevard & Washington Boulevard	Culver City	X		0.567	A	0.510	A	0.620	B	0.569	A	0.511	A	0.629	B	-	-	-
133	Sepulveda Boulevard & Washington Place	Culver City	X		0.588	A	0.487	A	0.577	A	0.588	A	0.487	A	0.583	A	-	-	-
134	Sepulveda Boulevard & I-405 Northbound On-/Off-Ramps	Caltrans/Culver City	X		0.824	D	0.565	A	0.762	C	0.828	D	0.566	A	0.764	C	-	-	-
135	Sepulveda Boulevard & Westchester Parkway	City of LA	X	X	0.447	A	0.528	A	0.683	B	0.495	A	0.592	A	0.688	B	-	-	-
136	Sepulveda Boulevard & 76th Street	City of LA	X	X	0.663	B	0.422	A	0.628	B	0.670	B	0.425	A	0.635	B	-	-	-
137	Sepulveda Boulevard & 79th Street	City of LA	X	X	0.445	A	0.351	A	0.507	A	0.465	A	0.360	A	0.515	A	-	-	-
138	Sepulveda Boulevard & 83rd Street	City of LA	X	X	0.390	A	0.312	A	0.456	A	0.394	A	0.315	A	0.456	A	-	-	-
139	Sepulveda Boulevard & I-105 Westbound Ramps (n/o Imperial Highway)	Caltrans/City of LA	X	X	0.839	D	0.805	D	0.872	D	0.763	C	0.663	B	0.781	C	-	-	-
140	SR 90 Westbound Ramps & Slauson Avenue	Caltrans/Culver City/LA County	X		0.505	A	0.393	A	0.671	B	0.512	A	0.396	A	0.646	B	-	-	-
141	Airport Boulevard & 96th Street	City of LA	X	X	0.175	A	0.288	A	0.360	A	0.320	A	0.337	A	0.467	A	-	-	-
142	Jenny Avenue & 96th Street	City of LA	X	X	0.129	A	0.154	A	0.115	A	0.213	A	0.322	A	0.185	A	-	-	-
143	Vicksburg Avenue & 96th Street	City of LA	X	X	0.180	A	0.292	A	0.219	A	0.003	A	0.090	A	-0.009	A	-	-	-
144	Airport Boulevard & 98th Street	City of LA	X	X	0.292	A	0.381	A	0.439	A	0.315	A	0.388	A	0.462	A	-	-	-
145	Jenny Avenue & Westchester Parkway	City of LA	X	X	0.060	A	0.151	A	0.143	A	0.139	A	0.353	A	0.205	A	-	-	-
146	Sepulveda Eastway & Westchester Parkway	City of LA	X	X	0.221	A	0.340	A	0.423	A	0.258	A	0.347	A	0.459	A	-	-	-
147	Crenshaw Boulevard & Century Boulevard	Inglewood			0.563	A	0.674	B	0.781	C	0.574	A	0.677	B	0.781	C	-	-	-
148	La Cienega Boulevard & Fairview Boulevard	Inglewood/City of LA	X	X	0.834	D	0.603	B	0.851	D	0.849	D	0.606	B	0.858	D	-	-	-
149	Crenshaw Boulevard & Imperial Highway	Inglewood			0.566	A	0.620	B	0.818	D	0.591	A	0.621	B	0.836	D	-	-	-
150	Sepulveda Boulevard & Braddock Drive	Culver City			0.505	A	0.446	A	0.566	A	0.508	A	0.449	A	0.569	A	-	-	-
151	Buckingham Parkway & Slauson Avenue	Culver City			0.646	B	0.451	A	0.778	C	0.647	B	0.454	A	0.781	C	-	-	-
152	Duquesne Avenue & Washington Boulevard	Culver City			0.493	A	0.435	A	0.607	B	0.501	A	0.437	A	0.608	B	-	-	-
153	Overland Avenue & Kelmore Street/Ranch Road	Culver City			21.6	C	13.7	B	28.5	D	21.7	C	13.8	B	28.5	D	-	-	-
154	Overland Avenue & Sawtelle Boulevard	Culver City			20.3	C	15.1	C	27.2	D	20.3	C	15.1	C	27.3	D	-	-	-
155	Overland Avenue & Washington Boulevard	Culver City/City of LA			0.764	C	0.663	B	0.980	E	0.767	C	0.665	B	0.981	E	-	-	-
156	Walgrove Avenue & Washington Boulevard	Culver City			17.1	C	37.0	E	68.1	F	17.1	C	38.2	E	68.8	F	-	-	-
157	La Cienega Boulevard & 104th Street	City of LA/LA County	X	X	0.297	A	0.241	A	0.301	A	0.183	A	0.174	A	0.288	A	-	-	-
158	Vista del Mar & Waterview Street	City of LA	X	X	0.305	A	0.056	A	0.237	A	0.307	A	0.061	A	0.239	A	-	-	-
159	Hindry Avenue & Manchester Boulevard	Caltrans/Inglewood			0.387	A	0.550	A	0.542	A	0.476	A	0.686	B	0.617	B	-	-	-

Table 4.12.2-15

Baseline (2010) With Alternative 3 Level of Service Analysis

					Baseline (2010)						Baseline (2010) With Alt. 3						Significant Impact?		
					AM		MD		PM		AM		MD		PM				
Int. #	Intersection	Jurisdiction	ATSAC	ATCS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	AM	MD	PM
160	Lincoln Boulevard & Rose Avenue	Caltrans/City of LA	X	X	0.873	D	0.775	C	0.797	C	0.877	D	0.785	C	0.799	C	-	-	-
161	Western Avenue & Century Boulevard	City of LA	X	X	0.440	A	0.509	A	0.637	B	0.440	A	0.519	A	0.646	B	-	-	-
162	Sepulveda Boulevard & Manhattan Beach Boulevard	Caltrans/Manhattan Beach			0.849	D	0.914	E	1.100	F	0.868	D	0.922	E	1.109	F	-	-	-
163	La Cienega Boulevard & Jefferson Boulevard	City of LA	X		0.898	D	0.679	B	1.014	F	0.898	D	0.682	B	1.018	F	-	-	-
164	Crenshaw Boulevard & Manchester Avenue	Caltrans/Inglewood			0.686	B	0.714	C	0.860	D	0.689	B	0.720	C	0.866	D	-	-	-
165	La Cienega Boulevard & Rodeo Road	City of LA	X		0.942	E	0.654	B	0.951	E	0.946	E	0.666	B	0.951	E	-	-	-
166	La Brea Avenue & Rodeo Road	City of LA	X		0.969	E	0.651	B	0.851	D	0.970	E	0.652	B	0.857	D	-	-	-
167	La Brea Avenue & Jefferson Boulevard	City of LA	X		0.980	E	0.578	A	0.866	D	0.981	E	0.584	A	0.875	D	-	-	-
168	Crenshaw Boulevard & Florence Avenue	City of LA	X	X	0.670	B	0.501	A	0.741	C	0.687	B	0.503	A	0.756	C	-	-	-
169	Prairie Avenue & Manchester Boulevard	Inglewood			0.942	E	0.646	B	0.785	C	0.950	E	0.656	B	0.802	D	-	-	-
170	I-110 Northbound Ramps & Manchester Avenue	Caltrans/City of LA	X	X	0.561	A	0.434	A	0.476	A	0.561	A	0.434	A	0.477	A	-	-	-
171	Western Avenue & Florence Avenue	City of LA	X	X	0.736	C	0.438	A	0.718	C	0.774	C	0.460	A	0.755	C	-	-	-
172	Western Avenue & Manchester Avenue	Caltrans/City of LA	X	X	0.648	B	0.493	A	0.748	C	0.689	B	0.505	A	0.784	C	-	-	-
173	Western Avenue & Imperial Highway	LA County	X	X	0.639	B	0.477	A	0.765	C	0.654	B	0.479	A	0.792	C	-	-	-
174	Vermont Avenue & Florence Avenue	City of LA	X	X	0.619	B	0.426	A	0.599	A	0.624	B	0.461	A	0.633	B	-	-	-
175	Vermont Avenue & Manchester Avenue	Caltrans/LA County/City of LA	X	X	0.661	B	0.471	A	0.611	B	0.694	B	0.473	A	0.631	B	-	-	-
176	Vermont Avenue & Century Boulevard	LA County/City of LA	X	X	0.605	B	0.399	A	0.563	A	0.612	B	0.409	A	0.563	A	-	-	-
177	Vermont Avenue & Imperial Highway	LA County/City of LA	X	X	0.728	C	0.458	A	0.758	C	0.742	C	0.460	A	0.766	C	-	-	-
178	Figueroa Street & Florence Avenue	City of LA	X	X	0.693	B	0.412	A	0.610	B	0.699	B	0.438	A	0.645	B	-	-	-
179	Figueroa Street & Manchester Avenue	Caltrans/City of LA	X	X	0.776	C	0.549	A	0.796	C	0.776	C	0.555	A	0.801	D	-	-	-
180	Figueroa Street & Century Boulevard	City of LA	X	X	0.840	D	0.411	A	0.658	B	0.848	D	0.417	A	0.658	B	-	-	-
181	Figueroa Street & Imperial Highway	City of LA	X	X	0.757	C	0.323	A	0.651	B	0.786	C	0.329	A	0.699	B	-	-	-
182	Inglewood Avenue & Rosecrans Avenue	Hawthorne			0.694	B	0.608	B	0.840	D	0.706	C	0.616	B	0.852	D	-	-	-
183	Hawthorne Boulevard & Rosecrans Avenue	Hawthorne			0.709	C	0.621	B	0.770	C	0.728	C	0.636	B	0.775	C	-	-	-
184	Prairie Avenue & Rosecrans Avenue	Hawthorne/Lawndale			0.776	C	0.673	B	0.856	D	0.798	C	0.676	B	0.858	D	-	-	-
185	Crenshaw Boulevard & Rosecrans Avenue	Gardena/Hawthorne/LA County			0.729	C	0.644	B	0.800	C	0.756	C	0.647	B	0.814	D	-	-	-
186	Western Avenue & Rosecrans Avenue	Gardena			0.737	C	0.603	B	0.838	D	0.756	C	0.606	B	0.843	D	-	-	-
187	Vermont Avenue & Rosecrans Avenue	Gardena/City of LA	X		0.702	C	0.553	A	0.747	C	0.704	C	0.555	A	0.759	C	-	-	-
188	Prairie Avenue & El Segundo Boulevard	Hawthorne			0.883	D	0.627	B	0.889	D	0.899	D	0.630	B	0.893	D	-	-	-
189	Crenshaw Boulevard & El Segundo Boulevard	Hawthorne/Gardena			0.882	D	0.654	B	0.774	C	0.900	D	0.660	B	0.788	C	-	-	-
190	Western Avenue & El Segundo Boulevard	Gardena/LA County			0.798	C	0.518	A	0.759	C	0.800	C	0.518	A	0.766	C	-	-	-
191	Vermont Avenue & El Segundo Boulevard	Gardena/LA County/City of LA	X		0.634	B	0.330	A	0.550	A	0.652	B	0.333	A	0.572	A	-	-	-
192	Aviation Boulevard & Artesia Boulevard	Redondo Beach/Manhattan Beach			1.062	F	0.734	C	1.053	F	1.063	F	0.748	C	1.054	F	-	-	-
193	Aviation Boulevard & Manhattan Beach Boulevard	Redondo Beach/Manhattan Beach			0.895	D	0.724	C	0.979	E	0.896	D	0.735	C	0.986	E	-	-	-
194	Sepulveda Boulevard & Palms Boulevard	City of LA	X		0.766	C	0.552	A	0.929	E	0.778	C	0.559	A	0.931	E	-	-	-
195	Sawtelle Boulevard & Palms Boulevard	City of LA	X		0.769	C	0.401	A	0.757	C	0.769	C	0.402	A	0.760	C	-	-	-
196	Prairie Avenue & Florence Avenue	Inglewood			0.915	E	0.571	A	0.781	C	0.915	E	0.582	A	0.799	C	-	-	-
197	Prairie Avenue & Lennox Boulevard	Inglewood			0.538	A	0.468	A	0.606	B	0.570	A	0.509	A	0.624	B	-	-	-
198	Flower Street (near I-110 Southbound Ramps) & Florence Avenue	Caltrans/City of LA	X	X	0.443	A	0.418	A	0.458	A	0.449	A	0.429	A	0.501	A	-	-	-
199	Grand Avenue (near I-110 Northbound Ramps) & Florence Avenue	Caltrans/City of LA	X	X	0.540	A	0.503	A	0.561	A	0.545	A	0.524	A	0.596	A	-	-	-
200	I-110 Southbound Ramps & Manchester Avenue	Caltrans/City of LA	X	X	0.474	A	0.402	A	0.477	A	0.477	A	0.402	A	0.498	A	-	-	-

Source: Fehr & Peers, 2012.

Table 4.12.2-16

Baseline (2010) With Alternative 4 Level of Service Analysis

					Baseline (2010)						Baseline (2010) With Alt. 4						Significant Impact?		
					AM		MD		PM		AM		MD		PM				
Int. #	Intersection	Jurisdiction	ATSAC	ATCS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	AM	MD	PM
1	Admiralty Way & Bali Way	LA County	X	X	0.566	A	0.530	A	0.696	B	0.565	A	0.529	A	0.688	B	-	-	-
2	Admiralty Way & Fiji Way	LA County	X	X	0.297	A	0.276	A	0.443	A	0.297	A	0.281	A	0.445	A	-	-	-
3	Admiralty Way & Mindanao Way	LA County	X	X	0.549	A	0.537	A	0.623	B	0.558	A	0.538	A	0.624	B	-	-	-
4	Palawan Way & Admiralty Way	LA County	X		0.518	A	0.424	A	0.599	A	0.520	A	0.431	A	0.601	B	-	-	-
5	Via Marina & Admiralty Way	LA County	X	X	0.414	A	0.440	A	0.641	B	0.420	A	0.440	A	0.641	B	-	-	-
6	Airport Boulevard & Arbor Vitae Street/Westchester Parkway	City of LA	X	X	0.299	A	0.485	A	0.579	A	0.270	A	0.483	A	0.549	A	-	-	-
7	Airport Boulevard & Century Boulevard	City of LA	X	X	0.516	A	0.552	A	0.517	A	0.647	B	0.779	C	0.719	C	-	Yes	Yes
8	La Tijera Boulevard & Airport Boulevard	City of LA	X	X	0.377	A	0.323	A	0.363	A	0.361	A	0.285	A	0.351	A	-	-	-
9	Airport Boulevard & Manchester Avenue	Caltrans/City of LA	X	X	0.563	A	0.681	B	0.786	C	0.556	A	0.681	B	0.736	C	-	-	-
10	Aviation Boulevard & Arbor Vitae Street	Inglewood/City of LA	X	X	0.427	A	0.420	A	0.551	A	0.353	A	0.309	A	0.419	A	-	-	-
11	Inglewood Avenue & Arbor Vitae Street	Inglewood			0.423	A	0.495	A	0.689	B	0.431	A	0.502	A	0.695	B	-	-	-
12	La Brea Avenue & Arbor Vitae Street	Inglewood			0.392	A	0.480	A	0.669	B	0.392	A	0.490	A	0.680	B	-	-	-
13	La Cienega Boulevard & Arbor Vitae Street	Inglewood/City of LA	X	X	0.354	A	0.397	A	0.491	A	0.361	A	0.397	A	0.491	A	-	-	-
14	Aviation Boulevard & Century Boulevard	City of LA	X	X	0.738	C	0.664	B	0.892	D	0.752	C	0.747	C	0.914	E	-	Yes	Yes
15	Aviation Boulevard & El Segundo Boulevard	El Segundo			0.851	D	~~0.589~~ *0.584*	A	~~0.761~~ *0.746*	C	0.851	D	~~0.590~~ *0.586*	A	~~0.771~~ *0.756*	C	-	-	-
16	Aviation Boulevard & Imperial Highway	City of LA	X	X	0.630	B	0.370	A	0.595	A	0.631	B	0.408	A	0.595	A	-	-	-
17	Aviation Boulevard/Florence Avenue & Manchester Avenue	Caltrans/Inglewood	X	X	0.589	A	0.591	A	0.653	B	0.613	B	0.637	B	0.658	B	-	-	-
18	Aviation Boulevard & Rosecrans Avenue	El Segundo/Hawthorne/ Manhattan Beach			0.684	B	0.760	C	0.827	D	0.692	B	0.762	C	0.828	D	-	-	-
19	Aviation Boulevard & 111th Street	City of LA	X	X	0.520	A	0.402	A	0.477	A	0.569	A	0.472	A	0.563	A	-	-	-
20	Aviation Boulevard & West 120th Street	El Segundo/LA County			0.592	A	0.365	A	0.516	A	0.630	B	0.370	A	0.525	A	-	-	-
21	Lincoln Boulevard & Bali Way	Caltrans/City of LA/LA County	X	X	0.449	A	0.497	A	0.696	B	0.450	A	0.498	A	0.699	B	-	-	-
22	Lincoln Boulevard & Bluff Creek Drive	Caltrans/City of LA	X	X	0.351	A	0.211	A	0.334	A	0.336	A	0.207	A	0.334	A	-	-	-
23	Centinela Avenue & Jefferson Boulevard	City of LA/LA County	X	X	0.459	A	0.420	A	0.600	A	0.458	A	0.418	A	0.598	A	-	-	-
24	Centinela Avenue & Culver Boulevard	City of LA	X	X	0.669	B	0.451	A	0.698	B	0.669	B	0.450	A	0.695	B	-	-	-
25	La Brea Avenue & Centinela Avenue	Inglewood			0.778	C	0.706	C	0.874	D	0.782	C	0.715	C	0.874	D	-	-	-
26	La Cienega Boulevard & Centinela Avenue	Inglewood/City of LA	X	X	0.933	E	0.590	A	0.973	E	0.937	E	0.594	A	0.973	E	-	-	-
27	La Tijera Boulevard & Centinela Avenue	City of LA/LA County	X	X	0.538	A	0.475	A	0.690	B	0.532	A	0.465	A	0.691	B	-	-	-
28	Sepulveda Boulevard & Centinela Avenue	Culver City	X		0.710	C	0.561	A	0.736	C	0.709	C	0.559	A	0.734	C	-	-	-
29	Centinela Avenue & Venice Boulevard	Caltrans/City of LA	X	X	0.955	E	0.800	C	0.893	D	0.957	E	0.803	D	0.897	D	-	-	-
30	Centinela Avenue & Washington Boulevard	Culver City	X		0.733	C	0.626	B	0.849	D	0.733	C	0.623	B	0.847	D	-	-	-
31	Centinela Avenue & Washington Place	Culver City/City of LA	X		0.721	C	0.589	A	0.754	C	0.721	C	0.589	A	0.758	C	-	-	-
32	Centinela Avenue & SR 90 Eastbound On-/Off-Ramps	Caltrans/City of LA	X	X	0.291	A	0.216	A	0.409	A	0.289	A	0.216	A	0.406	A	-	-	-
33	Centinela Avenue & Sandford/SR 90 Westbound Ramps	Caltrans/City of LA	X	X	0.351	A	0.216	A	0.454	A	0.356	A	0.216	A	0.454	A	-	-	-
34	La Brea Avenue/Hawthorne Boulevard & Century Boulevard	Inglewood			0.574	A	0.605	B	0.746	C	0.574	A	0.608	B	0.775	C	-	-	-
35	Inglewood Avenue & Century Boulevard	Inglewood			0.558	A	0.562	A	0.800	C	0.565	A	0.566	A	0.803	D	-	-	-
36	La Cienega Boulevard & Century Boulevard	Inglewood/City of LA/LA County	X	X	0.515	A	0.582	A	0.682	B	0.616	B	0.578	A	0.697	B	-	-	-
37	Prairie Avenue & Century Boulevard	Inglewood			0.583	A	0.681	B	0.783	C	0.578	A	0.676	B	0.769	C	-	-	-
38	Sepulveda Boulevard & Century Boulevard	Caltrans/City of LA	X	X	0.546	A	0.473	A	0.620	B	0.563	A	0.473	A	0.647	B	-	-	-
39	I-405 Northbound Ramps & Century Boulevard	Caltrans/Inglewood			0.643	B	0.544	A	0.641	B	0.669	B	0.603	B	0.643	B	-	-	-
40	Duquesne Avenue & Culver Boulevard	Culver City	X		0.539	A	0.358	A	0.592	A	0.546	A	0.369	A	0.594	A	-	-	-
41	Culver Boulevard & Jefferson Boulevard	City of LA	X	X	0.687	B	0.299	A	0.652	B	0.683	B	0.290	A	0.650	B	-	-	-
42	Nicholson Street & Culver Boulevard	City of LA	X	X	0.541	A	0.337	A	0.737	C	0.532	A	0.333	A	0.732	C	-	-	-
43	Overland Avenue & Culver Boulevard	Culver City	X		1.070	F	0.574	A	0.849	D	1.072	F	0.575	A	0.849	D	-	-	-
44	Sawtelle Boulevard & Culver Boulevard	Culver City	X		0.601	B	0.417	A	0.787	C	0.598	A	0.406	A	0.784	C	-	-	-
45	Sepulveda Boulevard & Culver Boulevard	Culver City	X		0.677	B	0.477	A	0.642	B	0.679	B	0.477	A	0.648	B	-	-	-
46	Douglas Street & El Segundo Boulevard	El Segundo			0.657	B	0.511	A	0.864	D	0.663	B	0.511	A	0.864	D	-	-	-
47	Douglas Street & Imperial Highway	El Segundo/City of LA	X	X	0.292	A	0.230	A	0.387	A	0.294	A	0.267	A	0.470	A	-	-	-
48	Douglas Street & Mariposa Avenue	El Segundo			0.324	A	0.365	A	0.514	A	0.322	A	0.361	A	0.514	A	-	-	-
49	Douglas Street & Rosecrans Avenue	El Segundo/Manhattan Beach			0.587	A	0.638	B	0.662	B	0.584	A	0.631	B	0.662	B	-	-	-
50	Duquesne Avenue & Jefferson Boulevard	Culver City	X		0.514	A	0.475	A	0.625	B	0.512	A	0.475	A	0.621	B	-	-	-
51	Hawthorne Boulevard & El Segundo Boulevard	Hawthorne			0.597	A	0.654	B	1.157	F	0.599	A	0.655	B	1.157	F	-	-	-

Table 4.12.2-16

Baseline (2010) With Alternative 4 Level of Service Analysis

					Baseline (2010)						Baseline (2010) With Alt. 4								
					AM		MD		PM		AM		MD		PM		Significant Impact?		
Int. #	Intersection	Jurisdiction	ATSAC	ATCS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	AM	MD	PM
52	Inglewood Avenue & El Segundo Boulevard	Hawthorne/LA County			0.582	A	0.632	B	0.961	E	0.584	A	0.633	B	0.965	E	-	-	-
53	La Cienega Boulevard & El Segundo Boulevard	Hawthorne/LA County			0.620	B	0.508	A	0.917	E	0.625	B	0.508	A	0.921	E	-	-	-
54	Nash Street & El Segundo Boulevard	El Segundo			0.524	A	0.402	A	0.634	B	0.524	A	0.400	A	0.632	B	-	-	-
55	Sepulveda Boulevard & El Segundo Boulevard	Caltrans/El Segundo			0.754	C	0.732	C	0.947	E	0.758	C	0.740	C	0.948	E	-	-	-
56	Lincoln Boulevard & Fiji Way	Caltrans/City of LA/LA County	X	X	0.550	A	0.544	A	0.752	C	0.551	A	0.545	A	0.754	C	-	-	-
57	La Brea Avenue & Florence Avenue	Inglewood			0.670	B	0.638	B	0.844	D	0.654	B	0.631	B	0.833	D	-	-	-
58	La Cienega Boulevard & Florence Avenue	Inglewood			0.667	B	0.658	B	0.895	D	0.667	B	0.672	B	0.896	D	-	-	-
59	Nash Street & Grand Avenue	El Segundo			0.422	A	0.324	A	0.426	A	0.392	A	0.324	A	0.412	A	-	-	-
60	Sepulveda Boulevard & Grand Avenue	Caltrans/El Segundo			0.753	C	0.695	B	0.828	D	0.766	C	0.698	B	0.837	D	-	-	-
61	Vista del Mar & Grand Avenue	City of LA	X	X	0.495	A	0.226	A	0.326	A	0.485	A	0.225	A	0.325	A	-	-	-
62	Hawthorne Boulevard & Imperial Avenue	Hawthorne			0.551	A	0.549	A	0.839	D	0.579	A	0.556	A	0.844	D	-	-	-
63	Hawthorne Boulevard & Lennox Boulevard	LA County			0.397	A	0.544	A	0.724	C	0.411	A	0.563	A	0.743	C	-	-	-
64	Highland Avenue/Vista del Mar & Rosecrans Avenue	Manhattan Beach			0.770	C	0.523	A	0.685	B	0.763	C	0.521	A	0.685	B	-	-	-
65	Sepulveda Boulevard & Howard Hughes Parkway	City of LA	X	X	0.388	A	0.365	A	0.540	A	0.390	A	0.365	A	0.541	A	-	-	-
66	Inglewood Avenue & Imperial Highway	Hawthorne			0.614	B	0.647	B	1.153	F	0.651	B	0.648	B	1.173	F	-	-	Yes
67	La Cienega Boulevard & Imperial Highway	City of LA/LA County	X	X	0.397	A	0.246	A	0.540	A	0.416	A	0.246	A	0.546	A	-	-	-
68	Main Street & Imperial Highway	El Segundo/City of LA	X	X	0.683	B	0.440	A	0.547	A	0.706	C	0.446	A	0.548	A	-	-	-
69	Pershing Drive & Imperial Highway	City of LA	X	X	0.515	A	0.368	A	0.354	A	0.481	A	0.335	A	0.335	A	-	-	-
70	Prairie Avenue & Imperial Highway	Hawthorne/Inglewood			0.611	B	0.581	A	0.820	D	0.613	B	0.585	A	0.820	D	-	-	-
71	Sepulveda Boulevard & Imperial Highway	Caltrans/El Segundo/City of LA	X	X	0.650	B	0.674	B	1.013	F	0.685	B	0.679	B	1.016	F	-	-	-
72	Vista del Mar & Imperial Highway	City of LA	X	X	0.403	A	0.205	A	0.363	A	0.387	A	0.192	A	0.359	A	-	-	-
73	Nash Street/I-105 Westbound Ramps & Imperial Highway	Caltrans/El Segundo/City of LA	X	X	0.575	A	0.279	A	0.332	A	0.607	B	0.280	A	0.333	A	-	-	-
74	I-105 Ramps (e/o Aviation Boulevard) & Imperial Highway	Caltrans/City of LA	X	X	0.544	A	0.308	A	0.534	A	0.544	A	0.341	A	0.562	A	-	-	-
75	I-405 Northbound Ramps (e/o La Cienega Boulevard) & Imperial Highway	Caltrans/Hawthorne/LA County			0.440	A	0.309	A	0.614	B	0.448	A	0.318	A	0.614	B	-	-	-
76	Inglewood Avenue & Lennox Boulevard	LA County			0.424	A	0.490	A	0.703	C	0.427	A	0.500	A	0.716	C	-	-	-
77	Inglewood Avenue & Manchester Boulevard	Caltrans/Inglewood			0.529	A	0.489	A	0.645	B	0.522	A	0.485	A	0.645	B	-	-	-
78	Lincoln Boulevard & Jefferson Boulevard	Caltrans/City of LA	X	X	0.610	B	0.487	A	0.624	B	0.611	B	0.487	A	0.624	B	-	-	-
79	Overland Avenue & Jefferson Boulevard	Culver City	X		0.630	B	0.468	A	0.687	B	0.628	B	0.467	A	0.684	B	-	-	-
80	Sepulveda Boulevard & Jefferson Boulevard	Culver City	X		0.384	A	0.336	A	0.406	A	0.389	A	0.349	A	0.409	A	-	-	-
81	Sepulveda Boulevard & Jefferson Boulevard & Playa Street	Culver City	X		0.666	B	0.601	B	0.785	C	0.678	B	0.610	B	0.793	C	-	-	-
82	Slauson Avenue & Jefferson Boulevard	Culver City	X		0.278	A	0.401	A	0.416	A	0.284	A	0.402	A	0.419	A	-	-	-
83	I-405 Northbound Ramps & Jefferson Boulevard	Caltrans/Culver City/City of LA	X	X	0.382	A	0.366	A	0.678	B	0.345	A	0.359	A	0.652	B	-	-	-
84	I-405 Southbound Ramps & Jefferson Boulevard	Caltrans/Culver City/City of LA	X	X	0.275	A	0.322	A	0.365	A	0.278	A	0.323	A	0.366	A	-	-	-
85	La Brea Avenue & Manchester Boulevard	Caltrans/Inglewood			0.678	B	0.670	B	0.714	C	0.691	B	0.695	B	0.739	C	-	-	-
86	La Brea Avenue/Overhill Drive & Stocker Street	LA County			0.694	B	0.611	B	1.071	F	0.691	B	0.609	B	1.059	F	-	-	-
87	La Brea Avenue & Slauson Avenue	LA County			0.753	C	0.629	B	0.917	E	0.750	C	0.627	B	0.912	E	-	-	-
88	La Cienega Boulevard & La Tijera Boulevard	Inglewood/City of LA	X	X	0.780	C	0.689	B	0.871	D	0.753	C	0.679	B	0.853	D	-	-	-
89	La Cienega Boulevard & Lennox Boulevard	City of LA/LA County	X	X	0.346	A	0.280	A	0.371	A	0.325	A	0.269	A	0.364	A	-	-	-
90	La Cienega Boulevard & Manchester Boulevard	Caltrans/Inglewood			0.605	B	0.666	B	0.765	C	0.615	B	0.675	B	0.766	C	-	-	-
91	La Cienega Boulevard Northbound Ramps & Slauson Avenue	LA County			0.664	B	0.525	A	0.648	B	0.658	B	0.519	A	0.636	B	-	-	-
92	La Cienega Boulevard Southbound Ramps & Slauson Avenue	LA County			0.672	B	0.616	B	0.787	C	0.706	C	0.616	B	0.788	C	-	-	-
93	La Cienega Boulevard & Stocker Street	LA County			1.212	F	0.786	C	1.127	F	1.212	F	0.793	C	1.128	F	-	-	-
94	La Cienega Boulevard & 111th Street	City of LA/LA County	X	X	0.290	A	0.277	A	0.413	A	0.330	A	0.327	A	0.460	A	-	-	-
95	La Cienega Boulevard & West 120th Street	LA County			0.358	A	0.282	A	0.696	B	0.373	A	0.282	A	0.696	B	-	-	-
96	La Cienega Boulevard & I-405 Southbound Ramps (n/o Century Boulevard)	Caltrans/Inglewood/City of LA	X	X	0.627	B	0.571	A	0.589	A	0.614	B	0.516	A	0.541	A	-	-	-
97	La Cienega Boulevard & I-405 Southbound Ramps (s/o Century Boulevard)	Caltrans/City of LA/LA County	X	X	0.352	A	0.418	A	0.471	A	0.355	A	0.423	A	0.472	A	-	-	-
98	La Cienega Boulevard & I-405 Southbound Ramps (n/o Imperial Highway)	Caltrans/City of LA/LA County	X	X	0.400	A	0.290	A	0.285	A	0.401	A	0.290	A	0.310	A	-	-	-
99	Lincoln Boulevard & La Tijera Boulevard	Caltrans/City of LA	X	X	0.339	A	0.228	A	0.366	A	0.350	A	0.232	A	0.374	A	-	-	-
100	La Tijera Boulevard & Manchester Avenue	Caltrans/City of LA	X	X	0.445	A	0.460	A	0.507	A	0.473	A	0.511	A	0.517	A	-	-	-
101	Sepulveda Boulevard & La Tijera Boulevard	City of LA	X	X	0.501	A	0.573	A	0.629	B	0.556	A	0.656	B	0.667	B	-	-	-
102	I-405 Northbound Ramps & La Tijera Boulevard	Caltrans/City of LA	X	X	0.534	A	0.631	B	0.536	A	0.539	A	0.659	B	0.536	A	-	-	-
103	I-405 Southbound Ramps & La Tijera Boulevard	Caltrans/City of LA	X	X	0.432	A	0.515	A	0.552	A	0.432	A	0.532	A	0.562	A	-	-	-
104	Lincoln Boulevard & Loyola Marymount University Drive	Caltrans/City of LA	X	X	0.427	A	0.320	A	0.525	A	0.428	A	0.337	A	0.561	A	-	-	-
105	Lincoln Boulevard & Manchester Avenue	Caltrans/City of LA	X	X	0.597	A	0.475	A	0.618	B	0.606	B	0.480	A	0.627	B	-	-	-
106	Lincoln Boulevard & Maxella Avenue	Caltrans/City of LA	X	X	0.554	A	0.550	A	0.592	A	0.556	A	0.550	A	0.592	A	-	-	-

Table 4.12.2-16

Baseline (2010) With Alternative 4 Level of Service Analysis

					Baseline (2010)						Baseline (2010) With Alt. 4								
					AM		MD		PM		AM		MD		PM		Significant Impact?		
Int. #	Intersection	Jurisdiction	ATSAC	ATCS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	AM	MD	PM
107	Lincoln Boulevard & Mindanao Way	Caltrans/City of LA/LA County	X	X	0.624	B	0.697	B	0.771	C	0.625	B	0.701	C	0.775	C	-	-	-
108	Sepulveda Boulevard & Lincoln Boulevard	Caltrans/City of LA	X	X	0.621	B	0.510	A	0.769	C	0.661	B	0.564	A	0.799	C	-	-	-
109	Lincoln Boulevard & Venice Boulevard	Caltrans/City of LA	X	X	0.814	D	0.811	D	0.895	D	0.816	D	0.812	D	0.896	D	-	-	-
110	Lincoln Boulevard & Washington Boulevard	Caltrans/City of LA	X	X	0.746	C	0.816	D	0.936	E	0.746	C	0.816	D	0.936	E	-	-	-
111	Lincoln Boulevard & 83rd Street	Caltrans/City of LA	X	X	0.544	A	0.379	A	0.547	A	0.544	A	0.381	A	0.547	A	-	-	-
112	Lincoln Boulevard & SR 90 Ramps	Caltrans/City of LA	X	X	0.595	A	0.594	A	0.701	C	0.596	A	0.599	A	0.701	C	-	-	-
113	Pershing Drive & Manchester Avenue	Caltrans/City of LA	X	X	0.454	A	0.295	A	0.375	A	0.454	A	0.295	A	0.376	A	-	-	-
114	Sepulveda Boulevard & Manchester Avenue	Caltrans/City of LA	X	X	~~0.747~~	~~C~~	~~0.648~~	B	~~0.754~~	C	~~0.760~~	~~C~~	~~0.649~~	B	~~0.754~~	C	-	-	-
					0.630	*B*	*0.611*		*0.773*		*0.643*	*B*	*0.605*		*0.776*				
115	Ash Avenue & Manchester Avenue	Caltrans/Inglewood			0.699	B	0.622	B	0.780	C	0.697	B	0.609	B	0.780	C	-	-	-
116	Nash Street & Mariposa Avenue	El Segundo			0.574	A	0.324	A	0.434	A	0.573	A	0.312	A	0.433	A	-	-	-
117	Sepulveda Boulevard & Mariposa Avenue	Caltrans/El Segundo			0.708	C	0.641	B	0.757	C	0.713	C	0.652	B	0.761	C	-	-	-
118	Sawtelle Boulevard & Matteson Street/I-405 Southbound Ramps	Caltrans/Culver City	X		0.760	C	0.523	A	0.778	C	0.741	C	0.511	A	0.763	C	-	-	-
119	Ocean Avenue/Via Marina & Washington Boulevard	City of LA/LA County	X	X	0.531	A	0.476	A	0.694	B	0.540	A	0.478	A	0.697	B	-	-	-
120	Overhill Drive & Slauson Avenue	LA County			0.639	B	0.533	A	0.986	E	0.640	B	0.537	A	0.989	E	-	-	-
121	Overland Avenue & Venice Boulevard	Caltrans/Culver City/City of LA	X		0.819	D	0.657	B	0.873	D	0.819	D	0.658	B	0.880	D	-	-	-
122	Palawan Way & Washington Boulevard	City of LA/LA County			13.4	B	12.1	B	12.8	B	13.4	B	12.2	B	12.8	B	-	-	-
123	Pershing Drive & Westchester Parkway	City of LA	X	X	0.211	A	0.115	A	0.187	A	0.211	A	0.115	A	0.188	A	-	-	-
124	Prairie Avenue & West 112th Street/I-105 Off-Ramp	Caltrans/Inglewood			0.457	A	0.583	A	0.646	B	0.439	A	0.580	A	0.643	B	-	-	-
125	Sepulveda Boulevard & Rosecrans Avenue	Caltrans/El Segundo/Manhattan Beach			0.840	D	0.766	C	1.058	F	0.832	D	0.758	C	1.058	F	-	-	-
126	Sepulveda Boulevard & Sawtelle Boulevard	Culver City	X		0.421	A	0.526	A	0.595	A	0.423	A	0.529	A	0.597	A	-	-	-
127	Sawtelle Boulevard & Venice Boulevard	Caltrans/Culver City/City of LA	X		0.899	D	0.739	C	0.881	D	0.892	D	0.734	C	0.879	D	-	-	-
128	Sawtelle Boulevard & Washington Boulevard	Culver City	X		0.476	A	0.414	A	0.599	A	0.476	A	0.417	A	0.605	B	-	-	-
129	Sawtelle Boulevard & Washington Place	Culver City	X		0.427	A	0.325	A	0.515	A	0.418	A	0.322	A	0.510	A	-	-	-
130	Sepulveda Boulevard & Slauson Avenue	Culver City	X		0.487	A	0.526	A	0.703	C	0.490	A	0.528	A	0.707	C	-	-	-
131	Sepulveda Boulevard & Venice Boulevard	Caltrans/Culver City/City of LA	X	X	0.758	C	0.649	B	0.951	E	0.760	C	0.661	B	0.958	E	-	-	-
132	Sepulveda Boulevard & Washington Boulevard	Culver City	X		0.567	A	0.510	A	0.620	B	0.578	A	0.517	A	0.631	B	-	-	-
133	Sepulveda Boulevard & Washington Place	Culver City	X		0.588	A	0.487	A	0.577	A	0.590	A	0.494	A	0.584	A	-	-	-
134	Sepulveda Boulevard & I-405 Northbound On-/Off-Ramps	Caltrans/Culver City	X		0.824	D	0.565	A	0.762	C	0.781	C	0.539	A	0.735	C	-	-	-
135	Sepulveda Boulevard & Westchester Parkway	City of LA	X	X	0.447	A	0.528	A	0.683	B	0.487	A	0.605	B	0.813	D	-	-	Yes
136	Sepulveda Boulevard & 76th Street	City of LA	X	X	0.663	B	0.422	A	0.628	B	0.667	B	0.422	A	0.633	B	-	-	-
137	Sepulveda Boulevard & 79th Street	City of LA	X	X	0.445	A	0.351	A	0.507	A	0.451	A	0.353	A	0.510	A	-	-	-
138	Sepulveda Boulevard & 83rd Street	City of LA	X	X	0.390	A	0.312	A	0.456	A	0.391	A	0.312	A	0.457	A	-	-	-
139	Sepulveda Boulevard & I-105 Westbound Ramps (n/o Imperial Highway)	Caltrans/City of LA	X	X	0.839	D	0.805	D	0.872	D	0.821	D	0.765	C	0.847	D	-	-	-
140	SR 90 Westbound Ramps & Slauson Avenue	Caltrans/Culver City/LA County	X		0.505	A	0.393	A	0.671	B	0.502	A	0.390	A	0.643	B	-	-	-
141	Airport Boulevard & 96th Street	City of LA	X	X	0.175	A	0.288	A	0.360	A	0.256	A	0.336	A	0.362	A	-	-	-
142	Jenny Avenue & 96th Street	City of LA	X	X	0.129	A	0.154	A	0.115	A	0.298	A	0.404	A	0.256	A	-	-	-
143	Vicksburg Avenue & 96th Street	City of LA	X	X	0.180	A	0.292	A	0.219	A	0.103	A	0.202	A	0.116	A	-	-	-
144	Airport Boulevard & 98th Street	City of LA	X	X	0.292	A	0.381	A	0.439	A	0.301	A	0.443	A	0.491	A	-	-	-
145	Jenny Avenue & Westchester Parkway	City of LA	X	X	0.060	A	0.151	A	0.143	A	0.105	A	0.373	A	0.202	A	-	-	-
146	Sepulveda Eastway & Westchester Parkway	City of LA	X	X	0.221	A	0.340	A	0.423	A	0.233	A	0.345	A	0.427	A	-	-	-
147	Crenshaw Boulevard & Century Boulevard	Inglewood			0.563	A	0.674	B	0.781	C	0.564	A	0.674	B	0.798	C	-	-	-
148	La Cienega Boulevard & Fairview Boulevard	Inglewood/City of LA	X	X	0.834	D	0.603	B	0.851	D	0.851	D	0.603	B	0.851	D	-	-	-
149	Crenshaw Boulevard & Imperial Highway	Inglewood			0.566	A	0.620	B	0.818	D	0.566	A	0.626	B	0.836	D	-	-	-
150	Sepulveda Boulevard & Braddock Drive	Culver City			0.505	A	0.446	A	0.566	A	0.511	A	0.453	A	0.570	A	-	-	-
151	Buckingham Parkway & Slauson Avenue	Culver City			0.646	B	0.451	A	0.778	C	0.647	B	0.453	A	0.779	C	-	-	-
152	Duquesne Avenue & Washington Boulevard	Culver City			0.493	A	0.435	A	0.607	B	0.497	A	0.440	A	0.607	B	-	-	-
153	Overland Avenue & Kelmore Street/Ranch Road	Culver City			21.6	C	13.7	B	28.5	D	21.6	C	13.7	B	28.5	D	-	-	-
154	Overland Avenue & Sawtelle Boulevard	Culver City			20.3	C	15.1	C	27.2	D	20.3	C	15.1	C	27.4	D	-	-	-
155	Overland Avenue & Washington Boulevard	Culver City/City of LA			0.764	C	0.663	B	0.980	E	0.767	C	0.668	B	0.989	E	-	-	-
156	Walgrove Avenue & Washington Boulevard	Culver City			17.1	C	37.0	E	68.1	F	17.8	C	40.6	E	68.2	F	-	-	-
157	La Cienega Boulevard & 104th Street	City of LA/LA County	X	X	0.297	A	0.241	A	0.301	A	0.281	A	0.241	A	0.283	A	-	-	-
158	Vista del Mar & Waterview Street	City of LA	X	X	0.305	A	0.056	A	0.237	A	0.296	A	0.053	A	0.232	A	-	-	-
159	Hindry Avenue & Manchester Boulevard	Caltrans/Inglewood			0.387	A	0.550	A	0.542	A	0.399	A	0.562	A	0.542	A	-	-	-
160	Lincoln Boulevard & Rose Avenue	Caltrans/City of LA	X	X	0.873	D	0.775	C	0.797	C	0.871	D	0.774	C	0.792	C	-	-	-

Table 4.12.2-16

Baseline (2010) With Alternative 4 Level of Service Analysis

					Baseline (2010)						Baseline (2010) With Alt. 4								
					AM		MD		PM		AM		MD		PM		Significant Impact?		
Int. #	Intersection	Jurisdiction	ATSAC	ATCS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	AM	MD	PM
161	Western Avenue & Century Boulevard	City of LA	X	X	0.440	A	0.509	A	0.637	B	0.432	A	0.505	A	0.633	B	-	-	-
162	Sepulveda Boulevard & Manhattan Beach Boulevard	Caltrans/Manhattan Beach			0.849	D	0.914	E	1.100	F	0.850	D	0.917	E	1.104	F	-	-	-
163	La Cienega Boulevard & Jefferson Boulevard	City of LA	X		0.898	D	0.679	B	1.014	F	0.893	D	0.672	B	1.002	F	-	-	-
164	Crenshaw Boulevard & Manchester Avenue	Caltrans/Inglewood			0.686	B	0.714	C	0.860	D	0.684	B	0.708	C	0.860	D	-	-	-
165	La Cienega Boulevard & Rodeo Road	City of LA	X		0.942	E	0.654	B	0.951	E	0.937	E	0.654	B	0.950	E	-	-	-
166	La Brea Avenue & Rodeo Road	City of LA	X		0.969	E	0.651	B	0.851	D	0.954	E	0.647	B	0.855	D	-	-	-
167	La Brea Avenue & Jefferson Boulevard	City of LA	X		0.980	E	0.578	A	0.866	D	0.977	E	0.570	A	0.856	D	-	-	-
168	Crenshaw Boulevard & Florence Avenue	City of LA	X	X	0.670	B	0.501	A	0.741	C	0.677	B	0.504	A	0.742	C	-	-	-
169	Prairie Avenue & Manchester Boulevard	Inglewood			0.942	E	0.646	B	0.785	C	0.936	E	0.646	B	0.780	C	-	-	-
170	I-110 Northbound Ramps & Manchester Avenue	Caltrans/City of LA	X	X	0.561	A	0.434	A	0.476	A	0.554	A	0.433	A	0.469	A	-	-	-
171	Western Avenue & Florence Avenue	City of LA	X	X	0.736	C	0.438	A	0.718	C	0.748	C	0.455	A	0.736	C	-	-	-
172	Western Avenue & Manchester Avenue	Caltrans/City of LA	X	X	0.648	B	0.493	A	0.748	C	0.655	B	0.501	A	0.763	C	-	-	-
173	Western Avenue & Imperial Highway	LA County	X	X	0.639	B	0.477	A	0.765	C	0.647	B	0.483	A	0.788	C	-	-	-
174	Vermont Avenue & Florence Avenue	City of LA	X	X	0.619	B	0.426	A	0.599	A	0.629	B	0.443	A	0.600	A	-	-	-
175	Vermont Avenue & Manchester Avenue	Caltrans/LA County/City of LA	X	X	0.661	B	0.471	A	0.611	B	0.669	B	0.472	A	0.614	B	-	-	-
176	Vermont Avenue & Century Boulevard	LA County/City of LA	X	X	0.605	B	0.399	A	0.563	A	0.605	B	0.402	A	0.574	A	-	-	-
177	Vermont Avenue & Imperial Highway	LA County/City of LA	X	X	0.728	C	0.458	A	0.758	C	0.741	C	0.458	A	0.771	C	-	-	-
178	Figueroa Street & Florence Avenue	City of LA	X	X	0.693	B	0.412	A	0.610	B	0.693	B	0.435	A	0.610	B	-	-	-
179	Figueroa Street & Manchester Avenue	Caltrans/City of LA	X	X	0.776	C	0.549	A	0.796	C	0.775	C	0.539	A	0.762	C	-	-	-
180	Figueroa Street & Century Boulevard	City of LA	X	X	0.840	D	0.411	A	0.658	B	0.851	D	0.413	A	0.672	B	-	-	-
181	Figueroa Street & Imperial Highway	City of LA	X	X	0.757	C	0.323	A	0.651	B	0.778	C	0.326	A	0.699	B	-	-	-
182	Inglewood Avenue & Rosecrans Avenue	Hawthorne			0.694	B	0.608	B	0.840	D	0.695	B	0.614	B	0.844	D	-	-	-
183	Hawthorne Boulevard & Rosecrans Avenue	Hawthorne			0.709	C	0.621	B	0.770	C	0.711	C	0.631	B	0.771	C	-	-	-
184	Prairie Avenue & Rosecrans Avenue	Hawthorne/Lawndale			0.776	C	0.673	B	0.856	D	0.788	C	0.675	B	0.856	D	-	-	-
185	Crenshaw Boulevard & Rosecrans Avenue	Gardena/Hawthorne/LA County			0.729	C	0.644	B	0.800	C	0.746	C	0.647	B	0.802	D	-	-	-
186	Western Avenue & Rosecrans Avenue	Gardena			0.737	C	0.603	B	0.838	D	0.738	C	0.607	B	0.838	D	-	-	-
187	Vermont Avenue & Rosecrans Avenue	Gardena/City of LA	X		0.702	C	0.553	A	0.747	C	0.703	C	0.553	A	0.749	C	-	-	-
188	Prairie Avenue & El Segundo Boulevard	Hawthorne			0.883	D	0.627	B	0.889	D	0.886	D	0.629	B	0.899	D	-	-	-
189	Crenshaw Boulevard & El Segundo Boulevard	Hawthorne/Gardena			0.882	D	0.654	B	0.774	C	0.899	D	0.658	B	0.780	C	-	-	-
190	Western Avenue & El Segundo Boulevard	Gardena/LA County			0.798	C	0.518	A	0.759	C	0.800	C	0.524	A	0.766	C	-	-	-
191	Vermont Avenue & El Segundo Boulevard	Gardena/LA County/City of LA	X		0.634	B	0.330	A	0.550	A	0.635	B	0.332	A	0.550	A	-	-	-
192	Aviation Boulevard & Artesia Boulevard	Redondo Beach/Manhattan Beach			1.062	F	0.734	C	1.053	F	1.068	F	0.736	C	1.054	F	-	-	-
193	Aviation Boulevard & Manhattan Beach Boulevard	Redondo Beach/Manhattan Beach			0.895	D	0.724	C	0.979	E	0.899	D	0.726	C	0.981	E	-	-	-
194	Sepulveda Boulevard & Palms Boulevard	City of LA	X		0.766	C	0.552	A	0.929	E	0.780	C	0.563	A	0.929	E	-	-	-
195	Sawtelle Boulevard & Palms Boulevard	City of LA	X		0.769	C	0.401	A	0.757	C	0.758	C	0.395	A	0.730	C	-	-	-
196	Prairie Avenue & Florence Avenue	Inglewood			0.915	E	0.571	A	0.781	C	0.914	E	0.563	A	0.780	C	-	-	-
197	Prairie Avenue & Lennox Boulevard	Inglewood			0.538	A	0.468	A	0.606	B	0.550	A	0.468	A	0.617	B	-	-	-
198	Flower Street (near I-110 Southbound Ramps) & Florence Avenue	Caltrans/City of LA	X	X	0.443	A	0.418	A	0.458	A	0.443	A	0.435	A	0.469	A	-	-	-
199	Grand Avenue (near I-110 Northbound Ramps) & Florence Avenue	Caltrans/City of LA	X	X	0.540	A	0.503	A	0.561	A	0.547	A	0.511	A	0.567	A	-	-	-
200	I-110 Southbound Ramps & Manchester Avenue	Caltrans/City of LA	X	X	0.474	A	0.402	A	0.477	A	0.473	A	0.401	A	0.472	A	-	-	-

Source: Fehr & Peers, 2012.

Table 4.12.2-17

Baseline (2010) With Alternative 8 Level of Service Analysis

					Baseline (2010)						Baseline (2010) With Alt. 8								
					AM		MD		PM		AM		MD		PM		Significant Impact?		
Int. #	Intersection	Jurisdiction	ATSAC	ATCS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	AM	MD	PM
1	Admiralty Way & Bali Way	LA County	X	X	0.566	A	0.530	A	0.696	B	0.566	A	0.535	A	0.696	B	-	-	-
2	Admiralty Way & Fiji Way	LA County	X	X	0.297	A	0.276	A	0.443	A	0.306	A	0.279	A	0.445	A	-	-	-
3	Admiralty Way & Mindanao Way	LA County	X	X	0.549	A	0.537	A	0.623	B	0.549	A	0.534	A	0.621	B	-	-	-
4	Palawan Way & Admiralty Way	LA County	X		0.518	A	0.424	A	0.599	A	0.522	A	0.441	A	0.599	A	-	-	-
5	Via Marina & Admiralty Way	LA County	X	X	0.414	A	0.440	A	0.641	B	0.415	A	0.440	A	0.642	B	-	-	-
6	Airport Boulevard & Arbor Vitae Street/Westchester Parkway	City of LA	X	X	0.299	A	0.485	A	0.579	A	0.247	A	0.430	A	0.544	A	-	-	-
7	Airport Boulevard & Century Boulevard	City of LA	X	X	0.516	A	0.552	A	0.517	A	0.561	A	0.611	B	0.640	B	-	-	-
8	La Tijera Boulevard & Airport Boulevard	City of LA	X	X	0.377	A	0.323	A	0.363	A	0.435	A	0.361	A	0.372	A	-	-	-
9	Airport Boulevard & Manchester Avenue	Caltrans/City of LA	X	X	0.563	A	0.681	B	0.786	C	0.591	A	0.735	C	0.804	D	-	Yes	-
10	Aviation Boulevard & Arbor Vitae Street	Inglewood/City of LA	X	X	0.427	A	0.420	A	0.551	A	0.339	A	0.320	A	0.475	A	-	-	-
11	Inglewood Avenue & Arbor Vitae Street	Inglewood			0.423	A	0.495	A	0.689	B	0.450	A	0.542	A	0.728	C	-	-	-
12	La Brea Avenue & Arbor Vitae Street	Inglewood			0.392	A	0.480	A	0.669	B	0.392	A	0.487	A	0.676	B	-	-	-
13	La Cienega Boulevard & Arbor Vitae Street	Inglewood/City of LA	X	X	0.354	A	0.397	A	0.491	A	0.422	A	0.430	A	0.613	B	-	-	-
14	Aviation Boulevard & Century Boulevard	City of LA	X	X	0.738	C	0.664	B	0.892	D	0.755	C	0.667	B	0.892	D	-	-	-
15	Aviation Boulevard & El Segundo Boulevard	El Segundo			0.851	D	~~0.589~~ *0.584*	A	~~0.761~~ *0.746*	C	0.851	D	~~0.591~~ *0.586*	A	~~0.765~~ *0.751*	C	-	-	-
16	Aviation Boulevard & Imperial Highway	City of LA	X	X	0.630	B	0.370	A	0.595	A	0.562	A	0.351	A	0.589	A	-	-	-
17	Aviation Boulevard/Florence Avenue & Manchester Avenue	Caltrans/Inglewood	X	X	0.589	A	0.591	A	0.653	B	0.654	B	0.649	B	0.683	B	-	-	-
18	Aviation Boulevard & Rosecrans Avenue	El Segundo/Hawthorne/ Manhattan Beach			0.684	B	0.760	C	0.827	D	0.687	B	0.762	C	0.827	D	-	-	-
19	Aviation Boulevard & 111th Street	City of LA	X	X	0.520	A	0.402	A	0.477	A	0.516	A	0.353	A	0.453	A	-	-	-
20	Aviation Boulevard & West 120th Street	El Segundo/LA County			0.592	A	0.365	A	0.516	A	0.580	A	0.362	A	0.505	A	-	-	-
21	Lincoln Boulevard & Bali Way	Caltrans/City of LA/LA County	X	X	0.449	A	0.497	A	0.696	B	0.457	A	0.497	A	0.696	B	-	-	-
22	Lincoln Boulevard & Bluff Creek Drive	Caltrans/City of LA	X	X	0.351	A	0.211	A	0.334	A	0.352	A	0.213	A	0.341	A	-	-	-
23	Centinela Avenue & Jefferson Boulevard	City of LA/LA County	X	X	0.459	A	0.420	A	0.600	A	0.461	A	0.420	A	0.607	B	-	-	-
24	Centinela Avenue & Culver Boulevard	City of LA	X	X	0.669	B	0.451	A	0.698	B	0.669	B	0.449	A	0.693	B	-	-	-
25	La Brea Avenue & Centinela Avenue	Inglewood			0.778	C	0.706	C	0.874	D	0.780	C	0.712	C	0.875	D	-	-	-
26	La Cienega Boulevard & Centinela Avenue	Inglewood/City of LA	X	X	0.933	E	0.590	A	0.973	E	0.934	E	0.598	A	0.974	E	-	-	-
27	La Tijera Boulevard & Centinela Avenue	City of LA/LA County	X	X	0.538	A	0.475	A	0.690	B	0.539	A	0.475	A	0.696	B	-	-	-
28	Sepulveda Boulevard & Centinela Avenue	Culver City	X		0.710	C	0.561	A	0.736	C	0.712	C	0.567	A	0.736	C	-	-	-
29	Centinela Avenue & Venice Boulevard	Caltrans/City of LA	X	X	0.955	E	0.800	C	0.893	D	0.955	E	0.805	D	0.901	E	-	-	-
30	Centinela Avenue & Washington Boulevard	Culver City	X		0.733	C	0.626	B	0.849	D	0.734	C	0.626	B	0.848	D	-	-	-
31	Centinela Avenue & Washington Place	Culver City/City of LA	X		0.721	C	0.589	A	0.754	C	0.720	C	0.590	A	0.755	C	-	-	-
32	Centinela Avenue & SR 90 Eastbound On-/Off-Ramps	Caltrans/City of LA	X	X	0.291	A	0.216	A	0.409	A	0.293	A	0.219	A	0.409	A	-	-	-
33	Centinela Avenue & Sandford/SR 90 Westbound Ramps	Caltrans/City of LA	X	X	0.351	A	0.216	A	0.454	A	0.355	A	0.216	A	0.454	A	-	-	-
34	La Brea Avenue/Hawthorne Boulevard & Century Boulevard	Inglewood			0.574	A	0.605	B	0.746	C	0.578	A	0.614	B	0.764	C	-	-	-
35	Inglewood Avenue & Century Boulevard	Inglewood			0.558	A	0.562	A	0.800	C	0.570	A	0.565	A	0.802	D	-	-	-
36	La Cienega Boulevard & Century Boulevard	Inglewood/City of LA/LA County	X	X	0.515	A	0.582	A	0.682	B	0.763	C	0.677	B	0.669	B	Yes	-	-
37	Prairie Avenue & Century Boulevard	Inglewood			0.583	A	0.681	B	0.783	C	0.587	A	0.681	B	0.783	C	-	-	-
38	Sepulveda Boulevard & Century Boulevard	Caltrans/City of LA	X	X	0.546	A	0.473	A	0.620	B	0.570	A	0.498	A	0.653	B	-	-	-
39	I-405 Northbound Ramps & Century Boulevard	Caltrans/Inglewood			0.643	B	0.544	A	0.641	B	0.664	B	0.588	A	0.642	B	-	-	-
40	Duquesne Avenue & Culver Boulevard	Culver City	X		0.539	A	0.358	A	0.592	A	0.546	A	0.366	A	0.595	A	-	-	-
41	Culver Boulevard & Jefferson Boulevard	City of LA	X	X	0.687	B	0.299	A	0.652	B	0.684	B	0.293	A	0.649	B	-	-	-
42	Nicholson Street & Culver Boulevard	City of LA	X	X	0.541	A	0.337	A	0.737	C	0.530	A	0.329	A	0.734	C	-	-	-
43	Overland Avenue & Culver Boulevard	Culver City	X		1.070	F	0.574	A	0.849	D	1.069	F	0.574	A	0.845	D	-	-	-
44	Sawtelle Boulevard & Culver Boulevard	Culver City	X		0.601	B	0.417	A	0.787	C	0.593	A	0.407	A	0.782	C	-	-	-
45	Sepulveda Boulevard & Culver Boulevard	Culver City	X		0.677	B	0.477	A	0.642	B	0.679	B	0.477	A	0.645	B	-	-	-
46	Douglas Street & El Segundo Boulevard	El Segundo			0.657	B	0.511	A	0.864	D	0.654	B	0.504	A	0.856	D	-	-	-
47	Douglas Street & Imperial Highway	El Segundo/City of LA	X	X	0.292	A	0.230	A	0.387	A	0.319	A	0.257	A	0.415	A	-	-	-
48	Douglas Street & Mariposa Avenue	El Segundo			0.324	A	0.365	A	0.514	A	0.319	A	0.360	A	0.506	A	-	-	-
49	Douglas Street & Rosecrans Avenue	El Segundo/Manhattan Beach			0.587	A	0.638	B	0.662	B	0.580	A	0.632	B	0.662	B	-	-	-
50	Duquesne Avenue & Jefferson Boulevard	Culver City	X		0.514	A	0.475	A	0.625	B	0.516	A	0.478	A	0.625	B	-	-	-
51	Hawthorne Boulevard & El Segundo Boulevard	Hawthorne			0.597	A	0.654	B	1.157	F	0.597	A	0.651	B	1.147	F	-	-	-

Table 4.12.2-17

Baseline (2010) With Alternative 8 Level of Service Analysis

					Baseline (2010)						Baseline (2010) With Alt. 8						Significant Impact?		
					AM		MD		PM		AM		MD		PM				
Int. #	Intersection	Jurisdiction	ATSAC	ATCS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	AM	MD	PM
52	Inglewood Avenue & El Segundo Boulevard	Hawthorne/LA County			0.582	A	0.632	B	0.961	E	0.589	A	0.632	B	0.970	E	-	-	-
53	La Cienega Boulevard & El Segundo Boulevard	Hawthorne/LA County			0.620	B	0.508	A	0.917	E	0.615	B	0.500	A	0.909	E	-	-	-
54	Nash Street & El Segundo Boulevard	El Segundo			0.524	A	0.402	A	0.634	B	0.515	A	0.394	A	0.629	B	-	-	-
55	Sepulveda Boulevard & El Segundo Boulevard	Caltrans/El Segundo			0.754	C	0.732	C	0.947	E	0.755	C	0.734	C	0.949	E	-	-	-
56	Lincoln Boulevard & Fiji Way	Caltrans/City of LA/LA County	X	X	0.550	A	0.544	A	0.752	C	0.550	A	0.544	A	0.756	C	-	-	-
57	La Brea Avenue & Florence Avenue	Inglewood			0.670	B	0.638	B	0.844	D	0.658	B	0.611	B	0.826	D	-	-	-
58	La Cienega Boulevard & Florence Avenue	Inglewood			0.667	B	0.658	B	0.895	D	0.670	B	0.689	B	0.897	D	-	-	-
59	Nash Street & Grand Avenue	El Segundo			0.422	A	0.324	A	0.426	A	0.405	A	0.322	A	0.413	A	-	-	-
60	Sepulveda Boulevard & Grand Avenue	Caltrans/El Segundo			0.753	C	0.695	B	0.828	D	0.764	C	0.703	C	0.828	D	-	-	-
61	Vista del Mar & Grand Avenue	City of LA	X	X	0.495	A	0.226	A	0.326	A	0.490	A	0.225	A	0.324	A	-	-	-
62	Hawthorne Boulevard & Imperial Avenue	Hawthorne			0.551	A	0.549	A	0.839	D	0.561	A	0.551	A	0.843	D	-	-	-
63	Hawthorne Boulevard & Lennox Boulevard	LA County			0.397	A	0.544	A	0.724	C	0.423	A	0.557	A	0.754	C	-	-	-
64	Highland Avenue/Vista del Mar & Rosecrans Avenue	Manhattan Beach			0.770	C	0.523	A	0.685	B	0.763	C	0.523	A	0.685	B	-	-	-
65	Sepulveda Boulevard & Howard Hughes Parkway	City of LA	X	X	0.388	A	0.365	A	0.540	A	0.388	A	0.365	A	0.543	A	-	-	-
66	Inglewood Avenue & Imperial Highway	Hawthorne			0.614	B	0.647	B	1.153	F	0.627	B	0.653	B	1.154	F	-	-	-
67	La Cienega Boulevard & Imperial Highway	City of LA/LA County	X	X	0.397	A	0.246	A	0.540	A	0.361	A	0.220	A	0.529	A	-	-	-
68	Main Street & Imperial Highway	El Segundo/City of LA	X	X	0.683	B	0.440	A	0.547	A	0.699	B	0.445	A	0.537	A	-	-	-
69	Pershing Drive & Imperial Highway	City of LA	X	X	0.515	A	0.368	A	0.354	A	0.499	A	0.341	A	0.349	A	-	-	-
70	Prairie Avenue & Imperial Highway	Hawthorne/Inglewood			0.611	B	0.581	A	0.820	D	0.602	B	0.579	A	0.816	D	-	-	-
71	Sepulveda Boulevard & Imperial Highway	Caltrans/El Segundo/City of LA	X	X	0.650	B	0.674	B	1.013	F	0.677	B	0.683	B	1.024	F	-	-	Yes
72	Vista del Mar & Imperial Highway	City of LA	X	X	0.403	A	0.205	A	0.363	A	0.396	A	0.191	A	0.359	A	-	-	-
73	Nash Street/I-105 Westbound Ramps & Imperial Highway	Caltrans/El Segundo/City of LA	X	X	0.575	A	0.279	A	0.332	A	0.589	A	0.279	A	0.336	A	-	-	-
74	I-105 Ramps (e/o Aviation Boulevard) & Imperial Highway	Caltrans/City of LA	X	X	0.544	A	0.308	A	0.534	A	0.515	A	0.308	A	0.530	A	-	-	-
75	I-405 Northbound Ramps (e/o La Cienega Boulevard) & Imperial Highway	Caltrans/Hawthorne/LA County			0.440	A	0.309	A	0.614	B	0.440	A	0.302	A	0.610	B	-	-	-
76	Inglewood Avenue & Lennox Boulevard	LA County			0.424	A	0.490	A	0.703	C	0.425	A	0.503	A	0.715	C	-	-	-
77	Inglewood Avenue & Manchester Boulevard	Caltrans/Inglewood			0.529	A	0.489	A	0.645	B	0.525	A	0.486	A	0.635	B	-	-	-
78	Lincoln Boulevard & Jefferson Boulevard	Caltrans/City of LA	X	X	0.610	B	0.487	A	0.624	B	0.627	B	0.492	A	0.630	B	-	-	-
79	Overland Avenue & Jefferson Boulevard	Culver City	X		0.630	B	0.468	A	0.687	B	0.628	B	0.466	A	0.685	B	-	-	-
80	Sepulveda Boulevard & Jefferson Boulevard	Culver City	X		0.384	A	0.336	A	0.406	A	0.389	A	0.349	A	0.407	A	-	-	-
81	Sepulveda Boulevard & Jefferson Boulevard & Playa Street	Culver City	X		0.666	B	0.601	B	0.785	C	0.674	B	0.608	B	0.793	C	-	-	-
82	Slauson Avenue & Jefferson Boulevard	Culver City	X		0.278	A	0.401	A	0.416	A	0.284	A	0.401	A	0.419	A	-	-	-
83	I-405 Northbound Ramps & Jefferson Boulevard	Caltrans/Culver City/City of LA	X	X	0.382	A	0.366	A	0.678	B	0.348	A	0.351	A	0.652	B	-	-	-
84	I-405 Southbound Ramps & Jefferson Boulevard	Caltrans/Culver City/City of LA	X	X	0.275	A	0.322	A	0.365	A	0.274	A	0.315	A	0.364	A	-	-	-
85	La Brea Avenue & Manchester Boulevard	Caltrans/Inglewood			0.678	B	0.670	B	0.714	C	0.705	C	0.716	C	0.745	C	-	Yes	-
86	La Brea Avenue/Overhill Drive & Stocker Street	LA County			0.694	B	0.611	B	1.071	F	0.694	B	0.619	B	1.072	F	-	-	-
87	La Brea Avenue & Slauson Avenue	LA County			0.753	C	0.629	B	0.917	E	0.751	C	0.625	B	0.914	E	-	-	-
88	La Cienega Boulevard & La Tijera Boulevard	Inglewood/City of LA	X	X	0.780	C	0.689	B	0.871	D	0.760	C	0.667	B	0.868	D	-	-	-
89	La Cienega Boulevard & Lennox Boulevard	City of LA/LA County	X	X	0.346	A	0.280	A	0.371	A	0.356	A	0.291	A	0.379	A	-	-	-
90	La Cienega Boulevard & Manchester Boulevard	Caltrans/Inglewood			0.605	B	0.666	B	0.765	C	0.606	B	0.688	B	0.766	C	-	-	-
91	La Cienega Boulevard Northbound Ramps & Slauson Avenue	LA County			0.664	B	0.525	A	0.648	B	0.660	B	0.525	A	0.639	B	-	-	-
92	La Cienega Boulevard Southbound Ramps & Slauson Avenue	LA County			0.672	B	0.616	B	0.787	C	0.706	C	0.616	B	0.788	C	-	-	-
93	La Cienega Boulevard & Stocker Street	LA County			1.212	F	0.786	C	1.127	F	1.207	F	0.786	C	1.127	F	-	-	-
94	La Cienega Boulevard & 111th Street	City of LA/LA County	X	X	0.290	A	0.277	A	0.413	A	0.291	A	0.277	A	0.348	A	-	-	-
95	La Cienega Boulevard & West 120th Street	LA County			0.358	A	0.282	A	0.696	B	0.354	A	0.281	A	0.695	B	-	-	-
96	La Cienega Boulevard & I-405 Southbound Ramps (n/o Century Boulevard)	Caltrans/Inglewood/City of LA	X	X	0.627	B	0.571	A	0.589	A	0.659	B	0.695	B	0.803	D	-	-	Yes
97	La Cienega Boulevard & I-405 Southbound Ramps (s/o Century Boulevard)	Caltrans/City of LA/LA County	X	X	0.352	A	0.418	A	0.471	A	0.352	A	0.393	A	0.459	A	-	-	-
98	La Cienega Boulevard & I-405 Southbound Ramps (n/o Imperial Highway)	Caltrans/City of LA/LA County	X	X	0.400	A	0.290	A	0.285	A	0.384	A	0.286	A	0.243	A	-	-	-
99	Lincoln Boulevard & La Tijera Boulevard	Caltrans/City of LA	X	X	0.339	A	0.228	A	0.366	A	0.364	A	0.230	A	0.371	A	-	-	-
100	La Tijera Boulevard & Manchester Avenue	Caltrans/City of LA	X	X	0.445	A	0.460	A	0.507	A	0.416	A	0.436	A	0.491	A	-	-	-
101	Sepulveda Boulevard & La Tijera Boulevard	City of LA	X	X	0.501	A	0.573	A	0.629	B	0.465	A	0.478	A	0.586	A	-	-	-
102	I-405 Northbound Ramps & La Tijera Boulevard	Caltrans/City of LA	X	X	0.534	A	0.631	B	0.536	A	0.534	A	0.688	B	0.536	A	-	-	-
103	I-405 Southbound Ramps & La Tijera Boulevard	Caltrans/City of LA	X	X	0.432	A	0.515	A	0.552	A	0.433	A	0.524	A	0.568	A	-	-	-
104	Lincoln Boulevard & Loyola Marymount University Drive	Caltrans/City of LA	X	X	0.427	A	0.320	A	0.525	A	0.438	A	0.335	A	0.560	A	-	-	-
105	Lincoln Boulevard & Manchester Avenue	Caltrans/City of LA	X	X	0.597	A	0.475	A	0.618	B	0.593	A	0.475	A	0.613	B	-	-	-

Table 4.12.2-17

Baseline (2010) With Alternative 8 Level of Service Analysis

					Baseline (2010)						Baseline (2010) With Alt. 8								
					AM		MD		PM		AM		MD		PM		Significant Impact?		
Int. #	Intersection	Jurisdiction	ATSAC	ATCS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	AM	MD	PM
106	Lincoln Boulevard & Maxella Avenue	Caltrans/City of LA	X	X	0.554	A	0.550	A	0.592	A	0.552	A	0.548	A	0.591	A	-	-	-
107	Lincoln Boulevard & Mindanao Way	Caltrans/City of LA/LA County	X	X	0.624	B	0.697	B	0.771	C	0.631	B	0.720	C	0.777	C	-	-	-
108	Sepulveda Boulevard & Lincoln Boulevard	Caltrans/City of LA	X	X	0.621	B	0.510	A	0.769	C	0.609	B	0.467	A	0.756	C	-	-	-
109	Lincoln Boulevard & Venice Boulevard	Caltrans/City of LA	X	X	0.814	D	0.811	D	0.895	D	0.817	D	0.813	D	0.896	D	-	-	-
110	Lincoln Boulevard & Washington Boulevard	Caltrans/City of LA	X	X	0.746	C	0.816	D	0.936	E	0.746	C	0.817	D	0.936	E	-	-	-
111	Lincoln Boulevard & 83rd Street	Caltrans/City of LA	X	X	0.544	A	0.379	A	0.547	A	0.544	A	0.381	A	0.547	A	-	-	-
112	Lincoln Boulevard & SR 90 Ramps	Caltrans/City of LA	X	X	0.595	A	0.594	A	0.701	C	0.597	A	0.605	B	0.703	C	-	-	-
113	Pershing Drive & Manchester Avenue	Caltrans/City of LA	X	X	0.454	A	0.295	A	0.375	A	0.451	A	0.288	A	0.374	A	-	-	-
114	Sepulveda Boulevard & Manchester Avenue	Caltrans/City of LA	X	X	~~0.747~~	~~C~~	~~0.648~~	B	~~0.754~~	C	~~0.748~~	~~C~~	~~0.653~~	B	*0.755*	C	-	-	-
					0.630	*B*	*0.611*		*0.773*		*0.631*	*B*	*0.619*		*0.774*				
115	Ash Avenue & Manchester Avenue	Caltrans/Inglewood			0.699	B	0.622	B	0.780	C	0.696	B	0.612	B	0.780	C	-	-	-
116	Nash Street & Mariposa Avenue	El Segundo			0.574	A	0.324	A	0.434	A	0.571	A	0.322	A	0.434	A	-	-	-
117	Sepulveda Boulevard & Mariposa Avenue	Caltrans/El Segundo			0.708	C	0.641	B	0.757	C	0.711	C	0.642	B	0.759	C	-	-	-
118	Sawtelle Boulevard & Matteson Street/I-405 Southbound Ramps	Caltrans/Culver City	X		0.760	C	0.523	A	0.778	C	0.739	C	0.507	A	0.764	C	-	-	-
119	Ocean Avenue/Via Marina & Washington Boulevard	City of LA/LA County	X	X	0.531	A	0.476	A	0.694	B	0.531	A	0.480	A	0.698	B	-	-	-
120	Overhill Drive & Slauson Avenue	LA County			0.639	B	0.533	A	0.986	E	0.633	B	0.532	A	0.976	E	-	-	-
121	Overland Avenue & Venice Boulevard	Caltrans/Culver City/City of LA	X		0.819	D	0.657	B	0.873	D	0.820	D	0.656	B	0.879	D	-	-	-
122	Palawan Way & Washington Boulevard	City of LA/LA County			13.4	B	12.1	B	12.8	B	13.4	B	12.2	B	12.8	B	-	-	-
123	Pershing Drive & Westchester Parkway	City of LA	X	X	0.211	A	0.115	A	0.187	A	0.208	A	0.108	A	0.184	A	-	-	-
124	Prairie Avenue & West 112th Street/I-105 Off-Ramp	Caltrans/Inglewood			0.457	A	0.583	A	0.646	B	0.447	A	0.583	A	0.638	B	-	-	-
125	Sepulveda Boulevard & Rosecrans Avenue	Caltrans/El Segundo/Manhattan Beach			0.840	D	0.766	C	1.058	F	0.835	D	0.760	C	1.058	F	-	-	-
126	Sepulveda Boulevard & Sawtelle Boulevard	Culver City	X		0.421	A	0.526	A	0.595	A	0.424	A	0.528	A	0.598	A	-	-	-
127	Sawtelle Boulevard & Venice Boulevard	Caltrans/Culver City/City of LA	X		0.899	D	0.739	C	0.881	D	0.895	D	0.732	C	0.880	D	-	-	-
128	Sawtelle Boulevard & Washington Boulevard	Culver City	X		0.476	A	0.414	A	0.599	A	0.476	A	0.413	A	0.554	A	-	-	-
129	Sawtelle Boulevard & Washington Place	Culver City	X		0.427	A	0.325	A	0.515	A	0.419	A	0.321	A	0.514	A	-	-	-
130	Sepulveda Boulevard & Slauson Avenue	Culver City	X		0.487	A	0.526	A	0.703	C	0.491	A	0.529	A	0.708	C	-	-	-
131	Sepulveda Boulevard & Venice Boulevard	Caltrans/Culver City/City of LA	X	X	0.758	C	0.649	B	0.951	E	0.767	C	0.657	B	0.956	E	-	-	-
132	Sepulveda Boulevard & Washington Boulevard	Culver City	X		0.567	A	0.510	A	0.620	B	0.579	A	0.516	A	0.632	B	-	-	-
133	Sepulveda Boulevard & Washington Place	Culver City	X		0.588	A	0.487	A	0.577	A	0.594	A	0.493	A	0.582	A	-	-	-
134	Sepulveda Boulevard & I-405 Northbound On-/Off-Ramps	Caltrans/Culver City	X		0.824	D	0.565	A	0.762	C	0.784	C	0.535	A	0.733	C	-	-	-
135	Sepulveda Boulevard & Westchester Parkway	City of LA	X	X	0.447	A	0.528	A	0.683	B	0.427	A	0.468	A	0.638	B	-	-	-
136	Sepulveda Boulevard & 76th Street	City of LA	X	X	0.663	B	0.422	A	0.628	B	0.658	B	0.398	A	0.624	B	-	-	-
137	Sepulveda Boulevard & 79th Street	City of LA	X	X	0.445	A	0.351	A	0.507	A	0.430	A	0.325	A	0.504	A	-	-	-
138	Sepulveda Boulevard & 83rd Street	City of LA	X	X	0.390	A	0.312	A	0.456	A	0.381	A	0.290	A	0.453	A	-	-	-
139	Sepulveda Boulevard & I-105 Westbound Ramps (n/o Imperial Highway)	Caltrans/City of LA	X	X	0.839	D	0.805	D	0.872	D	0.825	D	0.787	C	0.851	D	-	-	-
140	SR 90 Westbound Ramps & Slauson Avenue	Caltrans/Culver City/LA County	X		0.505	A	0.393	A	0.671	B	0.504	A	0.391	A	0.642	B	-	-	-
141	Airport Boulevard & 96th Street	City of LA	X	X	0.175	A	0.288	A	0.360	A	0.227	A	0.320	A	0.437	A	-	-	-
142	Jenny Avenue & 96th Street	City of LA	X	X	0.129	A	0.154	A	0.115	A	0.169	A	0.193	A	0.159	A	-	-	-
143	Vicksburg Avenue & 96th Street	City of LA	X	X	0.180	A	0.292	A	0.219	A	0.322	A	0.325	A	0.420	A	-	-	-
144	Airport Boulevard & 98th Street	City of LA	X	X	0.292	A	0.381	A	0.439	A	0.325	A	0.463	A	0.534	A	-	-	-
145	Jenny Avenue & Westchester Parkway	City of LA	X	X	0.060	A	0.151	A	0.143	A	0.060	A	0.175	A	0.146	A	-	-	-
146	Sepulveda Eastway & Westchester Parkway	City of LA	X	X	0.221	A	0.340	A	0.423	A	0.219	A	0.330	A	0.421	A	-	-	-
147	Crenshaw Boulevard & Century Boulevard	Inglewood			0.563	A	0.674	B	0.781	C	0.567	A	0.679	B	0.785	C	-	-	-
148	La Cienega Boulevard & Fairview Boulevard	Inglewood/City of LA	X	X	0.834	D	0.603	B	0.851	D	0.834	D	0.595	A	0.838	D	-	-	-
149	Crenshaw Boulevard & Imperial Highway	Inglewood			0.566	A	0.620	B	0.818	D	0.570	A	0.625	B	0.834	D	-	-	-
150	Sepulveda Boulevard & Braddock Drive	Culver City			0.505	A	0.446	A	0.566	A	0.506	A	0.453	A	0.568	A	-	-	-
151	Buckingham Parkway & Slauson Avenue	Culver City			0.646	B	0.451	A	0.778	C	0.644	B	0.450	A	0.777	C	-	-	-
152	Duquesne Avenue & Washington Boulevard	Culver City			0.493	A	0.435	A	0.607	B	0.496	A	0.439	A	0.609	B	-	-	-
153	Overland Avenue & Kelmore Street/Ranch Road	Culver City			21.6	C	13.7	B	28.5	D	21.8	C	13.7	B	28.5	D	-	-	-
154	Overland Avenue & Sawtelle Boulevard	Culver City			20.3	C	15.1	C	27.2	D	20.3	C	15.1	C	27.2	D	-	-	-
155	Overland Avenue & Washington Boulevard	Culver City/City of LA			0.764	C	0.663	B	0.980	E	0.764	C	0.666	B	0.984	E	-	-	-
156	Walgrove Avenue & Washington Boulevard	Culver City			17.1	C	37.0	E	68.1	F	18.7	C	40.9	E	68.1	F	-	-	-
157	La Cienega Boulevard & 104th Street	City of LA/LA County	X	X	0.297	A	0.241	A	0.301	A	0.256	A	0.236	A	0.278	A	-	-	-
158	Vista del Mar & Waterview Street	City of LA	X	X	0.305	A	0.056	A	0.237	A	0.299	A	0.053	A	0.233	A	-	-	-

Table 4.12.2-17

Baseline (2010) With Alternative 8 Level of Service Analysis

					Baseline (2010)						Baseline (2010) With Alt. 8						Significant Impact?		
					AM		MD		PM		AM		MD		PM				
Int. #	Intersection	Jurisdiction	ATSAC	ATCS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	AM	MD	PM
159	Hindry Avenue & Manchester Boulevard	Caltrans/Inglewood			0.387	A	0.550	A	0.542	A	0.388	A	0.599	A	0.542	A	-	-	-
160	Lincoln Boulevard & Rose Avenue	Caltrans/City of LA	X	X	0.873	D	0.775	C	0.797	C	0.872	D	0.775	C	0.793	C	-	-	-
161	Western Avenue & Century Boulevard	City of LA	X	X	0.440	A	0.509	A	0.637	B	0.440	A	0.519	A	0.640	B	-	-	-
162	Sepulveda Boulevard & Manhattan Beach Boulevard	Caltrans/Manhattan Beach			0.849	D	0.914	E	1.100	F	0.849	D	0.917	E	1.104	F	-	-	-
163	La Cienega Boulevard & Jefferson Boulevard	City of LA	X		0.898	D	0.679	B	1.014	F	0.891	D	0.673	B	1.006	F	-	-	-
164	Crenshaw Boulevard & Manchester Avenue	Caltrans/Inglewood			0.686	B	0.714	C	0.860	D	0.686	B	0.710	C	0.857	D	-	-	-
165	La Cienega Boulevard & Rodeo Road	City of LA	X		0.942	E	0.654	B	0.951	E	0.938	E	0.654	B	0.948	E	-	-	-
166	La Brea Avenue & Rodeo Road	City of LA	X		0.969	E	0.651	B	0.851	D	0.969	E	0.653	B	0.854	D	-	-	-
167	La Brea Avenue & Jefferson Boulevard	City of LA	X		0.980	E	0.578	A	0.866	D	0.984	E	0.578	A	0.876	D	-	-	-
168	Crenshaw Boulevard & Florence Avenue	City of LA	X	X	0.670	B	0.501	A	0.741	C	0.676	B	0.514	A	0.746	C	-	-	-
169	Prairie Avenue & Manchester Boulevard	Inglewood			0.942	E	0.646	B	0.785	C	0.943	E	0.652	B	0.786	C	-	-	-
170	I-110 Northbound Ramps & Manchester Avenue	Caltrans/City of LA	X	X	0.561	A	0.434	A	0.476	A	0.556	A	0.431	A	0.470	A	-	-	-
171	Western Avenue & Florence Avenue	City of LA	X	X	0.736	C	0.438	A	0.718	C	0.751	C	0.458	A	0.736	C	-	-	-
172	Western Avenue & Manchester Avenue	Caltrans/City of LA	X	X	0.648	B	0.493	A	0.748	C	0.651	B	0.500	A	0.759	C	-	-	-
173	Western Avenue & Imperial Highway	LA County	X	X	0.639	B	0.477	A	0.765	C	0.641	B	0.481	A	0.794	C	-	-	-
174	Vermont Avenue & Florence Avenue	City of LA	X	X	0.619	B	0.426	A	0.599	A	0.629	B	0.453	A	0.605	B	-	-	-
175	Vermont Avenue & Manchester Avenue	Caltrans/LA County/City of LA	X	X	0.661	B	0.471	A	0.611	B	0.667	B	0.475	A	0.621	B	-	-	-
176	Vermont Avenue & Century Boulevard	LA County/City of LA	X	X	0.605	B	0.399	A	0.563	A	0.605	B	0.402	A	0.565	A	-	-	-
177	Vermont Avenue & Imperial Highway	LA County/City of LA	X	X	0.728	C	0.458	A	0.758	C	0.729	C	0.461	A	0.777	C	-	-	-
178	Figueroa Street & Florence Avenue	City of LA	X	X	0.693	B	0.412	A	0.610	B	0.693	B	0.428	A	0.621	B	-	-	-
179	Figueroa Street & Manchester Avenue	Caltrans/City of LA	X	X	0.776	C	0.549	A	0.796	C	0.768	C	0.549	A	0.781	C	-	-	-
180	Figueroa Street & Century Boulevard	City of LA	X	X	0.840	D	0.411	A	0.658	B	0.853	D	0.411	A	0.663	B	-	-	-
181	Figueroa Street & Imperial Highway	City of LA	X	X	0.757	C	0.323	A	0.651	B	0.779	C	0.325	A	0.677	B	-	-	-
182	Inglewood Avenue & Rosecrans Avenue	Hawthorne			0.694	B	0.608	B	0.840	D	0.699	B	0.615	B	0.843	D	-	-	-
183	Hawthorne Boulevard & Rosecrans Avenue	Hawthorne			0.709	C	0.621	B	0.770	C	0.709	C	0.625	B	0.770	C	-	-	-
184	Prairie Avenue & Rosecrans Avenue	Hawthorne/Lawndale			0.776	C	0.673	B	0.856	D	0.779	C	0.674	B	0.859	D	-	-	-
185	Crenshaw Boulevard & Rosecrans Avenue	Gardena/Hawthorne/LA County			0.729	C	0.644	B	0.800	C	0.739	C	0.648	B	0.800	C	-	-	-
186	Western Avenue & Rosecrans Avenue	Gardena			0.737	C	0.603	B	0.838	D	0.738	C	0.608	B	0.839	D	-	-	-
187	Vermont Avenue & Rosecrans Avenue	Gardena/City of LA	X		0.702	C	0.553	A	0.747	C	0.702	C	0.554	A	0.747	C	-	-	-
188	Prairie Avenue & El Segundo Boulevard	Hawthorne			0.883	D	0.627	B	0.889	D	0.881	D	0.618	B	0.889	D	-	-	-
189	Crenshaw Boulevard & El Segundo Boulevard	Hawthorne/Gardena			0.882	D	0.654	B	0.774	C	0.898	D	0.656	B	0.782	C	-	-	-
190	Western Avenue & El Segundo Boulevard	Gardena/LA County			0.798	C	0.518	A	0.759	C	0.798	C	0.521	A	0.759	C	-	-	-
191	Vermont Avenue & El Segundo Boulevard	Gardena/LA County/City of LA	X		0.634	B	0.330	A	0.550	A	0.620	B	0.329	A	0.535	A	-	-	-
192	Aviation Boulevard & Artesia Boulevard	Redondo Beach/Manhattan Beach			1.062	F	0.734	C	1.053	F	1.067	F	0.737	C	1.054	F	-	-	-
193	Aviation Boulevard & Manhattan Beach Boulevard	Redondo Beach/Manhattan Beach			0.895	D	0.724	C	0.979	E	0.899	D	0.724	C	0.981	E	-	-	-
194	Sepulveda Boulevard & Palms Boulevard	City of LA	X		0.766	C	0.552	A	0.929	E	0.775	C	0.559	A	0.929	E	-	-	-
195	Sawtelle Boulevard & Palms Boulevard	City of LA	X		0.769	C	0.401	A	0.757	C	0.757	C	0.394	A	0.730	C	-	-	-
196	Prairie Avenue & Florence Avenue	Inglewood			0.915	E	0.571	A	0.781	C	0.915	E	0.571	A	0.781	C	-	-	-
197	Prairie Avenue & Lennox Boulevard	Inglewood			0.538	A	0.468	A	0.606	B	0.541	A	0.470	A	0.606	B	-	-	-
198	Flower Street (near I-110 Southbound Ramps) & Florence Avenue	Caltrans/City of LA	X	X	0.443	A	0.418	A	0.458	A	0.445	A	0.433	A	0.478	A	-	-	-
199	Grand Avenue (near I-110 Northbound Ramps) & Florence Avenue	Caltrans/City of LA	X	X	0.540	A	0.503	A	0.561	A	0.541	A	0.521	A	0.566	A	-	-	-
200	I-110 Southbound Ramps & Manchester Avenue	Caltrans/City of LA	X	X	0.474	A	0.402	A	0.477	A	0.473	A	0.402	A	0.473	A	-	-	-

Source: Fehr & Peers, 2012.

Table 4.12.2-18

Baseline (2010) With Alternative 9 Level of Service Analysis

					Baseline (2010)						Baseline (2010) With Alt. 9								
					AM		MD		PM		AM		MD		PM		Significant impact?		
Int. #	Intersection	Jurisdiction	ATSAC	ATCS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	AM	MD	PM
1	Admiralty Way & Bali Way	LA County	X	X	0.566	A	0.530	A	0.696	B	0.566	A	0.535	A	0.696	B	-	-	-
2	Admiralty Way & Fiji Way	LA County	X	X	0.297	A	0.276	A	0.443	A	0.306	A	0.279	A	0.445	A	-	-	-
3	Admiralty Way & Mindanao Way	LA County	X	X	0.549	A	0.537	A	0.623	B	0.549	A	0.534	A	0.621	B	-	-	-
4	Palawan Way & Admiralty Way	LA County	X		0.518	A	0.424	A	0.599	A	0.522	A	0.441	A	0.599	A	-	-	-
5	Via Marina & Admiralty Way	LA County	X	X	0.414	A	0.440	A	0.641	B	0.415	A	0.440	A	0.642	B	-	-	-
6	Airport Boulevard & Arbor Vitae Street/Westchester Parkway	City of LA	X	X	0.299	A	0.485	A	0.579	A	0.247	A	0.430	A	0.544	A	-	-	-
7	Airport Boulevard & Century Boulevard	City of LA	X	X	0.516	A	0.552	A	0.517	A	0.561	A	0.611	B	0.640	B	-	-	-
8	La Tijera Boulevard & Airport Boulevard	City of LA	X	X	0.377	A	0.323	A	0.363	A	0.435	A	0.361	A	0.372	A	-	-	-
9	Airport Boulevard & Manchester Avenue	Caltrans/City of LA	X	X	0.563	A	0.681	B	0.786	C	0.591	A	0.735	C	0.804	D	-	Yes	-
10	Aviation Boulevard & Arbor Vitae Street	Inglewood/City of LA	X	X	0.427	A	0.420	A	0.551	A	0.339	A	0.320	A	0.475	A	-	-	-
11	Inglewood Avenue & Arbor Vitae Street	Inglewood			0.423	A	0.495	A	0.689	B	0.450	A	0.542	A	0.728	C	-	-	-
12	La Brea Avenue & Arbor Vitae Street	Inglewood			0.392	A	0.480	A	0.669	B	0.392	A	0.487	A	0.676	B	-	-	-
13	La Cienega Boulevard & Arbor Vitae Street	Inglewood/City of LA	X	X	0.354	A	0.397	A	0.491	A	0.422	A	0.430	A	0.613	B	-	-	-
14	Aviation Boulevard & Century Boulevard	City of LA	X	X	0.738	C	0.664	B	0.892	D	0.755	C	0.667	B	0.892	D	-	-	-
15	Aviation Boulevard & El Segundo Boulevard	El Segundo			0.851	D	~~0.589~~ *0.584*	A	~~0.761~~ *0.746*	C	0.851	D	~~0.591~~ *0.586*	A	~~0.765~~ *0.751*	C	-	-	-
16	Aviation Boulevard & Imperial Highway	City of LA	X	X	0.630	B	0.370	A	0.595	A	0.562	A	0.351	A	0.589	A	-	-	-
17	Aviation Boulevard/Florence Avenue & Manchester Avenue	Caltrans/Inglewood	X	X	0.589	A	0.591	A	0.653	B	0.654	B	0.649	B	0.683	B	-	-	-
18	Aviation Boulevard & Rosecrans Avenue	El Segundo/Hawthorne/Manhattan Beach			0.684	B	0.760	C	0.827	D	0.687	B	0.762	C	0.827	D	-	-	-
19	Aviation Boulevard & 111th Street	City of LA	X	X	0.520	A	0.402	A	0.477	A	0.516	A	0.353	A	0.453	A	-	-	-
20	Aviation Boulevard & West 120th Street	El Segundo/LA County			0.592	A	0.365	A	0.516	A	0.580	A	0.362	A	0.505	A	-	-	-
21	Lincoln Boulevard & Bali Way	Caltrans/City of LA/LA County	X	X	0.449	A	0.497	A	0.696	B	0.457	A	0.497	A	0.696	B	-	-	-
22	Lincoln Boulevard & Bluff Creek Drive	Caltrans/City of LA	X	X	0.351	A	0.211	A	0.334	A	0.352	A	0.213	A	0.341	A	-	-	-
23	Centinela Avenue & Jefferson Boulevard	City of LA/LA County	X	X	0.459	A	0.420	A	0.600	A	0.461	A	0.420	A	0.607	B	-	-	-
24	Centinela Avenue & Culver Boulevard	City of LA	X	X	0.669	B	0.451	A	0.698	B	0.669	B	0.449	A	0.693	B	-	-	-
25	La Brea Avenue & Centinela Avenue	Inglewood			0.778	C	0.706	C	0.874	D	0.780	C	0.712	C	0.875	D	-	-	-
26	La Cienega Boulevard & Centinela Avenue	Inglewood/City of LA	X	X	0.933	E	0.590	A	0.973	E	0.934	E	0.598	A	0.974	E	-	-	-
27	La Tijera Boulevard & Centinela Avenue	City of LA/LA County	X	X	0.538	A	0.475	A	0.690	B	0.539	A	0.475	A	0.696	B	-	-	-
28	Sepulveda Boulevard & Centinela Avenue	Culver City	X		0.710	C	0.561	A	0.736	C	0.712	C	0.567	A	0.736	C	-	-	-
29	Centinela Avenue & Venice Boulevard	Caltrans/City of LA	X	X	0.955	E	0.800	C	0.893	D	0.955	E	0.805	D	0.901	E	-	-	-
30	Centinela Avenue & Washington Boulevard	Culver City	X		0.733	C	0.626	B	0.849	D	0.734	C	0.626	B	0.848	D	-	-	-
31	Centinela Avenue & Washington Place	Culver City/City of LA	X		0.721	C	0.589	A	0.754	C	0.720	C	0.590	A	0.755	C	-	-	-
32	Centinela Avenue & SR 90 Eastbound On-/Off-Ramps	Caltrans/City of LA	X	X	0.291	A	0.216	A	0.409	A	0.293	A	0.219	A	0.409	A	-	-	-
33	Centinela Avenue & Sandford/SR 90 Westbound Ramps	Caltrans/City of LA	X	X	0.351	A	0.216	A	0.454	A	0.355	A	0.216	A	0.454	A	-	-	-
34	La Brea Avenue/Hawthorne Boulevard & Century Boulevard	Inglewood			0.574	A	0.605	B	0.746	C	0.578	A	0.614	B	0.764	C	-	-	-
35	Inglewood Avenue & Century Boulevard	Inglewood			0.558	A	0.562	A	0.800	C	0.570	A	0.565	A	0.802	D	-	-	-
36	La Cienega Boulevard & Century Boulevard	Inglewood/City of LA/LA County	X	X	0.515	A	0.582	A	0.682	B	0.763	C	0.677	B	0.669	B	Yes	-	-
37	Prairie Avenue & Century Boulevard	Inglewood			0.583	A	0.681	B	0.783	C	0.587	A	0.681	B	0.783	C	-	-	-
38	Sepulveda Boulevard & Century Boulevard	Caltrans/City of LA	X	X	0.546	A	0.473	A	0.620	B	0.570	A	0.498	A	0.653	B	-	-	-
39	I-405 Northbound Ramps & Century Boulevard	Caltrans/Inglewood			0.643	B	0.544	A	0.641	B	0.664	B	0.588	A	0.642	B	-	-	-
40	Duquesne Avenue & Culver Boulevard	Culver City	X		0.539	A	0.358	A	0.592	A	0.546	A	0.366	A	0.595	A	-	-	-
41	Culver Boulevard & Jefferson Boulevard	City of LA	X	X	0.687	B	0.299	A	0.652	B	0.684	B	0.293	A	0.649	B	-	-	-
42	Nicholson Street & Culver Boulevard	City of LA	X	X	0.541	A	0.337	A	0.737	C	0.530	A	0.329	A	0.734	C	-	-	-
43	Overland Avenue & Culver Boulevard	Culver City	X		1.070	F	0.574	A	0.849	D	1.069	F	0.574	A	0.845	D	-	-	-
44	Sawtelle Boulevard & Culver Boulevard	Culver City	X		0.601	B	0.417	A	0.787	C	0.593	A	0.407	A	0.782	C	-	-	-
45	Sepulveda Boulevard & Culver Boulevard	Culver City	X		0.677	B	0.477	A	0.642	B	0.679	B	0.477	A	0.645	B	-	-	-
46	Douglas Street & El Segundo Boulevard	El Segundo			0.657	B	0.511	A	0.864	D	0.654	B	0.504	A	0.856	D	-	-	-
47	Douglas Street & Imperial Highway	El Segundo/City of LA	X	X	0.292	A	0.230	A	0.387	A	0.319	A	0.257	A	0.415	A	-	-	-
48	Douglas Street & Mariposa Avenue	El Segundo			0.324	A	0.365	A	0.514	A	0.319	A	0.360	A	0.506	A	-	-	-
49	Douglas Street & Rosecrans Avenue	El Segundo/Manhattan Beach			0.587	A	0.638	B	0.662	B	0.580	A	0.632	B	0.662	B	-	-	-
50	Duquesne Avenue & Jefferson Boulevard	Culver City	X		0.514	A	0.475	A	0.625	B	0.516	A	0.478	A	0.625	B	-	-	-
51	Hawthorne Boulevard & El Segundo Boulevard	Hawthorne			0.597	A	0.654	B	1.157	F	0.597	A	0.651	B	1.147	F	-	-	-
52	Inglewood Avenue & El Segundo Boulevard	Hawthorne/LA County			0.582	A	0.632	B	0.961	E	0.589	A	0.632	B	0.970	E	-	-	-

Table 4.12.2-18

Baseline (2010) With Alternative 9 Level of Service Analysis

					Baseline (2010)						Baseline (2010) With Alt. 9						Significant impact?		
					AM		MD		PM		AM		MD		PM				
Int. #	Intersection	Jurisdiction	ATSAC	ATCS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	AM	MD	PM
53	La Cienega Boulevard & El Segundo Boulevard	Hawthorne/LA County			0.620	B	0.508	A	0.917	E	0.615	B	0.500	A	0.909	E	-	-	-
54	Nash Street & El Segundo Boulevard	El Segundo			0.524	A	0.402	A	0.634	B	0.515	A	0.394	A	0.629	B	-	-	-
55	Sepulveda Boulevard & El Segundo Boulevard	Caltrans/El Segundo			0.754	C	0.732	C	0.947	E	0.755	C	0.734	C	0.949	E	-	-	-
56	Lincoln Boulevard & Fiji Way	Caltrans/City of LA/LA County	X	X	0.550	A	0.544	A	0.752	C	0.550	A	0.544	A	0.756	C	-	-	-
57	La Brea Avenue & Florence Avenue	Inglewood			0.670	B	0.638	B	0.844	D	0.658	B	0.611	B	0.826	D	-	-	-
58	La Cienega Boulevard & Florence Avenue	Inglewood			0.667	B	0.658	B	0.895	D	0.670	B	0.689	B	0.897	D	-	-	-
59	Nash Street & Grand Avenue	El Segundo			0.422	A	0.324	A	0.426	A	0.405	A	0.322	A	0.413	A	-	-	-
60	Sepulveda Boulevard & Grand Avenue	Caltrans/El Segundo			0.753	C	0.695	B	0.828	D	0.764	C	0.703	C	0.828	D	-	-	-
61	Vista del Mar & Grand Avenue	City of LA	X	X	0.495	A	0.226	A	0.326	A	0.490	A	0.225	A	0.324	A	-	-	-
62	Hawthorne Boulevard & Imperial Avenue	Hawthorne			0.551	A	0.549	A	0.839	D	0.561	A	0.551	A	0.843	D	-	-	-
63	Hawthorne Boulevard & Lennox Boulevard	LA County			0.397	A	0.544	A	0.724	C	0.423	A	0.557	A	0.754	C	-	-	-
64	Highland Avenue/Vista del Mar & Rosecrans Avenue	Manhattan Beach			0.770	C	0.523	A	0.685	B	0.763	C	0.523	A	0.685	B	-	-	-
65	Sepulveda Boulevard & Howard Hughes Parkway	City of LA	X	X	0.388	A	0.365	A	0.540	A	0.388	A	0.365	A	0.543	A	-	-	-
66	Inglewood Avenue & Imperial Highway	Hawthorne			0.614	B	0.647	B	1.153	F	0.627	B	0.653	B	1.154	F	-	-	-
67	La Cienega Boulevard & Imperial Highway	City of LA/LA County	X	X	0.397	A	0.246	A	0.540	A	0.361	A	0.220	A	0.529	A	-	-	-
68	Main Street & Imperial Highway	El Segundo/City of LA	X	X	0.683	B	0.440	A	0.547	A	0.699	B	0.445	A	0.537	A	-	-	-
69	Pershing Drive & Imperial Highway	City of LA	X	X	0.515	A	0.368	A	0.354	A	0.499	A	0.341	A	0.349	A	-	-	-
70	Prairie Avenue & Imperial Highway	Hawthorne/Inglewood			0.611	B	0.581	A	0.820	D	0.602	B	0.579	A	0.816	D	-	-	-
71	Sepulveda Boulevard & Imperial Highway	Caltrans/El Segundo/City of LA	X	X	0.650	B	0.674	B	1.013	F	0.677	B	0.683	B	1.024	F	-	-	Yes
72	Vista del Mar & Imperial Highway	City of LA	X	X	0.403	A	0.205	A	0.363	A	0.396	A	0.191	A	0.359	A	-	-	-
73	Nash Street/I-105 Westbound Ramps & Imperial Highway	Caltrans/El Segundo/City of LA	X	X	0.575	A	0.279	A	0.332	A	0.589	A	0.279	A	0.336	A	-	-	-
74	I-105 Ramps (e/o Aviation Boulevard) & Imperial Highway	Caltrans/City of LA	X	X	0.544	A	0.308	A	0.534	A	0.515	A	0.308	A	0.530	A	-	-	-
75	I-405 Northbound Ramps (e/o La Cienega Boulevard) & Imperial Highway	Caltrans/Hawthorne/LA County			0.440	A	0.309	A	0.614	B	0.440	A	0.302	A	0.610	B	-	-	-
76	Inglewood Avenue & Lennox Boulevard	LA County			0.424	A	0.490	A	0.703	C	0.425	A	0.503	A	0.715	C	-	-	-
77	Inglewood Avenue & Manchester Boulevard	Caltrans/Inglewood			0.529	A	0.489	A	0.645	B	0.525	A	0.486	A	0.635	B	-	-	-
78	Lincoln Boulevard & Jefferson Boulevard	Caltrans/City of LA	X	X	0.610	B	0.487	A	0.624	B	0.627	B	0.492	A	0.630	B	-	-	-
79	Overland Avenue & Jefferson Boulevard	Culver City	X		0.630	B	0.468	A	0.687	B	0.628	B	0.466	A	0.685	B	-	-	-
80	Sepulveda Boulevard & Jefferson Boulevard	Culver City	X		0.384	A	0.336	A	0.406	A	0.389	A	0.349	A	0.407	A	-	-	-
81	Sepulveda Boulevard & Jefferson Boulevard & Playa Street	Culver City	X		0.666	B	0.601	B	0.785	C	0.674	B	0.608	B	0.793	C	-	-	-
82	Slauson Avenue & Jefferson Boulevard	Culver City	X		0.278	A	0.401	A	0.416	A	0.284	A	0.401	A	0.419	A	-	-	-
83	I-405 Northbound Ramps & Jefferson Boulevard	Caltrans/Culver City/City of LA	X	X	0.382	A	0.366	A	0.678	B	0.348	A	0.351	A	0.652	B	-	-	-
84	I-405 Southbound Ramps & Jefferson Boulevard	Caltrans/Culver City/City of LA	X	X	0.275	A	0.322	A	0.365	A	0.274	A	0.315	A	0.364	A	-	-	-
85	La Brea Avenue & Manchester Boulevard	Caltrans/Inglewood			0.678	B	0.670	B	0.714	C	0.705	C	0.716	C	0.745	C	-	Yes	-
86	La Brea Avenue/Overhill Drive & Stocker Street	LA County			0.694	B	0.611	B	1.071	F	0.694	B	0.619	B	1.072	F	-	-	-
87	La Brea Avenue & Slauson Avenue	LA County			0.753	C	0.629	B	0.917	E	0.751	C	0.625	B	0.914	E	-	-	-
88	La Cienega Boulevard & La Tijera Boulevard	Inglewood/City of LA	X	X	0.780	C	0.689	B	0.871	D	0.760	C	0.667	B	0.868	D	-	-	-
89	La Cienega Boulevard & Lennox Boulevard	City of LA/LA County	X	X	0.346	A	0.280	A	0.371	A	0.356	A	0.291	A	0.379	A	-	-	-
90	La Cienega Boulevard & Manchester Boulevard	Caltrans/Inglewood			0.605	B	0.666	B	0.765	C	0.606	B	0.688	B	0.766	C	-	-	-
91	La Cienega Boulevard Northbound Ramps & Slauson Avenue	LA County			0.664	B	0.525	A	0.648	B	0.660	B	0.525	A	0.639	B	-	-	-
92	La Cienega Boulevard Southbound Ramps & Slauson Avenue	LA County			0.672	B	0.616	B	0.787	C	0.706	C	0.616	B	0.788	C	-	-	-
93	La Cienega Boulevard & Stocker Street	LA County			1.212	F	0.786	C	1.127	F	1.207	F	0.786	C	1.127	F	-	-	-
94	La Cienega Boulevard & 111th Street	City of LA/LA County	X	X	0.290	A	0.277	A	0.413	A	0.291	A	0.277	A	0.348	A	-	-	-
95	La Cienega Boulevard & West 120th Street	LA County			0.358	A	0.282	A	0.696	B	0.354	A	0.281	A	0.695	B	-	-	-
96	La Cienega Boulevard & I-405 Southbound Ramps (n/o Century Boulevard)	Caltrans/Inglewood/City of LA	X	X	0.627	B	0.571	A	0.589	A	0.659	B	0.695	B	0.803	D	-	-	Yes
97	La Cienega Boulevard & I-405 Southbound Ramps (s/o Century Boulevard)	Caltrans/City of LA/LA County	X	X	0.352	A	0.418	A	0.471	A	0.352	A	0.393	A	0.459	A	-	-	-
98	La Cienega Boulevard & I-405 Southbound Ramps (n/o Imperial Highway)	Caltrans/City of LA/LA County	X	X	0.400	A	0.290	A	0.285	A	0.384	A	0.286	A	0.243	A	-	-	-
99	Lincoln Boulevard & La Tijera Boulevard	Caltrans/City of LA	X	X	0.339	A	0.228	A	0.366	A	0.364	A	0.230	A	0.371	A	-	-	-
100	La Tijera Boulevard & Manchester Avenue	Caltrans/City of LA	X	X	0.445	A	0.460	A	0.507	A	0.416	A	0.436	A	0.491	A	-	-	-
101	Sepulveda Boulevard & La Tijera Boulevard	City of LA	X	X	0.501	A	0.573	A	0.629	B	0.465	A	0.478	A	0.586	A	-	-	-
102	I-405 Northbound Ramps & La Tijera Boulevard	Caltrans/City of LA	X	X	0.534	A	0.631	B	0.536	A	0.534	A	0.688	B	0.536	A	-	-	-

Table 4.12.2-18

Baseline (2010) With Alternative 9 Level of Service Analysis

					Baseline (2010)						Baseline (2010) With Alt. 9								
					AM		MD		PM		AM		MD		PM		Significant impact?		
Int. #	Intersection	Jurisdiction	ATSAC	ATCS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	AM	MD	PM
103	I-405 Southbound Ramps & La Tijera Boulevard	Caltrans/City of LA	X	X	0.432	A	0.515	A	0.552	A	0.433	A	0.524	A	0.568	A	-	-	-
104	Lincoln Boulevard & Loyola Marymount University Drive	Caltrans/City of LA	X	X	0.427	A	0.320	A	0.525	A	0.438	A	0.335	A	0.560	A	-	-	-
105	Lincoln Boulevard & Manchester Avenue	Caltrans/City of LA	X	X	0.597	A	0.475	A	0.618	B	0.593	A	0.475	A	0.613	B	-	-	-
106	Lincoln Boulevard & Maxella Avenue	Caltrans/City of LA	X	X	0.554	A	0.550	A	0.592	A	0.552	A	0.548	A	0.591	A	-	-	-
107	Lincoln Boulevard & Mindanao Way	Caltrans/City of LA/LA County	X	X	0.624	B	0.697	B	0.771	C	0.631	B	0.720	C	0.777	C	-	-	-
108	Sepulveda Boulevard & Lincoln Boulevard	Caltrans/City of LA	X	X	0.621	B	0.510	A	0.769	C	0.609	B	0.467	A	0.756	C	-	-	-
109	Lincoln Boulevard & Venice Boulevard	Caltrans/City of LA	X	X	0.814	D	0.811	D	0.895	D	0.817	D	0.813	D	0.896	D	-	-	-
110	Lincoln Boulevard & Washington Boulevard	Caltrans/City of LA	X	X	0.746	C	0.816	D	0.936	E	0.746	C	0.817	D	0.936	E	-	-	-
111	Lincoln Boulevard & 83rd Street	Caltrans/City of LA	X	X	0.544	A	0.379	A	0.547	A	0.544	A	0.381	A	0.547	A	-	-	-
112	Lincoln Boulevard & SR 90 Ramps	Caltrans/City of LA	X	X	0.595	A	0.594	A	0.701	C	0.597	A	0.605	B	0.703	C	-	-	-
113	Pershing Drive & Manchester Avenue	Caltrans/City of LA	X	X	0.454	A	0.295	A	0.375	A	0.451	A	0.288	A	0.374	A	-	-	-
114	Sepulveda Boulevard & Manchester Avenue	Caltrans/City of LA	X	X	~~0.747~~	~~C~~	~~0.648~~	B	~~0.754~~	C	~~0.748~~	~~C~~	~~0.653~~	B	~~0.755~~	C	-	-	-
					0.630	*B*	*0.611*		*0.773*		*0.631*	*B*	*0.619*		*0.774*				
115	Ash Avenue & Manchester Avenue	Caltrans/Inglewood			0.699	B	0.622	B	0.780	C	0.696	B	0.612	B	0.780	C	-	-	-
116	Nash Street & Mariposa Avenue	El Segundo			0.574	A	0.324	A	0.434	A	0.571	A	0.322	A	0.434	A	-	-	-
117	Sepulveda Boulevard & Mariposa Avenue	Caltrans/El Segundo			0.708	C	0.641	B	0.757	C	0.711	C	0.642	B	0.759	C	-	-	-
118	Sawtelle Boulevard & Matteson Street/I-405 Southbound Ramps	Caltrans/Culver City	X		0.760	C	0.523	A	0.778	C	0.739	C	0.507	A	0.764	C	-	-	-
119	Ocean Avenue/Via Marina & Washington Boulevard	City of LA/LA County	X	X	0.531	A	0.476	A	0.694	B	0.531	A	0.480	A	0.698	B	-	-	-
120	Overhill Drive & Slauson Avenue	LA County			0.639	B	0.533	A	0.986	E	0.633	B	0.532	A	0.976	E	-	-	-
121	Overland Avenue & Venice Boulevard	Caltrans/Culver City/City of LA	X		0.819	D	0.657	B	0.873	D	0.820	D	0.656	B	0.879	D	-	-	-
122	Palawan Way & Washington Boulevard	City of LA/LA County			13.4	B	12.1	B	12.8	B	13.4	B	12.2	B	12.8	B	-	-	-
123	Pershing Drive & Westchester Parkway	City of LA	X	X	0.211	A	0.115	A	0.187	A	0.208	A	0.108	A	0.184	A	-	-	-
124	Prairie Avenue & West 112th Street/I-105 Off-Ramp	Caltrans/Inglewood			0.457	A	0.583	A	0.646	B	0.447	A	0.583	A	0.638	B	-	-	-
125	Sepulveda Boulevard & Rosecrans Avenue	Caltrans/El Segundo/Manhattan Beach			0.840	D	0.766	C	1.058	F	0.835	D	0.760	C	1.058	F	-	-	-
126	Sepulveda Boulevard & Sawtelle Boulevard	Culver City	X		0.421	A	0.526	A	0.595	A	0.424	A	0.528	A	0.598	A	-	-	-
127	Sawtelle Boulevard & Venice Boulevard	Caltrans/Culver City/City of LA	X		0.899	D	0.739	C	0.881	D	0.895	D	0.732	C	0.880	D	-	-	-
128	Sawtelle Boulevard & Washington Boulevard	Culver City	X		0.476	A	0.414	A	0.599	A	0.476	A	0.413	A	0.554	A	-	-	-
129	Sawtelle Boulevard & Washington Place	Culver City	X		0.427	A	0.325	A	0.515	A	0.419	A	0.321	A	0.514	A	-	-	-
130	Sepulveda Boulevard & Slauson Avenue	Culver City	X		0.487	A	0.526	A	0.703	C	0.491	A	0.529	A	0.708	C	-	-	-
131	Sepulveda Boulevard & Venice Boulevard	Caltrans/Culver City/City of LA	X	X	0.758	C	0.649	B	0.951	E	0.767	C	0.657	B	0.956	E	-	-	-
132	Sepulveda Boulevard & Washington Boulevard	Culver City	X		0.567	A	0.510	A	0.620	B	0.579	A	0.516	A	0.632	B	-	-	-
133	Sepulveda Boulevard & Washington Place	Culver City	X		0.588	A	0.487	A	0.577	A	0.594	A	0.493	A	0.582	A	-	-	-
134	Sepulveda Boulevard & I-405 Northbound On-/Off-Ramps	Caltrans/Culver City	X		0.824	D	0.565	A	0.762	C	0.784	C	0.535	A	0.733	C	-	-	-
135	Sepulveda Boulevard & Westchester Parkway	City of LA	X	X	0.447	A	0.528	A	0.683	B	0.427	A	0.468	A	0.638	B	-	-	-
136	Sepulveda Boulevard & 76th Street	City of LA	X	X	0.663	B	0.422	A	0.628	B	0.658	B	0.398	A	0.624	B	-	-	-
137	Sepulveda Boulevard & 79th Street	City of LA	X	X	0.445	A	0.351	A	0.507	A	0.430	A	0.325	A	0.504	A	-	-	-
138	Sepulveda Boulevard & 83rd Street	City of LA	X	X	0.390	A	0.312	A	0.456	A	0.381	A	0.290	A	0.453	A	-	-	-
139	Sepulveda Boulevard & I-105 Westbound Ramps (n/o Imperial Highway)	Caltrans/City of LA	X	X	0.839	D	0.805	D	0.872	D	0.825	D	0.787	C	0.851	D	-	-	-
140	SR 90 Westbound Ramps & Slauson Avenue	Caltrans/Culver City/LA County	X		0.505	A	0.393	A	0.671	B	0.504	A	0.391	A	0.642	B	-	-	-
141	Airport Boulevard & 96th Street	City of LA	X	X	0.175	A	0.288	A	0.360	A	0.227	A	0.320	A	0.437	A	-	-	-
142	Jenny Avenue & 96th Street	City of LA	X	X	0.129	A	0.154	A	0.115	A	0.169	A	0.193	A	0.159	A	-	-	-
143	Vicksburg Avenue & 96th Street	City of LA	X	X	0.180	A	0.292	A	0.219	A	0.322	A	0.325	A	0.420	A	-	-	-
144	Airport Boulevard & 98th Street	City of LA	X	X	0.292	A	0.381	A	0.439	A	0.325	A	0.463	A	0.534	A	-	-	-
145	Jenny Avenue & Westchester Parkway	City of LA	X	X	0.060	A	0.151	A	0.143	A	0.060	A	0.175	A	0.146	A	-	-	-
146	Sepulveda Eastway & Westchester Parkway	City of LA	X	X	0.221	A	0.340	A	0.423	A	0.219	A	0.330	A	0.421	A	-	-	-
147	Crenshaw Boulevard & Century Boulevard	Inglewood			0.563	A	0.674	B	0.781	C	0.567	A	0.679	B	0.785	C	-	-	-
148	La Cienega Boulevard & Fairview Boulevard	Inglewood/City of LA	X	X	0.834	D	0.603	B	0.851	D	0.834	D	0.595	A	0.838	D	-	-	-
149	Crenshaw Boulevard & Imperial Highway	Inglewood			0.566	A	0.620	B	0.818	D	0.570	A	0.625	B	0.834	D	-	-	-
150	Sepulveda Boulevard & Braddock Drive	Culver City			0.505	A	0.446	A	0.566	A	0.506	A	0.453	A	0.568	A	-	-	-
151	Buckingham Parkway & Slauson Avenue	Culver City			0.646	B	0.451	A	0.778	C	0.644	B	0.450	A	0.777	C	-	-	-
152	Duquesne Avenue & Washington Boulevard	Culver City			0.493	A	0.435	A	0.607	B	0.496	A	0.439	A	0.609	B	-	-	-
153	Overland Avenue & Kelmore Street/Ranch Road	Culver City			21.6	C	13.7	B	28.5	D	21.8	C	13.7	B	28.5	D	-	-	-
154	Overland Avenue & Sawtelle Boulevard	Culver City			20.3	C	15.1	C	27.2	D	20.3	C	15.1	C	27.2	D	-	-	-
155	Overland Avenue & Washington Boulevard	Culver City/City of LA			0.764	C	0.663	B	0.980	E	0.764	C	0.666	B	0.984	E	-	-	-

Table 4.12.2-18

Baseline (2010) With Alternative 9 Level of Service Analysis

					Baseline (2010)						Baseline (2010) With Alt. 9						Significant impact?		
					AM		MD		PM		AM		MD		PM				
Int. #	Intersection	Jurisdiction	ATSAC	ATCS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	AM	MD	PM
156	Walgrove Avenue & Washington Boulevard	Culver City			17.1	C	37.0	E	68.1	F	18.7	C	40.9	E	68.1	F	-	-	-
157	La Cienega Boulevard & 104th Street	City of LA/LA County	X	X	0.297	A	0.241	A	0.301	A	0.256	A	0.236	A	0.278	A	-	-	-
158	Vista del Mar & Waterview Street	City of LA	X	X	0.305	A	0.056	A	0.237	A	0.299	A	0.053	A	0.233	A	-	-	-
159	Hindry Avenue & Manchester Boulevard	Caltrans/Inglewood			0.387	A	0.550	A	0.542	A	0.388	A	0.599	A	0.542	A	-	-	-
160	Lincoln Boulevard & Rose Avenue	Caltrans/City of LA	X	X	0.873	D	0.775	C	0.797	C	0.872	D	0.775	C	0.793	C	-	-	-
161	Western Avenue & Century Boulevard	City of LA	X	X	0.440	A	0.509	A	0.637	B	0.440	A	0.519	A	0.640	B	-	-	-
162	Sepulveda Boulevard & Manhattan Beach Boulevard	Caltrans/Manhattan Beach			0.849	D	0.914	E	1.100	F	0.849	D	0.917	E	1.104	F	-	-	-
163	La Cienega Boulevard & Jefferson Boulevard	City of LA	X		0.898	D	0.679	B	1.014	F	0.891	D	0.673	B	1.006	F	-	-	-
164	Crenshaw Boulevard & Manchester Avenue	Caltrans/Inglewood			0.686	B	0.714	C	0.860	D	0.686	B	0.710	C	0.857	D	-	-	-
165	La Cienega Boulevard & Rodeo Road	City of LA	X		0.942	E	0.654	B	0.951	E	0.938	E	0.654	B	0.948	E	-	-	-
166	La Brea Avenue & Rodeo Road	City of LA	X		0.969	E	0.651	B	0.851	D	0.969	E	0.653	B	0.854	D	-	-	-
167	La Brea Avenue & Jefferson Boulevard	City of LA	X		0.980	E	0.578	A	0.866	D	0.984	E	0.578	A	0.876	D	-	-	-
168	Crenshaw Boulevard & Florence Avenue	City of LA	X	X	0.670	B	0.501	A	0.741	C	0.676	B	0.514	A	0.746	C	-	-	-
169	Prairie Avenue & Manchester Boulevard	Inglewood			0.942	E	0.646	B	0.785	C	0.943	E	0.652	B	0.786	C	-	-	-
170	I-110 Northbound Ramps & Manchester Avenue	Caltrans/City of LA	X	X	0.561	A	0.434	A	0.476	A	0.556	A	0.431	A	0.470	A	-	-	-
171	Western Avenue & Florence Avenue	City of LA	X	X	0.736	C	0.438	A	0.718	C	0.751	C	0.458	A	0.736	C	-	-	-
172	Western Avenue & Manchester Avenue	Caltrans/City of LA	X	X	0.648	B	0.493	A	0.748	C	0.651	B	0.500	A	0.759	C	-	-	-
173	Western Avenue & Imperial Highway	LA County	X	X	0.639	B	0.477	A	0.765	C	0.641	B	0.481	A	0.794	C	-	-	-
174	Vermont Avenue & Florence Avenue	City of LA	X	X	0.619	B	0.426	A	0.599	A	0.629	B	0.453	A	0.605	B	-	-	-
175	Vermont Avenue & Manchester Avenue	Caltrans/LA County/City of LA	X	X	0.661	B	0.471	A	0.611	B	0.667	B	0.475	A	0.621	B	-	-	-
176	Vermont Avenue & Century Boulevard	LA County/City of LA	X	X	0.605	B	0.399	A	0.563	A	0.605	B	0.402	A	0.565	A	-	-	-
177	Vermont Avenue & Imperial Highway	LA County/City of LA	X	X	0.728	C	0.458	A	0.758	C	0.729	C	0.461	A	0.777	C	-	-	-
178	Figueroa Street & Florence Avenue	City of LA	X	X	0.693	B	0.412	A	0.610	B	0.693	B	0.428	A	0.621	B	-	-	-
179	Figueroa Street & Manchester Avenue	Caltrans/City of LA	X	X	0.776	C	0.549	A	0.796	C	0.768	C	0.549	A	0.781	C	-	-	-
180	Figueroa Street & Century Boulevard	City of LA	X	X	0.840	D	0.411	A	0.658	B	0.853	D	0.411	A	0.663	B	-	-	-
181	Figueroa Street & Imperial Highway	City of LA	X	X	0.757	C	0.323	A	0.651	B	0.779	C	0.325	A	0.677	B	-	-	-
182	Inglewood Avenue & Rosecrans Avenue	Hawthorne			0.694	B	0.608	B	0.840	D	0.699	B	0.615	B	0.843	D	-	-	-
183	Hawthorne Boulevard & Rosecrans Avenue	Hawthorne			0.709	C	0.621	B	0.770	C	0.709	C	0.625	B	0.770	C	-	-	-
184	Prairie Avenue & Rosecrans Avenue	Hawthorne/Lawndale			0.776	C	0.673	B	0.856	D	0.779	C	0.674	B	0.859	D	-	-	-
185	Crenshaw Boulevard & Rosecrans Avenue	Gardena/Hawthorne/LA County			0.729	C	0.644	B	0.800	C	0.739	C	0.648	B	0.800	C	-	-	-
186	Western Avenue & Rosecrans Avenue	Gardena			0.737	C	0.603	B	0.838	D	0.738	C	0.608	B	0.839	D	-	-	-
187	Vermont Avenue & Rosecrans Avenue	Gardena/City of LA	X		0.702	C	0.553	A	0.747	C	0.702	C	0.554	B	0.747	C	-	-	-
188	Prairie Avenue & El Segundo Boulevard	Hawthorne			0.883	D	0.627	B	0.889	D	0.881	D	0.618	B	0.889	D	-	-	-
189	Crenshaw Boulevard & El Segundo Boulevard	Hawthorne/Gardena			0.882	D	0.654	B	0.774	C	0.898	D	0.656	B	0.782	C	-	-	-
190	Western Avenue & El Segundo Boulevard	Gardena/LA County			0.798	C	0.518	A	0.759	C	0.798	C	0.521	A	0.759	C	-	-	-
191	Vermont Avenue & El Segundo Boulevard	Gardena/LA County/City of LA	X		0.634	B	0.330	A	0.550	A	0.620	B	0.329	A	0.535	A	-	-	-
192	Aviation Boulevard & Artesia Boulevard	Redondo Beach/Manhattan Beach			1.062	F	0.734	C	1.053	F	1.067	F	0.737	C	1.054	F	-	-	-
193	Aviation Boulevard & Manhattan Beach Boulevard	Redondo Beach/Manhattan Beach			0.895	D	0.724	C	0.979	E	0.899	D	0.724	C	0.981	E	-	-	-
194	Sepulveda Boulevard & Palms Boulevard	City of LA	X		0.766	C	0.552	A	0.929	E	0.775	C	0.559	A	0.929	E	-	-	-
195	Sawtelle Boulevard & Palms Boulevard	City of LA	X		0.769	C	0.401	A	0.757	C	0.757	C	0.394	A	0.730	C	-	-	-
196	Prairie Avenue & Florence Avenue	Inglewood			0.915	E	0.571	A	0.781	C	0.915	E	0.571	A	0.781	C	-	-	-
197	Prairie Avenue & Lennox Boulevard	Inglewood			0.538	A	0.468	A	0.606	B	0.541	A	0.470	A	0.606	B	-	-	-
198	Flower Street (near I-110 Southbound Ramps) & Florence Avenue	Caltrans/City of LA	X	X	0.443	A	0.418	A	0.458	A	0.445	A	0.433	A	0.478	A	-	-	-
199	Grand Avenue (near I-110 Northbound Ramps) & Florence Avenue	Caltrans/City of LA	X	X	0.540	A	0.503	A	0.561	A	0.541	A	0.521	A	0.566	A	-	-	-
200	I-110 Southbound Ramps & Manchester Avenue	Caltrans/City of LA	X	X	0.474	A	0.402	A	0.477	A	0.473	A	0.402	A	0.473	A	-	-	-

Source: Fehr & Peers, 2012.

Table 4.12.2-19

Future (2025) With Alternative Impact Analysis Summary

		Alt. 1-2			Alt. 3			Alt. 4			Alt. 8			Alt. 9		
Int. #	Intersection	AM	MD	PM	AM	MD	PM	AM	MD	PM	AM	MD	PM	AM	MD	PM
6	Airport Boulevard & Arbor Vitae Street/Westchester Parkway	-	Yes	Yes	-	Yes	Yes	-	Yes	Yes	-	-	Yes	-	-	Yes
7	Airport Boulevard & Century Boulevard	Yes	Yes	Yes	-	-	-	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
9	Airport Boulevard & Manchester Avenue	Yes	Yes	Yes	-	-	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
10	Aviation Boulevard & Arbor Vitae Street	-	-	Yes	-	Yes	-	-	-	Yes	-	-	Yes	-	-	Yes
11	Inglewood Avenue & Arbor Vitae Street	-	-	Yes	-	-	-	-	-	Yes	-	-	Yes	-	-	Yes
12	La Brea Avenue & Arbor Vitae Street	-	-	Yes	-	-	-	-	-	-	-	-	Yes	-	-	Yes
13	La Cienega Boulevard & Arbor Vitae Street	-	-	-	Yes	Yes	Yes	-	-	-	-	-	-	-	-	-
14	Aviation Boulevard & Century Boulevard	Yes	Yes	Yes	-	-	-	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
15	Aviation Boulevard & El Segundo Boulevard	-	-	-	Yes	-	-	-	-	-	-	-	-	-	-	-
16	Aviation Boulevard & Imperial Highway	-	-	-	Yes	-	Yes	Yes	-	-	-	-	-	-	-	-
17	Aviation Boulevard/Florence Avenue & Manchester Avenue	Yes	Yes	Yes	-	-	Yes	-	Yes	Yes	Yes	-	Yes	Yes	-	Yes
25	La Brea Avenue & Centinela Avenue	Yes	-	-	-	Yes	-	-	-	-	Yes	Yes	-	Yes	Yes	-
26	La Cienega Boulevard & Centinela Avenue	Yes	Yes	-	Yes	Yes	Yes	Yes	Yes	-	Yes	Yes	-	Yes	Yes	-
27	La Tijera Boulevard & Centinela Avenue	-	-	Yes	-	-	-	-	-	Yes	-	-	Yes	-	-	Yes
28	Sepulveda Boulevard & Centinela Avenue	-	-	-	Yes	-	Yes	-	-	-	-	-	-	-	-	-
34	La Brea Avenue/Hawthorne Boulevard & Century Boulevard	Yes	Yes	Yes	-	-	-	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
35	Inglewood Avenue & Century Boulevard	Yes	Yes	Yes	-	Yes	-	-	Yes	-	Yes	Yes	-	Yes	Yes	-
36	La Cienega Boulevard & Century Boulevard	Yes	Yes	Yes	Yes	-	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
37	Prairie Avenue & Century Boulevard	Yes	Yes	Yes	-	-	-	-	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
38	Sepulveda Boulevard & Century Boulevard	-	-	Yes	Yes	-	Yes	-	-	Yes	-	-	Yes	-	-	Yes
46	Douglas Street & El Segundo Boulevard	-	-	Yes	-	-	-	-	-	Yes	-	-	Yes	-	-	Yes
51	Hawthorne Boulevard & El Segundo Boulevard	-	-	Yes	Yes	Yes	Yes	-	Yes	Yes	-	-	Yes	-	-	Yes
52	Inglewood Avenue & El Segundo Boulevard	-	-	-	Yes	Yes	Yes	-	-	-	-	-	-	-	-	-
53	La Cienega Boulevard & El Segundo Boulevard	-	-	-	-	-	Yes	-	-	-	-	-	-	-	-	-
57	La Brea Avenue & Florence Avenue	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
58	La Cienega Boulevard & Florence Avenue	Yes	Yes	-	Yes	Yes	Yes	Yes	Yes	-	Yes	Yes	Yes	Yes	Yes	Yes
60	Sepulveda Boulevard & Grand Avenue	-	-	Yes	-	-	-	-	-	-	-	-	Yes	-	-	Yes
62	Hawthorne Boulevard & Imperial Avenue	-	-	Yes	Yes	Yes	Yes	-	-	Yes	-	-	Yes	-	-	Yes
63	Hawthorne Boulevard & Lennox Boulevard	-	-	Yes	-	-	-	-	-	Yes	-	-	Yes	-	-	Yes
64	Highland Avenue/Vista del Mar & Rosecrans Avenue	Yes	-	-	-	-	-	Yes	-	-	Yes	-	-	Yes	-	-
66	Inglewood Avenue & Imperial Highway	Yes	-	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
69	Pershing Drive & Imperial Highway	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
70	Prairie Avenue & Imperial Highway	-	-	-	Yes	-	-	-	-	-	-	-	-	-	-	-
71	Sepulveda Boulevard & Imperial Highway	Yes	Yes	Yes	-	Yes	Yes	Yes	-	Yes	Yes	Yes	Yes	Yes	Yes	Yes
74	I-105 Ramps (e/o Aviation Boulevard) & Imperial Highway	-	-	-	Yes	Yes	Yes	-	-	-	-	-	-	-	-	-
76	Inglewood Avenue & Lennox Boulevard	-	-	Yes	-	-	Yes	-	-	Yes	-	-	Yes	-	-	Yes
77	Inglewood Avenue & Manchester Boulevard	-	-	-	-	-	-	-	-	-	-	-	Yes	-	-	Yes
85	La Brea Avenue & Manchester Boulevard	-	-	-	Yes	Yes	Yes	-	-	-	-	-	Yes	-	-	Yes
86	La Brea Avenue/Overhill Drive & Stocker Street	Yes	Yes	Yes	Yes	Yes	Yes	Yes	-	Yes	Yes	-	Yes	Yes	-	Yes
87	La Brea Avenue & Slauson Avenue	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
88	La Cienega Boulevard & La Tijera Boulevard	-	-	Yes	Yes	-	Yes	-	-	Yes	-	Yes	Yes	-	Yes	Yes
90	La Cienega Boulevard & Manchester Boulevard	-	-	Yes	Yes	Yes	Yes	-	-	Yes	Yes	Yes	Yes	Yes	Yes	Yes
93	La Cienega Boulevard & Stocker Street	Yes	-	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
95	La Cienega Boulevard & West 120th Street	-	-	Yes	-	-	Yes	-	-	Yes	-	-	Yes	-	-	Yes
96	La Cienega Boulevard & I-405 Southbound Ramps (n/o Century Boulevard)	Yes	-	-	-	-	-	-	-	-	-	Yes	Yes	-	Yes	Yes
101	Sepulveda Boulevard & La Tijera Boulevard	-	-	-	-	Yes	-	-	Yes	Yes	-	-	-	-	-	-
102	I-405 Northbound Ramps & La Tijera Boulevard	Yes	Yes	-	Yes	Yes	-	-	Yes	-	Yes	Yes	-	Yes	Yes	-
105	Lincoln Boulevard & Manchester Avenue	-	-	-	Yes	-	-	-	-	-	-	-	-	-	-	-
109	Lincoln Boulevard & Venice Boulevard	-	Yes	-	-	-	-	-	Yes	-	-	Yes	-	-	Yes	-
110	Lincoln Boulevard & Washington Boulevard	-	Yes	-	-	-	-	-	Yes	-	-	Yes	-	-	Yes	-
~~114~~	~~Sepulveda Boulevard & Manchester Avenue~~	~~Yes~~	~~-~~	~~-~~	~~Yes~~	~~-~~	~~-~~	~~Yes~~	~~-~~	~~-~~	~~Yes~~	~~-~~	~~-~~	~~Yes~~	~~-~~	~~-~~
115	Ash Avenue & Manchester Avenue	-	Yes	Yes	-	-	-	-	-	Yes	-	Yes	Yes	-	Yes	Yes
119	Ocean Avenue/Via Marina & Washington Boulevard	Yes	Yes	Yes	Yes	Yes	-	Yes	Yes	-	Yes	Yes	Yes	Yes	Yes	Yes
125	Sepulveda Boulevard & Rosecrans Avenue	-	Yes	-	Yes	Yes	-	Yes	Yes	-	-	Yes	-	-	Yes	-
135	Sepulveda Boulevard & Westchester Parkway	-	-	-	Yes	-	-	Yes	Yes	Yes	-	-	-	-	-	-

Table 4.12.2-19

Future (2025) With Alternative Impact Analysis Summary

		Alt. 1-2			Alt. 3			Alt. 4			Alt. 8			Alt. 9		
Int. #	**Intersection**	**AM**	**MD**	**PM**	**AM**	**MD**	**PM**	**AM**	**MD**	**PM**	**AM**	**MD**	**PM**	**AM**	**MD**	**PM**
139	Sepulveda Boulevard & I-105 Westbound Ramps (n/o Imperial Highway)	-	Yes	Yes	-	-	-	-	Yes	Yes	-	Yes	Yes	-	Yes	Yes
143	Vicksburg Avenue & 96th Street	-	-	Yes	-	-	-	-	-	-	-	-	Yes	-	-	Yes
146	Sepulveda Eastway & Westchester Parkway	-	-	-	-	-	Yes	-	-	Yes	-	-	-	-	-	-
147	Crenshaw Boulevard & Century Boulevard	-	Yes	Yes	-	-	-	-	-	Yes	-	Yes	Yes	-	Yes	Yes
148	La Cienega Boulevard & Fairview Boulevard	Yes	-	-	Yes	Yes	Yes	-	-	-	-	-	-	-	-	-
149	Crenshaw Boulevard & Imperial Highway	Yes	Yes	Yes	-	-	Yes	Yes	Yes	Yes	-	Yes	Yes	-	Yes	Yes
153	Overland Avenue & Kelmore Street/Ranch Road	-	-	-	-	-	Yes	-	-	-	-	-	-	-	-	-
154	Overland Avenue & Sawtelle Boulevard	-	-	Yes	-	-	Yes	-	-	Yes	-	-	Yes	-	-	Yes
156	Walgrove Avenue & Washington Boulevard	Yes	Yes	Yes	-	Yes	Yes	-	Yes	Yes	-	Yes	Yes	-	Yes	Yes
159	Hindry Avenue & Manchester Boulevard	-	Yes	-	-	Yes	Yes	-	Yes	-	-	Yes	-	-	Yes	-
162	Sepulveda Boulevard & Manhattan Beach Boulevard	-	Yes	-	-	-	-	-	-	-	-	Yes	-	-	Yes	-
164	Crenshaw Boulevard & Manchester Avenue	Yes	Yes	Yes	-	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
165	La Cienega Boulevard & Rodeo Road	-	-	-	-	-	-	-	-	-	Yes	-	-	Yes	-	-
166	La Brea Avenue & Rodeo Road	Yes	-	Yes	Yes	-	-	-	-	-	-	-	-	-	-	-
169	Prairie Avenue & Manchester Boulevard	Yes	-	-	Yes	Yes	-	Yes	-	-	Yes	-	Yes	Yes	-	Yes
172	Western Avenue & Manchester Avenue	-	-	-	-	-	Yes	-	-	-	-	-	Yes	-	-	Yes
173	Western Avenue & Imperial Highway	-	-	Yes	-	-	-	-	-	Yes	-	-	Yes	-	-	Yes
188	Prairie Avenue & El Segundo Boulevard	Yes	-	-	Yes	-	Yes	Yes	-	-	Yes	-	-	Yes	-	-
197	Prairie Avenue & Lennox Boulevard	-	-	Yes	-	-	Yes	Yes	-	Yes	-	-	Yes	-	-	Yes
	Number of Significant Impacts	~~29~~ *28*	28	41	~~31~~ *30*	28	37	24	28	38	26	31	45	26	31	45
	Number of Significantly Impacted Intersections		~~56~~ *55*			~~51~~ *50*			~~52~~ *51*			~~58~~ *57*			~~58~~ *57*	

Source: Fehr & Peers, 2012.

Table 4.12.2-21

Future (2025) With Alternative 1-2 Level of Service Analysis

					Future (2025) Without Alternative						Future (2025) With Alt 1-2						Significant impact?		
					AM		MD		PM		AM		MD		PM				
Int. #	Intersection	Jurisdiction	ATSAC	ATCS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	AM	MD	PM
1	Admiralty Way & Bali Way	LA County	X	X	~~0.794~~	~~C~~	~~0.707~~	~~C~~	~~0.950~~	~~E~~	~~0.810~~	~~D~~	~~0.720~~	~~C~~	~~0.959~~	~~E~~	-	-	-
					0.647	*B*	*0.607*	*B*	*0.817*	*D*	*0.660*	*B*	*0.614*	*B*	*0.823*	*D*			
2	Admiralty Way & Fiji Way	LA County	X	X	0.447	A	0.360	A	0.595	A	0.463	A	0.372	A	0.595	A	-	-	-
3	Admiralty Way & Mindanao Way	LA County	X	X	~~0.620~~	~~B~~	~~0.568~~	A	~~0.672~~	B	~~0.647~~	~~B~~	~~0.587~~	A	~~0.672~~	B	-	-	-
					0.481	*A*	*0.522*		*0.671*		*0.508*	*A*	*0.534*		*0.671*				
4	Palawan Way & Admiralty Way	LA County	X		~~0.616~~	B	~~0.458~~	A	~~0.682~~	B	~~0.625~~	B	~~0.499~~	A	~~0.699~~	B	-	-	-
					0.625		*0.436*		*0.657*		*0.634*		*0.477*		*0.674*				
5	Via Marina & Admiralty Way	LA County	X	X	0.598	A	0.576	A	0.833	D	0.601	B	0.595	A	0.839	D	-	-	-
6	Airport Boulevard & Arbor Vitae Street/Westchester Parkway	City of LA	X	X	0.471	A	0.573	A	0.747	C	0.500	A	0.740	C	0.936	E	-	Yes	Yes
7	Airport Boulevard & Century Boulevard	City of LA	X	X	0.651	B	0.648	B	0.619	B	0.765	C	0.993	E	0.861	D	Yes	Yes	Yes
8	La Tijera Boulevard & Airport Boulevard	City of LA	X	X	0.520	A	0.441	A	0.580	A	0.621	B	0.626	B	0.660	B	-	-	-
9	Airport Boulevard & Manchester Avenue	Caltrans/City of LA	X	X	0.740	C	0.849	D	0.951	E	0.831	D	1.096	F	1.035	F	Yes	Yes	Yes
10	Aviation Boulevard & Arbor Vitae Street	Inglewood/City of LA	X	X	0.550	A	0.525	A	0.791	C	0.606	B	0.649	B	0.878	D	-	-	Yes
11	Inglewood Avenue & Arbor Vitae Street	Inglewood			0.508	A	0.575	A	0.798	C	0.556	A	0.606	B	0.828	D	-	-	Yes
12	La Brea Avenue & Arbor Vitae Street	Inglewood			0.440	A	0.547	A	0.759	C	0.473	A	0.553	A	0.803	D	-	-	Yes
13	La Cienega Boulevard & Arbor Vitae Street	Inglewood/City of LA	X	X	0.542	A	0.501	A	0.701	C	0.591	A	0.541	A	0.732	C	-	-	-
14	Aviation Boulevard & Century Boulevard	City of LA	X	X	0.943	E	0.827	D	1.097	F	1.191	F	1.123	F	1.270	F	Yes	Yes	Yes
15	Aviation Boulevard & El Segundo Boulevard	El Segundo			0.922	E	~~0.643~~	B	~~0.850~~	D	0.931	E	0.681	B	~~0.886~~	D	-	-	-
							0.638		*0.823*						*0.853*				
16	Aviation Boulevard & Imperial Highway	City of LA	X	X	0.675	B	0.455	A	0.691	B	0.691	B	0.579	A	0.701	C	-	-	-
17	Aviation Boulevard/Florence Avenue & Manchester Avenue	Caltrans/Inglewood	X	X	0.854	D	0.903	E	0.894	D	0.875	D	0.932	E	0.988	E	Yes	Yes	Yes
18	Aviation Boulevard & Rosecrans Avenue	El Segundo/Hawthorne/Manhattan Beach			0.743	C	0.819	D	0.926	E	0.754	C	0.834	D	0.935	E	-	-	-
19	Aviation Boulevard & 111th Street	City of LA	X	X	0.573	A	0.478	A	0.555	A	0.576	A	0.547	A	0.613	B	-	-	-
20	Aviation Boulevard & West 120th Street	El Segundo/LA County			0.659	B	0.413	A	0.557	A	0.706	C	0.504	A	0.638	B	-	-	-
21	Lincoln Boulevard & Bali Way	Caltrans/City of LA/LA County	X	X	0.570	A	0.574	A	0.836	D	0.583	A	0.589	A	0.840	D	-	-	-
22	Lincoln Boulevard & Bluff Creek Drive	Caltrans/City of LA	X	X	0.553	A	0.333	A	0.567	A	0.553	A	0.348	A	0.567	A	-	-	-
23	Centinela Avenue & Jefferson Boulevard	City of LA/LA County	X	X	0.643	B	0.504	A	0.840	D	0.664	B	0.512	A	0.841	D	-	-	-
24	Centinela Avenue & Culver Boulevard	City of LA	X	X	0.777	C	0.577	A	0.907	E	0.795	C	0.581	A	0.907	E	-	-	-
25	La Brea Avenue & Centinela Avenue	Inglewood			0.913	E	0.794	C	0.991	E	0.928	E	0.813	D	0.991	E	Yes	-	-
26	La Cienega Boulevard & Centinela Avenue	Inglewood/City of LA	X	X	0.896	D	0.681	B	1.134	F	0.932	E	0.729	C	1.136	F	Yes	Yes	-
27	La Tijera Boulevard & Centinela Avenue	City of LA/LA County	X	X	0.643	B	0.502	A	0.840	D	0.682	B	0.539	A	0.865	D	-	-	Yes
28	Sepulveda Boulevard & Centinela Avenue	Culver City	X		0.884	D	0.711	C	0.879	D	0.886	D	0.724	C	0.892	D	-	-	-
29	Centinela Avenue & Venice Boulevard	Caltrans/City of LA	X	X	1.048	F	0.898	D	1.064	F	1.051	F	0.898	D	1.071	F	-	-	-
30	Centinela Avenue & Washington Boulevard	Culver City	X		0.853	D	0.707	C	1.003	F	0.860	D	0.713	C	1.020	F	-	-	-
31	Centinela Avenue & Washington Place	Culver City/City of LA	X		0.770	C	0.657	B	0.880	D	0.777	C	0.667	B	0.883	D	-	-	-
32	Centinela Avenue & SR 90 Eastbound On-/Off-Ramps	Caltrans/City of LA	X	X	0.391	A	0.282	A	0.525	A	0.402	A	0.300	A	0.532	A	-	-	-
33	Centinela Avenue & Sandford/SR 90 Westbound Ramps	Caltrans/City of LA	X	X	0.440	A	0.267	A	0.556	A	0.454	A	0.286	A	0.560	A	-	-	-
34	La Brea Avenue/Hawthorne Boulevard & Century Boulevard	Inglewood			0.735	C	0.771	C	0.983	E	0.785	C	0.948	E	1.075	F	Yes	Yes	Yes
35	Inglewood Avenue & Century Boulevard	Inglewood			0.705	C	0.657	B	0.926	E	0.749	C	0.737	C	0.943	E	Yes	Yes	Yes
36	La Cienega Boulevard & Century Boulevard	Inglewood/City of LA/LA County	X	X	0.730	C	0.661	B	0.827	D	0.815	D	0.856	D	1.004	F	Yes	Yes	Yes
37	Prairie Avenue & Century Boulevard	Inglewood			0.678	B	0.754	C	0.927	E	0.721	C	0.800	C	0.977	E	Yes	Yes	Yes
38	Sepulveda Boulevard & Century Boulevard	Caltrans/City of LA	X	X	0.579	A	0.497	A	0.655	B	0.673	B	0.629	B	0.762	C	-	-	Yes
39	I-405 Northbound Ramps & Century Boulevard	Caltrans/Inglewood			0.743	C	0.586	A	0.714	C	0.760	C	0.640	B	0.720	C	-	-	-
40	Duquesne Avenue & Culver Boulevard	Culver City	X		0.585	A	0.432	A	0.661	B	0.588	A	0.432	A	0.668	B	-	-	-
41	Culver Boulevard & Jefferson Boulevard	City of LA	X	X	0.733	C	0.342	A	0.738	C	0.741	C	0.359	A	0.752	C	-	-	-
42	Nicholson Street & Culver Boulevard	City of LA	X	X	0.675	B	0.412	A	0.816	D	0.675	B	0.433	A	0.833	D	-	-	-
43	Overland Avenue & Culver Boulevard	Culver City	X		1.182	F	0.660	B	0.935	E	1.182	F	0.671	B	0.946	E	-	-	-
44	Sawtelle Boulevard & Culver Boulevard	Culver City	X		0.686	B	0.479	A	0.888	D	0.692	B	0.502	A	0.891	D	-	-	-
45	Sepulveda Boulevard & Culver Boulevard	Culver City	X		0.730	C	0.557	A	0.733	C	0.745	C	0.560	A	0.738	C	-	-	-
46	Douglas Street & El Segundo Boulevard	El Segundo			0.773	C	0.594	A	0.976	E	0.784	C	0.640	B	1.001	F	-	-	Yes
47	Douglas Street & Imperial Highway	El Segundo/City of LA	X	X	0.371	A	0.256	A	0.456	A	0.416	A	0.302	A	0.521	A	-	-	-

Table 4.12.2-21

Future (2025) With Alternative 1-2 Level of Service Analysis

					Future (2025) Without Alternative						Future (2025) With Alt 1-2						Significant impact?		
					AM		MD		PM		AM		MD		PM				
Int. #	Intersection	Jurisdiction	ATSAC	ATCS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	AM	MD	PM
48	Douglas Street & Mariposa Avenue	El Segundo			0.400	A	0.444	A	0.592	A	0.434	A	0.483	A	0.606	B	-	-	-
49	Douglas Street & Rosecrans Avenue	El Segundo/Manhattan Beach			0.666	B	0.717	C	0.789	C	0.680	B	0.730	C	0.804	D	-	-	-
50	Duquesne Avenue & Jefferson Boulevard	Culver City	X		0.614	B	0.569	A	0.741	C	0.621	B	0.579	A	0.769	C	-	-	-
51	Hawthorne Boulevard & El Segundo Boulevard	Hawthorne			0.675	B	0.697	B	1.230	F	0.681	B	0.722	C	1.240	F	-	-	Yes
52	Inglewood Avenue & El Segundo Boulevard	Hawthorne/LA County			0.670	B	0.697	B	1.078	F	0.692	B	0.723	C	1.082	F	-	-	-
53	La Cienega Boulevard & El Segundo Boulevard	Hawthorne/LA County			0.710	C	0.562	A	1.015	F	0.732	C	0.577	A	1.024	F	-	-	-
54	Nash Street & El Segundo Boulevard	El Segundo			0.593	A	0.456	A	0.708	C	0.599	A	0.466	A	0.714	C	-	-	-
55	Sepulveda Boulevard & El Segundo Boulevard	Caltrans/El Segundo			0.821	D	0.843	D	1.013	F	0.833	D	0.860	D	1.018	F	-	-	-
56	Lincoln Boulevard & Fiji Way	Caltrans/City of LA/LA County	X	X	0.620	B	0.613	B	0.860	D	0.629	B	0.647	B	0.865	D	-	-	-
57	La Brea Avenue & Florence Avenue	Inglewood			0.791	C	0.763	C	1.054	F	0.841	D	0.853	D	1.135	F	Yes	Yes	Yes
58	La Cienega Boulevard & Florence Avenue	Inglewood			0.896	D	0.896	D	1.165	F	0.958	E	1.048	F	1.166	F	Yes	Yes	-
59	Nash Street & Grand Avenue	El Segundo			0.545	A	0.416	A	0.510	A	0.557	A	0.416	A	0.526	A	-	-	-
60	Sepulveda Boulevard & Grand Avenue	Caltrans/El Segundo			0.810	D	0.755	C	0.934	E	0.815	D	0.756	C	0.960	E	-	-	Yes
61	Vista del Mar & Grand Avenue	City of LA	X	X	0.549	A	0.265	A	0.388	A	0.588	A	0.279	A	0.409	A	-	-	-
62	Hawthorne Boulevard & Imperial Avenue	Hawthorne			0.664	B	0.602	B	0.959	E	0.682	B	0.629	B	1.000	E	-	-	Yes
63	Hawthorne Boulevard & Lennox Boulevard	LA County			0.508	A	0.607	B	0.810	D	0.516	A	0.646	B	0.859	D	-	-	Yes
64	Highland Avenue/Vista del Mar & Rosecrans Avenue	Manhattan Beach			0.823	D	0.563	A	0.737	C	0.857	D	0.569	A	0.744	C	Yes	-	-
65	Sepulveda Boulevard & Howard Hughes Parkway	City of LA	X	X	0.418	A	0.400	A	0.598	A	0.434	A	0.416	A	0.609	B	-	-	-
66	Inglewood Avenue & Imperial Highway	Hawthorne			0.765	C	0.695	B	1.286	F	0.807	D	0.733	C	1.313	F	Yes	-	Yes
67	La Cienega Boulevard & Imperial Highway	City of LA/LA County	X	X	0.536	A	0.276	A	0.698	B	0.546	A	0.326	A	0.702	C	-	-	-
68	Main Street & Imperial Highway	El Segundo/City of LA	X	X	0.763	C	0.526	A	0.639	B	0.770	C	0.542	A	0.655	B	-	-	-
69	Pershing Drive & Imperial Highway	City of LA	X	X	0.382	A	0.304	A	0.433	A	0.416	A	0.319	A	0.452	A	-	-	-
70	Prairie Avenue & Imperial Highway	Hawthorne/Inglewood			0.690	B	0.628	B	0.881	D	0.711	C	0.649	B	0.882	D	-	-	-
71	Sepulveda Boulevard & Imperial Highway	Caltrans/El Segundo/City of LA	X	X	0.805	D	0.807	D	1.223	F	0.845	D	0.872	D	1.240	F	Yes	Yes	Yes
72	Vista del Mar & Imperial Highway	City of LA	X	X	0.416	A	0.224	A	0.409	A	0.427	A	0.235	A	0.420	A	-	-	-
73	Nash Street/I-105 Westbound Ramps & Imperial Highway	Caltrans/El Segundo/City of LA	X	X	0.642	B	0.237	A	0.416	A	0.716	C	0.397	A	0.478	A	-	-	-
74	I-105 Ramps (e/o Aviation Boulevard) & Imperial Highway	Caltrans/City of LA	X	X	0.647	B	0.340	A	0.609	B	0.669	B	0.382	A	0.660	B	-	-	-
75	I-405 Northbound Ramps (e/o La Cienega Boulevard) & Imperial Highway	Caltrans/Hawthorne/LA County			0.500	A	0.353	A	0.703	C	0.521	A	0.383	A	0.703	C	-	-	-
76	Inglewood Avenue & Lennox Boulevard	LA County			0.468	A	0.557	A	0.819	D	0.526	A	0.558	A	0.858	D	-	-	Yes
77	Inglewood Avenue & Manchester Boulevard	Caltrans/Inglewood			0.651	B	0.565	A	0.773	C	0.666	B	0.578	A	0.800	C	-	-	-
78	Lincoln Boulevard & Jefferson Boulevard	Caltrans/City of LA	X	X	0.688	B	0.560	A	0.741	C	0.688	B	0.577	A	0.743	C	-	-	-
79	Overland Avenue & Jefferson Boulevard	Culver City	X		0.678	B	0.542	A	0.777	C	0.686	B	0.546	A	0.789	C	-	-	-
80	Sepulveda Boulevard & Jefferson Boulevard	Culver City	X		0.475	A	0.419	A	0.503	A	0.479	A	0.421	A	0.505	A	-	-	-
81	Sepulveda Boulevard & Jefferson Boulevard & Playa Street	Culver City	X		0.819	D	0.712	C	1.019	F	0.823	D	0.724	C	1.020	F	-	-	-
82	Slauson Avenue & Jefferson Boulevard	Culver City	X		0.388	A	0.528	A	0.505	A	0.398	A	0.536	A	0.506	A	-	-	-
83	I-405 Northbound Ramps & Jefferson Boulevard	Caltrans/Culver City/City of LA	X	X	0.506	A	0.424	A	0.782	C	0.506	A	0.429	A	0.786	C	-	-	-
84	I-405 Southbound Ramps & Jefferson Boulevard	Caltrans/Culver City/City of LA	X	X	0.329	A	0.349	A	0.446	A	0.361	A	0.358	A	0.476	A	-	-	-
85	La Brea Avenue & Manchester Boulevard	Caltrans/Inglewood			0.847	D	0.744	C	0.945	E	0.857	D	0.751	C	0.951	E	-	-	-
86	La Brea Avenue/Overhill Drive & Stocker Street	LA County			0.820	D	0.724	C	1.193	F	0.869	D	0.771	C	1.229	F	Yes	Yes	Yes
87	La Brea Avenue & Slauson Avenue	LA County			0.905	E	0.747	C	1.007	F	0.970	E	0.813	D	1.033	F	Yes	Yes	Yes
88	La Cienega Boulevard & La Tijera Boulevard	Inglewood/City of LA	X	X	0.794	C	0.738	C	1.005	F	0.794	C	0.769	C	1.018	F	-	-	Yes
89	La Cienega Boulevard & Lennox Boulevard	City of LA/LA County	X	X	0.419	A	0.354	A	0.497	A	0.472	A	0.422	A	0.541	A	-	-	-
90	La Cienega Boulevard & Manchester Boulevard	Caltrans/Inglewood			0.736	C	0.741	C	0.907	E	0.763	C	0.778	C	0.954	E	-	-	Yes
91	La Cienega Boulevard Northbound Ramps & Slauson Avenue	LA County			0.693	B	0.589	A	0.834	D	0.729	C	0.640	B	0.846	D	-	-	-
92	La Cienega Boulevard Southbound Ramps & Slauson Avenue	LA County			1.002	F	0.829	D	1.010	F	0.985	E	0.796	C	0.974	E	-	-	-
93	La Cienega Boulevard & Stocker Street	LA County			1.270	F	0.838	D	1.210	F	1.287	F	0.857	D	1.223	F	Yes	-	Yes
94	La Cienega Boulevard & 111th Street	City of LA/LA County	X	X	0.438	A	0.294	A	0.453	A	0.470	A	0.439	A	0.486	A	-	-	-
95	La Cienega Boulevard & West 120th Street	LA County			0.449	A	0.313	A	0.817	D	0.473	A	0.361	A	0.865	D	-	-	Yes
96	La Cienega Boulevard & I-405 Southbound Ramps (n/o Century Boulevard)	Caltrans/Inglewood/City of LA	X	X	0.669	B	0.695	B	0.694	B	0.718	C	0.698	B	0.690	B	Yes	-	-
97	La Cienega Boulevard & I-405 Southbound Ramps (s/o Century Boulevard)	Caltrans/City of LA/LA County	X	X	0.415	A	0.462	A	0.540	A	0.475	A	0.518	A	0.600	A	-	-	-
98	La Cienega Boulevard & I-405 Southbound Ramps (n/o Imperial Highway)	Caltrans/City of LA/LA County	X	X	0.478	A	0.341	A	0.369	A	0.528	A	0.429	A	0.396	A	-	-	-
99	Lincoln Boulevard & La Tijera Boulevard	Caltrans/City of LA	X	X	0.520	A	0.320	A	0.625	B	0.521	A	0.335	A	0.635	B	-	-	-
100	La Tijera Boulevard & Manchester Avenue	Caltrans/City of LA	X	X	0.570	A	0.549	A	0.679	B	0.570	A	0.553	A	0.714	C	-	-	-
101	Sepulveda Boulevard & La Tijera Boulevard	City of LA	X	X	0.602	B	0.729	C	0.851	D	0.596	A	0.581	A	0.779	C	-	-	-

Table 4.12.2-21

Future (2025) With Alternative 1-2 Level of Service Analysis

					Future (2025) Without Alternative						Future (2025) With Alt 1-2						Significant impact?		
					AM		MD		PM		AM		MD		PM				
Int. #	Intersection	Jurisdiction	ATSAC	ATCS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	AM	MD	PM
102	I-405 Northbound Ramps & La Tijera Boulevard	Caltrans/City of LA	X	X	0.619	B	0.693	B	0.609	B	0.744	C	0.851	D	0.692	B	Yes	Yes	-
103	I-405 Southbound Ramps & La Tijera Boulevard	Caltrans/City of LA	X	X	0.467	A	0.563	A	0.681	B	0.520	A	0.616	B	0.716	C	-	-	-
104	Lincoln Boulevard & Loyola Marymount University Drive	Caltrans/City of LA	X	X	0.569	A	0.441	A	0.698	B	0.570	A	0.467	A	0.724	C	-	-	-
105	Lincoln Boulevard & Manchester Avenue	Caltrans/City of LA	X	X	0.800	C	0.547	A	0.871	D	0.800	C	0.560	A	0.873	D	-	-	-
106	Lincoln Boulevard & Maxella Avenue	Caltrans/City of LA	X	X	0.599	A	0.624	B	0.683	B	0.604	B	0.635	B	0.688	B	-	-	-
107	Lincoln Boulevard & Mindanao Way	Caltrans/City of LA/LA County	X	X	0.739	C	0.872	D	0.947	E	0.749	C	0.883	D	0.951	E	-	-	-
108	Sepulveda Boulevard & Lincoln Boulevard	Caltrans/City of LA	X	X	0.684	B	0.571	A	0.938	E	0.658	B	0.558	A	0.923	E	-	-	-
109	Lincoln Boulevard & Venice Boulevard	Caltrans/City of LA	X	X	0.892	D	0.915	E	1.036	F	0.899	D	0.933	E	1.043	F	-	Yes	-
110	Lincoln Boulevard & Washington Boulevard	Caltrans/City of LA	X	X	0.841	D	0.904	E	1.053	F	0.845	D	0.925	E	1.057	F	-	Yes	-
111	Lincoln Boulevard & 83rd Street	Caltrans/City of LA	X	X	0.609	B	0.435	A	0.700	B	0.612	B	0.455	A	0.706	C	-	-	-
112	Lincoln Boulevard & SR 90 Ramps	Caltrans/City of LA	X	X	0.629	B	0.639	B	0.802	D	0.638	B	0.656	B	0.815	D	-	-	-
113	Pershing Drive & Manchester Avenue	Caltrans/City of LA	X	X	0.464	A	0.329	A	0.475	A	0.467	A	0.340	A	0.482	A	-	-	-
114	Sepulveda Boulevard & Manchester Avenue	Caltrans/City of LA	X	X	~~0.804~~	~~D~~	~~0.761~~	C	~~0.929~~	E	~~0.835~~	~~D~~	~~0.768~~	C	~~0.931~~	E	~~Yes~~	-	-
					0.684	*B*	*0.709*		*0.962*		*0.715*	*C*	*0.734*		*0.964*		-		
115	Ash Avenue & Manchester Avenue	Caltrans/Inglewood			0.786	C	0.711	C	0.945	E	0.805	D	0.752	C	0.979	E	-	Yes	Yes
116	Nash Street & Mariposa Avenue	El Segundo			0.650	B	0.385	A	0.538	A	0.672	B	0.416	A	0.557	A	-	-	-
117	Sepulveda Boulevard & Mariposa Avenue	Caltrans/El Segundo			0.783	C	0.759	C	0.839	D	0.813	D	0.767	C	0.841	D	-	-	-
118	Sawtelle Boulevard & Matteson Street/I-405 Southbound Ramps	Caltrans/Culver City	X		0.926	E	0.611	B	1.081	F	0.926	E	0.625	B	1.088	F	-	-	-
119	Ocean Avenue/Via Marina & Washington Boulevard	City of LA/LA County	X	X	1.181	F	0.956	E	1.514	F	1.209	F	0.998	E	1.525	F	Yes	Yes	Yes
120	Overhill Drive & Slauson Avenue	LA County			0.736	C	0.620	B	1.147	F	0.754	C	0.692	B	1.152	F	-	-	-
121	Overland Avenue & Venice Boulevard	Caltrans/Culver City/City of LA	X	X	0.879	D	0.709	C	0.991	E	0.884	D	0.719	C	0.991	E	-	-	-
122	Palawan Way & Washington Boulevard	City of LA/LA County			16.5	C	14.5	B	16.5	C	17.0	C	14.7	B	17.0	C	-	-	-
123	Pershing Drive & Westchester Parkway	City of LA	X	X	0.244	A	0.166	A	0.311	A	0.286	A	0.180	A	0.334	A	-	-	-
124	Prairie Avenue & West 112th Street/I-105 Off-Ramp	Caltrans/Inglewood			0.553	A	0.623	B	0.759	C	0.555	A	0.630	B	0.784	C	-	-	-
125	Sepulveda Boulevard & Rosecrans Avenue	Caltrans/El Segundo/Manhattan Beach			0.918	E	0.836	D	1.158	F	0.925	E	0.863	D	1.163	F	-	Yes	-
126	Sepulveda Boulevard & Sawtelle Boulevard	Culver City	X		0.516	A	0.614	B	0.742	C	0.523	A	0.621	B	0.753	C	-	-	-
127	Sawtelle Boulevard & Venice Boulevard	Caltrans/Culver City/City of LA	X	X	1.077	F	0.843	D	0.956	E	1.077	F	0.844	D	0.961	E	-	-	-
128	Sawtelle Boulevard & Washington Boulevard	Culver City	X		0.660	B	0.517	A	0.787	C	0.660	B	0.530	A	0.797	C	-	-	-
129	Sawtelle Boulevard & Washington Place	Culver City	X		0.487	A	0.373	A	0.667	B	0.510	A	0.383	A	0.670	B	-	-	-
130	Sepulveda Boulevard & Slauson Avenue	Culver City	X		0.598	A	0.688	B	0.894	D	0.620	B	0.715	C	0.904	E	-	-	-
131	Sepulveda Boulevard & Venice Boulevard	Caltrans/Culver City/City of LA	X	X	0.893	D	0.734	C	1.115	F	0.893	D	0.744	C	1.120	F	-	-	-
132	Sepulveda Boulevard & Washington Boulevard	Culver City	X		0.610	B	0.597	A	0.727	C	0.627	B	0.610	B	0.727	C	-	-	-
133	Sepulveda Boulevard & Washington Place	Culver City	X		0.660	B	0.583	A	0.707	C	0.660	B	0.590	A	0.707	C	-	-	-
134	Sepulveda Boulevard & I-405 Northbound On-/Off-Ramps	Caltrans/Culver City	X		0.885	D	0.610	B	0.812	D	0.885	D	0.614	B	0.812	D	-	-	-
135	Sepulveda Boulevard & Westchester Parkway	City of LA	X	X	0.658	B	0.643	B	1.109	F	0.680	B	0.647	B	1.111	F	-	-	-
136	Sepulveda Boulevard & 76th Street	City of LA	X	X	0.691	B	0.484	A	0.700	B	0.706	C	0.496	A	0.736	C	-	-	-
137	Sepulveda Boulevard & 79th Street	City of LA	X	X	0.507	A	0.411	A	0.573	A	0.509	A	0.418	A	0.609	B	-	-	-
138	Sepulveda Boulevard & 83rd Street	City of LA	X	X	0.449	A	0.398	A	0.549	A	0.467	A	0.398	A	0.589	A	-	-	-
139	Sepulveda Boulevard & I-105 Westbound Ramps (n/o Imperial Highway)	Caltrans/City of LA	X	X	0.877	D	0.840	D	0.923	E	0.892	D	0.893	D	0.956	E	-	Yes	Yes
140	SR 90 Westbound Ramps & Slauson Avenue	Caltrans/Culver City/LA County	X		0.534	A	0.426	A	0.682	B	0.546	A	0.434	A	0.683	B	-	-	-
141	Airport Boulevard & 96th Street	City of LA	X	X	0.234	A	0.348	A	0.456	A	0.315	A	0.461	A	0.531	A	-	-	-
142	Jenny Avenue & 96th Street	City of LA	X	X	0.183	A	0.203	A	0.153	A	0.260	A	0.313	A	0.337	A	-	-	-
143	Vicksburg Avenue & 96th Street	City of LA	X	X	0.279	A	0.363	A	0.335	A	0.433	A	0.700	B	0.861	D	-	-	Yes
144	Airport Boulevard & 98th Street	City of LA	X	X	0.357	A	0.447	A	0.500	A	0.447	A	0.633	B	0.640	B	-	-	-
145	Jenny Avenue & Westchester Parkway	City of LA	X	X	0.153	A	0.220	A	0.243	A	0.157	A	0.267	A	0.273	A	-	-	-
146	Sepulveda Eastway & Westchester Parkway	City of LA	X	X	0.427	A	0.543	A	0.693	B	0.430	A	0.557	A	0.693	B	-	-	-
147	Crenshaw Boulevard & Century Boulevard	Inglewood			0.708	C	0.773	C	0.928	E	0.738	C	0.807	D	0.961	E	-	Yes	Yes
148	La Cienega Boulevard & Fairview Boulevard	Inglewood/City of LA	X	X	0.881	D	0.657	B	0.952	E	0.901	E	0.688	B	0.954	E	Yes	-	-
149	Crenshaw Boulevard & Imperial Highway	Inglewood			0.680	B	0.705	C	1.001	F	0.721	C	0.746	C	1.048	F	Yes	Yes	Yes
150	Sepulveda Boulevard & Braddock Drive	Culver City			0.580	A	0.527	A	0.677	B	0.580	A	0.530	A	0.693	B	-	-	-
151	Buckingham Parkway & Slauson Avenue	Culver City			0.716	C	0.544	A	0.888	D	0.722	C	0.551	A	0.888	D	-	-	-
152	Duquesne Avenue & Washington Boulevard	Culver City			0.573	A	0.507	A	0.657	B	0.580	A	0.513	A	0.670	B	-	-	-
153	Overland Avenue & Kelmore Street/Ranch Road	Culver City			32.1	D	15.3	C	46.2	E	32.6	D	15.7	C	49.9	E	-	-	-
154	Overland Avenue & Sawtelle Boulevard	Culver City			31.4	D	17.6	C	45.9	E	32.6	D	18.4	C	51.4	F	-	-	Yes

Table 4.12.2-21

Future (2025) With Alternative 1-2 Level of Service Analysis

					Future (2025) Without Alternative						Future (2025) With Alt 1-2						Significant impact?		
					AM		MD		PM		AM		MD		PM				
Int. #	Intersection	Jurisdiction	ATSAC	ATCS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	AM	MD	PM
155	Overland Avenue & Washington Boulevard	Culver City/City of LA			0.840	D	0.756	C	1.069	F	0.844	D	0.760	C	1.076	F	-	-	-
156	Walgrove Avenue & Washington Boulevard	Culver City			68.8	F	>100	F	>100	F	71.6	F	382.0	F	952.7	F	Yes	Yes	Yes
157	La Cienega Boulevard & 104th Street	City of LA/LA County	X	X	0.340	A	0.301	A	0.370	A	0.386	A	0.423	A	0.410	A	-	-	-
158	Vista del Mar & Waterview Street	City of LA	X	X	0.327	A	0.073	A	0.267	A	0.343	A	0.077	A	0.283	A	-	-	-
159	Hindry Avenue & Manchester Boulevard	Caltrans/Inglewood			0.513	A	0.638	B	0.597	A	0.515	A	0.744	C	0.682	B	-	Yes	-
160	Lincoln Boulevard & Rose Avenue	Caltrans/City of LA	X	X	0.920	E	0.847	D	0.843	D	0.927	E	0.857	D	0.850	D	-	-	-
161	Western Avenue & Century Boulevard	City of LA	X	X	0.576	A	0.629	B	0.824	D	0.598	A	0.667	B	0.829	D	-	-	-
162	Sepulveda Boulevard & Manhattan Beach Boulevard	Caltrans/Manhattan Beach			0.950	E	0.987	E	1.193	F	0.957	E	0.997	E	1.199	F	-	Yes	-
163	La Cienega Boulevard & Jefferson Boulevard	City of LA	X	X	0.986	E	0.700	B	0.955	E	0.988	E	0.716	C	0.964	E	-	-	-
164	Crenshaw Boulevard & Manchester Avenue	Caltrans/Inglewood			0.816	D	0.843	D	1.025	F	0.854	D	0.870	D	1.066	F	Yes	Yes	Yes
165	La Cienega Boulevard & Rodeo Road	City of LA	X	X	1.025	F	0.719	C	1.037	F	1.032	F	0.734	C	1.038	F	-	-	-
166	La Brea Avenue & Rodeo Road	City of LA	X	X	0.989	E	0.756	C	0.972	E	1.000	E	0.775	C	0.995	E	Yes	-	Yes
167	La Brea Avenue & Jefferson Boulevard	City of LA	X	X	1.035	F	0.659	B	1.063	F	1.042	F	0.685	B	1.072	F	-	-	-
168	Crenshaw Boulevard & Florence Avenue	City of LA	X	X	0.754	C	0.579	A	0.896	D	0.778	C	0.618	B	0.899	D	-	-	-
169	Prairie Avenue & Manchester Boulevard	Inglewood			1.042	F	0.701	C	0.922	E	1.073	F	0.726	C	0.930	E	Yes	-	-
170	I-110 Northbound Ramps & Manchester Avenue	Caltrans/City of LA	X	X	0.593	A	0.460	A	0.537	A	0.598	A	0.465	A	0.547	A	-	-	-
171	Western Avenue & Florence Avenue	City of LA	X	X	0.860	D	0.600	A	0.902	E	0.876	D	0.604	B	0.907	E	-	-	-
172	Western Avenue & Manchester Avenue	Caltrans/City of LA	X	X	0.727	C	0.560	A	0.887	D	0.733	C	0.560	A	0.899	D	-	-	-
173	Western Avenue & Imperial Highway	LA County	X	X	0.743	C	0.575	A	0.912	E	0.767	C	0.600	A	0.936	E	-	-	Yes
174	Vermont Avenue & Florence Avenue	City of LA	X	X	0.700	B	0.540	A	0.734	C	0.722	C	0.557	A	0.753	C	-	-	-
175	Vermont Avenue & Manchester Avenue	Caltrans/LA County/City of LA	X	X	0.722	C	0.542	A	0.760	C	0.749	C	0.551	A	0.772	C	-	-	-
176	Vermont Avenue & Century Boulevard	LA County/City of LA	X	X	0.700	B	0.556	A	0.726	C	0.714	C	0.603	B	0.763	C	-	-	-
177	Vermont Avenue & Imperial Highway	LA County/City of LA	X	X	0.823	D	0.545	A	0.992	E	0.823	D	0.552	A	0.992	E	-	-	-
178	Figueroa Street & Florence Avenue	City of LA	X	X	0.741	C	0.506	A	0.733	C	0.765	C	0.528	A	0.768	C	-	-	-
179	Figueroa Street & Manchester Avenue	Caltrans/City of LA	X	X	0.886	D	0.618	B	0.913	E	0.886	D	0.653	B	0.920	E	-	-	-
180	Figueroa Street & Century Boulevard	City of LA	X	X	0.893	D	0.500	A	0.784	C	0.901	E	0.540	A	0.793	C	-	-	-
181	Figueroa Street & Imperial Highway	City of LA	X	X	0.837	D	0.378	A	0.818	D	0.840	D	0.385	A	0.827	D	-	-	-
182	Inglewood Avenue & Rosecrans Avenue	Hawthorne			0.798	C	0.663	B	0.952	E	0.811	D	0.700	B	0.961	E	-	-	-
183	Hawthorne Boulevard & Rosecrans Avenue	Hawthorne			0.802	D	0.700	B	0.943	E	0.802	D	0.724	C	0.944	E	-	-	-
184	Prairie Avenue & Rosecrans Avenue	Hawthorne/Lawndale			0.872	D	0.736	C	0.969	E	0.876	D	0.761	C	0.976	E	-	-	-
185	Crenshaw Boulevard & Rosecrans Avenue	Gardena/Hawthorne/LA County			0.796	C	0.727	C	0.916	E	0.802	D	0.736	C	0.925	E	-	-	-
186	Western Avenue & Rosecrans Avenue	Gardena			0.810	D	0.672	B	0.927	E	0.824	D	0.678	B	0.936	E	-	-	-
187	Vermont Avenue & Rosecrans Avenue	Gardena/City of LA	X		0.757	C	0.604	B	0.857	D	0.757	C	0.612	B	0.865	D	-	-	-
188	Prairie Avenue & El Segundo Boulevard	Hawthorne			1.001	F	0.684	B	1.006	F	1.023	F	0.704	C	1.010	F	Yes	-	-
189	Crenshaw Boulevard & El Segundo Boulevard	Hawthorne/Gardena			0.969	E	0.722	C	0.890	D	0.969	E	0.742	C	0.898	D	-	-	-
190	Western Avenue & El Segundo Boulevard	Gardena/LA County			0.846	D	0.594	A	0.860	D	0.852	D	0.612	B	0.872	D	-	-	-
191	Vermont Avenue & El Segundo Boulevard	Gardena/LA County/City of LA	X		0.682	B	0.422	A	0.676	B	0.701	C	0.436	A	0.708	C	-	-	-
192	Aviation Boulevard & Artesia Boulevard	Redondo Beach/Manhattan Beach			1.132	F	0.769	C	1.078	F	1.136	F	0.769	C	1.084	F	-	-	-
193	Aviation Boulevard & Manhattan Beach Boulevard	Redondo Beach/Manhattan Beach			0.976	E	0.769	C	1.083	F	0.982	E	0.776	C	1.085	F	-	-	-
194	Sepulveda Boulevard & Palms Boulevard	City of LA	X	X	0.770	C	0.590	A	0.980	E	0.777	C	0.597	A	0.987	E	-	-	-
195	Sawtelle Boulevard & Palms Boulevard	City of LA	X	X	0.787	C	0.407	A	0.850	D	0.787	C	0.410	A	0.853	D	-	-	-
196	Prairie Avenue & Florence Avenue	Inglewood			0.965	E	0.647	B	0.851	D	0.972	E	0.657	B	0.862	D	-	-	-
197	Prairie Avenue & Lennox Boulevard	Inglewood			0.670	B	0.557	A	0.704	C	0.690	B	0.607	B	0.780	C	-	-	Yes
198	Flower Street (near I-110 Southbound Ramps) & Florence Avenue	Caltrans/City of LA	X	X	0.527	A	0.513	A	0.535	A	0.538	A	0.545	A	0.564	A	-	-	-
199	Grand Avenue (near I-110 Northbound Ramps) & Florence Avenue	Caltrans/City of LA	X	X	0.617	B	0.602	B	0.675	B	0.633	B	0.630	B	0.689	B	-	-	-
200	I-110 Southbound Ramps & Manchester Avenue	Caltrans/City of LA	X	X	0.487	A	0.436	A	0.531	A	0.489	A	0.451	A	0.537	A	-	-	-

Source: Fehr & Peers, 2012.

Table 4.12.2-22

Future (2025) With Alternative 3 Level of Service Analysis

					Future (2025) Without Alternative						Future (2025) With Alt. 3						Significant impact?		
					AM		MD		PM		AM		MD		PM				
Int. #	Intersection	Jurisdiction	ATSAC	ATCS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	AM	MD	PM
1	Admiralty Way & Bali Way	LA County	X	X	~~0.794~~	~~C~~	~~0.707~~	~~C~~	~~0.950~~	~~E~~	~~0.794~~	~~C~~	~~0.707~~	~~C~~	~~0.956~~	~~E~~	-	-	-
					0.647	*B*	*0.607*	*B*	*0.817*	*D*	*0.650*	*B*	*0.607*	*B*	*0.820*	*D*			
2	Admiralty Way & Fiji Way	LA County	X	X	0.447	A	0.360	A	0.595	A	0.453	A	0.360	A	0.595	A	-	-	-
3	Admiralty Way & Mindanao Way	LA County	X	X	~~0.620~~	~~B~~	~~0.568~~	A	~~0.672~~	B	~~0.621~~	~~B~~	~~0.597~~	A	~~0.676~~	B	-	-	-
					0.481	*A*	*0.522*		*0.671*		*0.482*	*A*	*0.534*		*0.675*				
4	Palawan Way & Admiralty Way	LA County	X		~~0.616~~	B	~~0.458~~	A	~~0.682~~	B	~~0.619~~	B	~~0.483~~	A	~~0.702~~	~~C~~	-	-	-
					0.625		*0.436*		*0.657*		*0.628*		*0.461*		*0.677*	*B*			
5	Via Marina & Admiralty Way	LA County	X	X	0.598	A	0.576	A	0.833	D	0.599	A	0.589	A	0.839	D	-	-	-
6	Airport Boulevard & Arbor Vitae Street/Westchester Parkway	City of LA	X	X	0.471	A	0.573	A	0.747	C	0.645	B	1.013	F	0.827	D	-	Yes	Yes
7	Airport Boulevard & Century Boulevard	City of LA	X	X	0.651	B	0.648	B	0.619	B	0.637	B	0.451	A	0.570	A	-	-	-
8	La Tijera Boulevard & Airport Boulevard	City of LA	X	X	0.520	A	0.441	A	0.580	A	0.559	A	0.539	A	0.688	B	-	-	-
9	Airport Boulevard & Manchester Avenue	Caltrans/City of LA	X	X	0.740	C	0.849	D	0.951	E	0.747	C	0.853	D	0.962	E	-	-	Yes
10	Aviation Boulevard & Arbor Vitae Street	Inglewood/City of LA	X	X	0.550	A	0.525	A	0.791	C	0.678	B	0.791	C	0.792	C	-	Yes	-
11	Inglewood Avenue & Arbor Vitae Street	Inglewood			0.508	A	0.575	A	0.798	C	0.542	A	0.672	B	0.800	C	-	-	-
12	La Brea Avenue & Arbor Vitae Street	Inglewood			0.440	A	0.547	A	0.759	C	0.461	A	0.601	B	0.759	C	-	-	-
13	La Cienega Boulevard & Arbor Vitae Street	Inglewood/City of LA	X	X	0.542	A	0.501	A	0.701	C	1.590	F	2.242	F	2.159	F	Yes	Yes	Yes
14	Aviation Boulevard & Century Boulevard	City of LA	X	X	0.943	E	0.827	D	1.097	F	0.883	D	0.628	B	0.805	D	-	-	-
15	Aviation Boulevard & El Segundo Boulevard	El Segundo			0.922	E	~~0.643~~	B	~~0.850~~	D	0.972	E	~~0.686~~	B	~~0.897~~	D	Yes	-	-
							0.638		*0.823*				*0.679*		*0.868*				
16	Aviation Boulevard & Imperial Highway	City of LA	X	X	0.675	B	0.455	A	0.691	B	0.923	E	0.554	A	0.813	D	Yes	-	Yes
17	Aviation Boulevard/Florence Avenue & Manchester Avenue	Caltrans/Inglewood	X	X	0.854	D	0.903	E	0.894	D	0.856	D	0.910	E	0.936	E	-	-	Yes
18	Aviation Boulevard & Rosecrans Avenue	El Segundo/Hawthorne/Manhattan Beach			0.743	C	0.819	D	0.926	E	0.750	C	0.819	D	0.927	E	-	-	-
19	Aviation Boulevard & 111th Street	City of LA	X	X	0.573	A	0.478	A	0.555	A	0.574	A	0.480	A	0.574	A	-	-	-
20	Aviation Boulevard & West 120th Street	El Segundo/LA County			0.659	B	0.413	A	0.557	A	0.666	B	0.532	A	0.648	B	-	-	-
21	Lincoln Boulevard & Bali Way	Caltrans/City of LA/LA County	X	X	0.570	A	0.574	A	0.836	D	0.571	A	0.575	A	0.837	D	-	-	-
22	Lincoln Boulevard & Bluff Creek Drive	Caltrans/City of LA	X	X	0.553	A	0.333	A	0.567	A	0.553	A	0.358	A	0.569	A	-	-	-
23	Centinela Avenue & Jefferson Boulevard	City of LA/LA County	X	X	0.643	B	0.504	A	0.840	D	0.643	B	0.504	A	0.848	D	-	-	-
24	Centinela Avenue & Culver Boulevard	City of LA	X	X	0.777	C	0.577	A	0.907	E	0.784	C	0.584	A	0.907	E	-	-	-
25	La Brea Avenue & Centinela Avenue	Inglewood			0.913	E	0.794	C	0.991	E	0.922	E	0.838	D	0.994	E	-	Yes	-
26	La Cienega Boulevard & Centinela Avenue	Inglewood/City of LA	X	X	0.896	D	0.681	B	1.134	F	0.998	E	0.792	C	1.197	F	Yes	Yes	Yes
27	La Tijera Boulevard & Centinela Avenue	City of LA/LA County	X	X	0.643	B	0.502	A	0.840	D	0.669	B	0.541	A	0.848	D	-	-	-
28	Sepulveda Boulevard & Centinela Avenue	Culver City	X		0.884	D	0.711	C	0.879	D	0.910	E	0.741	C	0.940	E	Yes	-	Yes
29	Centinela Avenue & Venice Boulevard	Caltrans/City of LA	X	X	1.048	F	0.898	D	1.064	F	1.049	F	0.899	D	1.069	F	-	-	-
30	Centinela Avenue & Washington Boulevard	Culver City	X		0.853	D	0.707	C	1.003	F	0.853	D	0.743	C	1.013	F	-	-	-
31	Centinela Avenue & Washington Place	Culver City/City of LA	X		0.770	C	0.657	B	0.880	D	0.773	C	0.660	B	0.883	D	-	-	-
32	Centinela Avenue & SR 90 Eastbound On-/Off-Ramps	Caltrans/City of LA	X	X	0.391	A	0.282	A	0.525	A	0.391	A	0.289	A	0.537	A	-	-	-
33	Centinela Avenue & Sandford/SR 90 Westbound Ramps	Caltrans/City of LA	X	X	0.440	A	0.267	A	0.556	A	0.451	A	0.269	A	0.567	A	-	-	-
34	La Brea Avenue/Hawthorne Boulevard & Century Boulevard	Inglewood			0.735	C	0.771	C	0.983	E	0.659	B	0.683	B	0.875	D	-	-	-
35	Inglewood Avenue & Century Boulevard	Inglewood			0.705	C	0.657	B	0.926	E	0.744	C	0.709	C	0.929	E	-	Yes	-
36	La Cienega Boulevard & Century Boulevard	Inglewood/City of LA/LA County	X	X	0.730	C	0.661	B	0.827	D	0.920	E	0.688	B	0.957	E	Yes	-	Yes
37	Prairie Avenue & Century Boulevard	Inglewood			0.678	B	0.754	C	0.927	E	0.678	B	0.757	C	0.932	E	-	-	-
38	Sepulveda Boulevard & Century Boulevard	Caltrans/City of LA	X	X	0.579	A	0.497	A	0.655	B	0.731	C	0.529	A	0.734	C	Yes	-	Yes
39	I-405 Northbound Ramps & Century Boulevard	Caltrans/Inglewood			0.743	C	0.586	A	0.714	C	0.760	C	0.597	A	0.729	C	-	-	-
40	Duquesne Avenue & Culver Boulevard	Culver City	X		0.585	A	0.432	A	0.661	B	0.588	A	0.439	A	0.668	B	-	-	-
41	Culver Boulevard & Jefferson Boulevard	City of LA	X	X	0.733	C	0.342	A	0.738	C	0.751	C	0.376	A	0.745	C	-	-	-
42	Nicholson Street & Culver Boulevard	City of LA	X	X	0.675	B	0.412	A	0.816	D	0.704	C	0.486	A	0.830	D	-	-	-
43	Overland Avenue & Culver Boulevard	Culver City	X		1.182	F	0.660	B	0.935	E	1.182	F	0.667	B	0.939	E	-	-	-
44	Sawtelle Boulevard & Culver Boulevard	Culver City	X		0.686	B	0.479	A	0.888	D	0.688	B	0.497	A	0.889	D	-	-	-
45	Sepulveda Boulevard & Culver Boulevard	Culver City	X		0.730	C	0.557	A	0.733	C	0.745	C	0.561	A	0.736	C	-	-	-
46	Douglas Street & El Segundo Boulevard	El Segundo			0.773	C	0.594	A	0.976	E	0.862	D	0.684	B	0.976	E	-	-	-
47	Douglas Street & Imperial Highway	El Segundo/City of LA	X	X	0.371	A	0.256	A	0.456	A	0.391	A	0.241	A	0.392	A	-	-	-

Table 4.12.2-22

Future (2025) With Alternative 3 Level of Service Analysis

					Future (2025) Without Alternative						Future (2025) With Alt. 3						Significant impact?		
					AM		MD		PM		AM		MD		PM				
Int. #	Intersection	Jurisdiction	ATSAC	ATCS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	AM	MD	PM
48	Douglas Street & Mariposa Avenue	El Segundo			0.400	A	0.444	A	0.592	A	0.417	A	0.447	A	0.601	B	-	-	-
49	Douglas Street & Rosecrans Avenue	El Segundo/Manhattan Beach			0.666	B	0.717	C	0.789	C	0.670	B	0.738	C	0.789	C	-	-	-
50	Duquesne Avenue & Jefferson Boulevard	Culver City	X		0.614	B	0.569	A	0.741	C	0.618	B	0.576	A	0.772	C	-	-	-
51	Hawthorne Boulevard & El Segundo Boulevard	Hawthorne			0.675	B	0.697	B	1.230	F	0.720	C	0.773	C	1.289	F	Yes	Yes	Yes
52	Inglewood Avenue & El Segundo Boulevard	Hawthorne/LA County			0.670	B	0.697	B	1.078	F	0.715	C	0.772	C	1.095	F	Yes	Yes	Yes
53	La Cienega Boulevard & El Segundo Boulevard	Hawthorne/LA County			0.710	C	0.562	A	1.015	F	0.730	C	0.608	B	1.038	F	-	-	Yes
54	Nash Street & El Segundo Boulevard	El Segundo			0.593	A	0.456	A	0.708	C	0.608	B	0.462	A	0.708	C	-	-	-
55	Sepulveda Boulevard & El Segundo Boulevard	Caltrans/El Segundo			0.821	D	0.843	D	1.013	F	0.823	D	0.843	D	1.014	F	-	-	-
56	Lincoln Boulevard & Fiji Way	Caltrans/City of LA/LA County	X	X	0.620	B	0.613	B	0.860	D	0.624	B	0.678	B	0.875	D	-	-	-
57	La Brea Avenue & Florence Avenue	Inglewood			0.791	C	0.763	C	1.054	F	0.816	D	0.844	D	1.126	F	Yes	Yes	Yes
58	La Cienega Boulevard & Florence Avenue	Inglewood			0.896	D	0.896	D	1.165	F	1.229	F	1.327	F	1.525	F	Yes	Yes	Yes
59	Nash Street & Grand Avenue	El Segundo			0.545	A	0.416	A	0.510	A	0.581	A	0.419	A	0.576	A	-	-	-
60	Sepulveda Boulevard & Grand Avenue	Caltrans/El Segundo			0.810	D	0.755	C	0.934	E	0.841	D	0.777	C	0.940	E	-	-	-
61	Vista del Mar & Grand Avenue	City of LA	X	X	0.549	A	0.265	A	0.388	A	0.588	A	0.279	A	0.412	A	-	-	-
62	Hawthorne Boulevard & Imperial Avenue	Hawthorne			0.664	B	0.602	B	0.959	E	0.746	C	0.706	C	1.112	F	Yes	Yes	Yes
63	Hawthorne Boulevard & Lennox Boulevard	LA County			0.508	A	0.607	B	0.810	D	0.529	A	0.632	B	0.810	D	-	-	-
64	Highland Avenue/Vista del Mar & Rosecrans Avenue	Manhattan Beach			0.823	D	0.563	A	0.737	C	0.838	D	0.569	A	0.737	C	-	-	-
65	Sepulveda Boulevard & Howard Hughes Parkway	City of LA	X	X	0.418	A	0.400	A	0.598	A	0.418	A	0.404	A	0.605	B	-	-	-
66	Inglewood Avenue & Imperial Highway	Hawthorne			0.765	C	0.695	B	1.286	F	0.886	D	0.817	D	1.415	F	Yes	Yes	Yes
67	La Cienega Boulevard & Imperial Highway	City of LA/LA County	X	X	0.536	A	0.276	A	0.698	B	0.669	B	0.473	A	0.735	C	-	-	-
68	Main Street & Imperial Highway	El Segundo/City of LA	X	X	0.763	C	0.526	A	0.639	B	0.766	C	0.564	A	0.675	B	-	-	-
69	Pershing Drive & Imperial Highway	City of LA	X	X	0.382	A	0.304	A	0.433	A	0.470	A	0.415	A	0.488	A	-	-	-
70	Prairie Avenue & Imperial Highway	Hawthorne/Inglewood			0.690	B	0.628	B	0.881	D	0.740	C	0.645	B	0.896	D	Yes	-	-
71	Sepulveda Boulevard & Imperial Highway	Caltrans/El Segundo/City of LA	X	X	0.805	D	0.807	D	1.223	F	0.805	D	0.936	E	1.267	F	-	Yes	Yes
72	Vista del Mar & Imperial Highway	City of LA	X	X	0.416	A	0.224	A	0.409	A	0.445	A	0.231	A	0.409	A	-	-	-
73	Nash Street/I-105 Westbound Ramps & Imperial Highway	Caltrans/El Segundo/City of LA	X	X	0.642	B	0.237	A	0.416	A	0.683	B	0.334	A	0.428	A	-	-	-
74	I-105 Ramps (e/o Aviation Boulevard) & Imperial Highway	Caltrans/City of LA	X	X	0.647	B	0.340	A	0.609	B	1.286	F	1.023	F	1.200	F	Yes	Yes	Yes
75	I-405 Northbound Ramps (e/o La Cienega Boulevard) & Imperial Highway	Caltrans/Hawthorne/LA County			0.500	A	0.353	A	0.703	C	0.570	A	0.436	A	0.732	C	-	-	-
76	Inglewood Avenue & Lennox Boulevard	LA County			0.468	A	0.557	A	0.819	D	0.531	A	0.558	A	0.888	D	-	-	Yes
77	Inglewood Avenue & Manchester Boulevard	Caltrans/Inglewood			0.651	B	0.565	A	0.773	C	0.651	B	0.585	A	0.798	C	-	-	-
78	Lincoln Boulevard & Jefferson Boulevard	Caltrans/City of LA	X	X	0.688	B	0.560	A	0.741	C	0.688	B	0.586	A	0.747	C	-	-	-
79	Overland Avenue & Jefferson Boulevard	Culver City	X		0.678	B	0.542	A	0.777	C	0.686	B	0.546	A	0.789	C	-	-	-
80	Sepulveda Boulevard & Jefferson Boulevard	Culver City	X		0.475	A	0.419	A	0.503	A	0.479	A	0.421	A	0.510	A	-	-	-
81	Sepulveda Boulevard & Jefferson Boulevard & Playa Street	Culver City	X		0.819	D	0.712	C	1.019	F	0.829	D	0.729	C	1.019	F	-	-	-
82	Slauson Avenue & Jefferson Boulevard	Culver City	X		0.388	A	0.528	A	0.505	A	0.391	A	0.531	A	0.508	A	-	-	-
83	I-405 Northbound Ramps & Jefferson Boulevard	Caltrans/Culver City/City of LA	X	X	0.506	A	0.424	A	0.782	C	0.513	A	0.426	A	0.786	C	-	-	-
84	I-405 Southbound Ramps & Jefferson Boulevard	Caltrans/Culver City/City of LA	X	X	0.329	A	0.349	A	0.446	A	0.333	A	0.359	A	0.449	A	-	-	-
85	La Brea Avenue & Manchester Boulevard	Caltrans/Inglewood			0.847	D	0.744	C	0.945	E	0.888	D	0.844	D	0.982	E	Yes	Yes	Yes
86	La Brea Avenue/Overhill Drive & Stocker Street	LA County			0.820	D	0.724	C	1.193	F	0.844	D	0.789	C	1.222	F	Yes	Yes	Yes
87	La Brea Avenue & Slauson Avenue	LA County			0.905	E	0.747	C	1.007	F	0.969	E	0.902	E	1.047	F	Yes	Yes	Yes
88	La Cienega Boulevard & La Tijera Boulevard	Inglewood/City of LA	X	X	0.794	C	0.738	C	1.005	F	0.755	C	0.769	C	1.031	F	Yes*	-	Yes
89	La Cienega Boulevard & Lennox Boulevard	City of LA/LA County	X	X	0.419	A	0.354	A	0.497	A	0.397	A	0.276	A	0.413	A	-	-	-
90	La Cienega Boulevard & Manchester Boulevard	Caltrans/Inglewood			0.736	C	0.741	C	0.907	E	0.979	E	1.267	F	1.201	F	Yes	Yes	Yes
91	La Cienega Boulevard Northbound Ramps & Slauson Avenue	LA County			0.693	B	0.589	A	0.834	D	0.747	C	0.704	C	0.853	D	-	-	-
92	La Cienega Boulevard Southbound Ramps & Slauson Avenue	LA County			1.002	F	0.829	D	1.010	F	0.983	E	0.780	C	0.978	E	-	-	-
93	La Cienega Boulevard & Stocker Street	LA County			1.270	F	0.838	D	1.210	F	1.284	F	0.877	D	1.222	F	Yes	Yes	Yes
94	La Cienega Boulevard & 111th Street	City of LA/LA County	X	X	0.438	A	0.294	A	0.453	A	0.467	A	0.381	A	0.485	A	-	-	-
95	La Cienega Boulevard & West 120th Street	LA County			0.449	A	0.313	A	0.817	D	0.507	A	0.415	A	0.928	E	-	-	Yes
96	La Cienega Boulevard & I-405 Southbound Ramps (n/o Century Boulevard)	Caltrans/Inglewood/City of LA	X	X	0.669	B	0.695	B	0.694	B	0.589	A	0.623	B	0.587	A	-	-	-
97	La Cienega Boulevard & I-405 Southbound Ramps (s/o Century	Caltrans/City of LA/LA County	X	X	0.415	A	0.462	A	0.540	A	0.361	A	0.361	A	0.510	A	-	-	-

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Future (2025) With Alternative 3 Level of Service Analysis

					Future (2025) Without Alternative						Future (2025) With Alt. 3								
					AM		MD		PM		AM		MD		PM		Significant impact?		
Int. #	Intersection	Jurisdiction	ATSAC	ATCS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	AM	MD	PM
	Boulevard)																		
98	La Cienega Boulevard & I-405 Southbound Ramps (n/o Imperial Highway)	Caltrans/City of LA/LA County	X	X	0.478	A	0.341	A	0.369	A	0.475	A	0.323	A	0.302	A	-	-	-
99	Lincoln Boulevard & La Tijera Boulevard	Caltrans/City of LA	X	X	0.520	A	0.320	A	0.625	B	0.528	A	0.368	A	0.675	B	-	-	-
100	La Tijera Boulevard & Manchester Avenue	Caltrans/City of LA	X	X	0.570	A	0.549	A	0.679	B	0.602	B	0.553	A	0.714	C	-	-	-
101	Sepulveda Boulevard & La Tijera Boulevard	City of LA	X	X	0.602	B	0.729	C	0.851	D	0.695	B	0.815	D	0.869	D	-	Yes	-
102	I-405 Northbound Ramps & La Tijera Boulevard	Caltrans/City of LA	X	X	0.619	B	0.693	B	0.609	B	0.811	D	0.828	D	0.688	B	Yes	Yes	-
103	I-405 Southbound Ramps & La Tijera Boulevard	Caltrans/City of LA	X	X	0.467	A	0.563	A	0.681	B	0.509	A	0.672	B	0.716	C	-	-	-
104	Lincoln Boulevard & Loyola Marymount University Drive	Caltrans/City of LA	X	X	0.569	A	0.441	A	0.698	B	0.573	A	0.456	A	0.722	C	-	-	-
105	Lincoln Boulevard & Manchester Avenue	Caltrans/City of LA	X	X	0.800	C	0.547	A	0.871	D	0.862	D	0.586	A	0.882	D	Yes	-	-
106	Lincoln Boulevard & Maxella Avenue	Caltrans/City of LA	X	X	0.599	A	0.624	B	0.683	B	0.605	B	0.635	B	0.686	B	-	-	-
107	Lincoln Boulevard & Mindanao Way	Caltrans/City of LA/LA County	X	X	0.739	C	0.872	D	0.947	E	0.761	C	0.872	D	0.947	E	-	-	-
108	Sepulveda Boulevard & Lincoln Boulevard	Caltrans/City of LA	X	X	0.684	B	0.571	A	0.938	E	0.682	B	0.491	A	0.935	E	-	-	-
109	Lincoln Boulevard & Venice Boulevard	Caltrans/City of LA	X	X	0.892	D	0.915	E	1.036	F	0.892	D	0.922	E	1.036	F	-	-	-
110	Lincoln Boulevard & Washington Boulevard	Caltrans/City of LA	X	X	0.841	D	0.904	E	1.053	F	0.847	D	0.912	E	1.053	F	-	-	-
111	Lincoln Boulevard & 83rd Street	Caltrans/City of LA	X	X	0.609	B	0.435	A	0.700	B	0.624	B	0.466	A	0.718	C	-	-	-
112	Lincoln Boulevard & SR 90 Ramps	Caltrans/City of LA	X	X	0.629	B	0.639	B	0.802	D	0.633	B	0.687	B	0.812	D	-	-	-
113	Pershing Drive & Manchester Avenue	Caltrans/City of LA	X	X	0.464	A	0.329	A	0.475	A	0.475	A	0.369	A	0.475	A	-	-	-
114	Sepulveda Boulevard & Manchester Avenue	Caltrans/City of LA	X	X	~~0.804~~ *0.684*	~~D~~ *B*	~~0.761~~ *0.709*	C	~~0.929~~ *0.962*	E	~~0.835~~ *0.708*	~~D~~ *C*	~~0.764~~ *0.731*	C	~~0.929~~ *0.965*	E	~~Yes~~ -	-	-
115	Ash Avenue & Manchester Avenue	Caltrans/Inglewood			0.786	C	0.711	C	0.945	E	0.788	C	0.728	C	0.950	E	-	-	-
116	Nash Street & Mariposa Avenue	El Segundo			0.650	B	0.385	A	0.538	A	0.659	B	0.388	A	0.554	A	-	-	-
117	Sepulveda Boulevard & Mariposa Avenue	Caltrans/El Segundo			0.783	C	0.759	C	0.839	D	0.806	D	0.779	C	0.889	D	-	-	-
118	Sawtelle Boulevard & Matteson Street/I-405 Southbound Ramps	Caltrans/Culver City	X		0.926	E	0.611	B	1.081	F	0.930	E	0.614	B	1.081	F	-	-	-
119	Ocean Avenue/Via Marina & Washington Boulevard	City of LA/LA County	X	X	1.181	F	0.956	E	1.514	F	1.202	F	1.005	F	1.518	F	Yes	Yes	-
120	Overhill Drive & Slauson Avenue	LA County			0.736	C	0.620	B	1.147	F	0.751	C	0.722	C	1.152	F	-	-	-
121	Overland Avenue & Venice Boulevard	Caltrans/Culver City/City of LA	X	X	0.879	D	0.709	C	0.991	E	0.887	D	0.713	C	0.991	E	-	-	-
122	Palawan Way & Washington Boulevard	City of LA/LA County			16.5	C	14.5	B	16.5	C	16.5	C	14.5	B	16.8	C	-	-	-
123	Pershing Drive & Westchester Parkway	City of LA	X	X	0.244	A	0.166	A	0.311	A	0.256	A	0.184	A	0.322	A	-	-	-
124	Prairie Avenue & West 112th Street/I-105 Off-Ramp	Caltrans/Inglewood			0.553	A	0.623	B	0.759	C	0.557	A	0.623	B	0.782	C	-	-	-
125	Sepulveda Boulevard & Rosecrans Avenue	Caltrans/El Segundo/Manhattan Beach			0.918	E	0.836	D	1.158	F	0.933	E	0.857	D	1.160	F	Yes	Yes	-
126	Sepulveda Boulevard & Sawtelle Boulevard	Culver City	X		0.516	A	0.614	B	0.742	C	0.525	A	0.627	B	0.756	C	-	-	-
127	Sawtelle Boulevard & Venice Boulevard	Caltrans/Culver City/City of LA	X	X	1.077	F	0.843	D	0.956	E	1.080	F	0.843	D	0.956	E	-	-	-
128	Sawtelle Boulevard & Washington Boulevard	Culver City	X		0.660	B	0.517	A	0.787	C	0.660	B	0.517	A	0.797	C	-	-	-
129	Sawtelle Boulevard & Washington Place	Culver City	X		0.487	A	0.373	A	0.667	B	0.493	A	0.373	A	0.667	B	-	-	-
130	Sepulveda Boulevard & Slauson Avenue	Culver City	X		0.598	A	0.688	B	0.894	D	0.612	B	0.709	C	0.901	E	-	-	-
131	Sepulveda Boulevard & Venice Boulevard	Caltrans/Culver City/City of LA	X	X	0.893	D	0.734	C	1.115	F	0.896	D	0.746	C	1.120	F	-	-	-
132	Sepulveda Boulevard & Washington Boulevard	Culver City	X		0.610	B	0.597	A	0.727	C	0.617	B	0.597	A	0.727	C	-	-	-
133	Sepulveda Boulevard & Washington Place	Culver City	X		0.660	B	0.583	A	0.707	C	0.660	B	0.583	A	0.710	C	-	-	-
134	Sepulveda Boulevard & I-405 Northbound On-/Off-Ramps	Caltrans/Culver City	X		0.885	D	0.610	B	0.812	D	0.885	D	0.614	B	0.812	D	-	-	-
135	Sepulveda Boulevard & Westchester Parkway	City of LA	X	X	0.658	B	0.643	B	1.109	F	0.800	C	0.672	B	1.118	F	Yes	-	-
136	Sepulveda Boulevard & 76th Street	City of LA	X	X	0.691	B	0.484	A	0.700	B	0.706	C	0.491	A	0.731	C	-	-	-
137	Sepulveda Boulevard & 79th Street	City of LA	X	X	0.507	A	0.411	A	0.573	A	0.529	A	0.413	A	0.620	B	-	-	-
138	Sepulveda Boulevard & 83rd Street	City of LA	X	X	0.449	A	0.398	A	0.549	A	0.465	A	0.413	A	0.565	A	-	-	-
139	Sepulveda Boulevard & I-105 Westbound Ramps (n/o Imperial Highway)	Caltrans/City of LA	X	X	0.877	D	0.840	D	0.923	E	0.839	D	0.833	D	0.859	D	-	-	-
140	SR 90 Westbound Ramps & Slauson Avenue	Caltrans/Culver City/LA County	X		0.534	A	0.426	A	0.682	B	0.535	A	0.435	A	0.688	B	-	-	-
141	Airport Boulevard & 96th Street	City of LA	X	X	0.234	A	0.348	A	0.456	A	0.200	A	0.256	A	0.409	A	-	-	-
142	Jenny Avenue & 96th Street	City of LA	X	X	0.183	A	0.203	A	0.153	A	0.437	A	0.621	B	0.388	A	-	-	-
143	Vicksburg Avenue & 96th Street	City of LA	X	X	0.279	A	0.363	A	0.335	A	0.184	A	0.346	A	0.198	A	-	-	-
144	Airport Boulevard & 98th Street	City of LA	X	X	0.357	A	0.447	A	0.500	A	0.400	A	0.563	A	0.577	A	-	-	-

Table 4.12.2-22

Future (2025) With Alternative 3 Level of Service Analysis

					Future (2025) Without Alternative						Future (2025) With Alt. 3						Significant impact?		
					AM		MD		PM		AM		MD		PM				
Int. #	Intersection	Jurisdiction	ATSAC	ATCS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	AM	MD	PM
145	Jenny Avenue & Westchester Parkway	City of LA	X	X	0.153	A	0.220	A	0.243	A	0.313	A	0.540	A	0.440	A	-	-	-
146	Sepulveda Eastway & Westchester Parkway	City of LA	X	X	0.427	A	0.543	A	0.693	B	0.523	A	0.690	B	0.770	C	-	-	Yes
147	Crenshaw Boulevard & Century Boulevard	Inglewood			0.708	C	0.773	C	0.928	E	0.711	C	0.777	C	0.932	E	-	-	-
148	La Cienega Boulevard & Fairview Boulevard	Inglewood/City of LA	X	X	0.881	D	0.657	B	0.952	E	0.920	E	0.717	C	0.967	E	Yes	Yes	Yes
149	Crenshaw Boulevard & Imperial Highway	Inglewood			0.680	B	0.705	C	1.001	F	0.697	B	0.709	C	1.019	F	-	-	Yes
150	Sepulveda Boulevard & Braddock Drive	Culver City			0.580	A	0.527	A	0.677	B	0.580	A	0.530	A	0.693	B	-	-	-
151	Buckingham Parkway & Slauson Avenue	Culver City			0.716	C	0.544	A	0.888	D	0.722	C	0.549	A	0.888	D	-	-	-
152	Duquesne Avenue & Washington Boulevard	Culver City			0.573	A	0.507	A	0.657	B	0.583	A	0.513	A	0.657	B	-	-	-
153	Overland Avenue & Kelmore Street/Ranch Road	Culver City			32.1	D	15.3	C	46.2	E	33.1	D	16.3	C	51.3	F	-	-	Yes
154	Overland Avenue & Sawtelle Boulevard	Culver City			31.4	D	17.6	C	45.9	E	33.6	D	19.5	C	52.8	F	-	-	Yes
155	Overland Avenue & Washington Boulevard	Culver City/City of LA			0.840	D	0.756	C	1.069	F	0.840	D	0.771	C	1.073	F	-	-	-
156	Walgrove Avenue & Washington Boulevard	Culver City			68.8	F	>100	F	>100	F	68.8	F	382.0	F	OVRFL	F	-	Yes	Yes
157	La Cienega Boulevard & 104th Street	City of LA/LA County	X	X	0.340	A	0.301	A	0.370	A	0.376	A	0.307	A	0.409	A	-	-	-
158	Vista del Mar & Waterview Street	City of LA	X	X	0.327	A	0.073	A	0.267	A	0.337	A	0.073	A	0.267	A	-	-	-
159	Hindry Avenue & Manchester Boulevard	Caltrans/Inglewood			0.513	A	0.638	B	0.597	A	0.611	B	0.923	E	0.834	D	-	Yes	Yes
160	Lincoln Boulevard & Rose Avenue	Caltrans/City of LA	X	X	0.920	E	0.847	D	0.843	D	0.923	E	0.857	D	0.850	D	-	-	-
161	Western Avenue & Century Boulevard	City of LA	X	X	0.576	A	0.629	B	0.824	D	0.589	A	0.659	B	0.824	D	-	-	-
162	Sepulveda Boulevard & Manhattan Beach Boulevard	Caltrans/Manhattan Beach			0.950	E	0.987	E	1.193	F	0.956	E	0.988	E	1.199	F	-	-	-
163	La Cienega Boulevard & Jefferson Boulevard	City of LA	X	X	0.986	E	0.700	B	0.955	E	0.989	E	0.722	C	0.963	E	-	-	-
164	Crenshaw Boulevard & Manchester Avenue	Caltrans/Inglewood			0.816	D	0.843	D	1.025	F	0.833	D	0.922	E	1.093	F	-	Yes	Yes
165	La Cienega Boulevard & Rodeo Road	City of LA	X	X	1.025	F	0.719	C	1.037	F	1.030	F	0.739	C	1.046	F	-	-	-
166	La Brea Avenue & Rodeo Road	City of LA	X	X	0.989	E	0.756	C	0.972	E	1.021	F	0.787	C	0.976	E	Yes	-	-
167	La Brea Avenue & Jefferson Boulevard	City of LA	X	X	1.035	F	0.659	B	1.063	F	1.042	F	0.689	B	1.067	F	-	-	-
168	Crenshaw Boulevard & Florence Avenue	City of LA	X	X	0.754	C	0.579	A	0.896	D	0.760	C	0.678	B	0.901	E	-	-	-
169	Prairie Avenue & Manchester Boulevard	Inglewood			1.042	F	0.701	C	0.922	E	1.076	F	0.793	C	0.929	E	Yes	Yes	-
170	I-110 Northbound Ramps & Manchester Avenue	Caltrans/City of LA	X	X	0.593	A	0.460	A	0.537	A	0.604	B	0.467	A	0.547	A	-	-	-
171	Western Avenue & Florence Avenue	City of LA	X	X	0.860	D	0.600	A	0.902	E	0.866	D	0.600	A	0.909	E	-	-	-
172	Western Avenue & Manchester Avenue	Caltrans/City of LA	X	X	0.727	C	0.560	A	0.887	D	0.760	C	0.576	A	0.901	E	-	-	Yes
173	Western Avenue & Imperial Highway	LA County	X	X	0.743	C	0.575	A	0.912	E	0.760	C	0.590	A	0.916	E	-	-	-
174	Vermont Avenue & Florence Avenue	City of LA	X	X	0.700	B	0.540	A	0.734	C	0.726	C	0.624	B	0.773	C	-	-	-
175	Vermont Avenue & Manchester Avenue	Caltrans/LA County/City of LA	X	X	0.722	C	0.542	A	0.760	C	0.760	C	0.568	A	0.780	C	-	-	-
176	Vermont Avenue & Century Boulevard	LA County/City of LA	X	X	0.700	B	0.556	A	0.726	C	0.701	C	0.569	A	0.762	C	-	-	-
177	Vermont Avenue & Imperial Highway	LA County/City of LA	X	X	0.823	D	0.545	A	0.992	E	0.827	D	0.563	A	0.995	E	-	-	-
178	Figueroa Street & Florence Avenue	City of LA	X	X	0.741	C	0.506	A	0.733	C	0.771	C	0.569	A	0.773	C	-	-	-
179	Figueroa Street & Manchester Avenue	Caltrans/City of LA	X	X	0.886	D	0.618	B	0.913	E	0.894	D	0.627	B	0.920	E	-	-	-
180	Figueroa Street & Century Boulevard	City of LA	X	X	0.893	D	0.500	A	0.784	C	0.901	E	0.534	A	0.789	C	-	-	-
181	Figueroa Street & Imperial Highway	City of LA	X	X	0.837	D	0.378	A	0.818	D	0.851	D	0.389	A	0.818	D	-	-	-
182	Inglewood Avenue & Rosecrans Avenue	Hawthorne			0.798	C	0.663	B	0.952	E	0.815	D	0.701	C	0.961	E	-	-	-
183	Hawthorne Boulevard & Rosecrans Avenue	Hawthorne			0.802	D	0.700	B	0.943	E	0.805	D	0.718	C	0.943	E	-	-	-
184	Prairie Avenue & Rosecrans Avenue	Hawthorne/Lawndale			0.872	D	0.736	C	0.969	E	0.886	D	0.761	C	0.975	E	-	-	-
185	Crenshaw Boulevard & Rosecrans Avenue	Gardena/Hawthorne/LA County			0.796	C	0.727	C	0.916	E	0.808	D	0.742	C	0.925	E	-	-	-
186	Western Avenue & Rosecrans Avenue	Gardena			0.810	D	0.672	B	0.927	E	0.824	D	0.673	B	0.936	E	-	-	-
187	Vermont Avenue & Rosecrans Avenue	Gardena/City of LA	X		0.757	C	0.604	B	0.857	D	0.771	C	0.610	B	0.859	D	-	-	-
188	Prairie Avenue & El Segundo Boulevard	Hawthorne			1.001	F	0.684	B	1.006	F	1.057	F	0.711	C	1.025	F	Yes	-	Yes
189	Crenshaw Boulevard & El Segundo Boulevard	Hawthorne/Gardena			0.969	E	0.722	C	0.890	D	0.975	E	0.748	C	0.899	D	-	-	-
190	Western Avenue & El Segundo Boulevard	Gardena/LA County			0.846	D	0.594	A	0.860	D	0.854	D	0.614	B	0.871	D	-	-	-
191	Vermont Avenue & El Segundo Boulevard	Gardena/LA County/City of LA	X		0.682	B	0.422	A	0.676	B	0.689	B	0.436	A	0.708	C	-	-	-
192	Aviation Boulevard & Artesia Boulevard	Redondo Beach/Manhattan Beach			1.132	F	0.769	C	1.078	F	1.132	F	0.776	C	1.084	F	-	-	-
193	Aviation Boulevard & Manhattan Beach Boulevard	Redondo Beach/Manhattan Beach			0.976	E	0.769	C	1.083	F	0.982	E	0.775	C	1.089	F	-	-	-
194	Sepulveda Boulevard & Palms Boulevard	City of LA	X	X	0.770	C	0.590	A	0.980	E	0.780	C	0.593	A	0.983	E	-	-	-
195	Sawtelle Boulevard & Palms Boulevard	City of LA	X	X	0.787	C	0.407	A	0.850	D	0.790	C	0.410	A	0.850	D	-	-	-
196	Prairie Avenue & Florence Avenue	Inglewood			0.965	E	0.647	B	0.851	D	0.965	E	0.684	B	0.859	D	-	-	-

Table 4.12.2-22

Future (2025) With Alternative 3 Level of Service Analysis

					Future (2025) Without Alternative						Future (2025) With Alt. 3								
					AM		MD		PM		AM		MD		PM		Significant impact?		
Int. #	Intersection	Jurisdiction	ATSAC	ATCS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	AM	MD	PM
197	Prairie Avenue & Lennox Boulevard	Inglewood			0.670	B	0.557	A	0.704	C	0.689	B	0.603	B	0.775	C	-	-	Yes
198	Flower Street (near I-110 Southbound Ramps) & Florence Avenue	Caltrans/City of LA	X	X	0.527	A	0.513	A	0.535	A	0.549	A	0.553	A	0.604	B	-	-	-
199	Grand Avenue (near I-110 Northbound Ramps) & Florence Avenue	Caltrans/City of LA	X	X	0.617	B	0.602	B	0.675	B	0.645	B	0.691	B	0.714	C	-	-	-
200	I-110 Southbound Ramps & Manchester Avenue	Caltrans/City of LA	X	X	0.487	A	0.436	A	0.531	A	0.491	A	0.467	A	0.558	A	-	-	-

Note:

Future (2025) Without Alternative V/C reported above was based on ICU Methodology. However, this intersection impact was determined based on CMA Methodology, where Future (2025) Without Alternative V/C was calculated as 0.698 (LOS B) and City of Los Angeles significant impact threshold is a V/C increase of 0.04 or greater for LOS C.

Source: Fehr & Peers, 2012.

Table 4.12.2-23

Future (2025) With Alternative 4 Level of Service Analysis

					Future (2025) Without Alternative						Future (2025) With Alt 4								
					AM		MD		PM		AM		MD		PM		Significant impact?		
Int. #	Intersection	Jurisdiction	ATSAC	ATCS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	AM	MD	PM
1	Admiralty Way & Bali Way	LA County	X	X	~~0.794~~	~~C~~	~~0.707~~	~~C~~	~~0.950~~	~~E~~	~~0.810~~	~~D~~	~~0.716~~	~~C~~	~~0.959~~	~~E~~	-	-	-
					0.647	*B*	*0.607*	*B*	*0.817*	*D*	*0.660*	*B*	*0.613*	*B*	*0.822*	*D*			
2	Admiralty Way & Fiji Way	LA County	X	X	0.447	A	0.360	A	0.595	A	0.457	A	0.372	A	0.595	A	-	-	-
3	Admiralty Way & Mindanao Way	LA County	X	X	~~0.620~~	~~B~~	~~0.568~~	A	~~0.672~~	B	~~0.641~~	~~B~~	~~0.590~~	A	~~0.672~~	B	-	-	-
					0.481	*A*	*0.522*		*0.671*		*0.502*	*A*	*0.534*		*0.671*				
4	Palawan Way & Admiralty Way	LA County	X		~~0.616~~	B	~~0.458~~	A	~~0.682~~	B	~~0.625~~	B	~~0.502~~	A	~~0.695~~	B	-	-	-
					0.625		*0.436*		*0.657*		*0.634*		*0.480*		*0.670*				
5	Via Marina & Admiralty Way	LA County	X	X	0.598	A	0.576	A	0.833	D	0.601	B	0.595	A	0.839	D	-	-	-
6	Airport Boulevard & Arbor Vitae Street/Westchester Parkway	City of LA	X	X	0.471	A	0.573	A	0.747	C	0.620	B	0.809	D	0.864	D	-	Yes	Yes
7	Airport Boulevard & Century Boulevard	City of LA	X	X	0.651	B	0.648	B	0.619	B	0.864	D	1.187	F	1.110	F	Yes	Yes	Yes
8	La Tijera Boulevard & Airport Boulevard	City of LA	X	X	0.520	A	0.441	A	0.580	A	0.533	A	0.453	A	0.580	A	-	-	-
9	Airport Boulevard & Manchester Avenue	Caltrans/City of LA	X	X	0.740	C	0.849	D	0.951	E	0.798	C	0.969	E	1.031	F	Yes	Yes	Yes
10	Aviation Boulevard & Arbor Vitae Street	Inglewood/City of LA	X	X	0.550	A	0.525	A	0.791	C	0.616	B	0.588	A	0.816	D	-	-	Yes
11	Inglewood Avenue & Arbor Vitae Street	Inglewood			0.508	A	0.575	A	0.798	C	0.532	A	0.597	A	0.832	D	-	-	Yes
12	La Brea Avenue & Arbor Vitae Street	Inglewood			0.440	A	0.547	A	0.759	C	0.467	A	0.561	A	0.782	C	-	-	-
13	La Cienega Boulevard & Arbor Vitae Street	Inglewood/City of LA	X	X	0.542	A	0.501	A	0.701	C	0.551	A	0.501	A	0.739	C	-	-	-
14	Aviation Boulevard & Century Boulevard	City of LA	X	X	0.943	E	0.827	D	1.097	F	1.109	F	1.200	F	1.288	F	Yes	Yes	Yes
15	Aviation Boulevard & El Segundo Boulevard	El Segundo			0.922	E	~~0.643~~	B	~~0.850~~	D	0.928	E	0.677	B	~~0.891~~	D	-	-	-
							0.638		*0.823*						*0.858*				
16	Aviation Boulevard & Imperial Highway	City of LA	X	X	0.675	B	0.455	A	0.691	B	0.731	C	0.597	A	0.704	C	Yes	-	-
17	Aviation Boulevard/Florence Avenue & Manchester Avenue	Caltrans/Inglewood	X	X	0.854	D	0.903	E	0.894	D	0.866	D	0.941	E	0.942	E	-	Yes	Yes
18	Aviation Boulevard & Rosecrans Avenue	El Segundo/Hawthorne/Manhattan Beach			0.743	C	0.819	D	0.926	E	0.757	C	0.834	D	0.933	E	-	-	-
19	Aviation Boulevard & 111th Street	City of LA	X	X	0.573	A	0.478	A	0.555	A	0.693	B	0.656	B	0.642	B	-	-	-
20	Aviation Boulevard & West 120th Street	El Segundo/LA County			0.659	B	0.413	A	0.557	A	0.781	C	0.498	A	0.650	B	-	-	-
21	Lincoln Boulevard & Bali Way	Caltrans/City of LA/LA County	X	X	0.570	A	0.574	A	0.836	D	0.586	A	0.587	A	0.840	D	-	-	-
22	Lincoln Boulevard & Bluff Creek Drive	Caltrans/City of LA	X	X	0.553	A	0.333	A	0.567	A	0.555	A	0.355	A	0.570	A	-	-	-

Table 4.12.2-23

Future (2025) With Alternative 4 Level of Service Analysis

					Future (2025) Without Alternative						Future (2025) With Alt 4								
					AM		MD		PM		AM		MD		PM		Significant impact?		
Int. #	Intersection	Jurisdiction	ATSAC	ATCS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	AM	MD	PM
23	Centinela Avenue & Jefferson Boulevard	City of LA/LA County	X	X	0.643	B	0.504	A	0.840	D	0.664	B	0.512	A	0.841	D	-	-	-
24	Centinela Avenue & Culver Boulevard	City of LA	X	X	0.777	C	0.577	A	0.907	E	0.795	C	0.581	A	0.907	E	-	-	-
25	La Brea Avenue & Centinela Avenue	Inglewood			0.913	E	0.794	C	0.991	E	0.916	E	0.813	D	0.991	E	-	-	-
26	La Cienega Boulevard & Centinela Avenue	Inglewood/City of LA	X	X	0.896	D	0.681	B	1.134	F	0.930	E	0.729	C	1.135	F	Yes	Yes	-
27	La Tijera Boulevard & Centinela Avenue	City of LA/LA County	X	X	0.643	B	0.502	A	0.840	D	0.669	B	0.551	A	0.863	D	-	-	Yes
28	Sepulveda Boulevard & Centinela Avenue	Culver City	X		0.884	D	0.711	C	0.879	D	0.885	D	0.718	C	0.888	D	-	-	-
29	Centinela Avenue & Venice Boulevard	Caltrans/City of LA	X	X	1.048	F	0.898	D	1.064	F	1.051	F	0.898	D	1.065	F	-	-	-
30	Centinela Avenue & Washington Boulevard	Culver City	X		0.853	D	0.707	C	1.003	F	0.857	D	0.710	C	1.017	F	-	-	-
31	Centinela Avenue & Washington Place	Culver City/City of LA	X		0.770	C	0.657	B	0.880	D	0.777	C	0.660	B	0.880	D	-	-	-
32	Centinela Avenue & SR 90 Eastbound On-/Off-Ramps	Caltrans/City of LA	X	X	0.391	A	0.282	A	0.525	A	0.402	A	0.300	A	0.532	A	-	-	-
33	Centinela Avenue & Sandford/SR 90 Westbound Ramps	Caltrans/City of LA	X	X	0.440	A	0.267	A	0.556	A	0.452	A	0.284	A	0.560	A	-	-	-
34	La Brea Avenue/Hawthorne Boulevard & Century Boulevard	Inglewood			0.735	C	0.771	C	0.983	E	0.775	C	0.917	E	1.086	F	Yes	Yes	Yes
35	Inglewood Avenue & Century Boulevard	Inglewood			0.705	C	0.657	B	0.926	E	0.740	C	0.732	C	0.932	E	-	Yes	-
36	La Cienega Boulevard & Century Boulevard	Inglewood/City of LA/LA County	X	X	0.730	C	0.661	B	0.827	D	0.877	D	0.835	D	1.182	F	Yes	Yes	Yes
37	Prairie Avenue & Century Boulevard	Inglewood			0.678	B	0.754	C	0.927	E	0.713	C	0.794	C	0.973	E	-	Yes	Yes
38	Sepulveda Boulevard & Century Boulevard	Caltrans/City of LA	X	X	0.579	A	0.497	A	0.655	B	0.662	B	0.595	A	0.840	D	-	-	Yes
39	I-405 Northbound Ramps & Century Boulevard	Caltrans/Inglewood			0.743	C	0.586	A	0.714	C	0.760	C	0.632	B	0.720	C	-	-	-
40	Duquesne Avenue & Culver Boulevard	Culver City	X		0.585	A	0.432	A	0.661	B	0.588	A	0.432	A	0.661	B	-	-	-
41	Culver Boulevard & Jefferson Boulevard	City of LA	X	X	0.733	C	0.342	A	0.738	C	0.744	C	0.359	A	0.752	C	-	-	-
42	Nicholson Street & Culver Boulevard	City of LA	X	X	0.675	B	0.412	A	0.816	D	0.679	B	0.437	A	0.828	D	-	-	-
43	Overland Avenue & Culver Boulevard	Culver City	X		1.182	F	0.660	B	0.935	E	1.182	F	0.671	B	0.943	E	-	-	-
44	Sawtelle Boulevard & Culver Boulevard	Culver City	X		0.686	B	0.479	A	0.888	D	0.686	B	0.505	A	0.891	D	-	-	-
45	Sepulveda Boulevard & Culver Boulevard	Culver City	X		0.730	C	0.557	A	0.733	C	0.745	C	0.564	A	0.738	C	-	-	-
46	Douglas Street & El Segundo Boulevard	El Segundo			0.773	C	0.594	A	0.976	E	0.797	C	0.633	B	1.014	F	-	-	Yes
47	Douglas Street & Imperial Highway	El Segundo/City of LA	X	X	0.371	A	0.256	A	0.456	A	0.408	A	0.316	A	0.531	A	-	-	-
48	Douglas Street & Mariposa Avenue	El Segundo			0.400	A	0.444	A	0.592	A	0.423	A	0.481	A	0.598	A	-	-	-
49	Douglas Street & Rosecrans Avenue	El Segundo/Manhattan Beach			0.666	B	0.717	C	0.789	C	0.680	B	0.726	C	0.801	D	-	-	-
50	Duquesne Avenue & Jefferson Boulevard	Culver City	X		0.614	B	0.569	A	0.741	C	0.621	B	0.583	A	0.765	C	-	-	-
51	Hawthorne Boulevard & El Segundo Boulevard	Hawthorne			0.675	B	0.697	B	1.230	F	0.693	B	0.750	C	1.245	F	-	Yes	Yes
52	Inglewood Avenue & El Segundo Boulevard	Hawthorne/LA County			0.670	B	0.697	B	1.078	F	0.700	B	0.734	C	1.086	F	-	-	-
53	La Cienega Boulevard & El Segundo Boulevard	Hawthorne/LA County			0.710	C	0.562	A	1.015	F	0.741	C	0.577	A	1.021	F	-	-	-
54	Nash Street & El Segundo Boulevard	El Segundo			0.593	A	0.456	A	0.708	C	0.603	B	0.466	A	0.713	C	-	-	-
55	Sepulveda Boulevard & El Segundo Boulevard	Caltrans/El Segundo			0.821	D	0.843	D	1.013	F	0.827	D	0.857	D	1.013	F	-	-	-
56	Lincoln Boulevard & Fiji Way	Caltrans/City of LA/LA County	X	X	0.620	B	0.613	B	0.860	D	0.627	B	0.650	B	0.865	D	-	-	-
57	La Brea Avenue & Florence Avenue	Inglewood			0.791	C	0.763	C	1.054	F	0.825	D	0.854	D	1.128	F	Yes	Yes	Yes
58	La Cienega Boulevard & Florence Avenue	Inglewood			0.896	D	0.896	D	1.165	F	0.929	E	1.019	F	1.165	F	Yes	Yes	-
59	Nash Street & Grand Avenue	El Segundo			0.545	A	0.416	A	0.510	A	0.550	A	0.416	A	0.514	A	-	-	-
60	Sepulveda Boulevard & Grand Avenue	Caltrans/El Segundo			0.810	D	0.755	C	0.934	E	0.812	D	0.755	C	0.954	E	-	-	-
61	Vista del Mar & Grand Avenue	City of LA	X	X	0.549	A	0.265	A	0.388	A	0.574	A	0.275	A	0.398	A	-	-	-
62	Hawthorne Boulevard & Imperial Avenue	Hawthorne			0.664	B	0.602	B	0.959	E	0.701	C	0.642	B	1.007	F	-	-	Yes
63	Hawthorne Boulevard & Lennox Boulevard	LA County			0.508	A	0.607	B	0.810	D	0.526	A	0.643	B	0.848	D	-	-	Yes
64	Highland Avenue/Vista del Mar & Rosecrans Avenue	Manhattan Beach			0.823	D	0.563	A	0.737	C	0.857	D	0.576	A	0.750	C	Yes	-	-
65	Sepulveda Boulevard & Howard Hughes Parkway	City of LA	X	X	0.418	A	0.400	A	0.598	A	0.429	A	0.419	A	0.612	B	-	-	-
66	Inglewood Avenue & Imperial Highway	Hawthorne			0.765	C	0.695	B	1.286	F	0.851	D	0.743	C	1.330	F	Yes	Yes	Yes
67	La Cienega Boulevard & Imperial Highway	City of LA/LA County	X	X	0.536	A	0.276	A	0.698	B	0.622	B	0.339	A	0.717	C	-	-	-
68	Main Street & Imperial Highway	El Segundo/City of LA	X	X	0.763	C	0.526	A	0.639	B	0.776	C	0.542	A	0.652	B	-	-	-
69	Pershing Drive & Imperial Highway	City of LA	X	X	0.382	A	0.304	A	0.433	A	0.411	A	0.319	A	0.448	A	-	-	-
70	Prairie Avenue & Imperial Highway	Hawthorne/Inglewood			0.690	B	0.628	B	0.881	D	0.726	C	0.647	B	0.885	D	-	-	-
71	Sepulveda Boulevard & Imperial Highway	Caltrans/El Segundo/City of LA	X	X	0.805	D	0.807	D	1.223	F	0.839	D	0.826	D	1.271	F	Yes	-	Yes
72	Vista del Mar & Imperial Highway	City of LA	X	X	0.416	A	0.224	A	0.409	A	0.420	A	0.235	A	0.416	A	-	-	-
73	Nash Street/I-105 Westbound Ramps & Imperial Highway	Caltrans/El Segundo/City of LA	X	X	0.642	B	0.237	A	0.416	A	0.705	C	0.393	A	0.499	A	-*	-	-
74	I-105 Ramps (e/o Aviation Boulevard) & Imperial Highway	Caltrans/City of LA	X	X	0.647	B	0.340	A	0.609	B	0.688	B	0.445	A	0.682	B	-	-	-
75	I-405 Northbound Ramps (e/o La Cienega Boulevard) & Imperial Highway	Caltrans/Hawthorne/LA County			0.500	A	0.353	A	0.703	C	0.526	A	0.402	A	0.705	C	-	-	-
76	Inglewood Avenue & Lennox Boulevard	LA County			0.468	A	0.557	A	0.819	D	0.538	A	0.563	A	0.888	D	-	-	Yes

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Future (2025) With Alternative 4 Level of Service Analysis

					Future (2025) Without Alternative						Future (2025) With Alt 4						Significant impact?		
					AM		MD		PM		AM		MD		PM				
Int. #	Intersection	Jurisdiction	ATSAC	ATCS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	AM	MD	PM
77	Inglewood Avenue & Manchester Boulevard	Caltrans/Inglewood			0.651	B	0.565	A	0.773	C	0.657	B	0.575	A	0.794	C	-	-	-
78	Lincoln Boulevard & Jefferson Boulevard	Caltrans/City of LA	X	X	0.688	B	0.560	A	0.741	C	0.691	B	0.581	A	0.742	C	-	-	-
79	Overland Avenue & Jefferson Boulevard	Culver City	X		0.678	B	0.542	A	0.777	C	0.686	B	0.553	A	0.789	C	-	-	-
80	Sepulveda Boulevard & Jefferson Boulevard	Culver City	X		0.475	A	0.419	A	0.503	A	0.482	A	0.419	A	0.508	A	-	-	-
81	Sepulveda Boulevard & Jefferson Boulevard & Playa Street	Culver City	X		0.819	D	0.712	C	1.019	F	0.834	D	0.724	C	1.019	F	-	-	-
82	Slauson Avenue & Jefferson Boulevard	Culver City	X		0.388	A	0.528	A	0.505	A	0.398	A	0.543	A	0.506	A	-	-	-
83	I-405 Northbound Ramps & Jefferson Boulevard	Caltrans/Culver City/City of LA	X	X	0.506	A	0.424	A	0.782	C	0.506	A	0.433	A	0.784	C	-	-	-
84	I-405 Southbound Ramps & Jefferson Boulevard	Caltrans/Culver City/City of LA	X	X	0.329	A	0.349	A	0.446	A	0.357	A	0.368	A	0.478	A	-	-	-
85	La Brea Avenue & Manchester Boulevard	Caltrans/Inglewood			0.847	D	0.744	C	0.945	E	0.857	D	0.763	C	0.951	E	-	-	-
86	La Brea Avenue/Overhill Drive & Stocker Street	LA County			0.820	D	0.724	C	1.193	F	0.844	D	0.749	C	1.229	F	Yes	-	Yes
87	La Brea Avenue & Slauson Avenue	LA County			0.905	E	0.747	C	1.007	F	0.963	E	0.810	D	1.033	F	Yes	Yes	Yes
88	La Cienega Boulevard & La Tijera Boulevard	Inglewood/City of LA	X	X	0.794	C	0.738	C	1.005	F	0.800	C	0.763	C	1.131	F	-	-	Yes
89	La Cienega Boulevard & Lennox Boulevard	City of LA/LA County	X	X	0.419	A	0.354	A	0.497	A	0.473	A	0.410	A	0.532	A	-	-	-
90	La Cienega Boulevard & Manchester Boulevard	Caltrans/Inglewood			0.736	C	0.741	C	0.907	E	0.749	C	0.776	C	0.925	E	-	-	Yes
91	La Cienega Boulevard Northbound Ramps & Slauson Avenue	LA County			0.693	B	0.589	A	0.834	D	0.717	C	0.633	B	0.846	D	-	-	-
92	La Cienega Boulevard Southbound Ramps & Slauson Avenue	LA County			1.002	F	0.829	D	1.010	F	0.994	E	0.784	C	0.974	E	-	-	-
93	La Cienega Boulevard & Stocker Street	LA County			1.270	F	0.838	D	1.210	F	1.286	F	0.873	D	1.237	F	Yes	Yes	Yes
94	La Cienega Boulevard & 111th Street	City of LA/LA County	X	X	0.438	A	0.294	A	0.453	A	0.634	B	0.544	A	0.564	A	-	-	-
95	La Cienega Boulevard & West 120th Street	LA County			0.449	A	0.313	A	0.817	D	0.495	A	0.376	A	0.853	D	-	-	Yes
96	La Cienega Boulevard & I-405 Southbound Ramps (n/o Century Boulevard)	Caltrans/Inglewood/City of LA	X	X	0.669	B	0.695	B	0.694	B	0.701	C	0.697	B	0.702	C	-	-	-
97	La Cienega Boulevard & I-405 Southbound Ramps (s/o Century Boulevard)	Caltrans/City of LA/LA County	X	X	0.415	A	0.462	A	0.540	A	0.457	A	0.547	A	0.590	A	-	-	-
98	La Cienega Boulevard & I-405 Southbound Ramps (n/o Imperial Highway)	Caltrans/City of LA/LA County	X	X	0.478	A	0.341	A	0.369	A	0.594	A	0.441	A	0.435	A	-	-	-
99	Lincoln Boulevard & La Tijera Boulevard	Caltrans/City of LA	X	X	0.520	A	0.320	A	0.625	B	0.523	A	0.347	A	0.635	B	-	-	-
100	La Tijera Boulevard & Manchester Avenue	Caltrans/City of LA	X	X	0.570	A	0.549	A	0.679	B	0.689	B	0.686	B	0.711	C	-	-	-
101	Sepulveda Boulevard & La Tijera Boulevard	City of LA	X	X	0.602	B	0.729	C	0.851	D	0.616	B	0.949	E	0.964	E	-	Yes	Yes
102	I-405 Northbound Ramps & La Tijera Boulevard	Caltrans/City of LA	X	X	0.619	B	0.693	B	0.609	B	0.695	B	0.814	D	0.664	B	-	Yes	-
103	I-405 Southbound Ramps & La Tijera Boulevard	Caltrans/City of LA	X	X	0.467	A	0.563	A	0.681	B	0.509	A	0.605	B	0.704	C	-	-	-
104	Lincoln Boulevard & Loyola Marymount University Drive	Caltrans/City of LA	X	X	0.569	A	0.441	A	0.698	B	0.571	A	0.472	A	0.727	C	-	-	-
105	Lincoln Boulevard & Manchester Avenue	Caltrans/City of LA	X	X	0.800	C	0.547	A	0.871	D	0.803	D	0.560	A	0.880	D	-	-	-
106	Lincoln Boulevard & Maxella Avenue	Caltrans/City of LA	X	X	0.599	A	0.624	B	0.683	B	0.608	B	0.635	B	0.695	B	-	-	-
107	Lincoln Boulevard & Mindanao Way	Caltrans/City of LA/LA County	X	X	0.739	C	0.872	D	0.947	E	0.752	C	0.885	D	0.951	E	-	-	-
108	Sepulveda Boulevard & Lincoln Boulevard	Caltrans/City of LA	X	X	0.684	B	0.571	A	0.938	E	0.706	C	0.680	B	0.944	E	-	-	-
109	Lincoln Boulevard & Venice Boulevard	Caltrans/City of LA	X	X	0.892	D	0.915	E	1.036	F	0.894	D	0.933	E	1.043	F	-	Yes	-
110	Lincoln Boulevard & Washington Boulevard	Caltrans/City of LA	X	X	0.841	D	0.904	E	1.053	F	0.845	D	0.925	E	1.057	F	-	Yes	-
111	Lincoln Boulevard & 83rd Street	Caltrans/City of LA	X	X	0.609	B	0.435	A	0.700	B	0.614	B	0.455	A	0.718	C	-	-	-
112	Lincoln Boulevard & SR 90 Ramps	Caltrans/City of LA	X	X	0.629	B	0.639	B	0.802	D	0.638	B	0.655	B	0.811	D	-	-	-
113	Pershing Drive & Manchester Avenue	Caltrans/City of LA	X	X	0.464	A	0.329	A	0.475	A	0.471	A	0.340	A	0.493	A	-	-	-
114	Sepulveda Boulevard & Manchester Avenue	Caltrans/City of LA	X	X	~~0.804~~	~~D~~	~~0.761~~	C	~~0.929~~	E	~~0.861~~	~~D~~	~~0.761~~	C	~~0.929~~	E	~~Yes~~	-	-
					0.684	*B*	*0.709*		*0.962*		*0.723*	*C*	*0.713*		*0.958*		-		
115	Ash Avenue & Manchester Avenue	Caltrans/Inglewood			0.786	C	0.711	C	0.945	E	0.797	C	0.726	C	0.965	E	-	-	Yes
116	Nash Street & Mariposa Avenue	El Segundo			0.650	B	0.385	A	0.538	A	0.650	B	0.429	A	0.538	A	-	-	-
117	Sepulveda Boulevard & Mariposa Avenue	Caltrans/El Segundo			0.783	C	0.759	C	0.839	D	0.810	D	0.761	C	0.847	D	-	-	-
118	Sawtelle Boulevard & Matteson Street/I-405 Southbound Ramps	Caltrans/Culver City	X		0.926	E	0.611	B	1.081	F	0.926	E	0.628	B	1.081	F	-	-	-
119	Ocean Avenue/Via Marina & Washington Boulevard	City of LA/LA County	X	X	1.181	F	0.956	E	1.514	F	1.216	F	1.012	F	1.514	F	Yes	Yes	-
120	Overhill Drive & Slauson Avenue	LA County			0.736	C	0.620	B	1.147	F	0.750	C	0.690	B	1.153	F	-	-	-
121	Overland Avenue & Venice Boulevard	Caltrans/Culver City/City of LA	X	X	0.879	D	0.709	C	0.991	E	0.885	D	0.715	C	0.992	E	-	-	-
122	Palawan Way & Washington Boulevard	City of LA/LA County			16.5	C	14.5	B	16.5	C	16.8	C	14.7	B	17.0	C	-	-	-
123	Pershing Drive & Westchester Parkway	City of LA	X	X	0.244	A	0.166	A	0.311	A	0.259	A	0.180	A	0.329	A	-	-	-
124	Prairie Avenue & West 112th Street/I-105 Off-Ramp	Caltrans/Inglewood			0.553	A	0.623	B	0.759	C	0.559	A	0.628	B	0.782	C	-	-	-
125	Sepulveda Boulevard & Rosecrans Avenue	Caltrans/El Segundo/Manhattan Beach			0.918	E	0.836	D	1.158	F	0.928	E	0.865	D	1.160	F	Yes	Yes	-
126	Sepulveda Boulevard & Sawtelle Boulevard	Culver City	X		0.516	A	0.614	B	0.742	C	0.525	A	0.619	B	0.756	C	-	-	-
127	Sawtelle Boulevard & Venice Boulevard	Caltrans/Culver City/City of LA	X	X	1.077	F	0.843	D	0.956	E	1.083	F	0.847	D	0.961	E	-	-	-
128	Sawtelle Boulevard & Washington Boulevard	Culver City	X		0.660	B	0.517	A	0.787	C	0.663	B	0.530	A	0.793	C	-	-	-
129	Sawtelle Boulevard & Washington Place	Culver City	X		0.487	A	0.373	A	0.667	B	0.497	A	0.383	A	0.670	B	-	-	-

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					Future (2025) Without Alternative						Future (2025) With Alt 4						Significant impact?		
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Int. #	Intersection	Jurisdiction	ATSAC	ATCS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	AM	MD	PM
130	Sepulveda Boulevard & Slauson Avenue	Culver City	X		0.598	A	0.688	B	0.894	D	0.611	B	0.715	C	0.902	E	-	-	-
131	Sepulveda Boulevard & Venice Boulevard	Caltrans/Culver City/City of LA	X	X	0.893	D	0.734	C	1.115	F	0.896	D	0.740	C	1.117	F	-	-	-
132	Sepulveda Boulevard & Washington Boulevard	Culver City	X		0.610	B	0.597	A	0.727	C	0.620	B	0.607	B	0.727	C	-	-	-
133	Sepulveda Boulevard & Washington Place	Culver City	X		0.660	B	0.583	A	0.707	C	0.660	B	0.587	A	0.708	C	-	-	-
134	Sepulveda Boulevard & I-405 Northbound On-/Off-Ramps	Caltrans/Culver City	X		0.885	D	0.610	B	0.812	D	0.885	D	0.614	B	0.812	D	-	-	-
135	Sepulveda Boulevard & Westchester Parkway	City of LA	X	X	0.658	B	0.643	B	1.109	F	0.749	C	0.832	D	1.411	F	Yes	Yes	Yes
136	Sepulveda Boulevard & 76th Street	City of LA	X	X	0.691	B	0.484	A	0.700	B	0.715	C	0.498	A	0.735	C	-	-	-
137	Sepulveda Boulevard & 79th Street	City of LA	X	X	0.507	A	0.411	A	0.573	A	0.545	A	0.431	A	0.580	A	-	-	-
138	Sepulveda Boulevard & 83rd Street	City of LA	X	X	0.449	A	0.398	A	0.549	A	0.489	A	0.420	A	0.573	A	-	-	-
139	Sepulveda Boulevard & I-105 Westbound Ramps (n/o Imperial Highway)	Caltrans/City of LA	X	X	0.877	D	0.840	D	0.923	E	0.883	D	0.865	D	0.949	E	-	Yes	Yes
140	SR 90 Westbound Ramps & Slauson Avenue	Caltrans/Culver City/LA County	X		0.534	A	0.426	A	0.682	B	0.543	A	0.434	A	0.683	B	-	-	-
141	Airport Boulevard & 96th Street	City of LA	X	X	0.234	A	0.348	A	0.456	A	0.322	A	0.405	A	0.511	A	-	-	-
142	Jenny Avenue & 96th Street	City of LA	X	X	0.183	A	0.203	A	0.153	A	0.399	A	0.645	B	0.383	A	-	-	-
143	Vicksburg Avenue & 96th Street	City of LA	X	X	0.279	A	0.363	A	0.335	A	0.191	A	0.353	A	0.247	A	-	-	-
144	Airport Boulevard & 98th Street	City of LA	X	X	0.357	A	0.447	A	0.500	A	0.420	A	0.610	B	0.657	B	-	-	-
145	Jenny Avenue & Westchester Parkway	City of LA	X	X	0.153	A	0.220	A	0.243	A	0.327	A	0.627	B	0.503	A	-	-	-
146	Sepulveda Eastway & Westchester Parkway	City of LA	X	X	0.427	A	0.543	A	0.693	B	0.457	A	0.603	B	0.760	C	-	-	Yes
147	Crenshaw Boulevard & Century Boulevard	Inglewood			0.708	C	0.773	C	0.928	E	0.734	C	0.797	C	0.956	E	-	-	Yes
148	La Cienega Boulevard & Fairview Boulevard	Inglewood/City of LA	X	X	0.881	D	0.657	B	0.952	E	0.891	D	0.688	B	0.952	E	-	-	-
149	Crenshaw Boulevard & Imperial Highway	Inglewood			0.680	B	0.705	C	1.001	F	0.731	C	0.750	C	1.046	F	Yes	Yes	Yes
150	Sepulveda Boulevard & Braddock Drive	Culver City			0.580	A	0.527	A	0.677	B	0.583	A	0.530	A	0.683	B	-	-	-
151	Buckingham Parkway & Slauson Avenue	Culver City			0.716	C	0.544	A	0.888	D	0.722	C	0.551	A	0.890	D	-	-	-
152	Duquesne Avenue & Washington Boulevard	Culver City			0.573	A	0.507	A	0.657	B	0.580	A	0.517	A	0.667	B	-	-	-
153	Overland Avenue & Kelmore Street/Ranch Road	Culver City			32.1	D	15.3	C	46.2	E	32.6	D	15.8	C	49.9	E	-	-	-
154	Overland Avenue & Sawtelle Boulevard	Culver City			31.4	D	17.6	C	45.9	E	33.1	D	18.6	C	51.4	F	-	-	Yes
155	Overland Avenue & Washington Boulevard	Culver City/City of LA			0.840	D	0.756	C	1.069	F	0.844	D	0.764	C	1.076	F	-	-	-
156	Walgrove Avenue & Washington Boulevard	Culver City			68.8	F	>100	F	>100	F	69.7	F	394.8	F	952.7	F	-	Yes	Yes
157	La Cienega Boulevard & 104th Street	City of LA/LA County	X	X	0.340	A	0.301	A	0.370	A	0.392	A	0.335	A	0.398	A	-	-	-
158	Vista del Mar & Waterview Street	City of LA	X	X	0.327	A	0.073	A	0.267	A	0.343	A	0.077	A	0.280	A	-	-	-
159	Hindry Avenue & Manchester Boulevard	Caltrans/Inglewood			0.513	A	0.638	B	0.597	A	0.514	A	0.719	C	0.681	B	-	Yes	-
160	Lincoln Boulevard & Rose Avenue	Caltrans/City of LA	X	X	0.920	E	0.847	D	0.843	D	0.927	E	0.860	D	0.850	D	-	-	-
161	Western Avenue & Century Boulevard	City of LA	X	X	0.576	A	0.629	B	0.824	D	0.603	B	0.651	B	0.824	D	-	-	-
162	Sepulveda Boulevard & Manhattan Beach Boulevard	Caltrans/Manhattan Beach			0.950	E	0.987	E	1.193	F	0.951	E	0.995	E	1.199	F	-	-	-
163	La Cienega Boulevard & Jefferson Boulevard	City of LA	X	X	0.986	E	0.700	B	0.955	E	0.991	E	0.712	C	0.964	E	-	-	-
164	Crenshaw Boulevard & Manchester Avenue	Caltrans/Inglewood			0.816	D	0.843	D	1.025	F	0.848	D	0.867	D	1.057	F	Yes	Yes	Yes
165	La Cienega Boulevard & Rodeo Road	City of LA	X	X	1.025	F	0.719	C	1.037	F	1.032	F	0.732	C	1.037	F	-	-	-
166	La Brea Avenue & Rodeo Road	City of LA	X	X	0.989	E	0.756	C	0.972	E	0.998	E	0.775	C	0.979	E	-	-	-
167	La Brea Avenue & Jefferson Boulevard	City of LA	X	X	1.035	F	0.659	B	1.063	F	1.039	F	0.692	B	1.064	F	-	-	-
168	Crenshaw Boulevard & Florence Avenue	City of LA	X	X	0.754	C	0.579	A	0.896	D	0.771	C	0.611	B	0.904	E	-	-	-
169	Prairie Avenue & Manchester Boulevard	Inglewood			1.042	F	0.701	C	0.922	E	1.073	F	0.716	C	0.928	E	Yes	-	-
170	I-110 Northbound Ramps & Manchester Avenue	Caltrans/City of LA	X	X	0.593	A	0.460	A	0.537	A	0.596	A	0.467	A	0.542	A	-	-	-
171	Western Avenue & Florence Avenue	City of LA	X	X	0.860	D	0.600	A	0.902	E	0.878	D	0.602	B	0.909	E	-	-	-
172	Western Avenue & Manchester Avenue	Caltrans/City of LA	X	X	0.727	C	0.560	A	0.887	D	0.738	C	0.562	A	0.900	D	-	-	-
173	Western Avenue & Imperial Highway	LA County	X	X	0.743	C	0.575	A	0.912	E	0.765	C	0.600	A	0.928	E	-	-	Yes
174	Vermont Avenue & Florence Avenue	City of LA	X	X	0.700	B	0.540	A	0.734	C	0.720	C	0.557	A	0.751	C	-	-	-
175	Vermont Avenue & Manchester Avenue	Caltrans/LA County/City of LA	X	X	0.722	C	0.542	A	0.760	C	0.739	C	0.550	A	0.787	C	-	-	-
176	Vermont Avenue & Century Boulevard	LA County/City of LA	X	X	0.700	B	0.556	A	0.726	C	0.713	C	0.598	A	0.762	C	-	-	-
177	Vermont Avenue & Imperial Highway	LA County/City of LA	X	X	0.823	D	0.545	A	0.992	E	0.830	D	0.549	A	0.995	E	-	-	-
178	Figueroa Street & Florence Avenue	City of LA	X	X	0.741	C	0.506	A	0.733	C	0.746	C	0.520	A	0.765	C	-	-	-
179	Figueroa Street & Manchester Avenue	Caltrans/City of LA	X	X	0.886	D	0.618	B	0.913	E	0.899	D	0.644	B	0.916	E	-	-	-
180	Figueroa Street & Century Boulevard	City of LA	X	X	0.893	D	0.500	A	0.784	C	0.902	E	0.536	A	0.800	C	-	-	-
181	Figueroa Street & Imperial Highway	City of LA	X	X	0.837	D	0.378	A	0.818	D	0.854	D	0.391	A	0.836	D	-	-	-
182	Inglewood Avenue & Rosecrans Avenue	Hawthorne			0.798	C	0.663	B	0.952	E	0.818	D	0.701	C	0.960	E	-	-	-
183	Hawthorne Boulevard & Rosecrans Avenue	Hawthorne			0.802	D	0.700	B	0.943	E	0.807	D	0.715	C	0.945	E	-	-	-

Table 4.12.2-23

Future (2025) With Alternative 4 Level of Service Analysis

					Future (2025) Without Alternative						Future (2025) With Alt 4								
					AM		MD		PM		AM		MD		PM		Significant impact?		
Int. #	Intersection	Jurisdiction	ATSAC	ATCS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	AM	MD	PM
184	Prairie Avenue & Rosecrans Avenue	Hawthorne/Lawndale			0.872	D	0.736	C	0.969	E	0.888	D	0.763	C	0.975	E	-	-	-
185	Crenshaw Boulevard & Rosecrans Avenue	Gardena/Hawthorne/LA County			0.796	C	0.727	C	0.916	E	0.812	D	0.746	C	0.924	E	-	-	-
186	Western Avenue & Rosecrans Avenue	Gardena			0.810	D	0.672	B	0.927	E	0.830	D	0.678	B	0.936	E	-	-	-
187	Vermont Avenue & Rosecrans Avenue	Gardena/City of LA	X		0.757	C	0.604	B	0.857	D	0.759	C	0.612	B	0.865	D	-	-	-
188	Prairie Avenue & El Segundo Boulevard	Hawthorne			1.001	F	0.684	B	1.006	F	1.028	F	0.707	C	1.008	F	Yes	-	-
189	Crenshaw Boulevard & El Segundo Boulevard	Hawthorne/Gardena			0.969	E	0.722	C	0.890	D	0.969	E	0.740	C	0.893	D	-	-	-
190	Western Avenue & El Segundo Boulevard	Gardena/LA County			0.846	D	0.594	A	0.860	D	0.857	D	0.617	B	0.872	D	-	-	-
191	Vermont Avenue & El Segundo Boulevard	Gardena/LA County/City of LA	X		0.682	B	0.422	A	0.676	B	0.710	C	0.445	A	0.710	C	-	-	-
192	Aviation Boulevard & Artesia Boulevard	Redondo Beach/Manhattan Beach			1.132	F	0.769	C	1.078	F	1.136	F	0.772	C	1.084	F	-	-	-
193	Aviation Boulevard & Manhattan Beach Boulevard	Redondo Beach/Manhattan Beach			0.976	E	0.769	C	1.083	F	0.982	E	0.776	C	1.086	F	-	-	-
194	Sepulveda Boulevard & Palms Boulevard	City of LA	X	X	0.770	C	0.590	A	0.980	E	0.777	C	0.593	A	0.980	E	-	-	-
195	Sawtelle Boulevard & Palms Boulevard	City of LA	X	X	0.787	C	0.407	A	0.850	D	0.790	C	0.410	A	0.853	D	-	-	-
196	Prairie Avenue & Florence Avenue	Inglewood			0.965	E	0.647	B	0.851	D	0.973	E	0.663	B	0.858	D	-	-	-
197	Prairie Avenue & Lennox Boulevard	Inglewood			0.670	B	0.557	A	0.704	C	0.711	C	0.598	A	0.759	C	Yes	-	Yes
198	Flower Street (near I-110 Southbound Ramps) & Florence Avenue	Caltrans/City of LA	X	X	0.527	A	0.513	A	0.535	A	0.533	A	0.544	A	0.558	A	-	-	-
199	Grand Avenue (near I-110 Northbound Ramps) & Florence Avenue	Caltrans/City of LA	X	X	0.617	B	0.602	B	0.675	B	0.628	B	0.621	B	0.686	B	-	-	-
200	I-110 Southbound Ramps & Manchester Avenue	Caltrans/City of LA	X	X	0.487	A	0.436	A	0.531	A	0.489	A	0.445	A	0.535	A	-	-	-

Note:

Future (2025) Without Alternative and With Alternative V/C reported above was based on ICU Methodology. Based on the City of El Segundo significance criteria, an intersection would only be impacted if the resulting LOS is E or F and the project-related traffic increase is greater than 0.02. This intersection was also analyzed based on City of Los Angeles CMA Methodology, where Future (2025) Without Alternative V/C was 0.504 (LOS A) and Future (2025) With Alternative V/C was 0.585 (LOS A). This intersection would not be impacted based on application of the significance criteria for both cities.

Source: Fehr & Peers, 2012.

Table 4.12.2-24

Future (2025) With Alternative 8 Level of Service Analysis

					Future (2025) Without Alternative						Future (2025) With Alt. 8						Significant impact?		
					AM		MD		PM		AM		MD		PM				
Int. #	Intersection	Jurisdiction	ATSAC	ATCS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	AM	MD	PM
1	Admiralty Way & Bali Way	LA County	X	X	~~0.794~~	~~C~~	~~0.707~~	~~C~~	~~0.950~~	~~E~~	~~0.807~~	~~D~~	~~0.723~~	~~C~~	~~0.959~~	~~E~~			
					0.647	*B*	*0.607*	*B*	*0.817*	*D*	*0.657*	*B*	*0.617*	*B*	*0.823*	*D*	-	-	-
2	Admiralty Way & Fiji Way	LA County	X	X	0.447	A	0.360	A	0.595	A	0.451	A	0.372	A	0.595	A	-	-	-
3	Admiralty Way & Mindanao Way	LA County	X	X	~~0.620~~	~~B~~	~~0.568~~	A	~~0.672~~	B	~~0.644~~	~~B~~	~~0.587~~	A	~~0.676~~	B	-	-	-
					0.481	*A*	*0.522*		*0.671*		*0.505*	*A*	*0.531*		*0.675*				
4	Palawan Way & Admiralty Way	LA County	X		~~0.616~~	B	~~0.458~~	A	~~0.682~~	B	~~0.622~~	B	~~0.496~~	A	~~0.693~~	B	-	-	-
					0.625		*0.436*		*0.657*		*0.631*		*0.474*		*0.668*				
5	Via Marina & Admiralty Way	LA County	X	X	0.598	A	0.576	A	0.833	D	0.604	B	0.595	A	0.839	D	-	-	-
6	Airport Boulevard & Arbor Vitae Street/Westchester Parkway	City of LA	X	X	0.471	A	0.573	A	0.747	C	0.500	A	0.685	B	0.925	E	-	-	Yes
7	Airport Boulevard & Century Boulevard	City of LA	X	X	0.651	B	0.648	B	0.619	B	0.736	C	0.979	E	0.861	D	Yes	Yes	Yes
8	La Tijera Boulevard & Airport Boulevard	City of LA	X	X	0.520	A	0.441	A	0.580	A	0.634	B	0.611	B	0.665	B	-	-	-
9	Airport Boulevard & Manchester Avenue	Caltrans/City of LA	X	X	0.740	C	0.849	D	0.951	E	0.871	D	1.056	F	1.060	F	Yes	Yes	Yes
10	Aviation Boulevard & Arbor Vitae Street	Inglewood/City of LA	X	X	0.550	A	0.525	A	0.791	C	0.582	A	0.569	A	0.864	D	-	-	Yes
11	Inglewood Avenue & Arbor Vitae Street	Inglewood			0.508	A	0.575	A	0.798	C	0.553	A	0.606	B	0.848	D	-	-	Yes
12	La Brea Avenue & Arbor Vitae Street	Inglewood			0.440	A	0.547	A	0.759	C	0.473	A	0.553	A	0.802	D	-	-	Yes
13	La Cienega Boulevard & Arbor Vitae Street	Inglewood/City of LA	X	X	0.542	A	0.501	A	0.701	C	0.595	A	0.503	A	0.736	C	-	-	-
14	Aviation Boulevard & Century Boulevard	City of LA	X	X	0.943	E	0.827	D	1.097	F	1.180	F	1.069	F	1.208	F	Yes	Yes	Yes
15	Aviation Boulevard & El Segundo Boulevard	El Segundo			0.922	E	~~0.643~~	B	~~0.850~~	D	0.928	E	0.677	B	~~0.887~~	D	-	-	-
							0.638		*0.823*						*0.854*				
16	Aviation Boulevard & Imperial Highway	City of LA	X	X	0.675	B	0.455	A	0.691	B	0.680	B	0.557	A	0.707	C	-	-	-
17	Aviation Boulevard/Florence Avenue & Manchester Avenue	Caltrans/Inglewood	X	X	0.854	D	0.903	E	0.894	D	0.885	D	0.909	E	0.984	E	Yes	-	Yes
18	Aviation Boulevard & Rosecrans Avenue	El Segundo/Hawthorne/ Manhattan Beach			0.743	C	0.819	D	0.926	E	0.752	C	0.833	D	0.932	E	-	-	-
19	Aviation Boulevard & 111th Street	City of LA	X	X	0.573	A	0.478	A	0.555	A	0.609	B	0.522	A	0.642	B	-	-	-
20	Aviation Boulevard & West 120th Street	El Segundo/LA County			0.659	B	0.413	A	0.557	A	0.700	B	0.501	A	0.650	B	-	-	-
21	Lincoln Boulevard & Bali Way	Caltrans/City of LA/LA County	X	X	0.570	A	0.574	A	0.836	D	0.579	A	0.587	A	0.840	D	-	-	-
22	Lincoln Boulevard & Bluff Creek Drive	Caltrans/City of LA	X	X	0.553	A	0.333	A	0.567	A	0.553	A	0.347	A	0.570	A	-	-	-
23	Centinela Avenue & Jefferson Boulevard	City of LA/LA County	X	X	0.643	B	0.504	A	0.840	D	0.664	B	0.510	A	0.845	D	-	-	-
24	Centinela Avenue & Culver Boulevard	City of LA	X	X	0.777	C	0.577	A	0.907	E	0.788	C	0.581	A	0.911	E	-	-	-
25	La Brea Avenue & Centinela Avenue	Inglewood			0.913	E	0.794	C	0.991	E	0.931	E	0.816	D	0.991	E	Yes	Yes	-
26	La Cienega Boulevard & Centinela Avenue	Inglewood/City of LA	X	X	0.896	D	0.681	B	1.134	F	0.938	E	0.741	C	1.134	F	Yes	Yes	-
27	La Tijera Boulevard & Centinela Avenue	City of LA/LA County	X	X	0.643	B	0.502	A	0.840	D	0.681	B	0.537	A	0.862	D	-	-	Yes
28	Sepulveda Boulevard & Centinela Avenue	Culver City	X		0.884	D	0.711	C	0.879	D	0.891	D	0.724	C	0.885	D	-	-	-
29	Centinela Avenue & Venice Boulevard	Caltrans/City of LA	X	X	1.048	F	0.898	D	1.064	F	1.051	F	0.899	D	1.069	F	-	-	-
30	Centinela Avenue & Washington Boulevard	Culver City	X		0.853	D	0.707	C	1.003	F	0.857	D	0.723	C	1.020	F	-	-	-
31	Centinela Avenue & Washington Place	Culver City/City of LA	X		0.770	C	0.657	B	0.880	D	0.777	C	0.660	B	0.883	D	-	-	-
32	Centinela Avenue & SR 90 Eastbound On-/Off-Ramps	Caltrans/City of LA	X	X	0.391	A	0.282	A	0.525	A	0.409	A	0.300	A	0.532	A	-	-	-
33	Centinela Avenue & Sandford/SR 90 Westbound Ramps	Caltrans/City of LA	X	X	0.440	A	0.267	A	0.556	A	0.454	A	0.286	A	0.560	A	-	-	-
34	La Brea Avenue/Hawthorne Boulevard & Century Boulevard	Inglewood			0.735	C	0.771	C	0.983	E	0.796	C	0.959	E	1.089	F	Yes	Yes	Yes
35	Inglewood Avenue & Century Boulevard	Inglewood			0.705	C	0.657	B	0.926	E	0.754	C	0.754	C	0.929	E	Yes	Yes	-
36	La Cienega Boulevard & Century Boulevard	Inglewood/City of LA/LA County	X	X	0.730	C	0.661	B	0.827	D	0.929	E	0.861	D	0.984	E	Yes	Yes	Yes
37	Prairie Avenue & Century Boulevard	Inglewood			0.678	B	0.754	C	0.927	E	0.725	C	0.794	C	0.979	E	Yes	Yes	Yes
38	Sepulveda Boulevard & Century Boulevard	Caltrans/City of LA	X	X	0.579	A	0.497	A	0.655	B	0.679	B	0.633	B	0.769	C	-	-	Yes
39	I-405 Northbound Ramps & Century Boulevard	Caltrans/Inglewood			0.743	C	0.586	A	0.714	C	0.762	C	0.627	B	0.714	C	-	-	-
40	Duquesne Avenue & Culver Boulevard	Culver City	X		0.585	A	0.432	A	0.661	B	0.588	A	0.432	A	0.661	B	-	-	-
41	Culver Boulevard & Jefferson Boulevard	City of LA	X	X	0.733	C	0.342	A	0.738	C	0.741	C	0.359	A	0.752	C	-	-	-
42	Nicholson Street & Culver Boulevard	City of LA	X	X	0.675	B	0.412	A	0.816	D	0.679	B	0.430	A	0.833	D	-	-	-
43	Overland Avenue & Culver Boulevard	Culver City	X		1.182	F	0.660	B	0.935	E	1.182	F	0.671	B	0.946	E	-	-	-
44	Sawtelle Boulevard & Culver Boulevard	Culver City	X		0.686	B	0.479	A	0.888	D	0.689	B	0.503	A	0.891	D	-	-	-
45	Sepulveda Boulevard & Culver Boulevard	Culver City	X		0.730	C	0.557	A	0.733	C	0.741	C	0.564	A	0.738	C	-	-	-
46	Douglas Street & El Segundo Boulevard	El Segundo			0.773	C	0.594	A	0.976	E	0.782	C	0.628	B	1.006	F	-	-	Yes
47	Douglas Street & Imperial Highway	El Segundo/City of LA	X	X	0.371	A	0.256	A	0.456	A	0.414	A	0.302	A	0.515	A	-	-	-
48	Douglas Street & Mariposa Avenue	El Segundo			0.400	A	0.444	A	0.592	A	0.431	A	0.477	A	0.604	B	-	-	-

Table 4.12.2-24

Future (2025) With Alternative 8 Level of Service Analysis

					Future (2025) Without Alternative						Future (2025) With Alt. 8								
					AM		MD		PM		AM		MD		PM		Significant impact?		
Int. #	Intersection	Jurisdiction	ATSAC	ATCS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	AM	MD	PM
49	Douglas Street & Rosecrans Avenue	El Segundo/Manhattan Beach			0.666	B	0.717	C	0.789	C	0.678	B	0.728	C	0.807	D	-	-	-
50	Duquesne Avenue & Jefferson Boulevard	Culver City	X		0.614	B	0.569	A	0.741	C	0.621	B	0.579	A	0.769	C	-	-	-
51	Hawthorne Boulevard & El Segundo Boulevard	Hawthorne			0.675	B	0.697	B	1.230	F	0.679	B	0.730	C	1.242	F	-	-	Yes
52	Inglewood Avenue & El Segundo Boulevard	Hawthorne/LA County			0.670	B	0.697	B	1.078	F	0.690	B	0.710	C	1.080	F	-	-	-
53	La Cienega Boulevard & El Segundo Boulevard	Hawthorne/LA County			0.710	C	0.562	A	1.015	F	0.735	C	0.579	A	1.023	F	-	-	-
54	Nash Street & El Segundo Boulevard	El Segundo			0.593	A	0.456	A	0.708	C	0.599	A	0.468	A	0.711	C	-	-	-
55	Sepulveda Boulevard & El Segundo Boulevard	Caltrans/El Segundo			0.821	D	0.843	D	1.013	F	0.821	D	0.860	D	1.014	F	-	-	-
56	Lincoln Boulevard & Fiji Way	Caltrans/City of LA/LA County	X	X	0.620	B	0.613	B	0.860	D	0.629	B	0.650	B	0.867	D	-	-	-
57	La Brea Avenue & Florence Avenue	Inglewood			0.791	C	0.763	C	1.054	F	0.838	D	0.849	D	1.144	F	Yes	Yes	Yes
58	La Cienega Boulevard & Florence Avenue	Inglewood			0.896	D	0.896	D	1.165	F	0.938	E	1.047	F	1.177	F	Yes	Yes	Yes
59	Nash Street & Grand Avenue	El Segundo			0.545	A	0.416	A	0.510	A	0.557	A	0.417	A	0.516	A	-	-	-
60	Sepulveda Boulevard & Grand Avenue	Caltrans/El Segundo			0.810	D	0.755	C	0.934	E	0.810	D	0.756	C	0.960	E	-	-	Yes
61	Vista del Mar & Grand Avenue	City of LA	X	X	0.549	A	0.265	A	0.388	A	0.588	A	0.279	A	0.409	A	-	-	-
62	Hawthorne Boulevard & Imperial Avenue	Hawthorne			0.664	B	0.602	B	0.959	E	0.675	B	0.638	B	1.026	F	-	-	Yes
63	Hawthorne Boulevard & Lennox Boulevard	LA County			0.508	A	0.607	B	0.810	D	0.518	A	0.652	B	0.863	D	-	-	Yes
64	Highland Avenue/Vista del Mar & Rosecrans Avenue	Manhattan Beach			0.823	D	0.563	A	0.737	C	0.857	D	0.569	A	0.744	C	Yes	-	-
65	Sepulveda Boulevard & Howard Hughes Parkway	City of LA	X	X	0.418	A	0.400	A	0.598	A	0.434	A	0.416	A	0.609	B	-	-	-
66	Inglewood Avenue & Imperial Highway	Hawthorne			0.765	C	0.695	B	1.286	F	0.810	D	0.739	C	1.324	F	Yes	Yes	Yes
67	La Cienega Boulevard & Imperial Highway	City of LA/LA County	X	X	0.536	A	0.276	A	0.698	B	0.537	A	0.315	A	0.701	C	-	-	-
68	Main Street & Imperial Highway	El Segundo/City of LA	X	X	0.763	C	0.526	A	0.639	B	0.766	C	0.548	A	0.652	B	-	-	-
69	Pershing Drive & Imperial Highway	City of LA	X	X	0.382	A	0.304	A	0.433	A	0.412	A	0.319	A	0.448	A	-	-	-
70	Prairie Avenue & Imperial Highway	Hawthorne/Inglewood			0.690	B	0.628	B	0.881	D	0.713	C	0.646	B	0.882	D	-	-	-
71	Sepulveda Boulevard & Imperial Highway	Caltrans/El Segundo/City of LA	X	X	0.805	D	0.807	D	1.223	F	0.851	D	0.864	D	1.245	F	Yes	Yes	Yes
72	Vista del Mar & Imperial Highway	City of LA	X	X	0.416	A	0.224	A	0.409	A	0.427	A	0.235	A	0.420	A	-	-	-
73	Nash Street/I-105 Westbound Ramps & Imperial Highway	Caltrans/El Segundo/City of LA	X	X	0.642	B	0.237	A	0.416	A	0.710	C	0.404	A	0.480	A	-	-	-
74	I-105 Ramps (e/o Aviation Boulevard) & Imperial Highway	Caltrans/City of LA	X	X	0.647	B	0.340	A	0.609	B	0.662	B	0.365	A	0.655	B	-	-	-
75	I-405 Northbound Ramps (e/o La Cienega Boulevard) & Imperial Highway	Caltrans/Hawthorne/LA County			0.500	A	0.353	A	0.703	C	0.516	A	0.375	A	0.703	C	-	-	-
76	Inglewood Avenue & Lennox Boulevard	LA County			0.468	A	0.557	A	0.819	D	0.525	A	0.558	A	0.870	D	-	-	Yes
77	Inglewood Avenue & Manchester Boulevard	Caltrans/Inglewood			0.651	B	0.565	A	0.773	C	0.675	B	0.597	A	0.803	D	-	-	Yes
78	Lincoln Boulevard & Jefferson Boulevard	Caltrans/City of LA	X	X	0.688	B	0.560	A	0.741	C	0.691	B	0.575	A	0.743	C	-	-	-
79	Overland Avenue & Jefferson Boulevard	Culver City	X		0.678	B	0.542	A	0.777	C	0.686	B	0.546	A	0.793	C	-	-	-
80	Sepulveda Boulevard & Jefferson Boulevard	Culver City	X		0.475	A	0.419	A	0.503	A	0.479	A	0.421	A	0.505	A	-	-	-
81	Sepulveda Boulevard & Jefferson Boulevard & Playa Street	Culver City	X		0.819	D	0.712	C	1.019	F	0.830	D	0.720	C	1.021	F	-	-	-
82	Slauson Avenue & Jefferson Boulevard	Culver City	X		0.388	A	0.528	A	0.505	A	0.394	A	0.536	A	0.506	A	-	-	-
83	I-405 Northbound Ramps & Jefferson Boulevard	Caltrans/Culver City/City of LA	X	X	0.506	A	0.424	A	0.782	C	0.512	A	0.428	A	0.786	C	-	-	-
84	I-405 Southbound Ramps & Jefferson Boulevard	Caltrans/Culver City/City of LA	X	X	0.329	A	0.349	A	0.446	A	0.361	A	0.360	A	0.480	A	-	-	-
85	La Brea Avenue & Manchester Boulevard	Caltrans/Inglewood			0.847	D	0.744	C	0.945	E	0.860	D	0.757	C	0.961	E	-	-	Yes
86	La Brea Avenue/Overhill Drive & Stocker Street	LA County			0.820	D	0.724	C	1.193	F	0.863	D	0.760	C	1.233	F	Yes	-	Yes
87	La Brea Avenue & Slauson Avenue	LA County			0.905	E	0.747	C	1.007	F	0.972	E	0.815	D	1.035	F	Yes	Yes	Yes
88	La Cienega Boulevard & La Tijera Boulevard	Inglewood/City of LA	X	X	0.794	C	0.738	C	1.005	F	0.788	C	0.782	C	1.131	F	-	Yes	Yes
89	La Cienega Boulevard & Lennox Boulevard	City of LA/LA County	X	X	0.419	A	0.354	A	0.497	A	0.466	A	0.441	A	0.551	A	-	-	-
90	La Cienega Boulevard & Manchester Boulevard	Caltrans/Inglewood			0.736	C	0.741	C	0.907	E	0.796	C	0.843	D	0.969	E	Yes	Yes	Yes
91	La Cienega Boulevard Northbound Ramps & Slauson Avenue	LA County			0.693	B	0.589	A	0.834	D	0.722	C	0.640	B	0.850	D	-	-	-
92	La Cienega Boulevard Southbound Ramps & Slauson Avenue	LA County			1.002	F	0.829	D	1.010	F	1.004	F	0.833	D	1.018	F	-	-	-
93	La Cienega Boulevard & Stocker Street	LA County			1.270	F	0.838	D	1.210	F	1.287	F	0.863	D	1.223	F	Yes	Yes	Yes
94	La Cienega Boulevard & 111th Street	City of LA/LA County	X	X	0.438	A	0.294	A	0.453	A	0.439	A	0.400	A	0.478	A	-	-	-
95	La Cienega Boulevard & West 120th Street	LA County			0.449	A	0.313	A	0.817	D	0.479	A	0.367	A	0.894	D	-	-	Yes
96	La Cienega Boulevard & I-405 Southbound Ramps (n/o Century Boulevard)	Caltrans/Inglewood/City of LA	X	X	0.669	B	0.695	B	0.694	B	0.674	B	0.864	D	0.810	D	-	Yes	Yes
97	La Cienega Boulevard & I-405 Southbound Ramps (s/o Century Boulevard)	Caltrans/City of LA/LA County	X	X	0.415	A	0.462	A	0.540	A	0.501	A	0.518	A	0.615	B	-	-	-
98	La Cienega Boulevard & I-405 Southbound Ramps (n/o Imperial Highway)	Caltrans/City of LA/LA County	X	X	0.478	A	0.341	A	0.369	A	0.509	A	0.431	A	0.381	A	-	-	-
99	Lincoln Boulevard & La Tijera Boulevard	Caltrans/City of LA	X	X	0.520	A	0.320	A	0.625	B	0.523	A	0.335	A	0.637	B	-	-	-
100	La Tijera Boulevard & Manchester Avenue	Caltrans/City of LA	X	X	0.570	A	0.549	A	0.679	B	0.570	A	0.542	A	0.679	B	-	-	-
101	Sepulveda Boulevard & La Tijera Boulevard	City of LA	X	X	0.602	B	0.729	C	0.851	D	0.600	A	0.589	A	0.784	C	-	-	-
102	I-405 Northbound Ramps & La Tijera Boulevard	Caltrans/City of LA	X	X	0.619	B	0.693	B	0.609	B	0.746	C	0.842	D	0.664	B	Yes	Yes	-

Table 4.12.2-24

Future (2025) With Alternative 8 Level of Service Analysis

					Future (2025) Without Alternative						Future (2025) With Alt. 8						Significant impact?		
					AM		MD		PM		AM		MD		PM				
Int. #	Intersection	Jurisdiction	ATSAC	ATCS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	AM	MD	PM
103	I-405 Southbound Ramps & La Tijera Boulevard	Caltrans/City of LA	X	X	0.467	A	0.563	A	0.681	B	0.516	A	0.612	B	0.713	C	-	-	-
104	Lincoln Boulevard & Loyola Marymount University Drive	Caltrans/City of LA	X	X	0.569	A	0.441	A	0.698	B	0.570	A	0.470	A	0.724	C	-	-	-
105	Lincoln Boulevard & Manchester Avenue	Caltrans/City of LA	X	X	0.800	C	0.547	A	0.871	D	0.802	D	0.549	A	0.878	D	-	-	-
106	Lincoln Boulevard & Maxella Avenue	Caltrans/City of LA	X	X	0.599	A	0.624	B	0.683	B	0.601	B	0.632	B	0.688	B	-	-	-
107	Lincoln Boulevard & Mindanao Way	Caltrans/City of LA/LA County	X	X	0.739	C	0.872	D	0.947	E	0.749	C	0.883	D	0.947	E	-	-	-
108	Sepulveda Boulevard & Lincoln Boulevard	Caltrans/City of LA	X	X	0.684	B	0.571	A	0.938	E	0.665	B	0.563	A	0.925	E	-	-	-
109	Lincoln Boulevard & Venice Boulevard	Caltrans/City of LA	X	X	0.892	D	0.915	E	1.036	F	0.899	D	0.925	E	1.043	F	-	Yes	-
110	Lincoln Boulevard & Washington Boulevard	Caltrans/City of LA	X	X	0.841	D	0.904	E	1.053	F	0.845	D	0.919	E	1.054	F	-	Yes	-
111	Lincoln Boulevard & 83rd Street	Caltrans/City of LA	X	X	0.609	B	0.435	A	0.700	B	0.618	B	0.448	A	0.704	C	-	-	-
112	Lincoln Boulevard & SR 90 Ramps	Caltrans/City of LA	X	X	0.629	B	0.639	B	0.802	D	0.638	B	0.650	B	0.813	D	-	-	-
113	Pershing Drive & Manchester Avenue	Caltrans/City of LA	X	X	0.464	A	0.329	A	0.475	A	0.478	A	0.340	A	0.482	A	-	-	-
114	Sepulveda Boulevard & Manchester Avenue	Caltrans/City of LA	X	X	~~0.804~~	~~D~~	~~0.761~~	C	~~0.929~~	E	~~0.837~~	~~D~~	~~0.768~~	C	~~0.933~~	E	~~Yes~~	-	-
					0.684	*B*	*0.709*		*0.962*		*0.717*	*C*	*0.723*		*0.958*		-		
115	Ash Avenue & Manchester Avenue	Caltrans/Inglewood			0.786	C	0.711	C	0.945	E	0.805	D	0.767	C	0.979	E	-	Yes	Yes
116	Nash Street & Mariposa Avenue	El Segundo			0.650	B	0.385	A	0.538	A	0.669	B	0.413	A	0.557	A	-	-	-
117	Sepulveda Boulevard & Mariposa Avenue	Caltrans/El Segundo			0.783	C	0.759	C	0.839	D	0.816	D	0.767	C	0.842	D	-	-	-
118	Sawtelle Boulevard & Matteson Street/I-405 Southbound Ramps	Caltrans/Culver City	X		0.926	E	0.611	B	1.081	F	0.926	E	0.625	B	1.081	F	-	-	-
119	Ocean Avenue/Via Marina & Washington Boulevard	City of LA/LA County	X	X	1.181	F	0.956	E	1.514	F	1.216	F	1.005	F	1.539	F	Yes	Yes	Yes
120	Overhill Drive & Slauson Avenue	LA County			0.736	C	0.620	B	1.147	F	0.760	C	0.698	B	1.155	F	-	-	-
121	Overland Avenue & Venice Boulevard	Caltrans/Culver City/City of LA	X	X	0.879	D	0.709	C	0.991	E	0.884	D	0.713	C	0.994	E	-	-	-
122	Palawan Way & Washington Boulevard	City of LA/LA County			16.5	C	14.5	B	16.5	C	16.6	C	14.7	B	17.0	C	-	-	-
123	Pershing Drive & Westchester Parkway	City of LA	X	X	0.244	A	0.166	A	0.311	A	0.286	A	0.187	A	0.329	A	-	-	-
124	Prairie Avenue & West 112th Street/I-105 Off-Ramp	Caltrans/Inglewood			0.553	A	0.623	B	0.759	C	0.555	A	0.630	B	0.774	C	-	-	-
125	Sepulveda Boulevard & Rosecrans Avenue	Caltrans/El Segundo/Manhattan Beach			0.918	E	0.836	D	1.158	F	0.923	E	0.862	D	1.160	F	-	Yes	-
126	Sepulveda Boulevard & Sawtelle Boulevard	Culver City	X		0.516	A	0.614	B	0.742	C	0.523	A	0.621	B	0.756	C	-	-	-
127	Sawtelle Boulevard & Venice Boulevard	Caltrans/Culver City/City of LA	X	X	1.077	F	0.843	D	0.956	E	1.084	F	0.848	D	0.958	E	-	-	-
128	Sawtelle Boulevard & Washington Boulevard	Culver City	X		0.660	B	0.517	A	0.787	C	0.660	B	0.533	A	0.797	C	-	-	-
129	Sawtelle Boulevard & Washington Place	Culver City	X		0.487	A	0.373	A	0.667	B	0.497	A	0.380	A	0.673	B	-	-	-
130	Sepulveda Boulevard & Slauson Avenue	Culver City	X		0.598	A	0.688	B	0.894	D	0.615	B	0.719	C	0.904	E	-	-	-
131	Sepulveda Boulevard & Venice Boulevard	Caltrans/Culver City/City of LA	X	X	0.893	D	0.734	C	1.115	F	0.893	D	0.746	C	1.117	F	-	-	-
132	Sepulveda Boulevard & Washington Boulevard	Culver City	X		0.610	B	0.597	A	0.727	C	0.620	B	0.610	B	0.727	C	-	-	-
133	Sepulveda Boulevard & Washington Place	Culver City	X		0.660	B	0.583	A	0.707	C	0.660	B	0.587	A	0.710	C	-	-	-
134	Sepulveda Boulevard & I-405 Northbound On-/Off-Ramps	Caltrans/Culver City	X		0.885	D	0.610	B	0.812	D	0.886	D	0.618	B	0.812	D	-	-	-
135	Sepulveda Boulevard & Westchester Parkway	City of LA	X	X	0.658	B	0.643	B	1.109	F	0.680	B	0.644	B	1.113	F	-	-	-
136	Sepulveda Boulevard & 76th Street	City of LA	X	X	0.691	B	0.484	A	0.700	B	0.699	B	0.496	A	0.740	C	-	-	-
137	Sepulveda Boulevard & 79th Street	City of LA	X	X	0.507	A	0.411	A	0.573	A	0.507	A	0.411	A	0.609	B	-	-	-
138	Sepulveda Boulevard & 83rd Street	City of LA	X	X	0.449	A	0.398	A	0.549	A	0.462	A	0.398	A	0.589	A	-	-	-
139	Sepulveda Boulevard & I-105 Westbound Ramps (n/o Imperial Highway)	Caltrans/City of LA	X	X	0.877	D	0.840	D	0.923	E	0.896	D	0.891	D	0.956	E	-	Yes	Yes
140	SR 90 Westbound Ramps & Slauson Avenue	Caltrans/Culver City/LA County	X		0.534	A	0.426	A	0.682	B	0.552	A	0.436	A	0.683	B	-	-	-
141	Airport Boulevard & 96th Street	City of LA	X	X	0.234	A	0.348	A	0.456	A	0.354	A	0.490	A	0.523	A	-	-	-
142	Jenny Avenue & 96th Street	City of LA	X	X	0.183	A	0.203	A	0.153	A	0.243	A	0.290	A	0.340	A	-	-	-
143	Vicksburg Avenue & 96th Street	City of LA	X	X	0.279	A	0.363	A	0.335	A	0.405	A	0.686	B	0.840	D	-	-	Yes
144	Airport Boulevard & 98th Street	City of LA	X	X	0.357	A	0.447	A	0.500	A	0.467	A	0.627	B	0.630	B	-	-	-
145	Jenny Avenue & Westchester Parkway	City of LA	X	X	0.153	A	0.220	A	0.243	A	0.157	A	0.253	A	0.263	A	-	-	-
146	Sepulveda Eastway & Westchester Parkway	City of LA	X	X	0.427	A	0.543	A	0.693	B	0.427	A	0.583	A	0.693	B	-	-	-
147	Crenshaw Boulevard & Century Boulevard	Inglewood			0.708	C	0.773	C	0.928	E	0.729	C	0.807	D	0.979	E	-	Yes	Yes
148	La Cienega Boulevard & Fairview Boulevard	Inglewood/City of LA	X	X	0.881	D	0.657	B	0.952	E	0.893	D	0.688	B	0.954	E	-	-	-
149	Crenshaw Boulevard & Imperial Highway	Inglewood			0.680	B	0.705	C	1.001	F	0.715	C	0.748	C	1.030	F	-	Yes	Yes
150	Sepulveda Boulevard & Braddock Drive	Culver City			0.580	A	0.527	A	0.677	B	0.580	A	0.537	A	0.683	B	-	-	-
151	Buckingham Parkway & Slauson Avenue	Culver City			0.716	C	0.544	A	0.888	D	0.724	C	0.551	A	0.888	D	-	-	-
152	Duquesne Avenue & Washington Boulevard	Culver City			0.573	A	0.507	A	0.657	B	0.580	A	0.517	A	0.663	B	-	-	-
153	Overland Avenue & Kelmore Street/Ranch Road	Culver City			32.1	D	15.3	C	46.2	E	32.6	D	15.7	C	49.9	E	-	-	-
154	Overland Avenue & Sawtelle Boulevard	Culver City			31.4	D	17.6	C	45.9	E	33.1	D	18.6	C	50.6	F	-	-	Yes
155	Overland Avenue & Washington Boulevard	Culver City/City of LA			0.840	D	0.756	C	1.069	F	0.847	D	0.771	C	1.069	F	-	-	-

Table 4.12.2-24

Future (2025) With Alternative 8 Level of Service Analysis

					Future (2025) Without Alternative						Future (2025) With Alt. 8						Significant impact?		
					AM		MD		PM		AM		MD		PM				
Int. #	Intersection	Jurisdiction	ATSAC	ATCS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	AM	MD	PM
156	Walgrove Avenue & Washington Boulevard	Culver City			68.8	F	>100	F	>100	F	68.8	F	355.8	F	952.7	F	-	Yes	Yes
157	La Cienega Boulevard & 104th Street	City of LA/LA County	X	X	0.340	A	0.301	A	0.370	A	0.417	A	0.379	A	0.417	A	-	-	-
158	Vista del Mar & Waterview Street	City of LA	X	X	0.327	A	0.073	A	0.267	A	0.343	A	0.077	A	0.283	A	-	-	-
159	Hindry Avenue & Manchester Boulevard	Caltrans/Inglewood			0.513	A	0.638	B	0.597	A	0.516	A	0.756	C	0.691	B	-	Yes	-
160	Lincoln Boulevard & Rose Avenue	Caltrans/City of LA	X	X	0.920	E	0.847	D	0.843	D	0.927	E	0.857	D	0.850	D	-	-	-
161	Western Avenue & Century Boulevard	City of LA	X	X	0.576	A	0.629	B	0.824	D	0.598	A	0.662	B	0.827	D	-	-	-
162	Sepulveda Boulevard & Manhattan Beach Boulevard	Caltrans/Manhattan Beach			0.950	E	0.987	E	1.193	F	0.957	E	0.997	E	1.199	F	-	Yes	-
163	La Cienega Boulevard & Jefferson Boulevard	City of LA	X	X	0.986	E	0.700	B	0.955	E	0.988	E	0.714	C	0.964	E	-	-	-
164	Crenshaw Boulevard & Manchester Avenue	Caltrans/Inglewood			0.816	D	0.843	D	1.025	F	0.857	D	0.873	D	1.066	F	Yes	Yes	Yes
165	La Cienega Boulevard & Rodeo Road	City of LA	X	X	1.025	F	0.719	C	1.037	F	1.035	F	0.734	C	1.038	F	Yes	-	-
166	La Brea Avenue & Rodeo Road	City of LA	X	X	0.989	E	0.756	C	0.972	E	0.996	E	0.775	C	0.981	E	-	-	-
167	La Brea Avenue & Jefferson Boulevard	City of LA	X	X	1.035	F	0.659	B	1.063	F	1.042	F	0.687	B	1.067	F	-	-	-
168	Crenshaw Boulevard & Florence Avenue	City of LA	X	X	0.754	C	0.579	A	0.896	D	0.782	C	0.624	B	0.904	E	-	-	-
169	Prairie Avenue & Manchester Boulevard	Inglewood			1.042	F	0.701	C	0.922	E	1.079	F	0.732	C	0.941	E	Yes	-	Yes
170	I-110 Northbound Ramps & Manchester Avenue	Caltrans/City of LA	X	X	0.593	A	0.460	A	0.537	A	0.598	A	0.467	A	0.549	A	-	-	-
171	Western Avenue & Florence Avenue	City of LA	X	X	0.860	D	0.600	A	0.902	E	0.876	D	0.602	B	0.911	E	-	-	-
172	Western Avenue & Manchester Avenue	Caltrans/City of LA	X	X	0.727	C	0.560	A	0.887	D	0.733	C	0.571	A	0.906	E	-	-	Yes
173	Western Avenue & Imperial Highway	LA County	X	X	0.743	C	0.575	A	0.912	E	0.764	C	0.596	A	0.941	E	-	-	Yes
174	Vermont Avenue & Florence Avenue	City of LA	X	X	0.700	B	0.540	A	0.734	C	0.717	C	0.567	A	0.749	C	-	-	-
175	Vermont Avenue & Manchester Avenue	Caltrans/LA County/City of LA	X	X	0.722	C	0.542	A	0.760	C	0.755	C	0.553	A	0.784	C	-	-	-
176	Vermont Avenue & Century Boulevard	LA County/City of LA	X	X	0.700	B	0.556	A	0.726	C	0.718	C	0.607	B	0.764	C	-	-	-
177	Vermont Avenue & Imperial Highway	LA County/City of LA	X	X	0.823	D	0.545	A	0.992	E	0.834	D	0.547	A	0.995	E	-	-	-
178	Figueroa Street & Florence Avenue	City of LA	X	X	0.741	C	0.506	A	0.733	C	0.771	C	0.533	A	0.765	C	-	-	-
179	Figueroa Street & Manchester Avenue	Caltrans/City of LA	X	X	0.886	D	0.618	B	0.913	E	0.887	D	0.644	B	0.920	E	-	-	-
180	Figueroa Street & Century Boulevard	City of LA	X	X	0.893	D	0.500	A	0.784	C	0.899	D	0.539	A	0.800	C	-	-	-
181	Figueroa Street & Imperial Highway	City of LA	X	X	0.837	D	0.378	A	0.818	D	0.851	D	0.391	A	0.835	D	-	-	-
182	Inglewood Avenue & Rosecrans Avenue	Hawthorne			0.798	C	0.663	B	0.952	E	0.807	D	0.698	B	0.960	E	-	-	-
183	Hawthorne Boulevard & Rosecrans Avenue	Hawthorne			0.802	D	0.700	B	0.943	E	0.814	D	0.720	C	0.944	E	-	-	-
184	Prairie Avenue & Rosecrans Avenue	Hawthorne/Lawndale			0.872	D	0.736	C	0.969	E	0.890	D	0.769	C	0.977	E	-	-	-
185	Crenshaw Boulevard & Rosecrans Avenue	Gardena/Hawthorne/LA County			0.796	C	0.727	C	0.916	E	0.816	D	0.748	C	0.923	E	-	-	-
186	Western Avenue & Rosecrans Avenue	Gardena			0.810	D	0.672	B	0.927	E	0.828	D	0.675	B	0.934	E	-	-	-
187	Vermont Avenue & Rosecrans Avenue	Gardena/City of LA	X		0.757	C	0.604	B	0.857	D	0.757	C	0.610	B	0.862	D	-	-	-
188	Prairie Avenue & El Segundo Boulevard	Hawthorne			1.001	F	0.684	B	1.006	F	1.027	F	0.704	C	1.008	F	Yes	-	-
189	Crenshaw Boulevard & El Segundo Boulevard	Hawthorne/Gardena			0.969	E	0.722	C	0.890	D	0.975	E	0.742	C	0.896	D	-	-	-
190	Western Avenue & El Segundo Boulevard	Gardena/LA County			0.846	D	0.594	A	0.860	D	0.852	D	0.614	B	0.872	D	-	-	-
191	Vermont Avenue & El Segundo Boulevard	Gardena/LA County/City of LA	X		0.682	B	0.422	A	0.676	B	0.703	C	0.436	A	0.708	C	-	-	-
192	Aviation Boulevard & Artesia Boulevard	Redondo Beach/Manhattan Beach			1.132	F	0.769	C	1.078	F	1.138	F	0.769	C	1.084	F	-	-	-
193	Aviation Boulevard & Manhattan Beach Boulevard	Redondo Beach/Manhattan Beach			0.976	E	0.769	C	1.083	F	0.979	E	0.776	C	1.089	F	-	-	-
194	Sepulveda Boulevard & Palms Boulevard	City of LA	X	X	0.770	C	0.590	A	0.980	E	0.780	C	0.597	A	0.987	E	-	-	-
195	Sawtelle Boulevard & Palms Boulevard	City of LA	X	X	0.787	C	0.407	A	0.850	D	0.793	C	0.410	A	0.853	D	-	-	-
196	Prairie Avenue & Florence Avenue	Inglewood			0.965	E	0.647	B	0.851	D	0.969	E	0.672	B	0.868	D	-	-	-
197	Prairie Avenue & Lennox Boulevard	Inglewood			0.670	B	0.557	A	0.704	C	0.684	B	0.603	B	0.782	C	-	-	Yes
198	Flower Street (near I-110 Southbound Ramps) & Florence Avenue	Caltrans/City of LA	X	X	0.527	A	0.513	A	0.535	A	0.538	A	0.545	A	0.564	A	-	-	-
199	Grand Avenue (near I-110 Northbound Ramps) & Florence Avenue	Caltrans/City of LA	X	X	0.617	B	0.602	B	0.675	B	0.633	B	0.632	B	0.689	B	-	-	-
200	I-110 Southbound Ramps & Manchester Avenue	Caltrans/City of LA	X	X	0.487	A	0.436	A	0.531	A	0.489	A	0.449	A	0.540	A	-	-	-

Source: Fehr & Peers, 2012.

Table 4.12.2-25

Future (2025) With Alternative 9 Level of Service Analysis

					Future (2025) Without Alternative						Future (2025) With Alt. 9						Significant impact?		
					AM		MD		PM		AM		MD		PM				
Int. #	Intersection	Jurisdiction	ATSAC	ATCS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	AM	MD	PM
1	Admiralty Way & Bali Way	LA County	X	X	~~0.794~~	~~C~~	~~0.707~~	~~C~~	~~0.950~~	~~E~~	~~0.807~~	~~D~~	~~0.723~~	~~C~~	~~0.959~~	~~E~~	-	-	-
					0.647	*B*	*0.607*	*B*	*0.817*	*D*	*0.657*	*B*	*0.617*	*B*	*0.823*	*D*			
2	Admiralty Way & Fiji Way	LA County	X	X	0.447	A	0.360	A	0.595	A	0.451	A	0.372	A	0.595	A	-	-	-
3	Admiralty Way & Mindanao Way	LA County	X	X	~~0.620~~	~~B~~	~~0.568~~	A	~~0.672~~	B	~~0.644~~	~~B~~	~~0.587~~	A	~~0.676~~	B	-	-	-
					0.481	*A*	*0.522*		*0.671*		*0.505*	*A*	*0.531*		*0.675*				
4	Palawan Way & Admiralty Way	LA County	X		~~0.616~~	B	~~0.458~~	A	~~0.682~~	B	~~0.622~~	B	~~0.496~~	A	~~0.693~~	B	-	-	-
					0.625		*0.436*		*0.657*		*0.631*		*0.474*		*0.668*				
5	Via Marina & Admiralty Way	LA County	X	X	0.598	A	0.576	A	0.833	D	0.604	B	0.595	A	0.839	D	-	-	-
6	Airport Boulevard & Arbor Vitae Street/Westchester Parkway	City of LA	X	X	0.471	A	0.573	A	0.747	C	0.500	A	0.685	B	0.925	E	-	-	Yes
7	Airport Boulevard & Century Boulevard	City of LA	X	X	0.651	B	0.648	B	0.619	B	0.736	C	0.979	E	0.861	D	Yes	Yes	Yes
8	La Tijera Boulevard & Airport Boulevard	City of LA	X	X	0.520	A	0.441	A	0.580	A	0.634	B	0.611	B	0.665	B	-	-	-
9	Airport Boulevard & Manchester Avenue	Caltrans/City of LA	X	X	0.740	C	0.849	D	0.951	E	0.871	D	1.056	F	1.060	F	Yes	Yes	Yes
10	Aviation Boulevard & Arbor Vitae Street	Inglewood/City of LA	X	X	0.550	A	0.525	A	0.791	C	0.582	A	0.569	A	0.864	D	-	-	Yes
11	Inglewood Avenue & Arbor Vitae Street	Inglewood			0.508	A	0.575	A	0.798	C	0.553	A	0.606	B	0.848	D	-	-	Yes
12	La Brea Avenue & Arbor Vitae Street	Inglewood			0.440	A	0.547	A	0.759	C	0.473	A	0.553	A	0.802	D	-	-	Yes
13	La Cienega Boulevard & Arbor Vitae Street	Inglewood/City of LA	X	X	0.542	A	0.501	A	0.701	C	0.595	A	0.503	A	0.736	C	-	-	-
14	Aviation Boulevard & Century Boulevard	City of LA	X	X	0.943	E	0.827	D	1.097	F	1.180	F	1.069	F	1.208	F	Yes	Yes	Yes
15	Aviation Boulevard & El Segundo Boulevard	El Segundo			0.922	E	~~0.643~~	B	~~0.850~~	D	0.928	E	0.677	B	~~0.887~~	D	-	-	-
							0.638		*0.823*						*0.854*				
16	Aviation Boulevard & Imperial Highway	City of LA	X	X	0.675	B	0.455	A	0.691	B	0.680	B	0.557	A	0.707	C	-	-	-
17	Aviation Boulevard/Florence Avenue & Manchester Avenue	Caltrans/Inglewood	X	X	0.854	D	0.903	E	0.894	D	0.885	D	0.909	E	0.984	E	Yes	-	Yes
18	Aviation Boulevard & Rosecrans Avenue	El Segundo/Hawthorne/ Manhattan Beach			0.743	C	0.819	D	0.926	E	0.752	C	0.833	D	0.932	E	-	-	-
19	Aviation Boulevard & 111th Street	City of LA	X	X	0.573	A	0.478	A	0.555	A	0.609	B	0.522	A	0.642	B	-	-	-
20	Aviation Boulevard & West 120th Street	El Segundo/LA County			0.659	B	0.413	A	0.557	A	0.700	B	0.501	A	0.650	B	-	-	-
21	Lincoln Boulevard & Bali Way	Caltrans/City of LA/LA County	X	X	0.570	A	0.574	A	0.836	D	0.579	A	0.587	A	0.840	D	-	-	-
22	Lincoln Boulevard & Bluff Creek Drive	Caltrans/City of LA	X	X	0.553	A	0.333	A	0.567	A	0.553	A	0.347	A	0.570	A	-	-	-
23	Centinela Avenue & Jefferson Boulevard	City of LA/LA County	X	X	0.643	B	0.504	A	0.840	D	0.664	B	0.510	A	0.845	D	-	-	-
24	Centinela Avenue & Culver Boulevard	City of LA	X	X	0.777	C	0.577	A	0.907	E	0.788	C	0.581	A	0.911	E	-	-	-
25	La Brea Avenue & Centinela Avenue	Inglewood			0.913	E	0.794	C	0.991	E	0.931	E	0.816	D	0.991	E	Yes	Yes	-
26	La Cienega Boulevard & Centinela Avenue	Inglewood/City of LA	X	X	0.896	D	0.681	B	1.134	F	0.938	E	0.741	C	1.134	F	Yes	Yes	-
27	La Tijera Boulevard & Centinela Avenue	City of LA/LA County	X	X	0.643	B	0.502	A	0.840	D	0.681	B	0.537	A	0.862	D	-	-	Yes
28	Sepulveda Boulevard & Centinela Avenue	Culver City	X		0.884	D	0.711	C	0.879	D	0.891	D	0.724	C	0.885	D	-	-	-
29	Centinela Avenue & Venice Boulevard	Caltrans/City of LA	X	X	1.048	F	0.898	D	1.064	F	1.051	F	0.899	D	1.069	F	-	-	-
30	Centinela Avenue & Washington Boulevard	Culver City	X		0.853	D	0.707	C	1.003	F	0.857	D	0.723	C	1.020	F	-	-	-
31	Centinela Avenue & Washington Place	Culver City/City of LA	X		0.770	C	0.657	B	0.880	D	0.777	C	0.660	B	0.883	D	-	-	-
32	Centinela Avenue & SR 90 Eastbound On-/Off-Ramps	Caltrans/City of LA	X	X	0.391	A	0.282	A	0.525	A	0.409	A	0.300	A	0.532	A	-	-	-
33	Centinela Avenue & Sandford/SR 90 Westbound Ramps	Caltrans/City of LA	X	X	0.440	A	0.267	A	0.556	A	0.454	A	0.286	A	0.560	A	-	-	-
34	La Brea Avenue/Hawthorne Boulevard & Century Boulevard	Inglewood			0.735	C	0.771	C	0.983	E	0.796	C	0.959	E	1.089	F	Yes	Yes	Yes
35	Inglewood Avenue & Century Boulevard	Inglewood			0.705	C	0.657	B	0.926	E	0.754	C	0.754	C	0.929	E	Yes	Yes	-
36	La Cienega Boulevard & Century Boulevard	Inglewood/City of LA/LA County	X	X	0.730	C	0.661	B	0.827	D	0.929	E	0.861	D	0.984	E	Yes	Yes	Yes
37	Prairie Avenue & Century Boulevard	Inglewood			0.678	B	0.754	C	0.927	E	0.725	C	0.794	C	0.979	E	Yes	Yes	Yes
38	Sepulveda Boulevard & Century Boulevard	Caltrans/City of LA	X	X	0.579	A	0.497	A	0.655	B	0.659	B	0.613	B	0.749	C	-	-	Yes
39	I-405 Northbound Ramps & Century Boulevard	Caltrans/Inglewood			0.743	C	0.586	A	0.714	C	0.762	C	0.627	B	0.714	C	-	-	-
40	Duquesne Avenue & Culver Boulevard	Culver City	X		0.585	A	0.432	A	0.661	B	0.588	A	0.432	A	0.661	B	-	-	-
41	Culver Boulevard & Jefferson Boulevard	City of LA	X	X	0.733	C	0.342	A	0.738	C	0.741	C	0.359	A	0.752	C	-	-	-
42	Nicholson Street & Culver Boulevard	City of LA	X	X	0.675	B	0.412	A	0.816	D	0.679	B	0.430	A	0.833	D	-	-	-
43	Overland Avenue & Culver Boulevard	Culver City	X		1.182	F	0.660	B	0.935	E	1.182	F	0.671	B	0.946	E	-	-	-
44	Sawtelle Boulevard & Culver Boulevard	Culver City	X		0.686	B	0.479	A	0.888	D	0.689	B	0.503	A	0.891	D	-	-	-
45	Sepulveda Boulevard & Culver Boulevard	Culver City	X		0.730	C	0.557	A	0.733	C	0.741	C	0.564	A	0.738	C	-	-	-
46	Douglas Street & El Segundo Boulevard	El Segundo			0.773	C	0.594	A	0.976	E	0.782	C	0.628	B	1.006	F	-	-	Yes
47	Douglas Street & Imperial Highway	El Segundo/City of LA	X	X	0.371	A	0.256	A	0.456	A	0.414	A	0.302	A	0.515	A	-	-	-
48	Douglas Street & Mariposa Avenue	El Segundo			0.400	A	0.444	A	0.592	A	0.431	A	0.477	A	0.604	B	-	-	-

Table 4.12.2-25

Future (2025) With Alternative 9 Level of Service Analysis

					Future (2025) Without Alternative						Future (2025) With Alt. 9						Significant impact?		
					AM		MD		PM		AM		MD		PM				
Int. #	Intersection	Jurisdiction	ATSAC	ATCS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	AM	MD	PM
49	Douglas Street & Rosecrans Avenue	El Segundo/Manhattan Beach			0.666	B	0.717	C	0.789	C	0.678	B	0.728	C	0.807	D	-	-	-
50	Duquesne Avenue & Jefferson Boulevard	Culver City	X		0.614	B	0.569	A	0.741	C	0.621	B	0.579	A	0.769	C	-	-	-
51	Hawthorne Boulevard & El Segundo Boulevard	Hawthorne			0.675	B	0.697	B	1.230	F	0.679	B	0.730	C	1.242	F	-	-	Yes
52	Inglewood Avenue & El Segundo Boulevard	Hawthorne/LA County			0.670	B	0.697	B	1.078	F	0.690	B	0.710	C	1.080	F	-	-	-
53	La Cienega Boulevard & El Segundo Boulevard	Hawthorne/LA County			0.710	C	0.562	A	1.015	F	0.735	C	0.579	A	1.023	F	-	-	-
54	Nash Street & El Segundo Boulevard	El Segundo			0.593	A	0.456	A	0.708	C	0.599	A	0.468	A	0.711	C	-	-	-
55	Sepulveda Boulevard & El Segundo Boulevard	Caltrans/El Segundo			0.821	D	0.843	D	1.013	F	0.821	D	0.860	D	1.014	F	-	-	-
56	Lincoln Boulevard & Fiji Way	Caltrans/City of LA/LA County	X	X	0.620	B	0.613	B	0.860	D	0.629	B	0.650	B	0.867	D	-	-	-
57	La Brea Avenue & Florence Avenue	Inglewood			0.791	C	0.763	C	1.054	F	0.838	D	0.849	D	1.144	F	Yes	Yes	Yes
58	La Cienega Boulevard & Florence Avenue	Inglewood			0.896	D	0.896	D	1.165	F	0.938	E	1.047	F	1.177	F	Yes	Yes	Yes
59	Nash Street & Grand Avenue	El Segundo			0.545	A	0.416	A	0.510	A	0.557	A	0.417	A	0.516	A	-	-	-
60	Sepulveda Boulevard & Grand Avenue	Caltrans/El Segundo			0.810	D	0.755	C	0.934	E	0.810	D	0.756	C	0.960	E	-	-	Yes
61	Vista del Mar & Grand Avenue	City of LA	X	X	0.549	A	0.265	A	0.388	A	0.588	A	0.279	A	0.409	A	-	-	-
62	Hawthorne Boulevard & Imperial Avenue	Hawthorne			0.664	B	0.602	B	0.959	E	0.675	B	0.638	B	1.026	F	-	-	Yes
63	Hawthorne Boulevard & Lennox Boulevard	LA County			0.508	A	0.607	B	0.810	D	0.518	A	0.652	B	0.863	D	-	-	Yes
64	Highland Avenue/Vista del Mar & Rosecrans Avenue	Manhattan Beach			0.823	D	0.563	A	0.737	C	0.857	D	0.569	A	0.744	C	Yes	-	-
65	Sepulveda Boulevard & Howard Hughes Parkway	City of LA	X	X	0.418	A	0.400	A	0.598	A	0.434	A	0.416	A	0.609	B	-	-	-
66	Inglewood Avenue & Imperial Highway	Hawthorne			0.765	C	0.695	B	1.286	F	0.810	D	0.739	C	1.324	F	Yes	Yes	Yes
67	La Cienega Boulevard & Imperial Highway	City of LA/LA County	X	X	0.536	A	0.276	A	0.698	B	0.537	A	0.315	A	0.701	C	-	-	-
68	Main Street & Imperial Highway	El Segundo/City of LA	X	X	0.763	C	0.526	A	0.639	B	0.766	C	0.548	A	0.652	B	-	-	-
69	Pershing Drive & Imperial Highway	City of LA	X	X	0.382	A	0.304	A	0.433	A	0.412	A	0.319	A	0.448	A	-	-	-
70	Prairie Avenue & Imperial Highway	Hawthorne/Inglewood			0.690	B	0.628	B	0.881	D	0.713	C	0.646	B	0.882	D	-	-	-
71	Sepulveda Boulevard & Imperial Highway	Caltrans/El Segundo/City of LA	X	X	0.805	D	0.807	D	1.223	F	0.851	D	0.864	D	1.245	F	Yes	Yes	Yes
72	Vista del Mar & Imperial Highway	City of LA	X	X	0.416	A	0.224	A	0.409	A	0.427	A	0.235	A	0.420	A	-	-	-
73	Nash Street/I-105 Westbound Ramps & Imperial Highway	Caltrans/El Segundo/City of LA	X	X	0.642	B	0.237	A	0.416	A	0.710	C	0.404	A	0.480	A	-	-	-
74	I-105 Ramps (e/o Aviation Boulevard) & Imperial Highway	Caltrans/City of LA	X	X	0.647	B	0.340	A	0.609	B	0.662	B	0.365	A	0.655	B	-	-	-
75	I-405 Northbound Ramps (e/o La Cienega Boulevard) & Imperial Highway	Caltrans/Hawthorne/LA County			0.500	A	0.353	A	0.703	C	0.516	A	0.375	A	0.703	C	-	-	-
76	Inglewood Avenue & Lennox Boulevard	LA County			0.468	A	0.557	A	0.819	D	0.525	A	0.558	A	0.870	D	-	-	Yes
77	Inglewood Avenue & Manchester Boulevard	Caltrans/Inglewood			0.651	B	0.565	A	0.773	C	0.675	B	0.597	A	0.803	D	-	-	Yes
78	Lincoln Boulevard & Jefferson Boulevard	Caltrans/City of LA	X	X	0.688	B	0.560	A	0.741	C	0.691	B	0.575	A	0.743	C	-	-	-
79	Overland Avenue & Jefferson Boulevard	Culver City	X		0.678	B	0.542	A	0.777	C	0.686	B	0.546	A	0.793	C	-	-	-
80	Sepulveda Boulevard & Jefferson Boulevard	Culver City	X		0.475	A	0.419	A	0.503	A	0.479	A	0.421	A	0.505	A	-	-	-
81	Sepulveda Boulevard & Jefferson Boulevard & Playa Street	Culver City	X		0.819	D	0.712	C	1.019	F	0.830	D	0.720	C	1.021	F	-	-	-
82	Slauson Avenue & Jefferson Boulevard	Culver City	X		0.388	A	0.528	A	0.505	A	0.394	A	0.536	A	0.506	A	-	-	-
83	I-405 Northbound Ramps & Jefferson Boulevard	Caltrans/Culver City/City of LA	X	X	0.506	A	0.424	A	0.782	C	0.512	A	0.428	A	0.786	C	-	-	-
84	I-405 Southbound Ramps & Jefferson Boulevard	Caltrans/Culver City/City of LA	X	X	0.329	A	0.349	A	0.446	A	0.361	A	0.360	A	0.480	A	-	-	-
85	La Brea Avenue & Manchester Boulevard	Caltrans/Inglewood			0.847	D	0.744	C	0.945	E	0.860	D	0.757	C	0.961	E	-	-	Yes
86	La Brea Avenue/Overhill Drive & Stocker Street	City of LA/LA County			0.820	D	0.724	C	1.193	F	0.863	D	0.760	C	1.233	F	Yes	-	Yes
87	La Brea Avenue & Slauson Avenue	LA County			0.905	E	0.747	C	1.007	F	0.972	E	0.815	D	1.035	F	Yes	Yes	Yes
88	La Cienega Boulevard & La Tijera Boulevard	Inglewood/City of LA	X	X	0.794	C	0.738	C	1.005	F	0.788	C	0.782	C	1.131	F	-	Yes	Yes
89	La Cienega Boulevard & Lennox Boulevard	City of LA/LA County	X	X	0.419	A	0.354	A	0.497	A	0.466	A	0.441	A	0.551	A	-	-	-
90	La Cienega Boulevard & Manchester Boulevard	Caltrans/Inglewood			0.736	C	0.741	C	0.907	E	0.796	C	0.843	D	0.969	E	Yes	Yes	Yes
91	La Cienega Boulevard Northbound Ramps & Slauson Avenue	LA County			0.693	B	0.589	A	0.834	D	0.722	C	0.640	B	0.850	D	-	-	-
92	La Cienega Boulevard Southbound Ramps & Slauson Avenue	LA County			1.002	F	0.829	D	1.010	F	1.004	F	0.833	D	1.018	F	-	-	-
93	La Cienega Boulevard & Stocker Street	LA County			1.270	F	0.838	D	1.210	F	1.287	F	0.863	D	1.223	F	Yes	Yes	Yes
94	La Cienega Boulevard & 111th Street	City of LA/LA County	X	X	0.438	A	0.294	A	0.453	A	0.439	A	0.400	A	0.478	A	-	-	-
95	La Cienega Boulevard & West 120th Street	LA County			0.449	A	0.313	A	0.817	D	0.479	A	0.367	A	0.894	D	-	-	Yes
96	La Cienega Boulevard & I-405 Southbound Ramps (n/o Century Boulevard)	Caltrans/Inglewood/City of LA	X	X	0.669	B	0.695	B	0.694	B	0.674	B	0.864	D	0.810	D	-	Yes	Yes
97	La Cienega Boulevard & I-405 Southbound Ramps (s/o Century Boulevard)	Caltrans/City of LA/LA County	X	X	0.415	A	0.462	A	0.540	A	0.501	A	0.518	A	0.615	B	-	-	-
98	La Cienega Boulevard & I-405 Southbound Ramps (n/o Imperial Highway)	Caltrans/City of LA/LA County	X	X	0.478	A	0.341	A	0.369	A	0.509	A	0.431	A	0.381	A	-	-	-
99	Lincoln Boulevard & La Tijera Boulevard	Caltrans/City of LA	X	X	0.520	A	0.320	A	0.625	B	0.523	A	0.335	A	0.637	B	-	-	-
100	La Tijera Boulevard & Manchester Avenue	Caltrans/City of LA	X	X	0.570	A	0.549	A	0.679	B	0.570	A	0.542	A	0.679	B	-	-	-
101	Sepulveda Boulevard & La Tijera Boulevard	City of LA	X	X	0.602	B	0.729	C	0.851	D	0.600	A	0.589	A	0.784	C	-	-	-
102	I-405 Northbound Ramps & La Tijera Boulevard	Caltrans/City of LA	X	X	0.619	B	0.693	B	0.609	B	0.746	C	0.842	D	0.664	B	Yes	Yes	-

Table 4.12.2-25

Future (2025) With Alternative 9 Level of Service Analysis

					Future (2025) Without Alternative						Future (2025) With Alt. 9						Significant impact?		
					AM		MD		PM		AM		MD		PM				
Int. #	Intersection	Jurisdiction	ATSAC	ATCS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	AM	MD	PM
103	I-405 Southbound Ramps & La Tijera Boulevard	Caltrans/City of LA	X	X	0.467	A	0.563	A	0.681	B	0.516	A	0.612	B	0.713	C	-	-	-
104	Lincoln Boulevard & Loyola Marymount University Drive	Caltrans/City of LA	X	X	0.569	A	0.441	A	0.698	B	0.570	A	0.470	A	0.724	C	-	-	-
105	Lincoln Boulevard & Manchester Avenue	Caltrans/City of LA	X	X	0.800	C	0.547	A	0.871	D	0.802	D	0.549	A	0.878	D	-	-	-
106	Lincoln Boulevard & Maxella Avenue	Caltrans/City of LA	X	X	0.599	A	0.624	B	0.683	B	0.601	B	0.632	B	0.688	B	-	-	-
107	Lincoln Boulevard & Mindanao Way	Caltrans/City of LA/LA County	X	X	0.739	C	0.872	D	0.947	E	0.749	C	0.883	D	0.947	E	-	-	-
108	Sepulveda Boulevard & Lincoln Boulevard	Caltrans/City of LA	X	X	0.684	B	0.571	A	0.938	E	0.665	B	0.563	A	0.925	E	-	-	-
109	Lincoln Boulevard & Venice Boulevard	Caltrans/City of LA	X	X	0.892	D	0.915	E	1.036	F	0.899	D	0.925	E	1.043	F	-	Yes	-
110	Lincoln Boulevard & Washington Boulevard	Caltrans/City of LA	X	X	0.841	D	0.904	E	1.053	F	0.845	D	0.919	E	1.054	F	-	Yes	-
111	Lincoln Boulevard & 83rd Street	Caltrans/City of LA	X	X	0.609	B	0.435	A	0.700	B	0.618	B	0.448	A	0.704	C	-	-	-
112	Lincoln Boulevard & SR 90 Ramps	Caltrans/City of LA	X	X	0.629	B	0.639	B	0.802	D	0.638	B	0.650	B	0.813	D	-	-	-
113	Pershing Drive & Manchester Avenue	Caltrans/City of LA	X	X	0.464	A	0.329	A	0.475	A	0.478	A	0.340	A	0.482	A	-	-	-
114	Sepulveda Boulevard & Manchester Avenue	Caltrans/City of LA	X	X	~~0.804~~	~~D~~	~~0.761~~	C	~~0.929~~	E	~~0.837~~	~~D~~	~~0.768~~	C	~~0.933~~	E	~~Yes~~	-	-
					0.684	*B*	*0.709*		*0.962*		*0.717*	*C*	*0.723*		*0.958*		-		
115	Ash Avenue & Manchester Avenue	Caltrans/Inglewood			0.786	C	0.711	C	0.945	E	0.805	D	0.767	C	0.979	E	-	Yes	Yes
116	Nash Street & Mariposa Avenue	El Segundo			0.650	B	0.385	A	0.538	A	0.669	B	0.413	A	0.557	A	-	-	-
117	Sepulveda Boulevard & Mariposa Avenue	Caltrans/El Segundo			0.783	C	0.759	C	0.839	D	0.816	D	0.767	C	0.842	D	-	-	-
118	Sawtelle Boulevard & Matteson Street/I-405 Southbound Ramps	Caltrans/Culver City	X		0.926	E	0.611	B	1.081	F	0.926	E	0.625	B	1.081	F	-	-	-
119	Ocean Avenue/Via Marina & Washington Boulevard	City of LA/LA County	X	X	1.181	F	0.956	E	1.514	F	1.216	F	1.005	F	1.539	F	Yes	Yes	Yes
120	Overhill Drive & Slauson Avenue	LA County			0.736	C	0.620	B	1.147	F	0.760	C	0.698	B	1.155	F	-	-	-
121	Overland Avenue & Venice Boulevard	Caltrans/Culver City/City of LA	X	X	0.879	D	0.709	C	0.991	E	0.884	D	0.713	C	0.994	E	-	-	-
122	Palawan Way & Washington Boulevard	City of LA/LA County			16.5	C	14.5	B	16.5	C	16.6	C	14.7	B	17.0	C	-	-	-
123	Pershing Drive & Westchester Parkway	City of LA	X	X	0.244	A	0.166	A	0.311	A	0.286	A	0.187	A	0.329	A	-	-	-
124	Prairie Avenue & West 112th Street/I-105 Off-Ramp	Caltrans/Inglewood			0.553	A	0.623	B	0.759	C	0.555	A	0.630	B	0.774	C	-	-	-
125	Sepulveda Boulevard & Rosecrans Avenue	Caltrans/El Segundo/Manhattan Beach			0.918	E	0.836	D	1.158	F	0.923	E	0.862	D	1.160	F	-	Yes	-
126	Sepulveda Boulevard & Sawtelle Boulevard	Culver City	X		0.516	A	0.614	B	0.742	C	0.523	A	0.621	B	0.756	C	-	-	-
127	Sawtelle Boulevard & Venice Boulevard	Caltrans/Culver City/City of LA	X	X	1.077	F	0.843	D	0.956	E	1.084	F	0.848	D	0.958	E	-	-	-
128	Sawtelle Boulevard & Washington Boulevard	Culver City	X		0.660	B	0.517	A	0.787	C	0.660	B	0.533	A	0.797	C	-	-	-
129	Sawtelle Boulevard & Washington Place	Culver City	X		0.487	A	0.373	A	0.667	B	0.497	A	0.380	A	0.673	B	-	-	-
130	Sepulveda Boulevard & Slauson Avenue	Culver City	X		0.598	A	0.688	B	0.894	D	0.615	B	0.719	C	0.904	E	-	-	-
131	Sepulveda Boulevard & Venice Boulevard	Caltrans/Culver City/City of LA	X	X	0.893	D	0.734	C	1.115	F	0.893	D	0.746	C	1.117	F	-	-	-
132	Sepulveda Boulevard & Washington Boulevard	Culver City	X		0.610	B	0.597	A	0.727	C	0.620	B	0.610	B	0.727	C	-	-	-
133	Sepulveda Boulevard & Washington Place	Culver City	X		0.660	B	0.583	A	0.707	C	0.660	B	0.587	A	0.710	C	-	-	-
134	Sepulveda Boulevard & I-405 Northbound On-/Off-Ramps	Caltrans/Culver City	X		0.885	D	0.610	B	0.812	D	0.886	D	0.618	B	0.812	D	-	-	-
135	Sepulveda Boulevard & Westchester Parkway	City of LA	X	X	0.658	B	0.643	B	1.109	F	0.680	B	0.644	B	1.113	F	-	-	-
136	Sepulveda Boulevard & 76th Street	City of LA	X	X	0.691	B	0.484	A	0.700	B	0.699	B	0.496	A	0.740	C	-	-	-
137	Sepulveda Boulevard & 79th Street	City of LA	X	X	0.507	A	0.411	A	0.573	A	0.507	A	0.411	A	0.609	B	-	-	-
138	Sepulveda Boulevard & 83rd Street	City of LA	X	X	0.449	A	0.398	A	0.549	A	0.462	A	0.398	A	0.589	A	-	-	-
139	Sepulveda Boulevard & I-105 Westbound Ramps (n/o Imperial Highway)	Caltrans/City of LA	X	X	0.877	D	0.840	D	0.923	E	0.896	D	0.891	D	0.956	E	-	Yes	Yes
140	SR 90 Westbound Ramps & Slauson Avenue	Caltrans/Culver City/LA County	X		0.534	A	0.426	A	0.682	B	0.552	A	0.436	A	0.683	B	-	-	-
141	Airport Boulevard & 96th Street	City of LA	X	X	0.234	A	0.348	A	0.456	A	0.354	A	0.490	A	0.523	A	-	-	-
142	Jenny Avenue & 96th Street	City of LA	X	X	0.183	A	0.203	A	0.153	A	0.243	A	0.290	A	0.340	A	-	-	-
143	Vicksburg Avenue & 96th Street	City of LA	X	X	0.279	A	0.363	A	0.335	A	0.405	A	0.686	B	0.840	D	-	-	Yes
144	Airport Boulevard & 98th Street	City of LA	X	X	0.357	A	0.447	A	0.500	A	0.467	A	0.627	B	0.630	B	-	-	-
145	Jenny Avenue & Westchester Parkway	City of LA	X	X	0.153	A	0.220	A	0.243	A	0.157	A	0.253	A	0.263	A	-	-	-
146	Sepulveda Eastway & Westchester Parkway	City of LA	X	X	0.427	A	0.543	A	0.693	B	0.427	A	0.583	A	0.693	B	-	-	-
147	Crenshaw Boulevard & Century Boulevard	Inglewood			0.708	C	0.773	C	0.928	E	0.729	C	0.807	D	0.979	E	-	Yes	Yes
148	La Cienega Boulevard & Fairview Boulevard	Inglewood/City of LA	X	X	0.881	D	0.657	B	0.952	E	0.893	D	0.688	B	0.954	E	-	-	-
149	Crenshaw Boulevard & Imperial Highway	Inglewood			0.680	B	0.705	C	1.001	F	0.715	C	0.748	C	1.030	F	-	Yes	Yes
150	Sepulveda Boulevard & Braddock Drive	Culver City			0.580	A	0.527	A	0.677	B	0.580	A	0.537	A	0.683	B	-	-	-
151	Buckingham Parkway & Slauson Avenue	Culver City			0.716	C	0.544	A	0.888	D	0.724	C	0.551	A	0.888	D	-	-	-
152	Duquesne Avenue & Washington Boulevard	Culver City/City of LA			0.573	A	0.507	A	0.657	B	0.580	A	0.517	A	0.663	B	-	-	-
153	Overland Avenue & Kelmore Street/Ranch Road	Culver City			32.1	D	15.3	C	46.2	E	32.6	D	15.7	C	49.9	E	-	-	-
154	Overland Avenue & Sawtelle Boulevard	Culver City			31.4	D	17.6	C	45.9	E	33.1	D	18.6	C	50.6	F	-	-	Yes
155	Overland Avenue & Washington Boulevard	Culver City/City of LA			0.840	D	0.756	C	1.069	F	0.847	D	0.771	C	1.069	F	-	-	-

Table 4.12.2-25

Future (2025) With Alternative 9 Level of Service Analysis

					Future (2025) Without Alternative						Future (2025) With Alt. 9						Significant impact?		
					AM		MD		PM		AM		MD		PM				
Int. #	Intersection	Jurisdiction	ATSAC	ATCS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	AM	MD	PM
156	Walgrove Avenue & Washington Boulevard	Culver City			68.8	F	>100	F	>100	F	68.8	F	355.8	F	952.7	F	-	Yes	Yes
157	La Cienega Boulevard & 104th Street	City of LA/LA County	X	X	0.340	A	0.301	A	0.370	A	0.417	A	0.379	A	0.417	A	-	-	-
158	Vista del Mar & Waterview Street	City of LA	X	X	0.327	A	0.073	A	0.267	A	0.343	A	0.077	A	0.283	A	-	-	-
159	Hindry Avenue & Manchester Boulevard	Caltrans/Inglewood			0.513	A	0.638	B	0.597	A	0.516	A	0.756	C	0.691	B	-	Yes	-
160	Lincoln Boulevard & Rose Avenue	Caltrans/City of LA	X	X	0.920	E	0.847	D	0.843	D	0.927	E	0.857	D	0.850	D	-	-	-
161	Western Avenue & Century Boulevard	City of LA	X	X	0.576	A	0.629	B	0.824	D	0.598	A	0.662	B	0.827	D	-	-	-
162	Sepulveda Boulevard & Manhattan Beach Boulevard	Caltrans/Manhattan Beach			0.950	E	0.987	E	1.193	F	0.957	E	0.997	E	1.199	F	-	Yes	-
163	La Cienega Boulevard & Jefferson Boulevard	City of LA	X	X	0.986	E	0.700	B	0.955	E	0.988	E	0.714	C	0.964	E	-	-	-
164	Crenshaw Boulevard & Manchester Avenue	Caltrans/Inglewood			0.816	D	0.843	D	1.025	F	0.857	D	0.873	D	1.066	F	Yes	Yes	Yes
165	La Cienega Boulevard & Rodeo Road	City of LA	X	X	1.025	F	0.719	C	1.037	F	1.035	F	0.734	C	1.038	F	Yes	-	-
166	La Brea Avenue & Rodeo Road	City of LA	X	X	0.989	E	0.756	C	0.972	E	0.996	E	0.775	C	0.981	E	-	-	-
167	La Brea Avenue & Jefferson Boulevard	City of LA	X	X	1.035	F	0.659	B	1.063	F	1.042	F	0.687	B	1.067	F	-	-	-
168	Crenshaw Boulevard & Florence Avenue	City of LA	X	X	0.754	C	0.579	A	0.896	D	0.782	C	0.624	B	0.904	E	-	-	-
169	Prairie Avenue & Manchester Boulevard	Inglewood			1.042	F	0.701	C	0.922	E	1.079	F	0.732	C	0.941	E	Yes	-	Yes
170	I-110 Northbound Ramps & Manchester Avenue	Caltrans/City of LA	X	X	0.593	A	0.460	A	0.537	A	0.598	A	0.467	A	0.549	A	-	-	-
171	Western Avenue & Florence Avenue	City of LA	X	X	0.860	D	0.600	A	0.902	E	0.876	D	0.602	B	0.911	E	-	-	-
172	Western Avenue & Manchester Avenue	Caltrans/City of LA	X	X	0.727	C	0.560	A	0.887	D	0.733	C	0.571	A	0.906	E	-	-	Yes
173	Western Avenue & Imperial Highway	LA County	X	X	0.743	C	0.575	A	0.912	E	0.764	C	0.596	A	0.941	E	-	-	Yes
174	Vermont Avenue & Florence Avenue	City of LA	X	X	0.700	B	0.540	A	0.734	C	0.717	C	0.567	A	0.749	C	-	-	-
175	Vermont Avenue & Manchester Avenue	Caltrans/LA County/City of LA	X	X	0.722	C	0.542	A	0.760	C	0.755	C	0.553	A	0.784	C	-	-	-
176	Vermont Avenue & Century Boulevard	LA County/City of LA	X	X	0.700	B	0.556	A	0.726	C	0.718	C	0.607	B	0.764	C	-	-	-
177	Vermont Avenue & Imperial Highway	LA County/City of LA	X	X	0.823	D	0.545	A	0.992	E	0.834	D	0.547	A	0.995	E	-	-	-
178	Figueroa Street & Florence Avenue	City of LA	X	X	0.741	C	0.506	A	0.733	C	0.771	C	0.533	A	0.765	C	-	-	-
179	Figueroa Street & Manchester Avenue	Caltrans/City of LA	X	X	0.886	D	0.618	B	0.913	E	0.887	D	0.644	B	0.920	E	-	-	-
180	Figueroa Street & Century Boulevard	City of LA	X	X	0.893	D	0.500	A	0.784	C	0.899	D	0.539	A	0.800	C	-	-	-
181	Figueroa Street & Imperial Highway	City of LA	X	X	0.837	D	0.378	A	0.818	D	0.851	D	0.391	A	0.835	D	-	-	-
182	Inglewood Avenue & Rosecrans Avenue	Hawthorne			0.798	C	0.663	B	0.952	E	0.807	D	0.698	B	0.960	E	-	-	-
183	Hawthorne Boulevard & Rosecrans Avenue	Hawthorne			0.802	D	0.700	B	0.943	E	0.814	D	0.720	C	0.944	E	-	-	-
184	Prairie Avenue & Rosecrans Avenue	Hawthorne/Lawndale			0.872	D	0.736	C	0.969	E	0.890	D	0.769	C	0.977	E	-	-	-
185	Crenshaw Boulevard & Rosecrans Avenue	Gardena/Hawthorne/LA County			0.796	C	0.727	C	0.916	E	0.816	D	0.748	C	0.923	E	-	-	-
186	Western Avenue & Rosecrans Avenue	Gardena			0.810	D	0.672	B	0.927	E	0.828	D	0.675	B	0.934	E	-	-	-
187	Vermont Avenue & Rosecrans Avenue	Gardena/City of LA	X		0.757	C	0.604	B	0.857	D	0.757	C	0.610	B	0.862	D	-	-	-
188	Prairie Avenue & El Segundo Boulevard	Hawthorne			1.001	F	0.684	B	1.006	F	1.027	F	0.704	C	1.008	F	Yes	-	-
189	Crenshaw Boulevard & El Segundo Boulevard	Hawthorne/Gardena			0.969	E	0.722	C	0.890	D	0.975	E	0.742	C	0.896	D	-	-	-
190	Western Avenue & El Segundo Boulevard	Gardena/LA County			0.846	D	0.594	A	0.860	D	0.852	D	0.614	B	0.872	D	-	-	-
191	Vermont Avenue & El Segundo Boulevard	Gardena/LA County/City of LA	X		0.682	B	0.422	A	0.676	B	0.703	C	0.436	A	0.708	C	-	-	-
192	Aviation Boulevard & Artesia Boulevard	Redondo Beach/Manhattan Beach			1.132	F	0.769	C	1.078	F	1.138	F	0.769	C	1.084	F	-	-	-
193	Aviation Boulevard & Manhattan Beach Boulevard	Redondo Beach/Manhattan Beach			0.976	E	0.769	C	1.083	F	0.979	E	0.776	C	1.089	F	-	-	-
194	Sepulveda Boulevard & Palms Boulevard	City of LA	X	X	0.770	C	0.590	A	0.980	E	0.780	C	0.597	A	0.987	E	-	-	-
195	Sawtelle Boulevard & Palms Boulevard	City of LA	X	X	0.787	C	0.407	A	0.850	D	0.793	C	0.410	A	0.853	D	-	-	-
196	Prairie Avenue & Florence Avenue	Inglewood			0.965	E	0.647	B	0.851	D	0.969	E	0.672	B	0.868	D	-	-	-
197	Prairie Avenue & Lennox Boulevard	Inglewood			0.670	B	0.557	A	0.704	C	0.684	B	0.603	B	0.782	C	-	-	Yes
198	Flower Street (near I-110 Southbound Ramps) & Florence Avenue	Caltrans/City of LA	X	X	0.527	A	0.513	A	0.535	A	0.538	A	0.545	A	0.564	A	-	-	-
199	Grand Avenue (near I-110 Northbound Ramps) & Florence Avenue	Caltrans/City of LA	X	X	0.617	B	0.602	B	0.675	B	0.633	B	0.632	B	0.689	B	-	-	-
200	I-110 Southbound Ramps & Manchester Avenue	Caltrans/City of LA	X	X	0.487	A	0.436	A	0.531	A	0.489	A	0.449	A	0.540	A	-	-	-

Source: Fehr & Peers, 2012.

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60. The second paragraph on page 4-1283 of the Draft EIR is hereby revised as follows:

> **Table 4.12.2-26** identifies the impacts associated with each alternative following the implementation of the recommended SPAS-specific mitigation measures identified in Section 4.12.2.7.2. As illustrated in **Table 4.12.2-26**, Alternative 1, 2, 3, 4, 8, and 9 would all have significant and unavoidable impacts to intersections when compared to either Baseline (2010) Without Alternative conditions or Future (2025) conditions. When comparing to Baseline (2010) Without Alternative conditions, Alternative 3 would have the greatest number of significant, unavoidable impacts (11 intersections) after mitigation, whereas Alternatives 1 and 2 would have the fewest (1 intersection each). When comparing to Future (2025) conditions, Alternatives 8 and 9 would have the greatest number of significant, unavoidable impacts (~~44~~ *42* intersections) after mitigation, and Alternative 3 would have the fewest (*37* ~~38~~). Alternatives 1 and 2 would have *38* ~~40~~ significant and unavoidable impacts after mitigation. Alternative 4 would have significant, unavoidable impacts to *38* ~~40~~ intersections after mitigation.

61. Table 4.12.2-26 on page 4-1284 of the Draft EIR has been revised. Please see the following revised table.

Table 4.12.2-26

Summary of Off-Airport Transportation Impacts After Mitigation

	Alt. 1	Alt. 2	Alt. 3	Alt. 4	Alt. 8	Alt. 9
Impacts Relative to Baseline (2010) Without Alternative Conditions						
Intersections	SU(1)	SU(1)	SU(11)	SU(2)	SU(2)	SU(2)
CMP Facilities - Arterial Monitoring Intersections	LS	LS	SU(1)	LS	LS	LS
CMP Facilities - Freeway Monitoring Stations	LS	LS	LS	LS	LS	LS
CMP Facilities - Transit Demand	LS	LS	LS	LS	LS	LS
Impacts Relative to Future (2025) Conditions						
Intersections	SU(*38*~~39~~)	SU(*38*~~39~~)	SU(37)	SU(*38*~~40~~)	SU(*42*~~44~~)	SU(*42*~~44~~)
CMP Facilities - Arterial Monitoring Intersections	SU(1)	SU(1)	SU(2)	SU(2)	SU(1)	SU(1)
CMP Facilities - Freeway Monitoring Stations	SU(3)	SU(3)	SU(3)	SU(3)	SU(3)	SU(3)
CMP Facilities - Transit Demand	LS	LS	LS	LS	LS	LS
Construction Impacts[1]	SU	SU	SU	SU	SU	SU

Notes:

LS = Less Than Significant Impact
SU = Significant Unavoidable Impact

Numbers in parentheses indicate the number of affected intersections/facilities.

[1] The nine alternatives currently being considered for the SPAS project are only at a conceptual level of planning. No construction plans, programs, or schedules have been formulated for any of the alternatives. It would be speculative to estimate construction-related vehicle trip generation and distribution onto the local roadway network in order to evaluate traffic impacts on specific streets and intersections during peak and non-peak traffic periods. As such, the total number of intersections that may be temporarily significantly impacted during construction cannot be determined at this time.

Source: Fehr & Peers, 2012.

62. The fourth bullet on page 4-1288 of the Draft EIR is hereby revised as follows:

- **76. Inglewood Avenue and Lennox Boulevard (Alternative 3).**

  The addition of a second through lane on both the northbound and southbound approaches would fully mitigate the project impact at this location; however, this widening of the northbound and southbound approaches would require narrowing of existing sidewalk on ~~Imperial Highway~~ *Inglewood Avenue*, resulting in policy infeasibility and impacts to alternative modes of transportation. No other feasible improvements have been identified. Therefore, this impact would remain significant and unavoidable under Alternative 3.

63. The second bullet on page 4-1291 of the Draft EIR is hereby revised as follows:

- **10. Arbor Vitae Street and Aviation Boulevard (Alternatives 1-2, 3, 4, 8, and 9).**

  The mitigation measure at this location is to widen the eastbound approach to the intersection of Arbor Vitae Street and Aviation Boulevard to provide a separate right-turn lane, resulting in one left-turn lane, two through lanes and one right-turn lane. Implementation of this improvement can be accomplished within the existing right-of-way and would fully mitigate the significant impacts under the Alternatives 1-2, 4, 8, and 9. Under Alternative 3, this modification to the eastbound intersection approach would not provide effective mitigation and no other feasible improvements have been identified to mitigate the impacts under Alternative 3. Therefore, this impact would remain significant and unavoidable under Alternative 3.

  ~~A component of the LAX Master Plan would include widening and reconfiguration of both streets at the subject intersection in order to achieve the following lane configuration: northbound one left-turn lane, two through lanes, and one right-turn lane; southbound one left-turn lane, one through lane, and one shared through/right-turn lane; eastbound one left-turn lane, two through lanes, and one shared through/right-turn lane; and westbound two left-turn lanes, two through lanes, and one right-turn lane. Implementation of this improvement would fully mitigate the significant impacts under Alternatives 1-2, 4, 8, and 9, however could not be accommodated within the existing right-of-way and would require removal of existing business (economic and policy infeasibility) and may create additional environmental impacts associated with demolition and construction, such as noise, air quality and therefore is considered infeasible. No feasible physical improvements have been identified. Therefore, this impact would remain significant and unavoidable under Alternatives 1-2, 4, 8 and 9.~~

  ~~Under Alternative 3, the above improvements were found to be ineffective in improving the project impacts at this location; therefore, it is not recommended. The Westchester Community Plan, an element of the City's General Plan, includes policies to improve Arbor Vitae Street west of Aviation Boulevard and Aviation Boulevard south of Arbor Vitae Street south of Aviation Boulevard to provide six through lanes. To fully mitigate the impact under Alternative 3 would require the provision of dual left-turn lanes on the northbound approach, which may conflict with the cross-section adopted in the City's Westchester Community Plan, and therefore, may not be feasible. No other feasible improvements have been identified to mitigate the project impact under Alternative 3.~~

  ~~In summary, no feasible improvements are available to fully mitigate the project impact under Alternatives 1-2, 3, 4, 8, and 9 without additional right-of-way acquisition. Therefore, this impact would remain significant and unavoidable under Alternatives 1-2, 3, 4, 8, and 9.~~

64. The first paragraph under the fourth bullet on page 4-1293 of the Draft EIR is hereby revised as follows:

- **27. La Tijera Boulevard and Centinela Avenue (Alternatives 1-2, 4, 8, and 9).**

  The addition of a second southbound left-turn lane would fully mitigate the project impact at this location. However, this improvement could not be accommodated

with the existing right-of-way and would require narrowing of existing sidewalks on La Tijera Boulevard, which would result in policy infeasibility and impacts to alternative modes of transportation. No *other* feasible improvements have been identified to fully mitigate the project impact. Therefore, this impact would remain significant and unavoidable.

65. The following sentence is hereby added to the end of the second paragraph of the fourth bullet on page 4-1293 of the Draft EIR:

If permitted by the FAA, LAWA *will also make a monetary contribution to upgrading the County's ITS system at this intersection to partially mitigate the alternative's contribution to the cumulative impacts. Because the County does not have a method to quantify the benefits of this improvement, no quantitative V/C reduction can be taken for this location and the impact is considered to be significant and unavoidable.*

66. The last paragraph of the third bullet on page 4-1294 of the Draft EIR (Intersection 36. La Cienega Boulevard and Century Boulevard (Alternatives 1-2, 3, 4, 8, and 9)) is hereby revised as follows:

The impact at this location could be reduced through increased service levels of the airport employee TDM/Vanpool program. This program would improve intersection operations; however, it would only partially mitigate the significant impact at this location. *In addition, if permitted by the FAA, LAWA will also make a monetary contribution to upgrading the County's ITS system at this intersection to partially mitigate the alternative's contribution to the cumulative impacts. Because the County does not have a method to quantify the benefits of this improvement, no quantitative V/C reduction has been taken for this location.* No other feasible improvements have been identified to fully mitigate the project impact under Alternatives 1-2, 3, 4, 8, and 9. Therefore, the impact at this location would remain significant and unavoidable under Alternatives 1-2, 3, 4, 8, and 9.

67. The fifth bullet on page 4-1295 of the Draft EIR is hereby revised as follows:

- **52. Inglewood Avenue and El Segundo Boulevard (Alternative 3).**

The addition of a separate southbound right-turn lane and additional westbound through lane would fully mitigate the project impact at this location. Due to existing right-of-way and physical constraints that would require removal of existing business on El Segundo Boulevard and narrowing of the existing sidewalk on Inglewood Avenue north of El Segundo Boulevard, these improvements are considered infeasible. *If permitted by the FAA, LAWA will make a monetary contribution to upgrading the County's ITS system at this intersection to partially mitigate the alternative's contribution to the cumulative impacts. Because the County does not have a method to quantify the benefits of this improvement, no quantitative V/C reduction can be taken for this location.* No feasible improvements have been identified. Therefore, this impact would remain significant and unavoidable under Alternative 3.

68. The fifth bullet on page 4-1296 of the Draft EIR is hereby revised as follows:

- **63. Hawthorne Boulevard and Lennox Boulevard (Alternatives 1-2, 4, 8, and 9).**

The potential improvement evaluated at this location is to restripe the southbound approach to provide an additional left-turn lane and one additional through lane, which would require removal of the raised center median on Hawthorne Boulevard. The resulting southbound configuration would be two left-turn lanes, three through lanes, and one shared through/right-turn lane. This improvement would fully mitigate the identified impact; however, it could not be accommodated within the existing right-of-way and would require removal of existing business on Hawthorne Boulevard (economic and policy infeasibility) and create additional

environmental impacts associated with demolition and construction, such as noise, air quality, etc. Therefore, this improvement is considered infeasible. *If permitted by the FAA, LAWA will make a monetary contribution to upgrading the County's ITS system at this intersection to partially mitigate the alternative's contribution to the cumulative impacts. Because the County does not have a method to quantify the benefits of this improvement, no quantitative V/C reduction can be taken for this location.* No other feasible improvements have been identified to fully mitigate the project impact. Therefore, this impact would remain significant and unavoidable under Alternatives 1-2, 4, 8, and 9.

69. The sixth bullet on page 4-1297 of the Draft EIR is hereby revised as follows:

- **76. Inglewood Avenue and Lennox Boulevard (Alternatives 1-2, 3, 4, 8, and 9).**

  The addition of a second through lane on both the northbound and southbound approaches would fully mitigate the project impact at this location~~,~~; *however* ~~This~~ *this* widening of the northbound and southbound approaches would require narrowing of existing sidewalk on ~~Imperial Highway~~ *Inglewood Avenue*, resulting in policy infeasibility and impacts to alternative modes of transportation. *If permitted by the FAA, LAWA will make a monetary contribution to upgrading the County's ITS system at this intersection to partially mitigate the alternative's contribution to the cumulative impacts. Because the County does not have a method to quantify the benefits of this improvement, no quantitative V/C reduction can be taken for this location.* No other feasible improvements have been identified. Therefore, this impact would remain significant and unavoidable under Alternatives 1-2, 3, 4, 8, and 9.

70. The third bullet on page 4-1298 of the Draft EIR is hereby revised as follows:

- **86. La Brea Avenue/Overhill Avenue and Stocker Street (Alternatives 1-2, 3, 4, 8, and 9).**

  The potential improvement evaluated at this location would modify the southbound approach to provide additional through capacity by converting the southbound free right-turn lane to a shared through/right-turn lane, resulting in two left-turn lanes, two through lanes, and one shared through/right-turn lane. Implementation of this improvement could be accomplished within the existing right-of-way, but would remove the raised island on the northwest corner of the intersection. Because this improvement would only partially mitigate the project impact in certain peak hours but would worsen conditions in others, it is not recommended. To fully mitigate the impact at this location would require the provision of a southbound through lane, which is not feasible within the existing right-of-way and would require narrowing sidewalks on La Brea Avenue, which would result in policy infeasibility and impacts to alternative modes of transportation. *If permitted by the FAA, LAWA will make a monetary contribution to upgrading the County's ITS system at this intersection to partially mitigate the alternative's contribution to the cumulative impacts. Because the County does not have a method to quantify the benefits of this improvement, no quantitative V/C reduction has been taken for this location.* No other feasible improvements have been identified to fully mitigate the project impact. Therefore, this impact would remain significant and unavoidable under Alternatives 1-2, 3, 4, 8, and 9.

71. The fourth bullet on page 4-1298 of the Draft EIR is hereby revised as follows:

- **87. La Brea Avenue and Slauson Avenue (Alternatives 1-2, 3, 4, 8, and 9).**

  The potential improvement evaluated at this location is to restripe the southbound approach to provide one left-turn lane, two through lanes, and one shared through/right-turn lane and to eliminate the existing southbound right-turn overlap phase. Implementation of this improvement would partially mitigate the project impact at this location. *If permitted by the*

FAA, LAWA will also make a monetary contribution to upgrading the County's ITS system at this intersection to partially mitigate the alternative's contribution to the cumulative impacts. Because the County does not have a method to quantify the benefits of this improvement, no quantitative V/C reduction has been taken for this location. No other feasible improvements have been identified to fully mitigate the project impact. Therefore, this impact would remain significant and unavoidable under Alternatives 1-2, 3, 4, 8, and 9.

72. The second bullet on page 4-1299 of the Draft EIR is hereby revised as follows:

- **93. La Cienega Boulevard and Stocker Street (Alternatives 1-2, 3, 4, 8, and 9).**

  Due to right-of-way and physical constraints at this intersection, no feasible improvements have been identified. It is noted that a recent study conducted for SCAG developed a grade separation concept design for La Cienega Boulevard at Stocker Street. Pending further study of these concepts to determine their feasibility, however, this impact would remain significant and unavoidable under Alternatives 1-2, 3, 4, 8, and 9. If this grade separation concept becomes feasible, LAWA can provide fair share contribution to this improvement, subject to FAA approval, to fully mitigate the project impact at this location. *If permitted by the FAA, LAWA will also make a monetary contribution to upgrading the County's ITS system at this intersection to partially mitigate the alternative's contribution to the cumulative impacts. Because the County does not have a method to quantify the benefits of this improvement, no quantitative V/C reduction can be taken for this location and the impact is considered to be significant and unavoidable.*

73. The third bullet on page 4-1299 of the Draft EIR is hereby revised as follows:

- **95. La Cienega Boulevard and 120th Street (Alternatives 1-2, 3, 4, 8, and 9).**

  The addition of a second southbound left-turn lane would fully mitigate the project impact at this location. However, this improvement could not be accommodated within the existing right-of-way, but would require removal of existing business on the east side La Cienega Boulevard (economic and policy infeasibility) and create additional environmental impacts associated with demolition and construction, such as noise, air quality, etc. Therefore, this improvement is considered infeasible. *If permitted by the FAA, LAWA will make a monetary contribution to upgrading the County's ITS system at this intersection to partially mitigate the alternative's contribution to the cumulative impacts. Because the County does not have a method to quantify the benefits of this improvement, no quantitative V/C reduction can be taken for this location.* No feasible improvements have been identified *that would fully mitigate the identified impact*. Therefore, this impact would remain significant and unavoidable.

74. The second bullet on page 4-1301 of the Draft EIR is hereby deleted:

- ~~**114. Sepulveda Boulevard and Manchester Avenue (Alternatives 1-2, 3, 4, 8, and 9).**~~

  ~~The addition of a westbound right-turn lane would be the potential improvement to mitigate the project impact at this location. However, this improvement would result in an offset of more than four feet for the westbound through travel lanes, removal of street parking on the north side of Manchester Avenue east of Sepulveda Boulevard, and may conflict with the City's roadway classification standards for Manchester Avenue. This improvement would require further exploration with LADOT and may not be feasible. No other feasible improvements have been identified to fully mitigate the project impact. Therefore, this impact would be significant and unavoidable under Alternatives 1-2, 3, 4, 8, and 9.~~

  ~~If addition of the westbound right-turn lane becomes feasible, the project impact can be fully mitigated at this location under Alternatives 1-2, 3, 4, 8, and 9.~~

75. The fourth bullet on page 4-1301 of the Draft EIR is hereby revised as follows:

- **119. Ocean Avenue/Via Marina and Washington Boulevard (Alternatives 1-2, 3, 4, 8, and 9).**

  The potential improvement for this location would be restriping the westbound approach to provide a separate right-turn lane. Because it would not fully mitigate the project impact and because it would entail removal of approximately six on-street parking spaces, this improvement is not considered feasible. To fully mitigate the project impact at this location would require the provision of additional eastbound and westbound through lanes.

  However, these improvements would require widening of the eastbound and westbound approaches and departures, which would require removal of existing business on Washington Boulevard (economic and policy infeasibility) and create additional environmental impacts associated with demolition and construction, such as noise, air quality, etc., and therefore are considered infeasible. *If permitted by the FAA, LAWA will make a monetary contribution to upgrading the County's ITS system at this intersection to partially mitigate the alternative's contribution to the cumulative impacts. Because the County does not have a method to quantify the benefits of this improvement, no quantitative V/C reduction can be taken for this location.* No feasible improvements have been identified to fully mitigate the project impact. Therefore, this impact would remain significant and unavoidable under Alternatives 1-2, 3, 4, 8, and 9.

76. The third bullet on page 4-1304 of the Draft EIR is hereby revised as follows:

- **156. Walgrove Avenue and Washington Boulevard (Alternatives 1-2, 3, 4, 8, and 9).**

  This stop-controlled intersection meets the standard traffic signal warrants[715] recommended in the Federal Highway Administration Manual on Uniform Traffic Control Devices and associated State guidelines and the criteria for installation of a traffic signal under existing conditions. Installation of a signal would improve the traffic operations at this location and could fully mitigate the project impact. However, installation of a traffic signal at this location would be the responsibility of Culver City and, given the close proximity to upstream/downstream signals, may not be acceptable to Culver City. No other feasible improvements have been identified to fully mitigate the project impact. Therefore, the impact at this location would be significant and unavoidable under Alternatives 1-2, 3, 4, 8, and 9. *If installation of a signal becomes feasible at this location, LAWA would provide a fair share contribution, subject to FAA approval, to this improvement, which would fully mitigate the project impact at this location.*

[715] This analysis is intended to examine the general correlation between the planned level of future development and the need to install new traffic signals. It estimates future development-generated traffic compared against a sub-set of the standard traffic signal warrants recommended in the Federal Highway Administration Manual on Uniform Traffic Control Devices and associated State guidelines. This analysis should not serve as the only basis for deciding whether and when to install a signal. To reach such a decision, the full set of warrants should be investigated based on field-measured, rather than forecast, traffic data and a thorough study of traffic and roadway conditions by an experienced engineer. Furthermore, the decision to install a signal should not be based solely upon the warrants, since the installation of signals can lead to certain types of collisions. The responsible local agency should undertake regular monitoring of actual traffic conditions and accident data, and timely re-evaluation of the full set of warrants in order to prioritize and program intersections for signalization.

77. The third bullet on page 4-1306 of the Draft EIR is hereby revised as follows:

- **173. Western Avenue and Imperial Highway (Alternatives 1-2, 4, 8, and 9).**

  The addition of a separate eastbound right-turn lane would fully mitigate the project impact at this location. However, this improvement would require additional right-of-way acquisition from private property on the southwest corner of this intersection, and would significantly disrupt that existing business due to loss of off-street parking spaces, which would result in economic and policy infeasibility. Therefore, this improvement is determined to be infeasible. *If permitted by the FAA, LAWA will make a monetary contribution to upgrading the County's ITS system at this intersection to partially mitigate the alternative's contribution to the cumulative impacts. Because the County does not have a method to quantify the benefits of this improvement, no quantitative V/C reduction can be taken for this location.* No feasible improvements are available to fully mitigate the project impact. Therefore, this impact would remain significant and unavoidable under Alternatives 1-2, 4, 8, and 9.

78. The fifth bullet on page 4-1310 of the Draft EIR is hereby revised as follows:

- **MM-ST (SPAS)-19. Modify the Intersection of Sepulveda Boulevard and Grand Avenue (Intersection 60) (Alternatives 1-2, 8, and 9).**

  ~~The mitigation measure for this location is to restripe the eastbound approach to provide additional right turn capacity. The resulting eastbound lane configuration would be one left-turn lane, one shared left-/through/right-turn lane, and one right-turn lane. This improvement would be a full mitigation for project impacts under the Future (2025) With Alternatives 1-2, 8, and 9 scenarios.~~ *The mitigation measure for this location is to restripe the westbound approach to provide additional left-turn capacity by restriping a through lane to a shared through/left-turn lane. Minor changes to the lane assignment signage would also be necessary. The resulting westbound lane configuration would be two left-turn lanes, one shared through/left-turn lane, one through lane and one right-turn lane. This improvement would be a full mitigation for project impacts under the Future (2025) With Alternatives 1-2, 8, and 9 scenarios.*

79. The additional mitigation measures listed below are hereby added following the second bullet on page 4-1313 of the Draft EIR:

- ***MM-ST (SPAS)-37. Modify the Intersection of Arbor Vitae Street and Aviation Boulevard (Intersection 10) (Alternatives 1-2, 4, 8, and 9).***

  The mitigation measure for this location is to widen the eastbound approach to provide a separate right-turn lane, resulting in one left-turn lane, two through lanes, and one right-turn lane. This improvement would fully mitigate the project impact under the Future (2025) With Alternatives 1-2, 4, 8, and 9 scenarios.

- ***MM-ST (SPAS)-38. Modify the Intersection of La Tijera Boulevard and Centinela Avenue (Intersection 27) (Alternatives 1-2, 4, 8, and 9).***

  The mitigation measure for this location is to provide a fair share contribution to the improvement of this intersection as part of a grade separation project that would also affect the adjacent section of La Cienega Boulevard, subject to FAA approval and should the grade separation project be found to be feasible and implementation pursued by the affected local agencies. In addition, if permitted by the FAA, LAWA will make a monetary contribution to upgrading the County's ITS system at this intersection to partially mitigate the alternative's contribution to the cumulative impacts. Because the County does not have a method to quantify the benefits of this improvement, no quantitative V/C reduction has been taken for this location. Because the grade separation project is in the early design and conceptual

planning stages, however, it is not fully defined nor adopted at this time and the impact at this location would remain significant and unavoidable under Alternatives 1-2, 3, 4, 8, and 9.

- ***MM-ST (SPAS)-39. Fair Share Contribution to a Traffic Signal at the Intersection of Overland Avenue and Kelmore Street/Ranch Road (Intersection 153) (Alternative 3).***

  The mitigation measure for this location is to provide a fair share contribution to the installation of a traffic signal, subject to FAA approval and should it be implemented by the City of Culver City. Because it is uncertain that it will be implemented, however, the impact at this location would remain significant and unavoidable under Alternative 3.

- ***MM-ST (SPAS)-40. Fair Share Contribution to a Traffic Signal at the Intersection of Overland Avenue and Sawtelle Boulevard (Intersection 154) (Alternative 1-2, 3, 4, 8, and 9).***

  The mitigation measure for this location is to provide a fair share contribution to the installation of a traffic signal, subject to FAA approval and should it be implemented by the City of Culver City. Because it is uncertain that it will be implemented, however, the impact at this location would remain significant and unavoidable under Alternatives 1-2, 3, 4, 8, and 9.

- ***MM-ST (SPAS)-41. Fair Share Contribution to a Traffic Signal at the Intersection of Walgrove Avenue and Washington Boulevard (Intersection 156) (Alternative 1-2, 3, 4, 8, and 9).***

  The mitigation measure for this location is to provide a fair share contribution to the installation of a traffic signal, subject to FAA approval and should it be implemented by the City of Culver City. Because it is uncertain that it will be implemented, however, the impact at this location would remain significant and unavoidable under Alternatives 1-2, 3, 4, 8, and 9.

- ***MM-ST (SPAS)-42. Contribute to ITS (Intelligent Transportation Systems) Improvements at 11 Study Intersections within the Jurisdiction of Los Angeles County (Intersections 27, 36, 52, 63, 76, 86, 87, 93, 95, 119, and 173) (Alternatives 1-2, 3, 4, 8, and 9).***

- *Los Angeles County Department of Public Works staff determined that improvements to the County's intelligent transportation systems (ITS) equipment would improve traffic operations where no feasible physical mitigation measures have been identified. As partial mitigation for the identified cumulative impacts, LAWA will make a monetary contribution to upgrading the County's ITS system at these intersections, if permitted by the FAA. Because the contribution to Los Angeles County is conditional pending approval by FAA and because the County does not have a method to quantify the benefits of this improvement, no quantitative V/C reduction has been taken for this location and these impacts would remain significant and unavoidable.*

80. The first paragraph on page 4-1314 of the Draft EIR is hereby revised as follows:

A summary of the effectiveness of the proposed intersection mitigation measures under Future (2025) with Alternatives conditions is presented in **Table 4.12.2-33**, and a detailed listing for the impacted peak hours of these intersections is shown above in **Table 4.12.2-19**. As shown in **Tables 4.12.2-33** through **4.12.2-38**, under Future (2025) with Alternatives, there are *17* ~~16~~ fully mitigated intersections, 13 partially mitigated intersections, and *25* ~~27~~ intersections for which there are no feasible mitigation measures for a total of *38* ~~40~~ intersections with significant and unavoidable residual impacts under Alternative 1-2; there are 13 fully mitigated intersections, 15 partially mitigated intersections, and *22* ~~23~~ intersections for which there are no feasible mitigation measures for a total of *37* ~~38~~ intersections with significant and unavoidable residual impacts under Alternative 3; there are *13* ~~12~~ fully mitigated intersections, *16* ~~15~~ partially mitigated

intersections, and *22* ~~25~~ intersections for which there are no feasible mitigation measures for a total of *38* ~~40~~ intersections with significant and unavoidable residual impacts under Alternative 4; and there are *15* ~~14~~ fully mitigated intersections, 17 partially mitigated intersections, and *25* ~~27~~ intersections for which there are no feasible mitigation measures for a total of *42* ~~44~~ intersections with significant and unavoidable residual impacts under Alternatives 8 and 9. Under Alternative 1- 2, impacts at one CMP arterial monitoring intersection and three CMP freeway monitoring stations would be significant and unavoidable. Under Alternatives 3 and 4, impacts at two CMP arterial monitoring intersections and three CMP freeway monitoring stations would be significant and unavoidable. Under Alternatives 8 and 9, impacts at one CMP arterial monitoring intersection and three CMP freeway monitoring stations would be significant and unavoidable. Under each alternative, transit impacts would be less than significant.

81. Table 4.12.2-33 on pages 4-1317 through 4-1319 of the Draft EIR has been revised. Please see the following revised table.
82. Table 4.12.2-34 on pages 4-1319 through 4-1320 of the Draft EIR has been revised. Please see the following revised table.
83. Table 4.12.2-35 on pages 4-1321 through 4-1322 of the Draft EIR has been revised. Please see the following revised table.
84. Table 4.12.2-36 on pages 4-1322 through 4-1323 of the Draft EIR has been revised. Please see the following revised table.
85. Table 4.12.2-37 on pages 4-1323 through 4-1325 of the Draft EIR has been revised. Please see the following revised table.
86. Table 4.12.2-38 on pages 4-1325 through 4-1326 of the Draft EIR has been revised. Please see the following revised table.
87. Table 4.13.1-1 on page 4-1333 of the Draft EIR has been revised. Please see the following revised table.

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Table 4.12.2-33

Future (2025) With Alternative With Mitigation Impact Summary

		Alt. 1-2			Alt. 3			Alt. 4			Alt. 8			Alt. 9		
Int. #	**Intersection**	**AM**	**MD**	**PM**	**AM**	**MD**	**PM**	**AM**	**MD**	**PM**	**AM**	**MD**	**PM**	**AM**	**MD**	**PM**
6	Airport Boulevard & Arbor Vitae Street/Westchester Parkway	-	Full	Partial	-	Partial	Full	-	Partial	Full	-	-	Partial	-	-	Partial
7	Airport Boulevard & Century Boulevard	Full	Partial	Partial	-	-	-	Partial	Partial	Partial	Full	Partial	Partial	Full	Partial	Partial
9	Airport Boulevard & Manchester Avenue	N.F.M.	N.F.M.	N.F.M.	-	-	N.F.M.	N.F.M.	N.F.M.	N.F.M.	N.F.M.	N.F.M.	N.F.M.	N.F.M.	N.F.M.	N.F.M.
10	Aviation Boulevard & Arbor Vitae Street	-	-	~~N.F.M.~~ *Full*	-	N.F.M.	-	-	-	~~N.F.M.~~ *Full*	-	-	~~N.F.M.~~ *Full*	-	-	~~N.F.M.~~ *Full*
11	Inglewood Avenue & Arbor Vitae Street	-	-	Full	-	-	-	-	-	Full	-	-	Full	-	-	Full
12	La Brea Avenue & Arbor Vitae Street	-	-	Full	-	-	-	-	-	-	-	-	Full	-	-	Full
13	La Cienega Boulevard & Arbor Vitae Street	-	-	-	N.F.M.	N.F.M.	N.F.M.	-	-	-	-	-	-	-	-	-
14	Aviation Boulevard & Century Boulevard	Partial	Partial	N.F.M.	-	-	-	Partial	Partial	N.F.M.	Partial	Partial	N.F.M.	Partial	Partial	N.F.M.
15	Aviation Boulevard & El Segundo Boulevard	-	-	-	Full	-	-	-	-	-	-	-	-	-	-	-
16	Aviation Boulevard & Imperial Highway	-	-	-	Partial	-	N.F.M.	Full	-	-	-	-	-	-	-	-
17	Aviation Boulevard/Florence Avenue & Manchester Avenue	Full	Full	Full	-	-	Full	-	Full	Full	Full	-	Full	Full	-	Full
25	La Brea Avenue & Centinela Avenue	Full	-	-	-	Full	-	-	-	-	Full	Full	-	Full	Full	-
26	La Cienega Boulevard & Centinela Avenue	Full	Full	-	Partial	Partial	Full	Full	Full	-	Full	Full	-	Full	Full	-
27	La Tijera Boulevard & Centinela Avenue	-	-	N.F.M.	-	-	-	-	-	N.F.M.	-	-	N.F.M.	-	-	N.F.M.
28	Sepulveda Boulevard & Centinela Avenue	-	-	-	Full	-	Full	-	-	-	-	-	-	-	-	-
34	La Brea Avenue/Hawthorne Boulevard & Century Boulevard	Full	Partial	Full	-	-	-	Full	Partial	Full	Full	Partial	Full	Full	Partial	Full
35	Inglewood Avenue & Century Boulevard	Full	Full	Full	-	Full	-	-	Full	-	Full	Full	-	Full	Full	-
36	La Cienega Boulevard & Century Boulevard	N.F.M.	N.F.M.	N.F.M.	N.F.M.	-	N.F.M.	Partial	N.F.M.	N.F.M.	N.F.M.	N.F.M.	N.F.M.	N.F.M.	N.F.M.	N.F.M.
37	Prairie Avenue & Century Boulevard	Full	Full	Full	-	-	-	-	Full	Full	Full	Full	Full	Full	Full	Full
38	Sepulveda Boulevard & Century Boulevard	-	-	Full	Partial	-	Partial	-	-	Partial	-	-	Full	-	-	Full
46	Douglas Street & El Segundo Boulevard	-	-	N.F.M.	-	-	-	-	-	N.F.M.	-	-	N.F.M.	-	-	N.F.M.
51	Hawthorne Boulevard & El Segundo Boulevard	-	-	N.F.M.	N.F.M.	N.F.M.	N.F.M.	-	N.F.M.	N.F.M.	-	-	N.F.M.	-	-	N.F.M.
52	Inglewood Avenue & El Segundo Boulevard	-	-	-	N.F.M.	N.F.M.	N.F.M.	-	-	-	-	-	-	-	-	-
53	La Cienega Boulevard & El Segundo Boulevard	-	-	-	-	-	Full	-	-	-	-	-	-	-	-	-
57	La Brea Avenue & Florence Avenue	Full	Full	Full	Full	Partial	Full	Full	Full	Full	Full	Full	Full	Full	Full	Full
58	La Cienega Boulevard & Florence Avenue	Partial	Partial	-	Partial	Partial	Partial	Partial	Partial	-	Partial	Partial	Full	Partial	Partial	Full
60	Sepulveda Boulevard & Grand Avenue	-	-	Full	-	-	-	-	-	-	-	-	Full	-	-	Full
62	Hawthorne Boulevard & Imperial Avenue	-	-	Full	Partial	Full	Partial	-	-	Partial	-	-	Partial	-	-	Partial
63	Hawthorne Boulevard & Lennox Boulevard	-	-	N.F.M.	-	-	-	-	-	N.F.M.	-	-	N.F.M.	-	-	N.F.M.
64	Highland Avenue/Vista del Mar & Rosecrans Avenue	N.F.M.	-	-	-	-	-	N.F.M.	-	-	N.F.M.	-	-	N.F.M.	-	-
66	Inglewood Avenue & Imperial Highway	Full	-	Full	Partial	Partial	Full	Full	N.F.M.	Full	Full	N.F.M.	Full	Full	N.F.M.	Full
70	Prairie Avenue & Imperial Highway	-	-	-	Full	-	-	-	-	-	-	-	-	-	-	-
71	Sepulveda Boulevard & Imperial Highway	Full	-	Full	-	-	Full	Full	-	Full	Full	-	Full	Full	-	Full
74	I-105 Ramps (e/o Aviation Boulevard) & Imperial Highway	-	-	-	Partial	Full	Partial	-	-	-	-	-	-	-	-	-
76	Inglewood Avenue & Lennox Boulevard	-	-	N.F.M.	-	-	N.F.M.	-	-	N.F.M.	-	-	N.F.M.	-	-	N.F.M.
77	Inglewood Avenue & Manchester Boulevard	-	-	-	-	-	-	-	-	-	-	-	N.F.M.	-	-	N.F.M.
85	La Brea Avenue & Manchester Boulevard	-	-	-	Full	Full	Full	-	-	-	-	-	Full	-	-	Full
86	La Brea Avenue/Overhill Drive & Stocker Street	N.F.M.	N.F.M.	N.F.M.	N.F.M.	N.F.M.	N.F.M.	N.F.M.	-	N.F.M.	N.F.M.	-	N.F.M.	N.F.M.	-	N.F.M.
87	La Brea Avenue & Slauson Avenue	Partial	N.F.M.	Full	Partial	Partial	Full	Partial	N.F.M.	Full	Partial	N.F.M.	Full	Partial	N.F.M.	Full
88	La Cienega Boulevard & La Tijera Boulevard	-	-	N.F.M.	N.F.M.	-	N.F.M.	-	-	N.F.M.	-	N.F.M.	N.F.M.	-	N.F.M.	N.F.M.
90	La Cienega Boulevard & Manchester Boulevard	-	-	N.F.M.	Partial	Partial	Partial	-	-	N.F.M.	Full	Partial	N.F.M.	Full	Partial	N.F.M.
93	La Cienega Boulevard & Stocker Street	N.F.M.	-	N.F.M.	N.F.M.	N.F.M.	N.F.M.	N.F.M.	N.F.M.	N.F.M.	N.F.M.	N.F.M.	N.F.M.	N.F.M.	N.F.M.	N.F.M.
95	La Cienega Boulevard & West 120th Street	-	-	N.F.M.	-	-	N.F.M.	-	-	N.F.M.	-	-	N.F.M.	-	-	N.F.M.
96	La Cienega Boulevard & I-405 Southbound Ramps (n/o Century Boulevard)	Full	-	-	-	-	-	-	-	-	-	Full	Full	-	Full	Full
101	Sepulveda Boulevard & La Tijera Boulevard	-	-	-	-	Full	-	-	Full	Full	-	-	-	-	-	-
102	I-405 Northbound Ramps & La Tijera Boulevard	N.F.M.	N.F.M.	-	N.F.M.	N.F.M.	-	-	N.F.M.	-	N.F.M.	N.F.M.	-	N.F.M.	N.F.M.	-
105	Lincoln Boulevard & Manchester Avenue	-	-	-	Full	-	-	-	-	-	-	-	-	-	-	-
109	Lincoln Boulevard & Venice Boulevard	-	N.F.M.	-	-	-	-	-	N.F.M.	-	-	N.F.M.	-	-	N.F.M.	-
110	Lincoln Boulevard & Washington Boulevard	-	Partial	-	-	-	-	-	Partial	-	-	Partial	-	-	Partial	-
~~114~~	~~Sepulveda Boulevard & Manchester Avenue~~	~~N.F.M.~~	~~-~~	~~-~~	~~N.F.M.~~	~~-~~	~~-~~	~~N.F.M.~~	~~-~~	~~-~~	~~N.F.M.~~	~~-~~	~~-~~	~~N.F.M.~~	~~-~~	~~-~~
115	Ash Avenue & Manchester Avenue	-	Full	N.F.M.	-	-	-	-	-	N.F.M.	-	Full	N.F.M.	-	Full	N.F.M.
119	Ocean Avenue/Via Marina & Washington Boulevard	N.F.M.	N.F.M.	N.F.M.	N.F.M.	N.F.M.	-	N.F.M.	N.F.M.	-	N.F.M.	N.F.M.	N.F.M.	N.F.M.	N.F.M.	N.F.M.

Table 4.12.2-33

Future (2025) With Alternative With Mitigation Impact Summary

Int. #	Intersection	Alt. 1-2 AM	Alt. 1-2 MD	Alt. 1-2 PM	Alt. 3 AM	Alt. 3 MD	Alt. 3 PM	Alt. 4 AM	Alt. 4 MD	Alt. 4 PM	Alt. 8 AM	Alt. 8 MD	Alt. 8 PM	Alt. 9 AM	Alt. 9 MD	Alt. 9 PM
125	Sepulveda Boulevard & Rosecrans Avenue	-	Partial	-	Partial	Full	-	Full	Partial	-	-	Partial	-	-	Partial	-
135	Sepulveda Boulevard & Westchester Parkway	-	-	-	Partial	-	-	Partial	N.F.M.	N.F.M.	-	-	-	-	-	-
139	Sepulveda Boulevard & I-105 Westbound Ramps (n/o Imperial Highway)	-	Partial	Partial	-	-	-	-	Partial	Partial	-	Partial	Partial	-	Partial	Partial
143	Vicksburg Avenue & 96th Street	-	-	Full	-	-	-	-	-	-	-	-	Full	-	-	Full
146	Sepulveda Eastway & Westchester Parkway	-	-	-	-	-	Full	-	-	Full	-	-	-	-	-	-
147	Crenshaw Boulevard & Century Boulevard	-	Partial	Partial	-	-	-	-	-	Partial	-	Partial	Partial	-	Partial	Partial
148	La Cienega Boulevard & Fairview Boulevard	N.F.M.	-	-	N.F.M.	N.F.M.	N.F.M.	-	-	-	-	-	-	-	-	-
149	Crenshaw Boulevard & Imperial Highway	N.F.M.	N.F.M.	N.F.M.	-	-	N.F.M.	N.F.M.	N.F.M.	N.F.M.	-	N.F.M.	N.F.M.	-	N.F.M.	N.F.M.
153	Overland Avenue & Kelmore Street/Ranch Road	-	-	-	-	-	N.F.M.	-	-	-	-	-	-	-	-	-
154	Overland Avenue & Sawtelle Boulevard	-	-	N.F.M.	-	-	N.F.M.	-	-	N.F.M.	-	-	N.F.M.	-	-	N.F.M.
156	Walgrove Avenue & Washington Boulevard	N.F.M.	N.F.M.	N.F.M.	-	N.F.M.	N.F.M.	-	N.F.M.	N.F.M.	-	N.F.M.	N.F.M.	-	N.F.M.	N.F.M.
159	Hindry Avenue & Manchester Boulevard	-	Partial	-	-	Partial	Partial	-	Full	-	-	Partial	-	-	Partial	-
162	Sepulveda Boulevard & Manhattan Beach Boulevard	-	N.F.M.	-	-	-	-	-	-	-	-	N.F.M.	-	-	N.F.M.	-
164	Crenshaw Boulevard & Manchester Avenue	N.F.M.	N.F.M.	N.F.M.	-	N.F.M.	N.F.M.	N.F.M.	N.F.M.	N.F.M.	N.F.M.	N.F.M.	N.F.M.	N.F.M.	N.F.M.	N.F.M.
165	La Cienega Boulevard & Rodeo Road	-	-	-	-	-	-	-	-	-	N.F.M.	-	-	N.F.M.	-	-
166	La Brea Avenue & Rodeo Road	N.F.M.	-	N.F.M.	N.F.M.	-	-	-	-	-	-	-	-	-	-	-
169	Prairie Avenue & Manchester Boulevard	Full	-	-	Full	N.F.M.	-	Full	-	-	Full	-	N.F.M.	Full	-	N.F.M.
172	Western Avenue & Manchester Avenue	-	-	-	-	-	N.F.M.	-	-	-	-	-	N.F.M.	-	-	N.F.M.
173	Western Avenue & Imperial Highway	-	-	N.F.M.	-	-	-	-	-	N.F.M.	-	-	N.F.M.	-	-	N.F.M.
188	Prairie Avenue & El Segundo Boulevard	N.F.M.	-	-	N.F.M.	-	N.F.M.	N.F.M.	-	-	N.F.M.	-	-	N.F.M.	-	-
197	Prairie Avenue & Lennox Boulevard	-	-	Partial	-	-	Full	Full	-	N.F.M.	-	-	Partial	-	-	Partial
	Number of Intersections with Full Mitigation	12	7	~~14~~ *15*	7	7	12	9	7	~~11~~ *12*	12	7	~~15~~ *16*	12	7	~~15~~ *16*
	Number of Intersections with Partial Mitigation	3	9	5	11	8	6	6	8	5	3	10	6	3	10	6
	Number of Intersections with No Feasible Mitigation	14	11	~~22~~ *21*	~~13~~ *12*	12	19	~~9~~ *8*	13	~~22~~ *21*	11	13	~~24~~ *23*	11	13	~~24~~ *23*
	Number of Significantly Impacted Intersections after Mitigation			~~40~~ *38*		~~38~~ *37*			~~40~~ *38*			~~44~~ *42*			~~44~~ *42*	

Notes:

Full - Intersections that can be fully mitigated to a level less than significant with recommended mitigation measures.
Partial - Intersection operating conditions would be improved with recommended mitigation measures, however; would not be fully mitigated and would remain significant and unavoidable.
N.F.M. - No Feasible Physical Mitigation measures are available. Project impacts remain significant and unavoidable.

Source: Fehr & Peers, 2012.

Table 4.12.2-34

Future (2025) With Alternative 1-2 Plus Mitigation Level of Service Analysis

Int. #	Intersection	Jurisdiction	Future (2025) Without Alternative AM V/C	AM LOS	MD V/C	MD LOS	PM V/C	PM LOS	Future (2025) With Alt. 1-2 Plus Mitigation AM V/C	AM LOS	MD V/C	MD LOS	PM V/C	PM LOS	Mitigation Effectiveness AM	MD	PM
6	Airport Boulevard & Arbor Vitae Street/Westchester Parkway	City of LA	0.471	A	0.573	A	0.747	C	0.484	A	0.691	B	0.797	C	-	Full	Partial
7	Airport Boulevard & Century Boulevard	City of LA	0.651	B	0.648	B	0.619	B	0.688	B	0.853	D	0.850	D	Full	Partial	Partial
9	Airport Boulevard & Manchester Avenue	Caltrans/City of LA	0.740	C	0.849	D	0.951	E	0.831	D	1.096	F	1.035	F	N.F.M.	N.F.M.	N.F.M.
10	Aviation Boulevard & Arbor Vitae Street	Inglewood/City of LA	0.550	A	0.525	A	0.791	C	0.606	B	~~0.649~~ *0.598*	~~B~~ *A*	~~0.878~~ *0.809*	D	-	-	~~N.F.M.~~ *Full*
11	Inglewood Avenue & Arbor Vitae Street	Inglewood	0.508	A	0.575	A	0.798	C	0.525	A	0.563	A	0.797	C	-	-	Full

Table 4.12.2-34

Future (2025) With Alternative 1-2 Plus Mitigation Level of Service Analysis

			Future (2025) Without Alternative						Future (2025) With Alt. 1-2 Plus Mitigation								
			AM		MD		PM		AM		MD		PM		Mitigation Effectiveness		
Int. #	Intersection	Jurisdiction	V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	AM	MD	PM
12	La Brea Avenue & Arbor Vitae Street	Inglewood	0.440	A	0.547	A	0.759	C	0.373	A	0.453	A	0.703	C	-	-	Full
14	Aviation Boulevard & Century Boulevard	City of LA	0.943	E	0.827	D	1.097	F	1.173	F	1.118	F	1.270	F	Partial	Partial	N.F.M.
17	Aviation Boulevard/Florence Avenue & Manchester Avenue	Caltrans/Inglewood	0.854	D	0.903	E	0.894	D	0.775	C	0.828	D	0.902	E	Full	Full	Full
25	La Brea Avenue & Centinela Avenue	Inglewood	0.913	E	0.794	C	0.991	E	0.878	D	0.760	C	0.976	E	Full	-	-
26	La Cienega Boulevard & Centinela Avenue	Inglewood/City of LA	0.896	D	0.681	B	1.134	F	0.883	D	0.674	B	1.029	F	Full	Full	-
27	La Tijera Boulevard & Centinela Avenue[2]	City of LA/LA County	0.643	B	0.502	A	0.840	D	0.682	B	0.539	A	0.865	D	-	-	N.F.M.
34	La Brea Avenue/Hawthorne Boulevard & Century Boulevard	Inglewood	0.735	C	0.771	C	0.983	E	0.679	B	0.848	D	0.968	E	Full	Partial	Full
35	Inglewood Avenue & Century Boulevard	Inglewood	0.705	C	0.657	B	0.926	E	0.649	B	0.637	B	0.843	D	Full	Full	Full
36	La Cienega Boulevard & Century Boulevard[2]	Inglewood/City of LA/LA County	0.730	C	0.661	B	0.827	D	0.815	D	0.856	D	1.004	F	N.F.M.	N.F.M.	N.F.M.
37	Prairie Avenue & Century Boulevard	Inglewood	0.678	B	0.754	C	0.927	E	0.621	B	0.700	B	0.877	D	Full	Full	Full
38	Sepulveda Boulevard & Century Boulevard	Caltrans/City of LA	0.579	A	0.497	A	0.655	B	0.667	B	0.580	A	0.690	B	-	-	Full
46	Douglas Street & El Segundo Boulevard	El Segundo	0.773	C	0.594	A	0.976	E	0.784	C	0.640	B	1.001	F	-	-	N.F.M.
51	Hawthorne Boulevard & El Segundo Boulevard	Hawthorne	0.675	B	0.697	B	1.230	F	0.681	B	0.722	C	1.240	F	-	-	N.F.M.
57	La Brea Avenue & Florence Avenue	Inglewood	0.791	C	0.763	C	1.054	F	0.785	C	0.796	C	1.032	F	Full	Full	Full
58	La Cienega Boulevard & Florence Avenue	Inglewood	0.896	D	0.896	D	1.165	F	0.951	E	1.016	F	1.039	F	Partial	Partial	-
60	Sepulveda Boulevard & Grand Avenue	Caltrans/El Segundo	0.810	D	0.755	C	0.934	E	~~0.816~~ *0.811*	D	~~0.759~~ *0.756*	C	~~0.954~~ *0.913*	E	-	-	Full
62	Hawthorne Boulevard & Imperial Avenue	Hawthorne	0.664	B	0.602	B	0.959	E	0.638	B	0.621	B	0.967	E	-	-	Full
63	Hawthorne Boulevard & Lennox Boulevard[2]	LA County	0.508	A	0.607	B	0.810	D	0.516	A	0.646	B	0.859	D	-	-	N.F.M.
64	Highland Avenue/Vista del Mar & Rosecrans Avenue	Manhattan Beach	0.823	D	0.563	A	0.737	C	0.857	D	0.569	A	0.744	C	N.F.M.	-	-
66	Inglewood Avenue & Imperial Highway	Hawthorne	0.765	C	0.695	B	1.286	F	0.760	C	0.733	C	1.069	F	Full	-	Full
71	Sepulveda Boulevard & Imperial Highway	Caltrans/El Segundo/City of LA	0.805	D	0.807	D	1.223	F	0.779	C	0.611	B	0.855	D	Full	-	Full
76	Inglewood Avenue & Lennox Boulevard[2]	LA County	0.468	A	0.557	A	0.819	D	0.526	A	0.558	A	0.858	D	-	-	N.F.M.
86	La Brea Avenue/Overhill Drive & Stocker Street[2]	LA County	0.820	D	0.724	C	1.193	F	0.869	D	0.771	C	1.229	F	N.F.M.	N.F.M.	N.F.M.
87	La Brea Avenue & Slauson Avenue[2]	LA County	0.905	E	0.747	C	1.007	F	0.951	E	0.857	D	0.994	E	Partial	N.F.M.	Full
88	La Cienega Boulevard & La Tijera Boulevard	Inglewood/City of LA	0.794	C	0.738	C	1.005	F	0.794	C	0.769	C	1.018	F	-	-	N.F.M.
90	La Cienega Boulevard & Manchester Boulevard	Caltrans/Inglewood	0.736	C	0.741	C	0.907	E	0.763	C	0.778	C	0.954	E	-	-	N.F.M.
93	La Cienega Boulevard & Stocker Street[2]	LA County	1.270	F	0.838	D	1.210	F	1.287	F	0.857	D	1.223	F	N.F.M.	-	N.F.M.
95	La Cienega Boulevard & West 120th Street[2]	LA County	0.449	A	0.313	A	0.817	D	0.473	A	0.361	A	0.865	D	-	-	N.F.M.
96	La Cienega Boulevard & I-405 Southbound Ramps (n/o Century Boulevard)	Caltrans/Inglewood/City of LA	0.669	B	0.695	B	0.694	B	0.652	B	0.632	B	0.606	B	Full	-	-
102	I-405 Northbound Ramps & La Tijera Boulevard	Caltrans/City of LA	0.619	B	0.693	B	0.609	B	0.744	C	0.851	D	0.645	B	N.F.M.	N.F.M.	-
109	Lincoln Boulevard & Venice Boulevard	Caltrans/City of LA	0.892	D	0.915	E	1.036	F	0.899	D	0.933	E	1.019	F	-	N.F.M.	-
110	Lincoln Boulevard & Washington Boulevard	Caltrans/City of LA	0.841	D	0.904	E	1.053	F	0.829	D	0.921	E	1.057	F	-	Partial	-
~~114~~	~~Sepulveda Boulevard & Manchester Avenue~~	~~Caltrans/City of LA~~	~~0.804~~	~~D~~	~~0.761~~	~~C~~	~~0.929~~	~~E~~	~~0.835~~	~~D~~	~~0.768~~	~~C~~	~~0.931~~	~~E~~	~~N.F.M.~~	-	-
115	Ash Avenue & Manchester Avenue	Caltrans/Inglewood	0.786	C	0.711	C	0.945	E	0.735	C	0.716	C	1.072	F	-	Full	N.F.M.
119	Ocean Avenue/Via Marina & Washington Boulevard[2]	City of LA/LA County	1.181	F	0.956	E	1.514	F	1.209	F	0.998	E	1.525	F	N.F.M.	N.F.M.	N.F.M.
125	Sepulveda Boulevard & Rosecrans Avenue	Caltrans/El Segundo/Manhattan Beach	0.918	E	0.836	D	1.158	F	0.920	E	0.861	D	1.156	F	-	Partial	-
139	Sepulveda Boulevard & I-105 Westbound Ramps (n/o Imperial Highway)	Caltrans/City of LA	0.877	D	0.840	D	0.923	E	0.876	D	0.889	D	0.941	E	-	Partial	Partial
143	Vicksburg Avenue & 96th Street	City of LA	0.279	A	0.363	A	0.335	A	0.250	A	0.482	A	0.624	B	-	-	Full
147	Crenshaw Boulevard & Century Boulevard	Inglewood	0.708	C	0.773	C	0.928	E	0.731	C	0.805	D	0.955	E	-	Partial	Partial
148	La Cienega Boulevard & Fairview Boulevard	Inglewood/City of LA	0.881	D	0.657	B	0.952	E	0.901	E	0.688	B	0.954	E	N.F.M.	-	-
149	Crenshaw Boulevard & Imperial Highway	Inglewood	0.680	B	0.705	C	1.001	F	0.721	C	0.746	C	1.048	F	N.F.M.	N.F.M.	N.F.M.
154	Overland Avenue & Sawtelle Boulevard	Culver City	31.4	D	17.6	C	45.9	E	32.6	D	18.4	C	51.4	F	-	-	N.F.M.
156	Walgrove Avenue & Washington Boulevard	Culver City	68.8	F	>100	F	>100	F	71.6	F	>100	F	>100	F	N.F.M.[1]	N.F.M.[1]	N.F.M.[1]
159	Hindry Avenue & Manchester Boulevard	Caltrans/Inglewood	0.513	A	0.638	B	0.597	A	0.515	A	0.713	C	0.660	B	-	Partial	-
162	Sepulveda Boulevard & Manhattan Beach Boulevard	Caltrans/Manhattan Beach	0.950	E	0.987	E	1.193	F	0.950	E	0.997	E	1.193	F	-	N.F.M.	-
164	Crenshaw Boulevard & Manchester Avenue	Caltrans/Inglewood	0.816	D	0.843	D	1.025	F	0.854	D	0.870	D	1.066	F	N.F.M.	N.F.M.	N.F.M.
166	La Brea Avenue & Rodeo Road	City of LA	0.989	E	0.756	C	0.972	E	1.000	E	0.775	C	0.995	E	N.F.M.	-	N.F.M.
169	Prairie Avenue & Manchester Boulevard	Inglewood	1.042	F	0.701	C	0.922	E	1.042	F	0.726	C	0.930	E	Full	-	-
173	Western Avenue & Imperial Highway[2]	LA County	0.743	C	0.575	A	0.912	E	0.767	C	0.600	A	0.936	E	-	-	N.F.M.
188	Prairie Avenue & El Segundo Boulevard	Hawthorne	1.001	F	0.684	B	1.006	F	1.023	F	0.704	C	1.010	F	N.F.M.	-	-
197	Prairie Avenue & Lennox Boulevard	Inglewood	0.670	B	0.557	A	0.704	C	0.664	B	0.564	A	0.761	C	-	-	Partial

Table 4.12.2-34

Future (2025) With Alternative 1-2 Plus Mitigation Level of Service Analysis

			Future (2025) Without Alternative						Future (2025) With Alt. 1-2 Plus Mitigation								
			AM		MD		PM		AM		MD		PM		Mitigation Effectiveness		
Int. #	Intersection	Jurisdiction	V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	AM	MD	PM

Notes:

Full - Intersections that can be fully mitigated to a level less than significant with recommended mitigation measures.
Partial - Intersection operating conditions would be improved with recommended mitigation measures, however; would not be fully mitigated and would remain significant and unavoidable.
N.F.M. - No Feasible Physical Mitigation measures are available. Project impacts remain significant and unavoidable.

[1] This stop-controlled intersection is expected to operate at oversaturated condition, based on the vehicle delay reported for the worst-case approach. This intersection was also evaluated using the ICU methodology and the resulting project-related incremental increase in V/C ratio is greater than the City of Culver City adopted significance criteria.

[2] *The impact at this intersection would be partially mitigated by a monetary contribution by LAWA, pending FAA approval, to the County's ITS system. Because the County does not have a method for quantifying the benefits of this type of improvement, however, no quantitative V/C reduction has been taken.*

Source: Fehr & Peers, 2012.

Table 4.12.2-35

Future (2025) With Alternative 3 Plus Mitigation Level of Service Analysis

			Future (2025) Without Alternative						Future (2025) With Alt. 3 Plus Mitigation								
			AM		MD		PM		AM		MD		PM		Mitigation Effectiveness		
Int. #	Intersection	Jurisdiction	V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	AM	MD	PM
6	Airport Boulevard & Arbor Vitae Street/Westchester Parkway	City of LA	0.471	A	0.573	A	0.747	C	0.645	B	0.920	E	0.706	C	-	Partial	Full
9	Airport Boulevard & Manchester Avenue	Caltrans/City of LA	0.740	C	0.849	D	0.951	E	0.747	C	0.853	D	0.962	E	-	-	N.F.M.
10	Aviation Boulevard & Arbor Vitae Street	Inglewood/City of LA	0.550	A	0.525	A	0.791	C	0.678	B	0.791	C	0.792	C	-	N.F.M.	-
13	La Cienega Boulevard & Arbor Vitae Street	Inglewood/City of LA	0.542	A	0.501	A	0.701	C	1.590	F	2.242	F	2.159	F	N.F.M.	N.F.M.	N.F.M.
			0.922	E	~~0.643~~	B	~~0.850~~	D	0.880	D	~~0.660~~	B	~~0.877~~	D	Full	-	-
15	Aviation Boulevard & El Segundo Boulevard	El Segundo			*0.638*		*0.823*				*0.653*		*0.848*				
16	Aviation Boulevard & Imperial Highway	City of LA	0.675	B	0.455	A	0.691	B	0.877	D	0.537	A	0.813	D	Partial	-	N.F.M.
17	Aviation Boulevard/Florence Avenue & Manchester Avenue	Caltrans/Inglewood	0.854	D	0.903	E	0.894	D	0.766	C	0.855	D	0.857	D	-	-	Full
25	La Brea Avenue & Centinela Avenue	Inglewood	0.913	E	0.794	C	0.991	E	0.872	D	0.785	C	0.979	E	-	Full	-
26	La Cienega Boulevard & Centinela Avenue	Inglewood/City of LA	0.896	D	0.681	B	1.134	F	0.943	E	0.743	C	1.076	F	Partial	Partial	Full
28	Sepulveda Boulevard & Centinela Avenue	Culver City	0.884	D	0.711	C	0.879	D	0.820	D	0.677	B	0.860	D	Full	-	Full
35	Inglewood Avenue & Century Boulevard	Inglewood	0.705	C	0.657	B	0.926	E	0.644	B	0.609	B	0.829	D	-	Full	-
36	La Cienega Boulevard & Century Boulevard[2]	Inglewood/City of LA/LA County	0.730	C	0.661	B	0.827	D	0.920	E	0.688	B	0.957	E	N.F.M.	-	N.F.M.
38	Sepulveda Boulevard & Century Boulevard	Caltrans/City of LA	0.579	A	0.497	A	0.655	B	0.715	C	0.526	A	0.719	C	Partial	-	Partial
51	Hawthorne Boulevard & El Segundo Boulevard	Hawthorne	0.675	B	0.697	B	1.230	F	0.720	C	0.773	C	1.289	F	N.F.M.	N.F.M.	N.F.M.
52	Inglewood Avenue & El Segundo Boulevard[2]	Hawthorne/LA County	0.670	B	0.697	B	1.078	F	0.715	C	0.772	C	1.095	F	N.F.M.	N.F.M.	N.F.M.
53	La Cienega Boulevard & El Segundo Boulevard	Hawthorne/LA County	0.710	C	0.562	A	1.015	F	0.730	C	0.603	B	0.899	D	-	-	Full
57	La Brea Avenue & Florence Avenue	Inglewood	0.791	C	0.763	C	1.054	F	0.757	C	0.810	D	1.019	F	Full	Partial	Full
58	La Cienega Boulevard & Florence Avenue	Inglewood	0.896	D	0.896	D	1.165	F	1.032	F	1.156	F	1.295	F	Partial	Partial	Partial
62	Hawthorne Boulevard & Imperial Avenue	Hawthorne	0.664	B	0.602	B	0.959	E	0.717	C	0.672	B	1.079	F	Partial	Full	Partial
66	Inglewood Avenue & Imperial Highway	Hawthorne	0.765	C	0.695	B	1.286	F	0.845	D	0.742	C	1.137	F	Partial	Partial	Full
70	Prairie Avenue & Imperial Highway	Hawthorne/Inglewood	0.690	B	0.628	B	0.881	D	0.640	B	0.545	A	0.796	C	Full	-	-
71	Sepulveda Boulevard & Imperial Highway	Caltrans/El Segundo/City of LA	0.805	D	0.807	D	1.223	F	0.694	B	0.603	B	0.840	D	-	-	Full
74	I-105 Ramps (e/o Aviation Boulevard) & Imperial Highway	Caltrans/City of LA	0.647	B	0.340	A	0.609	B	0.970	E	0.689	B	0.884	D	Partial	Full	Partial
76	Inglewood Avenue & Lennox Boulevard[2]	LA County	0.468	A	0.557	A	0.819	D	0.531	A	0.558	A	0.888	D	-	-	N.F.M.
85	La Brea Avenue & Manchester Boulevard	Caltrans/Inglewood	0.847	D	0.744	C	0.945	E	0.782	C	0.738	C	0.882	D	Full	Full	Full

Table 4.12.2-35

Future (2025) With Alternative 3 Plus Mitigation Level of Service Analysis

			Future (2025) Without Alternative						Future (2025) With Alt. 3 Plus Mitigation						Mitigation Effectiveness		
			AM		MD		PM		AM		MD		PM				
Int. #	Intersection	Jurisdiction	V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	AM	MD	PM
86	La Brea Avenue/Overhill Drive & Stocker Street[2]	LA County	0.820	D	0.724	C	1.193	F	0.844	D	0.789	C	1.222	F	N.F.M.	N.F.M.	N.F.M.
87	La Brea Avenue & Slauson Avenue[2]	LA County	0.905	E	0.747	C	1.007	F	0.953	E	0.896	D	1.000	E	Partial	Partial	Full
88	La Cienega Boulevard & La Tijera Boulevard	Inglewood/City of LA	0.794	C	0.738	C	1.005	F	0.755	C	0.769	C	1.031	F	N.F.M.	-	N.F.M.
90	La Cienega Boulevard & Manchester Boulevard	Caltrans/Inglewood	0.736	C	0.741	C	0.907	E	0.848	D	1.051	F	1.113	F	Partial	Partial	Partial
93	La Cienega Boulevard & Stocker Street[2]	LA County	1.270	F	0.838	D	1.210	F	1.284	F	0.877	D	1.222	F	N.F.M.	N.F.M.	N.F.M.
95	La Cienega Boulevard & West 120th Street[2]	LA County	0.449	A	0.313	A	0.817	D	0.507	A	0.415	A	0.928	E	-	-	N.F.M.
101	Sepulveda Boulevard & La Tijera Boulevard	City of LA	0.602	B	0.729	C	0.851	D	0.695	B	0.677	B	0.791	C	-	Full	-
102	I-405 Northbound Ramps & La Tijera Boulevard	Caltrans/City of LA	0.619	B	0.693	B	0.609	B	0.811	D	0.828	D	0.642	B	N.F.M.	N.F.M.	-
105	Lincoln Boulevard & Manchester Avenue	Caltrans/City of LA	0.800	C	0.547	A	0.871	D	0.761	C	0.536	A	0.800	C	Full	-	-
~~114~~	~~Sepulveda Boulevard & Manchester Avenue~~	~~Caltrans/City of LA~~	~~0.804~~	~~D~~	~~0.761~~	~~C~~	~~0.929~~	~~E~~	~~0.835~~	~~D~~	~~0.764~~	~~C~~	~~0.929~~	~~E~~	~~N.F.M.~~	~~-~~	~~-~~
119	Ocean Avenue/Via Marina & Washington Boulevard[2]	City of LA/LA County	1.181	F	0.956	E	1.514	F	1.202	F	1.005	F	1.518	F	N.F.M.	N.F.M.	-
125	Sepulveda Boulevard & Rosecrans Avenue	Caltrans/El Segundo/Manhattan Beach	0.918	E	0.836	D	1.158	F	0.928	E	0.855	D	1.154	F	Partial	Full	-
135	Sepulveda Boulevard & Westchester Parkway	City of LA	0.658	B	0.643	B	1.109	F	0.786	C	0.672	B	1.118	F	Partial	-	-
146	Sepulveda Eastway & Westchester Parkway	City of LA	0.427	A	0.543	A	0.693	B	0.503	A	0.663	B	0.583	A	-	-	Full
148	La Cienega Boulevard & Fairview Boulevard	Inglewood/City of LA	0.881	D	0.657	B	0.952	E	0.920	E	0.717	C	0.967	E	N.F.M.	N.F.M.	N.F.M.
149	Crenshaw Boulevard & Imperial Highway	Inglewood	0.680	B	0.705	C	1.001	F	0.697	B	0.709	C	1.019	F	-	-	N.F.M.
153	Overland Avenue & Kelmore Street/Ranch Road	Culver City	32.1	D	15.3	C	46.2	E	33.1	D	16.3	C	51.3	F	-	-	N.F.M.
154	Overland Avenue & Sawtelle Boulevard	Culver City	31.4	D	17.6	C	45.9	E	33.6	D	19.5	C	52.8	F	-	-	N.F.M.
156	Walgrove Avenue & Washington Boulevard	Culver City	68.8	F	>100	F	>100	F	68.8	F	>100	F	>100	F	-	N.F.M.[1]	N.F.M.[1]
159	Hindry Avenue & Manchester Boulevard	Caltrans/Inglewood	0.513	A	0.638	B	0.597	A	0.592	A	0.889	D	0.812	D	-	Partial	Partial
164	Crenshaw Boulevard & Manchester Avenue	Caltrans/Inglewood	0.816	D	0.843	D	1.025	F	0.833	D	0.922	E	1.093	F	-	N.F.M.	N.F.M.
166	La Brea Avenue & Rodeo Road	City of LA	0.989	E	0.756	C	0.972	E	1.021	F	0.787	C	0.976	E	N.F.M.	-	-
169	Prairie Avenue & Manchester Boulevard	Inglewood	1.042	F	0.701	C	0.922	E	1.045	F	0.793	C	0.929	E	Full	N.F.M.	-
172	Western Avenue & Manchester Avenue	Caltrans/City of LA	0.727	C	0.560	A	0.887	D	0.760	C	0.576	A	0.901	E	-	-	N.F.M.
188	Prairie Avenue & El Segundo Boulevard	Hawthorne	1.001	F	0.684	B	1.006	F	1.057	F	0.711	C	1.025	F	N.F.M.	-	N.F.M.
197	Prairie Avenue & Lennox Boulevard	Inglewood	0.670	B	0.557	A	0.704	C	0.651	B	0.556	A	0.720	C	-	-	Full

Notes:

Full - Intersections that can be fully mitigated to a level less than significant with recommended mitigation measures.
Partial - Intersection operating conditions would be improved with recommended mitigation measures, however; would not be fully mitigated and would remain significant and unavoidable.
N.F.M. - No Feasible Physical Mitigation measures are available. Project impacts remain significant and unavoidable.

[1] This stop-controlled intersection is expected to operate at oversaturated condition, based on the vehicle delay reported for the worst-case approach. This intersection was also evaluated using the ICU methodology and the resulting project-related incremental increase in V/C ratio is greater than the City of Culver City adopted significance criteria.

[2] *The impact at this intersection would be partially mitigated by a monetary contribution by LAWA, pending FAA approval, to the County's ITS system. Because the County does not have a method for quantifying the benefits of this type of improvement, however, no quantitative V/C reduction has been taken.*

Source: Fehr & Peers, 2012.

Table 4.12.2-36

Future (2025) With Alternative 4 Plus Mitigation Level of Service Analysis

			Future (2025) Without Alternative						Future (2025) With Alt. 4 Plus Mitigation						Mitigation Effectiveness		
			AM		MD		PM		AM		MD		PM				
Int. #	Intersection	Jurisdiction	V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	AM	MD	PM
6	Airport Boulevard & Arbor Vitae Street/Westchester Parkway	City of LA	0.471	A	0.573	A	0.747	C	0.552	A	0.709	C	0.725	C	-	Partial	Full
7	Airport Boulevard & Century Boulevard	City of LA	0.651	B	0.648	B	0.619	B	0.730	C	0.971	E	0.924	E	Partial	Partial	Partial
8	La Tijera Boulevard & Airport Boulevard	City of LA	0.520	A	0.441	A	0.580	A	0.533	A	0.453	A	0.580	A	-	-	-
9	Airport Boulevard & Manchester Avenue	Caltrans/City of LA	0.740	C	0.849	D	0.951	E	0.798	C	0.969	E	1.031	F	N.F.M.	N.F.M.	N.F.M.
10	Aviation Boulevard & Arbor Vitae Street	Inglewood/City of LA	0.550	A	0.525	A	0.791	C	~~0.616~~	B	~~0.588~~	A	~~0.816~~	~~D~~	-	-	~~N.F.M.~~
									0.609		*0.541*		*0.747*	*C*			*Full*
11	Inglewood Avenue & Arbor Vitae Street	Inglewood	0.508	A	0.575	A	0.798	C	0.507	A	0.554	A	0.795	C	-	-	Full
14	Aviation Boulevard & Century Boulevard	City of LA	0.943	E	0.827	D	1.097	F	1.091	F	1.195	F	1.288	F	Partial	Partial	N.F.M.
16	Aviation Boulevard & Imperial Highway	City of LA	0.675	B	0.455	A	0.691	B	0.674	B	0.558	A	0.701	C	Full	-	-
17	Aviation Boulevard/Florence Avenue & Manchester Avenue	Caltrans/Inglewood	0.854	D	0.903	E	0.894	D	0.776	C	0.849	D	0.870	D	-	Full	Full
26	La Cienega Boulevard & Centinela Avenue	Inglewood/City of LA	0.896	D	0.681	B	1.134	F	0.881	D	0.674	B	1.027	F	Full	Full	-
27	La Tijera Boulevard & Centinela Avenue[2]	City of LA/LA County	0.643	B	0.502	A	0.840	D	0.669	B	0.551	A	0.863	D	-	-	N.F.M.
34	La Brea Avenue/Hawthorne Boulevard & Century Boulevard	Inglewood	0.735	C	0.771	C	0.983	E	0.669	B	0.817	D	0.979	E	Full	Partial	Full
35	Inglewood Avenue & Century Boulevard	Inglewood	0.705	C	0.657	B	0.926	E	0.640	B	0.632	B	0.832	D	-	Full	-
36	La Cienega Boulevard & Century Boulevard[2]	Inglewood/City of LA/LA County	0.730	C	0.661	B	0.827	D	0.859	D	0.835	D	1.182	F	Partial	N.F.M.	N.F.M.
37	Prairie Avenue & Century Boulevard	Inglewood	0.678	B	0.754	C	0.927	E	0.613	B	0.694	B	0.873	D	-	Full	Full
38	Sepulveda Boulevard & Century Boulevard	Caltrans/City of LA	0.579	A	0.497	A	0.655	B	0.639	B	0.557	A	0.754	C	-	-	Partial
46	Douglas Street & El Segundo Boulevard	El Segundo	0.773	C	0.594	A	0.976	E	0.797	C	0.633	B	1.014	F	-	-	N.F.M.
51	Hawthorne Boulevard & El Segundo Boulevard	Hawthorne	0.675	B	0.697	B	1.230	F	0.693	B	0.750	C	1.245	F	-	N.F.M.	N.F.M.
57	La Brea Avenue & Florence Avenue	Inglewood	0.791	C	0.763	C	1.054	F	0.769	C	0.797	C	1.028	F	Full	Full	Full
58	La Cienega Boulevard & Florence Avenue	Inglewood	0.896	D	0.896	D	1.165	F	0.910	E	0.957	E	1.029	F	Partial	Partial	-
62	Hawthorne Boulevard & Imperial Avenue	Hawthorne	0.664	B	0.602	B	0.959	E	0.662	B	0.609	B	0.973	E	-	-	Partial
63	Hawthorne Boulevard & Lennox Boulevard[2]	LA County	0.508	A	0.607	B	0.810	D	0.526	A	0.643	B	0.848	D	-	-	N.F.M.
64	Highland Avenue/Vista del Mar & Rosecrans Avenue	Manhattan Beach	0.823	D	0.563	A	0.737	C	0.857	D	0.576	A	0.750	C	N.F.M.	-	-
66	Inglewood Avenue & Imperial Highway	Hawthorne	0.765	C	0.695	B	1.286	F	0.797	C	0.743	C	1.086	F	Full	N.F.M.	Full
71	Sepulveda Boulevard & Imperial Highway	Caltrans/El Segundo/City of LA	0.805	D	0.807	D	1.223	F	0.795	C	0.626	B	0.849	D	Full	-	Full
76	Inglewood Avenue & Lennox Boulevard[2]	LA County	0.468	A	0.557	A	0.819	D	0.538	A	0.563	A	0.888	D	-	-	N.F.M.
86	La Brea Avenue/Overhill Drive & Stocker Street[2]	LA County	0.820	D	0.724	C	1.193	F	0.844	D	0.749	C	1.229	F	N.F.M.	-	N.F.M.
87	La Brea Avenue & Slauson Avenue[2]	LA County	0.905	E	0.747	C	1.007	F	0.945	E	0.863	D	0.998	E	Partial	N.F.M.	Full
88	La Cienega Boulevard & La Tijera Boulevard	Inglewood/City of LA	0.794	C	0.738	C	1.005	F	0.800	C	0.763	C	1.131	F	-	-	N.F.M.
90	La Cienega Boulevard & Manchester Boulevard	Caltrans/Inglewood	0.736	C	0.741	C	0.907	E	0.749	C	0.776	C	0.925	E	-	-	N.F.M.
93	La Cienega Boulevard & Stocker Street[2]	LA County	1.270	F	0.838	D	1.210	F	1.286	F	0.873	D	1.237	F	N.F.M.	N.F.M.	N.F.M.
95	La Cienega Boulevard & West 120th Street[2]	LA County	0.449	A	0.313	A	0.817	D	0.495	A	0.376	A	0.853	D	-	-	N.F.M.
101	Sepulveda Boulevard & La Tijera Boulevard	City of LA	0.602	B	0.729	C	0.851	D	0.616	B	0.746	C	0.837	D	-	Full	Full
102	I-405 Northbound Ramps & La Tijera Boulevard	Caltrans/City of LA	0.619	B	0.693	B	0.609	B	0.695	B	0.814	D	0.617	B	-	N.F.M.	-
109	Lincoln Boulevard & Venice Boulevard	Caltrans/City of LA	0.892	D	0.915	E	1.036	F	0.894	D	0.933	E	1.019	F	-	N.F.M.	-
110	Lincoln Boulevard & Washington Boulevard	Caltrans/City of LA	0.841	D	0.904	E	1.053	F	0.829	D	0.921	E	1.057	F	-	Partial	-
~~114~~	~~Sepulveda Boulevard & Manchester Avenue~~	~~Caltrans/City of LA~~	~~0.804~~	~~D~~	~~0.761~~	~~C~~	~~0.929~~	~~E~~	~~0.861~~	~~D~~	~~0.761~~	~~C~~	~~0.929~~	~~E~~	~~N.F.M.~~	-	-
115	Ash Avenue & Manchester Avenue	Caltrans/Inglewood	0.786	C	0.711	C	0.945	E	0.797	C	0.726	C	0.965	E	-	-	N.F.M.
119	Ocean Avenue/Via Marina & Washington Boulevard[2]	City of LA/LA County	1.181	F	0.956	E	1.514	F	1.216	F	1.012	F	1.514	F	N.F.M.	N.F.M.	-
125	Sepulveda Boulevard & Rosecrans Avenue	Caltrans/El Segundo/Manhattan Beach	0.918	E	0.836	D	1.158	F	0.923	E	0.863	D	1.153	F	Full	Partial	-
135	Sepulveda Boulevard & Westchester Parkway	City of LA	0.658	B	0.643	B	1.109	F	0.733	C	0.832	D	1.411	F	Partial	N.F.M.	N.F.M.
139	Sepulveda Boulevard & I-105 Westbound Ramps (n/o Imperial Highway)	Caltrans/City of LA	0.877	D	0.840	D	0.923	E	0.867	D	0.861	D	0.934	E	-	Partial	Partial
146	Sepulveda Eastway & Westchester Parkway	City of LA	0.427	A	0.543	A	0.693	B	0.417	A	0.563	A	0.580	A	-	-	Full
147	Crenshaw Boulevard & Century Boulevard	Inglewood	0.708	C	0.773	C	0.928	E	0.727	C	0.795	C	0.950	E	-	-	Partial
149	Crenshaw Boulevard & Imperial Highway	Inglewood	0.680	B	0.705	C	1.001	F	0.731	C	0.750	C	1.046	F	N.F.M.	N.F.M.	N.F.M.
154	Overland Avenue & Sawtelle Boulevard	Culver City	31.4	D	17.6	C	45.9	E	33.1	D	18.6	C	51.4	F	-	-	N.F.M.
156	Walgrove Avenue & Washington Boulevard	Culver City	68.8	F	>100	F	>100	F	69.7	F	>100	F	>100	F	-	N.F.M.[1]	N.F.M.[1]
159	Hindry Avenue & Manchester Boulevard	Caltrans/Inglewood	0.513	A	0.638	B	0.597	A	0.501	A	0.672	B	0.663	B	-	Full	-
164	Crenshaw Boulevard & Manchester Avenue	Caltrans/Inglewood	0.816	D	0.843	D	1.025	F	0.848	D	0.867	D	1.057	F	N.F.M.	N.F.M.	N.F.M.
169	Prairie Avenue & Manchester Boulevard	Inglewood	1.042	F	0.701	C	0.922	E	1.042	F	0.716	C	0.928	E	Full	-	-

Table 4.12.2-36

Future (2025) With Alternative 4 Plus Mitigation Level of Service Analysis

			Future (2025) Without Alternative						Future (2025) With Alt. 4 Plus Mitigation								
			AM		MD		PM		AM		MD		PM		Mitigation Effectiveness		
Int. #	Intersection	Jurisdiction	V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	AM	MD	PM
173	Western Avenue & Imperial Highway[2]	LA County	0.743	C	0.575	A	0.912	E	0.765	C	0.600	A	0.928	E	-	-	N.F.M.
188	Prairie Avenue & El Segundo Boulevard	Hawthorne	1.001	F	0.684	B	1.006	F	1.028	F	0.707	C	1.008	F	N.F.M.	-	-
197	Prairie Avenue & Lennox Boulevard	Inglewood	0.670	B	0.557	A	0.704	C	0.675	B	0.557	A	0.759	C	Full	-	N.F.M.

Notes:

Full - Intersections that can be fully mitigated to a level less than significant with recommended mitigation measures.
Partial - Intersection operating conditions would be improved with recommended mitigation measures, however; would not be fully mitigated and would remain significant and unavoidable.
N.F.M. - No Feasible Physical Mitigation measures are available. Project impacts remain significant and unavoidable.

[1] This stop-controlled intersection is expected to operate at oversaturated condition, based on the vehicle delay reported for the worst-case approach. This intersection was also evaluated using the ICU methodology and the resulting project-related incremental increase in V/C ratio is greater than the City of Culver City adopted significance criteria.

[2] *The impact at this intersection would be partially mitigated by a monetary contribution by LAWA, pending FAA approval, to the County's ITS system. Because the County does not have a method for quantifying the benefits of this type of improvement, however, no quantitative V/C reduction has been taken.*

Source: Fehr & Peers, 2012.

Table 4.12.2-37

Future (2025) With Alternative 8 Plus Mitigation Level of Service Analysis

			Future (2025) Without Alternative						Future (2025) With Alt. 8 Plus Mitigation								
			AM		MD		PM		AM		MD		PM		Mitigation Effectiveness		
Int. #	Intersection	Jurisdiction	V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	AM	MD	PM
6	Airport Boulevard & Arbor Vitae Street/Westchester Parkway	City of LA	0.471	A	0.573	A	0.747	C	0.444	A	0.595	A	0.787	C	-	-	Partial
7	Airport Boulevard & Century Boulevard	City of LA	0.651	B	0.648	B	0.619	B	0.686	B	0.869	D	0.858	D	Full	Partial	Partial
9	Airport Boulevard & Manchester Avenue	Caltrans/City of LA	0.740	C	0.849	D	0.951	E	0.871	D	1.056	F	1.060	F	N.F.M.	N.F.M.	N.F.M.
10	Aviation Boulevard & Arbor Vitae Street	Inglewood/City of LA	0.550	A	0.525	A	0.791	C	0.582	A	~~0.569~~ *0.525*	A	~~0.864~~ *0.795*	~~D~~ *C*	-	-	~~N.F.M.~~ *Full*
11	Inglewood Avenue & Arbor Vitae Street	Inglewood	0.508	A	0.575	A	0.798	C	0.522	A	0.563	A	0.810	D	-	-	Full
12	La Brea Avenue & Arbor Vitae Street	Inglewood	0.440	A	0.547	A	0.759	C	0.373	A	0.453	A	0.702	C	-	-	Full
14	Aviation Boulevard & Century Boulevard	City of LA	0.943	E	0.827	D	1.097	F	1.162	F	1.064	F	1.208	F	Partial	Partial	N.F.M.
17	Aviation Boulevard/Florence Avenue & Manchester Avenue	Caltrans/Inglewood	0.854	D	0.903	E	0.894	D	0.788	C	0.810	D	0.902	E	Full	-	Full
25	La Brea Avenue & Centinela Avenue	Inglewood	0.913	E	0.794	C	0.991	E	0.878	D	0.763	C	0.975	E	Full	Full	-
26	La Cienega Boulevard & Centinela Avenue	Inglewood/City of LA	0.896	D	0.681	B	1.134	F	0.885	D	0.685	B	1.023	F	Full	Full	-
27	La Tijera Boulevard & Centinela Avenue[2]	City of LA/LA County	0.643	B	0.502	A	0.840	D	0.681	B	0.537	A	0.862	D	-	-	N.F.M.
34	La Brea Avenue/Hawthorne Boulevard & Century Boulevard	Inglewood	0.735	C	0.771	C	0.983	E	0.690	B	0.859	D	0.983	E	Full	Partial	Full
35	Inglewood Avenue & Century Boulevard	Inglewood	0.705	C	0.657	B	0.926	E	0.654	B	0.600	A	0.829	D	Full	Full	-
36	La Cienega Boulevard & Century Boulevard[2]	Inglewood/City of LA/LA County	0.730	C	0.661	B	0.827	D	0.929	E	0.861	D	0.984	E	N.F.M.	N.F.M.	N.F.M.
37	Prairie Avenue & Century Boulevard	Inglewood	0.678	B	0.754	C	0.927	E	0.625	B	0.694	B	0.879	D	Full	Full	Full
38	Sepulveda Boulevard & Century Boulevard	Caltrans/City of LA	0.579	A	0.497	A	0.655	B	0.674	B	0.585	A	0.688	B	-	-	Full
46	Douglas Street & El Segundo Boulevard	El Segundo	0.773	C	0.594	A	0.976	E	0.782	C	0.628	B	1.006	F	-	-	N.F.M.
51	Hawthorne Boulevard & El Segundo Boulevard	Hawthorne	0.675	B	0.697	B	1.230	F	0.679	B	0.730	C	1.242	F	-	-	N.F.M.
57	La Brea Avenue & Florence Avenue	Inglewood	0.791	C	0.763	C	1.054	F	0.788	C	0.799	C	1.041	F	Full	Full	Full
58	La Cienega Boulevard & Florence Avenue	Inglewood	0.896	D	0.896	D	1.165	F	0.920	E	0.994	E	1.047	F	Partial	Partial	Full
60	Sepulveda Boulevard & Grand Avenue	Caltrans/El Segundo	0.810	D	0.755	C	0.934	E	~~0.814~~ *0.807*	D	~~0.759~~ *0.756*	C	~~0.954~~ *0.913*	E	-	-	Full
62	Hawthorne Boulevard & Imperial Avenue	Hawthorne	0.664	B	0.602	B	0.959	E	0.636	B	0.638	B	0.993	E	-	-	Partial
63	Hawthorne Boulevard & Lennox Boulevard[2]	LA County	0.508	A	0.607	B	0.810	D	0.518	A	0.652	B	0.863	D	-	-	N.F.M.

Table 4.12.2-37

Future (2025) With Alternative 8 Plus Mitigation Level of Service Analysis

			Future (2025) Without Alternative						Future (2025) With Alt. 8 Plus Mitigation						Mitigation Effectiveness		
			AM		MD		PM		AM		MD		PM				
Int. #	Intersection	Jurisdiction	V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	AM	MD	PM
64	Highland Avenue/Vista del Mar & Rosecrans Avenue	Manhattan Beach	0.823	D	0.563	A	0.737	C	0.857	D	0.569	A	0.744	C	N.F.M.	-	-
66	Inglewood Avenue & Imperial Highway	Hawthorne	0.765	C	0.695	B	1.286	F	0.763	C	0.739	C	1.061	F	Full	N.F.M.	Full
71	Sepulveda Boulevard & Imperial Highway	Caltrans/El Segundo/City of LA	0.805	D	0.807	D	1.223	F	0.784	C	0.606	B	0.857	D	Full	-	Full
76	Inglewood Avenue & Lennox Boulevard[2]	LA County	0.468	A	0.557	A	0.819	D	0.525	A	0.558	A	0.870	D	-	-	N.F.M.
77	Inglewood Avenue & Manchester Boulevard	Caltrans/Inglewood	0.651	B	0.565	A	0.773	C	0.675	B	0.597	A	0.803	D	-	-	N.F.M.
85	La Brea Avenue & Manchester Boulevard	Caltrans/Inglewood	0.847	D	0.744	C	0.945	E	0.760	C	0.657	B	0.861	D	-	-	Full
86	La Brea Avenue/Overhill Drive & Stocker Street[2]	LA County	0.820	D	0.724	C	1.193	F	0.863	D	0.760	C	1.233	F	N.F.M.	-	N.F.M.
87	La Brea Avenue & Slauson Avenue[2]	LA County	0.905	E	0.747	C	1.007	F	0.955	E	0.871	D	0.996	E	Partial	N.F.M.	Full
88	La Cienega Boulevard & La Tijera Boulevard	Inglewood/City of LA	0.794	C	0.738	C	1.005	F	0.788	C	0.782	C	1.131	F	-	N.F.M.	N.F.M.
90	La Cienega Boulevard & Manchester Boulevard	Caltrans/Inglewood	0.736	C	0.741	C	0.907	E	0.742	C	0.787	C	0.969	E	Full	Partial	N.F.M.
93	La Cienega Boulevard & Stocker Street[2]	LA County	1.270	F	0.838	D	1.210	F	1.287	F	0.863	D	1.223	F	N.F.M.	N.F.M.	N.F.M.
95	La Cienega Boulevard & West 120th Street[2]	LA County	0.449	A	0.313	A	0.817	D	0.479	A	0.367	A	0.894	D	-	-	N.F.M.
96	La Cienega Boulevard & I-405 Southbound Ramps (n/o Century Boulevard)	Caltrans/Inglewood/City of LA	0.669	B	0.695	B	0.694	B	0.605	B	0.614	B	0.592	A	-	Full	Full
102	I-405 Northbound Ramps & La Tijera Boulevard	Caltrans/City of LA	0.619	B	0.693	B	0.609	B	0.746	C	0.842	D	0.617	B	N.F.M.	N.F.M.	-
109	Lincoln Boulevard & Venice Boulevard	Caltrans/City of LA	0.892	D	0.915	E	1.036	F	0.899	D	0.925	E	1.019	F	-	N.F.M.	-
110	Lincoln Boulevard & Washington Boulevard	Caltrans/City of LA	0.841	D	0.904	E	1.053	F	0.829	D	0.915	E	1.054	F	-	Partial	-
~~114~~	~~Sepulveda Boulevard & Manchester Avenue~~	~~Caltrans/City of LA~~	~~0.804~~	~~D~~	~~0.761~~	~~C~~	~~0.929~~	~~E~~	~~0.837~~	~~D~~	~~0.768~~	~~C~~	~~0.933~~	~~E~~	~~N.F.M.~~	~~-~~	~~-~~
115	Ash Avenue & Manchester Avenue	Caltrans/Inglewood	0.786	C	0.711	C	0.945	E	0.735	C	0.744	C	1.070	F	-	Full	N.F.M.
119	Ocean Avenue/Via Marina & Washington Boulevard[2]	City of LA/LA County	1.181	F	0.956	E	1.514	F	1.216	F	1.005	F	1.539	F	N.F.M.	N.F.M.	N.F.M.
125	Sepulveda Boulevard & Rosecrans Avenue	Caltrans/El Segundo/Manhattan Beach	0.918	E	0.836	D	1.158	F	0.918	E	0.860	D	1.153	F	-	Partial	-
139	Sepulveda Boulevard & I-105 Westbound Ramps (n/o Imperial Highway)	Caltrans/City of LA	0.877	D	0.840	D	0.923	E	0.880	D	0.887	D	0.941	E	-	Partial	Partial
143	Vicksburg Avenue & 96th Street	City of LA	0.279	A	0.363	A	0.335	A	0.237	A	0.478	A	0.583	A	-	-	Full
147	Crenshaw Boulevard & Century Boulevard	Inglewood	0.708	C	0.773	C	0.928	E	0.723	C	0.805	D	0.973	E	-	Partial	Partial
149	Crenshaw Boulevard & Imperial Highway	Inglewood	0.680	B	0.705	C	1.001	F	0.715	C	0.748	C	1.030	F	-	N.F.M.	N.F.M.
154	Overland Avenue & Sawtelle Boulevard	Culver City	31.4	D	17.6	C	45.9	E	33.1	D	18.6	C	50.6	F	-	-	N.F.M.
156	Walgrove Avenue & Washington Boulevard	Culver City	68.8	F	>100	F	>100	F	68.8	F	>100	F	>100	F	-	N.F.M.[1]	N.F.M.[1]
159	Hindry Avenue & Manchester Boulevard	Caltrans/Inglewood	0.513	A	0.638	B	0.597	A	0.503	A	0.725	C	0.673	B	-	Partial	-
162	Sepulveda Boulevard & Manhattan Beach Boulevard	Caltrans/Manhattan Beach	0.950	E	0.987	E	1.193	F	0.950	E	0.997	E	1.193	F	-	N.F.M.	-
164	Crenshaw Boulevard & Manchester Avenue	Caltrans/Inglewood	0.816	D	0.843	D	1.025	F	0.857	D	0.873	D	1.066	F	N.F.M.	N.F.M.	N.F.M.
165	La Cienega Boulevard & Rodeo Road	City of LA	1.025	F	0.719	C	1.037	F	1.035	F	0.734	C	1.038	F	N.F.M.	-	-
169	Prairie Avenue & Manchester Boulevard	Inglewood	1.042	F	0.701	C	0.922	E	1.048	F	0.732	C	0.941	E	Full	-	N.F.M.
172	Western Avenue & Manchester Avenue	Caltrans/City of LA	0.727	C	0.560	A	0.887	D	0.733	C	0.571	A	0.906	E	-	-	N.F.M.
173	Western Avenue & Imperial Highway[2]	LA County	0.743	C	0.575	A	0.912	E	0.764	C	0.596	A	0.941	E	-	-	N.F.M.
188	Prairie Avenue & El Segundo Boulevard	Hawthorne	1.001	F	0.684	B	1.006	F	1.027	F	0.704	C	1.008	F	N.F.M.	-	-
197	Prairie Avenue & Lennox Boulevard	Inglewood	0.670	B	0.557	A	0.704	C	0.655	B	0.562	A	0.763	C	-	-	Partial

Notes:

Full - Intersections that can be fully mitigated to a level less than significant with recommended mitigation measures.
Partial - Intersection operating conditions would be improved with recommended mitigation measures, however; would not be fully mitigated and would remain significant and unavoidable.
N.F.M. - No Feasible Physical Mitigation measures are available. Project impacts remain significant and unavoidable.

[1] This stop-controlled intersection is expected to operate at oversaturated condition, based on the vehicle delay reported for the worst-case approach. This intersection was also evaluated using the ICU methodology and the resulting project-related incremental increase in V/C ratio is greater than the City of Culver City adopted significance criteria.

[2] *The impact at this intersection would be partially mitigated by a monetary contribution by LAWA, pending FAA approval, to the County's ITS system. Because the County does not have a method for quantifying the benefits of this type of improvement, however, no quantitative V/C reduction has been taken.*

Source: Fehr & Peers, 2012.

Table 4.12.2-38

Future (2025) With Alternative 9 Plus Mitigation Level of Service Analysis

			Future (2025) Without Alternative						Future (2025) With Alt. 9 Plus Mitigation						Mitigation Effectiveness		
			AM		MD		PM		AM		MD		PM				
Int. #	Intersection	Jurisdiction	V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	AM	MD	PM
6	Airport Boulevard & Arbor Vitae Street/Westchester Parkway	City of LA	0.471	A	0.573	A	0.747	C	0.444	A	0.595	A	0.787	C	-	-	Partial
7	Airport Boulevard & Century Boulevard	City of LA	0.651	B	0.648	B	0.619	B	0.686	B	0.869	D	0.858	D	Full	Partial	Partial
9	Airport Boulevard & Manchester Avenue	Caltrans/City of LA	0.740	C	0.849	D	0.951	E	0.871	D	1.056	F	1.060	F	N.F.M.	N.F.M.	N.F.M.
10	Aviation Boulevard & Arbor Vitae Street	Inglewood/City of LA	0.550	A	0.525	A	0.791	C	0.582	A	~~0.569~~ *0.525*	A	~~0.864~~ *0.795*	~~D~~ *C*	-	-	~~N.F.M.~~ *Full*
11	Inglewood Avenue & Arbor Vitae Street	Inglewood	0.508	A	0.575	A	0.798	C	0.522	A	0.563	A	0.810	D	-	-	Full
12	La Brea Avenue & Arbor Vitae Street	Inglewood	0.440	A	0.547	A	0.759	C	0.373	A	0.453	A	0.702	C	-	-	Full
14	Aviation Boulevard & Century Boulevard	City of LA	0.943	E	0.827	D	1.097	F	1.162	F	1.064	F	1.208	F	Partial	Partial	N.F.M.
17	Aviation Boulevard/Florence Avenue & Manchester Avenue	Caltrans/Inglewood	0.854	D	0.903	E	0.894	D	0.788	C	0.810	D	0.902	E	Full	-	Full
25	La Brea Avenue & Centinela Avenue	Inglewood	0.913	E	0.794	C	0.991	E	0.878	D	0.763	C	0.975	E	Full	Full	-
26	La Cienega Boulevard & Centinela Avenue	Inglewood/City of LA	0.896	D	0.681	B	1.134	F	0.885	D	0.685	B	1.023	F	Full	Full	-
27	La Tijera Boulevard & Centinela Avenue[2]	City of LA/LA County	0.643	B	0.502	A	0.840	D	0.681	B	0.537	A	0.862	D	-	-	N.F.M.
34	La Brea Avenue/Hawthorne Boulevard & Century Boulevard	Inglewood	0.735	C	0.771	C	0.983	E	0.690	B	0.859	D	0.983	E	Full	Partial	Full
35	Inglewood Avenue & Century Boulevard	Inglewood	0.705	C	0.657	B	0.926	E	0.654	B	0.654	B	0.829	D	Full	Full	-
36	La Cienega Boulevard & Century Boulevard[2]	Inglewood/City of LA/LA County	0.730	C	0.661	B	0.827	D	0.929	E	0.861	D	0.984	E	N.F.M.	N.F.M.	N.F.M.
37	Prairie Avenue & Century Boulevard	Inglewood	0.678	B	0.754	C	0.927	E	0.625	B	0.694	B	0.879	D	Full	Full	Full
38	Sepulveda Boulevard & Century Boulevard	Caltrans/City of LA	0.579	A	0.497	A	0.655	B	0.663	B	0.577	A	0.685	B	-	-	Full
46	Douglas Street & El Segundo Boulevard	El Segundo	0.773	C	0.594	A	0.976	E	0.782	C	0.628	B	1.006	F	-	-	N.F.M.
51	Hawthorne Boulevard & El Segundo Boulevard	Hawthorne	0.675	B	0.697	B	1.230	F	0.679	B	0.730	C	1.242	F	-	-	N.F.M.
57	La Brea Avenue & Florence Avenue	Inglewood	0.791	C	0.763	C	1.054	F	0.788	C	0.799	C	1.041	F	Full	Full	Full
58	La Cienega Boulevard & Florence Avenue	Inglewood	0.896	D	0.896	D	1.165	F	0.920	E	0.994	E	1.047	F	Full	Partial	Full
60	Sepulveda Boulevard & Grand Avenue	Caltrans/El Segundo	0.810	D	0.755	C	0.934	E	~~0.814~~ *0.807*	D	~~0.759~~ *0.756*	C	~~0.954~~ *0.913*	E	-	-	Full
62	Hawthorne Boulevard & Imperial Avenue	Hawthorne	0.664	B	0.602	B	0.959	E	0.636	B	0.638	B	0.993	E	-	-	Partial
63	Hawthorne Boulevard & Lennox Boulevard[2]	LA County	0.508	A	0.607	B	0.810	D	0.518	A	0.652	B	0.863	D	-	-	N.F.M.
64	Highland Avenue/Vista del Mar & Rosecrans Avenue	Manhattan Beach	0.823	D	0.563	A	0.737	C	0.857	D	0.569	A	0.744	C	N.F.M.	-	-
66	Inglewood Avenue & Imperial Highway	Hawthorne	0.765	C	0.695	B	1.286	F	0.763	C	0.739	C	1.061	F	Full	N.F.M.	Full
71	Sepulveda Boulevard & Imperial Highway	Caltrans/El Segundo/City of LA	0.805	D	0.807	D	1.223	F	0.784	C	0.606	B	0.857	D	Full	-	Full
76	Inglewood Avenue & Lennox Boulevard[2]	LA County	0.468	A	0.557	A	0.819	D	0.525	A	0.558	A	0.870	D	-	-	N.F.M.
77	Inglewood Avenue & Manchester Boulevard	Caltrans/Inglewood	0.651	B	0.565	A	0.773	C	0.675	B	0.597	A	0.803	D	-	-	N.F.M.
85	La Brea Avenue & Manchester Boulevard	Caltrans/Inglewood	0.847	D	0.744	C	0.945	E	0.760	C	0.657	B	0.861	D	-	-	Full
86	La Brea Avenue/Overhill Drive & Stocker Street[2]	LA County	0.820	D	0.724	C	1.193	F	0.863	D	0.760	C	1.233	F	N.F.M.	-	N.F.M.
87	La Brea Avenue & Slauson Avenue[2]	LA County	0.905	E	0.747	C	1.007	F	0.955	E	0.871	D	0.996	E	Partial	N.F.M.	Full
88	La Cienega Boulevard & La Tijera Boulevard	Inglewood/City of LA	0.794	C	0.738	C	1.005	F	0.788	C	0.782	C	1.131	F	-	N.F.M.	N.F.M.
90	La Cienega Boulevard & Manchester Boulevard	Caltrans/Inglewood	0.736	C	0.741	C	0.907	E	0.742	C	0.787	C	0.969	E	Full	Partial	N.F.M.
93	La Cienega Boulevard & Stocker Street[2]	LA County	1.270	F	0.838	D	1.210	F	1.287	F	0.863	D	1.223	F	N.F.M.	N.F.M.	N.F.M.
95	La Cienega Boulevard & West 120th Street[2]	LA County	0.449	A	0.313	A	0.817	D	0.479	A	0.367	A	0.894	D	-	-	N.F.M.
96	La Cienega Boulevard & I-405 Southbound Ramps (n/o Century Boulevard)	Caltrans/Inglewood/City of LA	0.669	B	0.695	B	0.694	B	0.605	B	0.614	B	0.592	A	-	Full	Full
102	I-405 Northbound Ramps & La Tijera Boulevard	Caltrans/City of LA	0.619	B	0.693	B	0.609	B	0.746	C	0.842	D	0.617	B	N.F.M.	N.F.M.	-
109	Lincoln Boulevard & Venice Boulevard	Caltrans/City of LA	0.892	D	0.915	E	1.036	F	0.899	D	0.925	E	1.019	F	-	N.F.M.	-
110	Lincoln Boulevard & Washington Boulevard	Caltrans/City of LA	0.841	D	0.904	E	1.053	F	0.829	D	0.915	E	1.054	F	-	Partial	-
~~114~~	~~Sepulveda Boulevard & Manchester Avenue~~	~~Caltrans/City of LA~~	~~0.804~~	~~D~~	~~0.761~~	~~C~~	~~0.929~~	~~E~~	~~0.837~~	~~D~~	~~0.768~~	~~C~~	~~0.933~~	~~E~~	~~N.F.M.~~	~~-~~	~~-~~
115	Ash Avenue & Manchester Avenue	Caltrans/Inglewood	0.786	C	0.711	C	0.945	E	0.735	C	0.744	C	1.070	F	-	Full	N.F.M.
119	Ocean Avenue/Via Marina & Washington Boulevard[2]	City of LA/LA County	1.181	F	0.956	E	1.514	F	1.216	F	1.005	F	1.539	F	N.F.M.	N.F.M.	N.F.M.
125	Sepulveda Boulevard & Rosecrans Avenue	Caltrans/El Segundo/Manhattan Beach	0.918	E	0.836	D	1.158	F	0.918	E	0.860	D	1.153	F	-	Partial	-
139	Sepulveda Boulevard & I-105 Westbound Ramps (n/o Imperial Highway)	Caltrans/City of LA	0.877	D	0.840	D	0.923	E	0.880	D	0.887	D	0.941	E	-	Partial	Partial
143	Vicksburg Avenue & 96th Street	City of LA	0.279	A	0.363	A	0.335	A	0.257	A	0.506	A	0.623	B	-	-	Full
147	Crenshaw Boulevard & Century Boulevard	Inglewood	0.708	C	0.773	C	0.928	E	0.723	C	0.805	D	0.973	E	-	Partial	Partial
149	Crenshaw Boulevard & Imperial Highway	Inglewood	0.680	B	0.705	C	1.001	F	0.715	C	0.748	C	1.030	F	-	N.F.M.	N.F.M.
154	Overland Avenue & Sawtelle Boulevard	Culver City	31.4	D	17.6	C	45.9	E	33.1	D	18.6	C	50.6	F	-	-	N.F.M.
156	Walgrove Avenue & Washington Boulevard	Culver City	68.8	F	>100	F	>100	F	68.8	F	>100	F	>100	F	-	N.F.M.[1]	N.F.M.[1]
159	Hindry Avenue & Manchester Boulevard	Caltrans/Inglewood	0.513	A	0.638	B	0.597	A	0.503	A	0.725	C	0.673	B	-	Partial	-

Table 4.12.2-38

Future (2025) With Alternative 9 Plus Mitigation Level of Service Analysis

			Future (2025) Without Alternative						Future (2025) With Alt. 9 Plus Mitigation								
			AM		MD		PM		AM		MD		PM		Mitigation Effectiveness		
Int. #	Intersection	Jurisdiction	V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	AM	MD	PM
162	Sepulveda Boulevard & Manhattan Beach Boulevard	Caltrans/Manhattan Beach	0.950	E	0.987	E	1.193	F	0.950	E	0.997	E	1.193	F	-	N.F.M.	-
164	Crenshaw Boulevard & Manchester Avenue	Caltrans/Inglewood	0.816	D	0.843	D	1.025	F	0.857	D	0.873	D	1.066	F	N.F.M.	N.F.M.	N.F.M.
165	La Cienega Boulevard & Rodeo Road	City of LA	1.025	F	0.719	C	1.037	F	1.035	F	0.734	C	1.038	F	N.F.M.	-	-
169	Prairie Avenue & Manchester Boulevard	Inglewood	1.042	F	0.701	C	0.922	E	1.048	F	0.732	C	0.941	E	Full	-	N.F.M.
172	Western Avenue & Manchester Avenue	Caltrans/City of LA	0.727	C	0.560	A	0.887	D	0.733	C	0.571	A	0.906	E	-	-	N.F.M.
173	Western Avenue & Imperial Highway[2]	LA County	0.743	C	0.575	A	0.912	E	0.764	C	0.596	A	0.941	E	-	-	N.F.M.
188	Prairie Avenue & El Segundo Boulevard	Hawthorne	1.001	F	0.684	B	1.006	F	1.027	F	0.704	C	1.008	F	N.F.M.	-	-
197	Prairie Avenue & Lennox Boulevard	Inglewood	0.670	B	0.557	A	0.704	C	0.655	B	0.562	A	0.763	C	-	-	Partial

Notes:

Full - Intersections that can be fully mitigated to a level less than significant with recommended mitigation measures.
Partial - Intersection operating conditions would be improved with recommended mitigation measures, however; would not be fully mitigated and would remain significant and unavoidable.
N.F.M. - No Feasible Physical Mitigation measures are available. Project impacts remain significant and unavoidable.

[1] This stop-controlled intersection is expected to operate at oversaturated condition, based on the vehicle delay reported for the worst-case approach. This intersection was also evaluated using the ICU methodology and the resulting project-related incremental increase in V/C ratio is greater than the City of Culver City adopted significance criteria.

[2] *The impact at this intersection would be partially mitigated by a monetary contribution by LAWA, pending FAA approval, to the County's ITS system. Because the County does not have a method for quantifying the benefits of this type of improvement, however, no quantitative V/C reduction has been taken.*

Source: Fehr & Peers, 2012.

Table 4.13.3-1

Baseline (2010) and Projected (2025) Wastewater Generation

Building Components	Baseline Conditions	Alt. 1 Airfield/ Terminals	Alt. 1 Ground Access	Alt. 1 Total Alt. 1	Alt. 2 Airfield/ Terminals	Alt. 2 Ground Access	Alt. 2 Total Alt. 2	Alt. 3	Alt. 4	Alt. 5	Alt. 6	Alt. 7	Alt. 8	Alt. 9
Terminals														
Terminal 0	NA	330,000	NA	330,000	330,000	NA	330,000	NA	NA	330,000	330,000	325,000	NA	NA
Terminal 1 Concourse	138,000	114,000	NA	114,000	114,000	NA	114,000	See Linear Concourse	138,000	114,000	114,000	114,000	NA	NA
Terminal 2 Concourse	306,000	306,000	NA	306,000	306,000	NA	306,000	See Linear Concourse	306,000	306,000	306,000	306,000	NA	NA
Terminal 3 Concourse	279,000	223,000	NA	223,000	223,000	NA	223,000	See Linear Concourse	279,000	223,000	223,000	205,000	NA	NA
New Linear Concourse	NA	NA	NA	NA	NA	NA	NA	1,400,000	NA	NA	NA	NA	NA	NA
New Passenger Processing Terminals	NA	NA	NA	NA	NA	NA	NA	2,151,000	NA	NA	NA	NA	NA	NA
Bradley West North Concourse Extension	NA	113,800	NA	113,800	113,800	NA	113,800	NA	NA	73,300	113,800	64,400	NA	NA
MSC North Concourse Extension	NA	249,400	NA	249,400	249,400	NA	249,400	NA	NA	204,800	249,400	190,700	NA	NA
Subtotal Terminal Components	**723,000**	**1,336,200**	**0**	**1,336,200**	**1,336,200**	**0**	**1,336,200**	**3,551,000**	**723,000**	**1,251,100**	**1,336,200**	**1,205,100**	**0**	**0**
Ground Access Components														
Ground Transportation Center	NA	NA	NA	0	NA	NA	0	1,400,000	NA	NA	NA	NA	NA	NA
Intermodal Transportation Center	NA	NA	NA	0	NA	NA	0	85,000	NA	NA	NA	NA	NA	NA
Intermodal Transportation Facility	NA	NA	75,000	75,000	NA	75,000	75,000	NA	NA	NA	NA	NA	75,000	75,000
CONRAC	NA	NA	NA	0	NA	NA	0	89,000	89,000	NA	NA	NA	85,000	85,000
Subtotal Ground Access Components	**0**	**0**	**75,000**	**75,000**	**0**	**75,000**	**75,000**	**1,574,000**	**89,000**	**0**	**0**	**0**	**160,000**	**160,000**
Total Building Area (sf)	**723,000**	**1,336,200**	**75,000**	**1,411,200**	**1,336,200**	**75,000**	**1,411,200**	**5,125,000**	**812,000**	**1,251,100**	**1,336,200**	**1,205,100**	**160,000**	**160,000**
Total Wastewater Generation (gpd)	**57,840**	**106,896**	**6,000**	**112,896**	**106,896**	**6,000**	**112,896**	**410,000**	**64,960**	**100,088**	**106,896**	**96,408**	**12,800**	**12,800**
% of Hyperion Treatment Plant Capacity	**0.01%**	**0.02%**	**0.001%**	**~~0.03%~~ *0.021%***	**0.02%**	**0.001%**	**~~0.03%~~ *0.021%***	**0.09%**	**0.01%**	**0.02%**	**0.02%**	**0.02%**	**0.003%**	**0.003%**

Note:

Alternatives 1 through 4 consist of airfield, terminal, and ground access improvements. Alternatives 5 through 7 focus on airfield and terminal improvements only. Alternatives 8 and 9 focus on ground access improvements only. The airfield/terminal improvements associated with Alternatives 1, 2, 5, 6, and 7 could be paired with the ground access improvements associated with Alternatives 1, 2, 8, or 9. Similarly, the ground access improvements associated with Alternatives 1, 2, 8, and 9 could be paired with the airfield improvements associated with Alternatives 1, 2, 5, 6, or 7. The full impacts of any alternative must consider airfield, terminal, and ground access contributions. The airfield, terminal, and ground access improvements associated with Alternatives 3 and 4 are specific to each of those alternatives and cannot be paired with other alternatives.

Source: CDM Smith, 2012.

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Chapter 5, Cumulative Impacts

1. The first sentence in Section 5.5.7.1 on page 5-80 of the Draft EIR is hereby revised as follows:

   Unlike air quality, for which standards have been established that determine acceptable levels of pollutant concentrations, no *federal* standards exist that establish acceptable levels of human health risks or that identify a threshold of significance for cumulative health risk impacts.

Chapter 7, Other CEQA Considerations

1. The third bullet under the heading "Off-Airport Transportation" on page 7-3 of the Draft EIR is hereby revised as follows:

   - Traffic thresholds would be exceeded when compared to future (2025) conditions for the following alternatives:
     - Alternatives 1 and 2: ~~39~~ *38* intersections; 1 CMP arterial monitoring intersection; 3 CMP freeway monitoring stations
     - Alternative 3: 37 intersections; 2 CMP arterial monitoring intersections; 3 CMP freeway monitoring stations
     - Alternative 4: ~~40~~ *38* intersections; 2 CMP arterial monitoring intersections; 3 CMP freeway monitoring stations
     - Alternatives 8 and 9: ~~44~~ *42* intersections; 1 CMP arterial monitoring intersection; 3 CMP freeway monitoring stations

5.3 Corrections and Additions to Appendices to the SPAS Draft EIR

Appendix C Air Quality

1. Tables 2, 3, 4, 5, 6, 7, 8, 15, 16, 30, 31, 32, 33, 34, 35, 36, 43, 44, and 65 in Attachment 3 of Appendix C of the Draft EIR have been revised to update the 1-hour NO2 NAAQS background concentration for all alternatives. Please see the following revised tables.

Appendix F Greenhouse Gas Emissions

1. Tables 10 through 19 in Appendix F of the Draft EIR have been revised to update the emission calculations for all alternatives and baseline. Please see the following revised tables.
2. Tables 74 and 75, which provide emission calculations for GHG emissions for APUs for baseline conditions and all alternatives, are hereby added to Appendix F of the Draft EIR. Please see the following tables.

Appendix I-2 Land Use Incompatibility Tables

1. Table 10 on page 34 in Appendix I-2 of the Draft EIR is hereby revised to add the following footnote:

   [3] *Impacts on parks are considered significant if newly exposed to noise levels of 75 CNEL or higher, as described on pages 4-703 and 4-704 in Section 4.9.6 of the SPAS Draft EIR. A listing of these parks is provided in Table 7 of Appendix I-2.*

2. Table 16 on page 44 in Appendix I-2 of the Draft EIR is hereby revised to add the following footnote:

   [3] *Impacts on parks are considered significant if newly exposed to noise levels of 75 CNEL or higher, as described on page 4-713 in Section 4.9.6 of the SPAS Draft EIR. A listing of these parks is provided in Table 13 of Appendix I-2.*

3. Table 22 on page 54 in Appendix I-2 of the Draft EIR is hereby revised to add the following footnote:

   [3] *Impacts on parks are considered significant if newly exposed to noise levels of 75 CNEL or higher, as described on pages 4-722 and 4-726 in Section 4.9.6 of the SPAS Draft EIR. A listing of these parks is provided in Table 19 of Appendix I-2.*

4. Table 28 on page 64 in Appendix I-2 of the Draft EIR is hereby revised to add the following footnote:

   [3] *Impacts on parks are considered significant if newly exposed to noise levels of 75 CNEL or higher, as described on pages 4-732 and 4-736 in Section 4.9.6 of the SPAS Draft EIR. A listing of these parks is provided in Table 25 of Appendix I-2.*

5. Table 34 on page 74 in Appendix I-2 of the Draft EIR is hereby revised to add the following footnote:

   [3] *Impacts on parks are considered significant if newly exposed to noise levels of 75 CNEL or higher, as described on pages 4-745 and 4-746 in Section 4.9.6 of the SPAS Draft EIR. A listing of these parks is provided in Table 31 of Appendix I-2.*

6. Table 40 on page 84 in Appendix I-2 of the Draft EIR is hereby revised to add the following footnote:

   [3] *Impacts on parks are considered significant if newly exposed to noise levels of 75 CNEL or higher, as described on page 4-756 in Section 4.9.6 of the SPAS Draft EIR. A listing of these parks is provided in Table 37 of Appendix I-2.*

Table 2

Alternative 1 (IFRW)

Note: 3,000,000 m should be added to Y (m) location values to get full UTM Northing (m) coordinate in 1984 WGS.

Peak Concentrations

Pollutant	Averaging Time	Concentration (ug/m3)	Location X (m)	Location Y (m)
CO	1-hr	3,829	368563	757880
	8-hr	1,399	370998	757293
NO2	1-hr	1,180	372622	756509
	1-hr NAAQS	521	372700	756511
SO2	1-hr	486	372622	756509
	1-hr NAAQS	274	372622	756509
	3-hr	218	372622	756509
	24-hr	52	372622	756509
PM10	24-hr	46	370400	756850
PM2.5	24-hr	17	370400	756850

Incremental Concentrations

Pollutant	Averaging Time	Concentration (ug/m3)	Location X (m)	Location Y (m)
CO	1-hr	1,856	368636	757926
	8-hr	490	372622	756509
NO2	1-hr	686	372622	756509
	1-hr NAAQS	189	372700	756511
SO2	1-hr	273	372622	756509
	1-hr NAAQS	104	371005	757357
	3-hr	92	372622	756509
	24-hr	19	372622	756509
PM10	24-hr	3	372622	756509
PM2.5	24-hr	3	372622	756509

Total Concentrations

Pollutant	Averaging Time	CAAQS (ug/m3)	NAAQS (ug/m3)
CO	1-hr	6,437	6,437
	8-hr	3,387	2,952
NO2	1-hr	863	313
SO2	1-hr	339	140
	3-hr	N/A	103
	24-hr	35	35

CAAQS Significance

Pollutant	Averaging Time	Concentration (ug/m3)	Threshold (ug/m3)	Significant?
CO	1-hr	6,437	23,000	No
	8-hr	3,387	10,000	No
NO2	1-hr	863	339	**Yes**
SO2	1-hr	339	655	No
	24-hr	35	105	No

NAAQS Significance

Pollutant	Averaging Time	Concentration (ug/m3)	Threshold (ug/m3)	Significant?
CO	1-hr	6,437	40,000	No
	8-hr	2,952	10,000	No
NO2	1-hr	*313*	188	**Yes**
SO2	1-hr	140	196	No
	3-hr	103	1,300	No
	24-hr	35	366	No

SCAQMD Significance

Pollutant	Averaging Time	Concentration (ug/m3)	Threshold (ug/m3)	Significant?
PM10	24-hr	3.1	2.5	**Yes**
PM2.5	24-hr	2.5	2.5	**Yes**

Note:

The 1971 SO2 national standards (24-hour and annual) were revoked on June 22, 2010; however, they will remain in effect until one year after an area is designated for the 2010 standard. Since the USEPA has not yet designated areas for the 2010 standard, the revoked SO2 standards are still included in this analysis.

Table 3

Alternative 2 (IFRW)

Note: 3,000,000 m should be added to Y (m) location values to get full UTM Northing (m) coordinate in 1984 WGS.

Peak Concentrations

Pollutant	Averaging Time	Concentration (ug/m3)	Location X (m)	Location Y (m)
CO	1-hr	3,700	370437	755428
	8-hr	1,391	370998	757293
NO2	1-hr	649	372622	756509
	1-hr NAAQS	540	372622	756509
SO2	1-hr	314	372622	756509
	1-hr NAAQS	282	372622	756509
	3-hr	172	372622	756509
	24-hr	50	372622	756509
PM10	24-hr	45	370400	756850
PM2.5	24-hr	17	370400	756850

Incremental Concentrations

Pollutant	Averaging Time	Concentration (ug/m3)	Location X (m)	Location Y (m)
CO	1-hr	1,325	371005	757357
	8-hr	419	372622	756509
NO2	1-hr	214	371026	757794
	1-hr NAAQS	186	372622	756509
SO2	1-hr	140	370975	757794
	1-hr NAAQS	105	371026	757794
	3-hr	58	371026	757794
	24-hr	18	372700	756511
PM10	24-hr	3	372622	756509
PM2.5	24-hr	2	372622	756509

Total Concentrations

Pollutant	Averaging Time	CAAQS (ug/m3)	NAAQS (ug/m3)
CO	1-hr	5,906	5,906
	8-hr	3,317	2,881
NO2	1-hr	391	310
SO2	1-hr	206	142
	3-hr	N/A	68
	24-hr	34	34

CAAQS Significance

Pollutant	Averaging Time	Concentration (ug/m3)	Threshold (ug/m3)	Significant?
CO	1-hr	5,906	23,000	No
	8-hr	3,317	10,000	No
NO2	1-hr	391	339	**Yes**
SO2	1-hr	206	655	No
	24-hr	34	105	No

NAAQS Significance

Pollutant	Averaging Time	Concentration (ug/m3)	Threshold (ug/m3)	Significant?
CO	1-hr	5,906	40,000	No
	8-hr	2,881	10,000	No
NO2	1-hr	*310*	188	**Yes**
SO2	1-hr	142	196	No
	3-hr	68	1,300	No
	24-hr	34	366	No

SCAQMD Significance

Pollutant	Averaging Time	Concentration (ug/m3)	Threshold (ug/m3)	Significant?
PM10	24-hr	2.9	2.5	**Yes**
PM2.5	24-hr	2.3	2.5	No

Note:

The 1971 SO2 national standards (24-hour and annual) were revoked on June 22, 2010; however, they will remain in effect until one year after an area is designated for the 2010 standard.

Since the USEPA has not yet designated areas for the 2010 standard, the revoked SO2 standards are still included in this analysis.

Table 4

Alternative 3 (IFRW)

Note: 3,000,000 m should be added to Y (m) location values to get full UTM Northing (m) coordinate in 1984 WGS.

Peak Concentrations

Pollutant	Averaging Time	Concentration (ug/m3)	Location X (m)	Location Y (m)
CO	1-hr	4,364	372622	756509
	8-hr	1,418	372622	756509
NO2	1-hr	926	372622	756509
	1-hr NAAQS	540	372700	756511
SO2	1-hr	412	372622	756509
	1-hr NAAQS	302	372622	756509
	3-hr	209	372622	756509
	24-hr	58	372622	756509
PM10	24-hr	74	372913	755342
PM2.5	24-hr	17	372651	757063

Incremental Concentrations

Pollutant	Averaging Time	Concentration (ug/m3)	Location X (m)	Location Y (m)
CO	1-hr	1,995	372622	756509
	8-hr	631	372700	756511
NO2	1-hr	432	372622	756509
	1-hr NAAQS	218	371005	757357
SO2	1-hr	206	371005	757357
	1-hr NAAQS	152	371005	757357
	3-hr	84	372622	756509
	24-hr	25	372622	756509
PM10	24-hr	71	372913	755342
PM2.5	24-hr	13	372651	757063

Total Concentrations

Pollutant	Averaging Time	CAAQS (ug/m3)	NAAQS (ug/m3)
CO	1-hr	6,576	6,576
	8-hr	3,528	3,093
NO2	1-hr	609	343
SO2	1-hr	272	188
	3-hr	N/A	94
	24-hr	41	41

CAAQS Significance

Pollutant	Averaging Time	Concentration (ug/m3)	Threshold (ug/m3)	Significant?
CO	1-hr	6,576	23,000	No
	8-hr	3,528	10,000	No
NO2	1-hr	609	339	**Yes**
SO2	1-hr	272	655	No
	24-hr	41	105	No

NAAQS Significance

Pollutant	Averaging Time	Concentration (ug/m3)	Threshold (ug/m3)	Significant?
CO	1-hr	6,576	40,000	No
	8-hr	3,093	10,000	No
NO2	1-hr	*343*	188	**Yes**
SO2	1-hr	188	196	No
	3-hr	94	1,300	No
	24-hr	41	366	No

SCAQMD Significance

Pollutant	Averaging Time	Concentration (ug/m3)	Threshold (ug/m3)	Significant?
PM10	24-hr	70.5	2.5	**Yes**
PM2.5	24-hr	13.3	2.5	**Yes**

Note:

The 1971 SO2 national standards (24-hour and annual) were revoked on June 22, 2010; however, they will remain in effect until one year after an area is designated for the 2010 standard. Since the USEPA has not yet designated areas for the 2010 standard, the revoked SO2 standards are still included in this analysis.

Table 5

Alternative 4 (IFRW)

Note: 3,000,000 m should be added to Y (m) location values to get full UTM Northing (m) coordinate in 1984 WGS.

Peak Concentrations

Pollutant	Averaging Time	Concentration (ug/m3)	Location X (m)	Location Y (m)
CO	1-hr	5,551	372622	756509
	8-hr	1,703	372622	756509
NO2	1-hr	842	372871	756437
	1-hr NAAQS	556	372622	756509
SO2	1-hr	457	372871	756437
	1-hr NAAQS	324	372622	756509
	3-hr	198	372622	756509
	24-hr	53	372622	756509
PM10	24-hr	49	370400	756850
PM2.5	24-hr	18	370400	756850

Incremental Concentrations

Pollutant	Averaging Time	Concentration (ug/m3)	Location X (m)	Location Y (m)
CO	1-hr	3,182	372622	756509
	8-hr	914	372622	756509
NO2	1-hr	464	372871	756437
	1-hr NAAQS	204	372700	756511
SO2	1-hr	243	372871	756437
	1-hr NAAQS	150	372871	756437
	3-hr	87	372871	756437
	24-hr	23	372871	756437
PM10	24-hr	4	373065	755906
PM2.5	24-hr	3	372622	756509

Total Concentrations

Pollutant	Averaging Time	CAAQS (ug/m3)	NAAQS (ug/m3)
CO	1-hr	7,763	7,763
	8-hr	3,812	3,377
NO2	1-hr	641	329
SO2	1-hr	308	187
	3-hr	N/A	97
	24-hr	38	38

CAAQS Significance

Pollutant	Averaging Time	Concentration (ug/m3)	Threshold (ug/m3)	Significant?
CO	1-hr	7,763	23,000	No
	8-hr	3,812	10,000	No
NO2	1-hr	641	339	**Yes**
SO2	1-hr	308	655	No
	24-hr	38	105	No

NAAQS Significance

Pollutant	Averaging Time	Concentration (ug/m3)	Threshold (ug/m3)	Significant?
CO	1-hr	7,763	40,000	No
	8-hr	3,377	10,000	No
NO2	1-hr	*329*	188	**Yes**
SO2	1-hr	187	196	No
	3-hr	97	1,300	No
	24-hr	38	366	No

SCAQMD Significance

Pollutant	Averaging Time	Concentration (ug/m3)	Threshold (ug/m3)	Significant?
PM10	24-hr	4.4	2.5	**Yes**
PM2.5	24-hr	2.8	2.5	**Yes**

Note:

The 1971 SO2 national standards (24-hour and annual) were revoked on June 22, 2010; however, they will remain in effect until one year after an area is designated for the 2010 standard. Since the USEPA has not yet designated areas for the 2010 standard, the revoked SO2 standards are still included in this analysis.

Table 6

Alternative 5 (IFRW)

Note: 3,000,000 m should be added to Y (m) location values to get full UTM Northing (m) coordinate in 1984 WGS.

Peak Concentrations

Pollutant	Averaging Time	Concentration (ug/m3)	Location X (m)	Location Y (m)
CO	1-hr	3,778	368636	757926
	8-hr	1,371	370998	757293
NO2	1-hr	1,180	372622	756509
	1-hr NAAQS	521	372700	756511
SO2	1-hr	485	372622	756509
	1-hr NAAQS	273	372622	756509
	3-hr	217	372622	756509
	24-hr	52	372622	756509
PM10	24-hr	46	370400	756850
PM2.5	24-hr	17	370400	756850

Incremental Concentrations

Pollutant	Averaging Time	Concentration (ug/m3)	Location X (m)	Location Y (m)
CO	1-hr	1,888	368636	757926
	8-hr	459	372622	756509
NO2	1-hr	686	372622	756509
	1-hr NAAQS	188	372700	756511
SO2	1-hr	273	372622	756509
	1-hr NAAQS	99	371005	757357
	3-hr	92	372622	756509
	24-hr	19	372622	756509
PM10	24-hr	3	372622	756509
PM2.5	24-hr	3	372622	756509

Total Concentrations

Pollutant	Averaging Time	CAAQS (ug/m3)	NAAQS (ug/m3)
CO	1-hr	6,469	6,469
	8-hr	3,357	2,922
NO2	1-hr	862	313
SO2	1-hr	338	136
	3-hr	N/A	102
	24-hr	34	34

CAAQS Significance

Pollutant	Averaging Time	Concentration (ug/m3)	Threshold (ug/m3)	Significant?
CO	1-hr	6,469	23,000	No
	8-hr	3,357	10,000	No
NO2	1-hr	862	339	**Yes**
SO2	1-hr	338	655	No
	24-hr	34	105	No

NAAQS Significance

Pollutant	Averaging Time	Concentration (ug/m3)	Threshold (ug/m3)	Significant?
CO	1-hr	6,469	40,000	No
	8-hr	2,922	10,000	No
NO2	1-hr	*313*	188	**Yes**
SO2	1-hr	136	196	No
	3-hr	102	1,300	No
	24-hr	34	366	No

SCAQMD Significance

Pollutant	Averaging Time	Concentration (ug/m3)	Threshold (ug/m3)	Significant?
PM10	24-hr	3.1	2.5	**Yes**
PM2.5	24-hr	2.5	2.5	**Yes**

Note:

The 1971 SO2 national standards (24-hour and annual) were revoked on June 22, 2010; however, they will remain in effect until one year after an area is designated for the 2010 standard. Since the USEPA has not yet designated areas for the 2010 standard, the revoked SO2 standards are still included in this analysis.

Table 7

Alternative 6 (IFRW)

Note: 3,000,000 m should be added to Y (m) location values to get full UTM Northing (m) coordinate in 1984 WGS.

Peak Concentrations

Pollutant	Averaging Time	Concentration (ug/m3)	Location X (m)	Location Y (m)
CO	1-hr	3,653	368563	757880
	8-hr	1,389	370998	757293
NO2	1-hr	1,180	372622	756509
	1-hr NAAQS	521	372700	756511
SO2	1-hr	486	372622	756509
	1-hr NAAQS	274	372622	756509
	3-hr	218	372622	756509
	24-hr	52	372622	756509
PM10	24-hr	46	370400	756850
PM2.5	24-hr	17	370400	756850

Incremental Concentrations

Pollutant	Averaging Time	Concentration (ug/m3)	Location X (m)	Location Y (m)
CO	1-hr	1,657	368563	757880
	8-hr	482	372622	756509
NO2	1-hr	686	372622	756509
	1-hr NAAQS	189	372700	756511
SO2	1-hr	273	372622	756509
	1-hr NAAQS	103	371005	757357
	3-hr	92	372622	756509
	24-hr	19	372622	756509
PM10	24-hr	3	372622	756509
PM2.5	24-hr	3	372622	756509

Total Concentrations

Pollutant	Averaging Time	CAAQS (ug/m3)	NAAQS (ug/m3)
CO	1-hr	6,237	6,237
	8-hr	3,379	2,944
NO2	1-hr	863	313
SO2	1-hr	339	140
	3-hr	N/A	103
	24-hr	35	35

CAAQS Significance

Pollutant	Averaging Time	Concentration (ug/m3)	Threshold (ug/m3)	Significant?
CO	1-hr	6,237	23,000	No
	8-hr	3,379	10,000	No
NO2	1-hr	863	339	**Yes**
SO2	1-hr	339	655	No
	24-hr	35	105	No

NAAQS Significance

Pollutant	Averaging Time	Concentration (ug/m3)	Threshold (ug/m3)	Significant?
CO	1-hr	6,237	40,000	No
	8-hr	2,944	10,000	No
NO2	1-hr	*313*	188	**Yes**
SO2	1-hr	140	196	No
	3-hr	103	1,300	No
	24-hr	35	366	No

SCAQMD Significance

Pollutant	Averaging Time	Concentration (ug/m3)	Threshold (ug/m3)	Significant?
PM10	24-hr	3.1	2.5	**Yes**
PM2.5	24-hr	2.5	2.5	**Yes**

Note:

The 1971 SO2 national standards (24-hour and annual) were revoked on June 22, 2010; however, they will remain in effect until one year after an area is designated for the 2010 standard. Since the USEPA has not yet designated areas for the 2010 standard, the revoked SO2 standards are still included in this analysis.

Table 8

Alternative 7 (IFRW)

Note: 3,000,000 m should be added to Y (m) location values to get full UTM Northing (m) coordinate in 1984 WGS.

Peak Concentrations

Pollutant	Averaging Time	Concentration (ug/m3)	Location X (m)	Location Y (m)
CO	1-hr	3,858	371005	757357
	8-hr	1,475	371005	757357
NO2	1-hr	1,181	372622	756509
	1-hr NAAQS	522	372700	756511
SO2	1-hr	489	372622	756509
	1-hr NAAQS	276	372622	756509
	3-hr	218	372622	756509
	24-hr	52	372622	756509
PM10	24-hr	46	370400	756850
PM2.5	24-hr	18	370400	756850

Incremental Concentrations

Pollutant	Averaging Time	Concentration (ug/m3)	Location X (m)	Location Y (m)
CO	1-hr	1,816	371005	757357
	8-hr	510	372622	756509
NO2	1-hr	687	372622	756509
	1-hr NAAQS	189	372700	756511
SO2	1-hr	276	372622	756509
	1-hr NAAQS	131	371005	757357
	3-hr	93	372622	756509
	24-hr	19	372622	756509
PM10	24-hr	3	370998	757096
PM2.5	24-hr	3	372622	756509

Total Concentrations

Pollutant	Averaging Time	CAAQS (ug/m3)	NAAQS (ug/m3)
CO	1-hr	6,397	6,397
	8-hr	3,407	2,972
NO2	1-hr	864	314
SO2	1-hr	341	168
	3-hr	N/A	104
	24-hr	35	35

CAAQS Significance

Pollutant	Averaging Time	Concentration (ug/m3)	Threshold (ug/m3)	Significant?
CO	1-hr	6,397	23,000	No
	8-hr	3,407	10,000	No
NO2	1-hr	864	339	**Yes**
SO2	1-hr	341	655	No
	24-hr	35	105	No

NAAQS Significance

Pollutant	Averaging Time	Concentration (ug/m3)	Threshold (ug/m3)	Significant?
CO	1-hr	6,397	40,000	No
	8-hr	2,972	10,000	No
NO2	1-hr	*314*	188	**Yes**
SO2	1-hr	168	196	No
	3-hr	104	1,300	No
	24-hr	35	366	No

SCAQMD Significance

Pollutant	Averaging Time	Concentration (ug/m3)	Threshold (ug/m3)	Significant?
PM10	24-hr	3.4	2.5	**Yes**
PM2.5	24-hr	2.5	2.5	**Yes**

Note:

The 1971 SO2 national standards (24-hour and annual) were revoked on June 22, 2010; however, they will remain in effect until one year after an area is designated for the 2010 standard.

Since the USEPA has not yet designated areas for the 2010 standard, the revoked SO2 standards are still included in this analysis.

Table 15
LAX SPAS
Operational Concentrations

IFRW Flight Rule
NO2, 1-Hour Averaging Time
98th Percentile

		Meters		Average Concentration (µg/m^3)								Project Concentration (µg/m^3)							Total Concentration (NAAQS) (µg/m^3)						
Receptor ID	Type	X	Y	Baseline	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Alt 6	Alt 7	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Alt 6	Alt 7	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Alt 6	Alt 7
Receptor_1	Recreational	367379	755396	126	144	141	144	152	143	143	144	17	15	17	26	17	17	17	*142*	*140*	*142*	*151*	*142*	*142*	*142*
Receptor_10	Recreational	367032	756191	123	141	140	144	143	140	141	141	18	16	20	20	17	17	18	*142*	*141*	*145*	*145*	*142*	*142*	*143*
Receptor_100	Residential	369791	758318	157	161	155	156	167	160	160	158	3	-3	-1	10	3	3	0	*128*	*122*	*124*	*134*	*128*	*128*	*125*
Receptor_101	Residential	369881	758318	164	160	157	158	168	160	160	158	-4	-7	-7	3	-4	-4	-6	*121*	*117*	*118*	*128*	*121*	*120*	*119*
Receptor_102	Residential	369972	758318	165	159	159	157	169	159	159	159	-6	-6	-8	4	-6	-6	-6	*119*	*119*	*117*	*129*	*119*	*119*	*118*
Receptor_103	Residential	370062	758318	172	162	163	161	172	162	161	160	-10	-9	-11	0	-10	-11	-11	*115*	*116*	*114*	*125*	*115*	*114*	*113*
Receptor_104	Residential	370153	758318	172	164	165	161	174	164	164	163	-8	-7	-11	2	-8	-8	-9	*117*	*118*	*114*	*127*	*117*	*116*	*116*
Receptor_105	Residential	370243	758318	170	169	168	162	175	169	168	166	-2	-3	-8	5	-2	-2	-4	*123*	*122*	*117*	*130*	*123*	*123*	*121*
Receptor_106	School	370247	758254	174	170	170	165	181	170	170	170	-4	-5	-9	6	-4	-5	-5	*121*	*120*	*116*	*131*	*121*	*120*	*120*
Receptor_107	School	370250	758189	184	174	173	170	185	174	174	173	-10	-10	-13	1	-10	-10	-11	*115*	*114*	*111*	*126*	*115*	*115*	*114*
Receptor_108	School	370308	758196	178	177	175	169	186	177	177	176	-1	-3	-9	7	-1	-1	-2	*124*	*122*	*116*	*132*	*123*	*123*	*123*
Receptor_109	School	370361	758236	175	180	175	168	181	180	180	175	5	0	-8	6	4	5	0	*130*	*125*	*117*	*131*	*129*	*129*	*125*
Receptor_11	Recreational	366993	756279	124	140	136	142	144	140	140	141	16	11	18	20	16	16	17	*141*	*136*	*143*	*145*	*140*	*141*	*141*
Receptor_110	School	370415	758275	173	176	177	167	181	176	176	174	2	4	-7	8	2	2	1	*127*	*129*	*118*	*133*	*127*	*127*	*125*
Receptor_111	Residential	370408	758347	168	172	170	164	177	172	172	171	4	2	-4	9	3	4	3	*129*	*127*	*120*	*134*	*128*	*128*	*127*
Receptor_112	Residential	370490	758344	171	176	172	167	178	176	176	170	5	1	-5	7	4	5	-1	*130*	*125*	*120*	*132*	*129*	*130*	*124*
Receptor_113	Residential	370572	758341	171	173	172	168	178	173	173	170	2	1	-4	7	1	1	-1	*126*	*126*	*121*	*132*	*126*	*126*	*123*
Receptor_114	Residential	370654	758338	170	174	174	166	179	173	174	171	4	4	-4	10	3	4	1	*129*	*129*	*121*	*134*	*128*	*128*	*126*
Receptor_115	Residential	370735	758335	171	181	172	169	182	180	181	177	10	1	-2	11	9	10	7	*135*	*126*	*123*	*136*	*134*	*134*	*131*
Receptor_116	Residential	370817	758333	169	180	171	173	180	179	180	178	11	3	4	11	11	11	9	*136*	*128*	*129*	*136*	*135*	*136*	*134*
Receptor_117	Offsite Worker	370814	758243	174	189	180	180	191	188	189	184	15	6	7	17	15	15	10	*140*	*131*	*131*	*142*	*140*	*140*	*135*
Receptor_118	Offsite Worker	370810	758153	183	200	191	188	199	199	200	194	17	8	5	16	16	17	11	*142*	*133*	*130*	*141*	*141*	*142*	*136*
Receptor_119	Offsite Worker	370807	758063	188	219	204	197	210	219	219	209	31	16	10	22	31	31	21	*156*	*141*	*135*	*147*	*156*	*156*	*146*
Receptor_12	Recreational	366954	756367	124	140	135	140	145	140	140	141	17	12	16	21	16	16	17	*141*	*136*	*141*	*146*	*141*	*141*	*142*
Receptor_120	Offsite Worker	370803	757974	187	244	225	209	233	243	244	230	56	37	22	46	56	56	42	*181*	*162*	*147*	*171*	*181*	*181*	*167*
Receptor_121	Offsite Worker	370835	757927	194	256	235	225	263	255	256	242	62	41	31	68	61	62	48	*187*	*165*	*156*	*193*	*186*	*187*	*173*
Receptor_122	Offsite Worker	370868	757880	195	270	248	236	277	269	270	251	74	53	41	81	74	74	55	*199*	*178*	*165*	*206*	*198*	*199*	*180*
Receptor_123	Offsite Worker	370921	757884	191	245	246	238	264	245	245	233	55	55	47	73	54	54	42	*179*	*180*	*172*	*198*	*179*	*179*	*166*
Receptor_124	Offsite Worker	370975	757887	191	269	259	234	262	268	268	246	78	69	44	72	77	78	56	*203*	*193*	*168*	*196*	*202*	*203*	*180*
Receptor_125	Offsite Worker	370975	757794	205	319	304	274	308	318	318	288	113	99	69	102	112	113	82	*238*	*223*	*194*	*227*	*237*	*238*	*207*
Receptor_126	Offsite Worker	371026	757794	195	320	298	287	326	319	320	295	125	103	91	130	124	124	99	*249*	*228*	*216*	*255*	*249*	*249*	*224*
Receptor_127	Offsite Worker	371076	757877	187	279	256	253	255	278	279	262	92	69	66	69	91	92	75	*217*	*194*	*191*	*193*	*216*	*217*	*200*
Receptor_128	Offsite Worker	371126	757959	173	248	226	231	231	248	248	237	75	53	58	58	75	75	64	*200*	*178*	*183*	*182*	*200*	*200*	*189*
Receptor_129	Offsite Worker	371119	758031	168	226	219	217	213	225	226	217	58	51	50	45	57	59	50	*183*	*176*	*174*	*170*	*182*	*183*	*174*
Receptor_13	Recreational	366916	756456	121	135	137	137	141	135	135	138	14	16	16	20	14	14	17	*139*	*141*	*141*	*144*	*138*	*139*	*142*
Receptor_130	Residential	371183	758027	164	228	211	213	213	228	228	221	64	46	49	49	63	64	57	*189*	*171*	*174*	*174*	*188*	*189*	*182*
Receptor_131	Residential	371248	758024	164	229	212	204	218	229	230	215	66	48	41	54	65	66	51	*191*	*173*	*165*	*179*	*190*	*191*	*176*
Receptor_132	Residential	371326	758075	158	215	199	193	209	214	215	206	56	40	35	51	56	57	48	*181*	*165*	*160*	*176*	*181*	*182*	*173*
Receptor_133	Residential	371404	758127	157	207	188	181	200	206	207	199	50	32	25	44	49	50	43	*175*	*157*	*149*	*169*	*174*	*175*	*168*
Receptor_134	Residential	371481	758178	152	199	183	172	193	198	199	192	47	31	20	41	46	47	39	*171*	*156*	*144*	*165*	*171*	*171*	*164*
Receptor_135	Residential	371559	758230	150	190	177	170	186	190	190	185	40	27	20	36	40	40	35	*165*	*151*	*145*	*161*	*164*	*165*	*160*
Receptor_136	Residential	371637	758281	148	182	171	169	181	182	182	179	34	23	20	32	33	34	31	*159*	*148*	*145*	*157*	*158*	*159*	*155*
Receptor_137	Residential	371715	758333	147	175	168	164	176	175	175	173	28	21	16	28	27	28	26	*152*	*145*	*141*	*153*	*152*	*152*	*151*
Receptor_138	Residential	371769	758261	149	173	170	167	177	172	173	173	23	20	18	27	23	23	23	*148*	*145*	*143*	*152*	*148*	*148*	*148*
Receptor_139	Residential	371822	758189	153	177	174	169	187	176	178	171	24	21	16	34	23	25	18	*149*	*146*	*141*	*159*	*148*	*150*	*143*
Receptor_14	Recreational	366877	756544	120	137	142	138	138	136	137	138	17	21	18	18	16	17	18	*142*	*146*	*142*	*143*	*141*	*142*	*142*
Receptor_140	Residential	371894	758160	158	180	178	166	180	180	180	179	22	20	8	22	22	22	21	*147*	*145*	*132*	*147*	*147*	*147*	*146*
Receptor_141	Residential	371894	758081	164	188	181	170	177	187	188	186	24	17	6	13	23	23	21	*148*	*142*	*131*	*137*	*148*	*148*	*146*
Receptor_142	Residential	371959	758074	161	182	178	171	174	182	182	182	21	17	10	13	21	21	21	*146*	*142*	*135*	*138*	*145*	*146*	*146*
Receptor_143	Offsite Worker	371953	757977	161	179	184	178	170	178	179	183	18	23	18	9	18	18	23	*143*	*148*	*142*	*134*	*142*	*143*	*147*
Receptor_144	Offsite Worker	371948	757880	154	185	188	186	170	184	185	181	31	34	33	17	31	31	27	*156*	*159*	*158*	*142*	*155*	*156*	*152*
Receptor_145	Offsite Worker	371943	757783	156	180	188	192	173	179	180	186	24	32	36	17	23	24	30	*149*	*157*	*161*	*142*	*148*	*149*	*155*
Receptor_146	Offsite Worker	372016	757794	153	174	182	185	170	174	174	180	21	29	32	17	21	21	27	*146*	*154*	*157*	*142*	*146*	*146*	*152*
Receptor_147	Offsite Worker	372102	757791	151	172	175	183	166	171	172	173	21	25	32	15	21	21	22	*146*	*149*	*157*	*140*	*145*	*145*	*147*
Receptor_148	Offsite Worker	372178	757760	150	169	173	175	165	169	170	171	19	23	24	15	19	19	20	*144*	*148*	*149*	*139*	*143*	*144*	*145*
Receptor_149	Offsite Worker	372177	757670	151	174	174	174	164	174	175	170	23	22	23	13	22	24	19	*148*	*147*	*148*	*138*	*147*	*149*	*144*

Table 15
LAX SPAS
Operational Concentrations

IFRW Flight Rule
NO2, 1-Hour Averaging Time
98th Percentile

		Meters		Average Concentration (µg/m^3)								Project Concentration (µg/m^3)							Total Concentration (NAAQS) (µg/m^3)							
Receptor ID	Type	X	Y	Baseline	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Alt 6	Alt 7	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Alt 6	Alt 7	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Alt 6	Alt 7
Receptor_15	Recreational	366839	756632	120	137	139	137	134	137	137	137	18	19	17	15	17	17	18	*142*	*144*	*142*	*140*	*142*	*142*	*143*
Receptor_150	Offsite Worker	372176	757579	151	175	171	178	164	175	175	178	23	20	27	13	23	24	26	*148*	*145*	*152*	*138*	*148*	*148*	*151*
Receptor_151	Offsite Worker	372174	757489	150	174	167	179	164	173	174	176	24	17	29	14	23	24	26	*148*	*141*	*154*	*139*	*148*	*148*	*150*
Receptor_152	Offsite Worker	372173	757398	150	178	174	185	170	178	178	176	28	25	35	20	28	28	26	*153*	*149*	*160*	*145*	*153*	*153*	*151*
Receptor_153	Offsite Worker	372171	757308	151	181	179	192	181	180	181	189	30	28	41	30	29	30	38	*155*	*153*	*166*	*155*	*154*	*154*	*163*
Receptor_154	Offsite Worker	372055	757309	153	191	186	183	177	191	191	192	38	33	30	24	38	38	39	*163*	*158*	*155*	*149*	*163*	*163*	*164*
Receptor_155	Residential	372055	757363	152	184	183	190	173	184	184	184	32	31	38	21	32	32	32	*157*	*155*	*163*	*146*	*157*	*157*	*157*
Receptor_156	Offsite Worker	372055	757416	151	182	182	190	170	182	182	182	31	31	39	18	31	31	31	*156*	*156*	*164*	*143*	*156*	*156*	*156*
Receptor_157	Offsite Worker	371952	757442	154	189	184	190	175	188	190	189	36	30	36	21	35	36	35	*160*	*155*	*161*	*146*	*159*	*161*	*160*
Receptor_158	Offsite Worker	371950	757345	157	198	187	193	172	198	198	198	41	30	36	15	41	41	41	*166*	*154*	*161*	*140*	*166*	*166*	*166*
Receptor_159	Offsite Worker	371864	757344	162	192	180	188	178	192	193	192	30	18	26	15	30	30	30	*155*	*143*	*151*	*140*	*154*	*155*	*154*
Receptor_16	Recreational	366800	756720	121	135	140	140	132	135	135	138	15	20	19	12	15	14	17	*140*	*144*	*144*	*136*	*140*	*139*	*142*
Receptor_160	Offsite Worker	371790	757347	161	196	179	189	175	195	196	196	35	18	29	14	35	35	35	*160*	*143*	*154*	*139*	*160*	*160*	*160*
Receptor_161	Offsite Worker	371708	757356	158	199	184	197	173	198	200	204	42	26	39	15	41	42	46	*167*	*151*	*164*	*140*	*166*	*167*	*171*
Receptor_162	Offsite Worker	371615	757356	157	205	187	206	176	204	205	216	47	29	49	18	47	47	58	*172*	*154*	*174*	*143*	*171*	*172*	*183*
Receptor_163	Offsite Worker	371523	757356	163	212	202	219	187	211	212	227	49	40	57	24	48	49	64	*174*	*164*	*181*	*149*	*173*	*174*	*189*
Receptor_164	Offsite Worker	371430	757356	167	219	220	239	196	218	219	238	52	53	73	29	51	52	72	*177*	*178*	*197*	*154*	*176*	*177*	*197*
Receptor_165	Offsite Worker	371338	757356	171	235	227	256	219	233	234	253	64	56	85	48	62	63	82	*189*	*181*	*210*	*173*	*187*	*188*	*207*
Receptor_166	Offsite Worker	371245	757356	173	239	232	279	232	238	239	274	66	60	107	60	66	67	101	*191*	*185*	*232*	*184*	*190*	*192*	*226*
Receptor_167	Offsite Worker	371153	757356	174	253	236	324	260	253	254	303	79	62	150	86	78	79	129	*204*	*187*	*274*	*210*	*203*	*204*	*254*
Receptor_168	Offsite Worker	371061	757356	180	273	260	339	278	273	272	305	92	79	158	97	92	92	124	*217*	*204*	*283*	*222*	*217*	*217*	*249*
Receptor_169	Offsite Worker	371005	757357	183	282	277	401	291	281	281	316	99	94	218	109	99	99	133	*224*	*219*	*343*	*233*	*224*	*224*	*258*
Receptor_17	Recreational	366762	756809	123	135	143	142	136	135	135	137	13	20	19	13	12	12	14	*137*	*145*	*144*	*138*	*137*	*137*	*139*
Receptor_170	Offsite Worker	370998	757293	181	243	245	325	246	242	243	271	61	64	143	64	61	61	89	*186*	*189*	*268*	*189*	*186*	*186*	*214*
Receptor_171	Offsite Worker	370998	757194	182	211	226	252	210	211	211	221	29	44	70	29	29	29	39	*154*	*169*	*195*	*153*	*154*	*154*	*164*
Receptor_172	Offsite Worker	370998	757096	187	191	192	230	196	190	190	203	4	6	44	9	3	4	16	*129*	*130*	*169*	*134*	*128*	*129*	*141*
Receptor_173	Offsite Worker	370998	756998	193	176	177	195	195	175	176	184	-17	-15	3	2	-17	-17	-9	*108*	*110*	*128*	*127*	*107*	*108*	*116*
Receptor_174	Offsite Worker	371057	756997	181	176	176	200	179	176	176	182	-4	-5	19	-1	-5	-5	2	*120*	*120*	*144*	*123*	*120*	*120*	*126*
Receptor_175	Offsite Worker	371153	756997	171	179	176	186	174	178	179	181	8	5	15	3	7	8	10	*133*	*130*	*140*	*128*	*132*	*132*	*135*
Receptor_176	Offsite Worker	371249	756997	177	173	170	180	176	173	173	179	-5	-7	3	-1	-5	-5	1	*120*	*117*	*127*	*123*	*120*	*120*	*126*
Receptor_177	Offsite Worker	371345	756997	172	176	169	179	177	175	176	178	4	-3	7	5	3	3	6	*128*	*122*	*132*	*130*	*128*	*128*	*131*
Receptor_178	Offsite Worker	371440	756997	161	183	172	182	179	183	183	185	22	10	21	18	22	22	24	*147*	*135*	*146*	*142*	*146*	*147*	*149*
Receptor_179	Offsite Worker	371536	756997	159	182	175	182	183	182	182	188	24	16	24	24	23	23	29	*148*	*141*	*148*	*149*	*148*	*148*	*154*
Receptor_18	Recreational	366723	756897	125	137	142	138	137	136	136	141	12	18	14	12	11	12	16	*137*	*143*	*139*	*137*	*136*	*137*	*141*
Receptor_180	Offsite Worker	371632	756997	157	189	181	185	186	189	189	193	33	24	28	29	32	32	36	*157*	*148*	*153*	*154*	*156*	*157*	*160*
Receptor_181	Offsite Worker	371728	756997	155	196	182	191	188	196	196	199	41	27	36	33	41	41	43	*166*	*152*	*161*	*157*	*166*	*166*	*168*
Receptor_182	Offsite Worker	371824	756997	155	201	182	193	197	201	201	203	46	27	38	43	46	46	48	*171*	*152*	*163*	*167*	*171*	*171*	*173*
Receptor_183	Offsite Worker	371920	756997	160	218	193	206	204	217	218	218	57	33	46	43	57	57	58	*182*	*158*	*170*	*168*	*182*	*182*	*182*
Receptor_184	Offsite Worker	372016	756997	162	231	212	204	212	231	231	231	69	50	42	50	69	69	69	*194*	*174*	*167*	*175*	*194*	*194*	*194*
Receptor_185	Offsite Worker	372111	756997	164	231	223	214	210	231	231	231	67	59	49	46	67	67	67	*192*	*184*	*174*	*170*	*192*	*192*	*192*
Receptor_186	Offsite Worker	372207	756997	168	231	217	224	215	231	231	231	63	48	55	47	62	63	63	*187*	*173*	*180*	*171*	*187*	*187*	*188*
Receptor_187	Offsite Worker	372303	756997	170	222	207	230	210	221	222	222	52	37	60	41	51	52	52	*176*	*161*	*185*	*165*	*176*	*176*	*177*
Receptor_188	Offsite Worker	372399	756997	165	211	212	228	217	211	211	211	46	46	63	52	46	46	46	*170*	*171*	*187*	*177*	*170*	*170*	*171*
Receptor_189	Offsite Worker	372495	756997	171	210	207	226	228	210	210	211	40	37	55	58	39	40	40	*165*	*162*	*180*	*182*	*164*	*164*	*165*
Receptor_19	Recreational	366685	756985	127	141	140	135	138	140	141	141	14	13	9	11	14	14	15	*139*	*138*	*133*	*136*	*139*	*139*	*140*
Receptor_190	Offsite Worker	372591	756997	173	224	214	221	223	224	224	224	52	41	48	50	51	52	52	*176*	*166*	*173*	*175*	*176*	*176*	*177*
Receptor_191	Offsite Worker	372610	757063	167	212	206	209	210	211	211	212	45	39	42	43	45	45	45	*170*	*164*	*167*	*168*	*169*	*170*	*170*
Receptor_192	Offsite Worker	372612	757132	160	198	194	199	203	197	197	198	37	33	38	43	37	37	37	*162*	*158*	*163*	*167*	*162*	*162*	*162*
Receptor_193	Offsite Worker	372614	757201	153	188	184	192	196	187	187	188	35	31	39	44	35	35	35	*160*	*156*	*164*	*169*	*159*	*160*	*160*
Receptor_194	Offsite Worker	372616	757270	147	180	176	184	190	180	180	180	33	29	37	43	32	33	33	*157*	*154*	*162*	*168*	*157*	*157*	*158*
Receptor_195	Offsite Worker	372627	757351	146	173	170	181	183	172	173	174	27	24	35	37	26	27	28	*152*	*149*	*160*	*162*	*151*	*152*	*153*
Receptor_196	Offsite Worker	372651	757422	146	168	165	177	177	168	168	168	22	19	31	31	22	22	22	*147*	*143*	*156*	*155*	*147*	*147*	*147*
Receptor_197	Offsite Worker	372676	757494	146	166	163	171	172	166	166	166	20	17	25	26	20	20	20	*144*	*142*	*150*	*151*	*144*	*144*	*144*
Receptor_198	Offsite Worker	372704	757569	145	164	158	168	165	164	164	165	19	14	23	20	19	19	21	*144*	*139*	*148*	*145*	*144*	*144*	*145*
Receptor_199	Offsite Worker	372733	757645	144	164	158	165	159	164	164	164	20	14	21	15	20	20	20	*145*	*139*	*146*	*140*	*145*	*145*	*145*
Receptor_2	Recreational	367340	755485	128	146	143	145	154	145	146	146	18	14	17	26	17	17	18	*142*	*139*	*142*	*150*	*142*	*142*	*142*

Table 15
LAX SPAS
Operational Concentrations

IFRW Flight Rule
NO2, 1-Hour Averaging Time
98th Percentile

		Meters		Average Concentration (µg/m^3)								Project Concentration (µg/m^3)							Total Concentration (NAAQS) (µg/m^3)						
Receptor ID	Type	X	Y	Baseline	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Alt 6	Alt 7	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Alt 6	Alt 7	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Alt 6	Alt 7
Receptor_20	Recreational	366646	757074	129	140	137	135	138	140	140	142	11	8	6	9	11	11	13	*136*	*132*	*131*	*133*	*136*	*136*	*138*
Receptor_200	Offsite Worker	372746	757702	145	161	159	164	156	161	161	162	17	14	19	12	17	17	17	*141*	*139*	*144*	*136*	*141*	*141*	*141*
Receptor_201	Offsite Worker	372746	757768	148	161	157	163	158	160	161	161	13	9	16	10	13	13	13	*138*	*134*	*140*	*135*	*138*	*138*	*138*
Receptor_202	Offsite Worker	372807	757781	147	160	155	163	156	160	160	161	13	9	17	10	13	13	15	*138*	*133*	*141*	*134*	*138*	*138*	*139*
Receptor_203	Offsite Worker	372901	757782	145	159	157	165	153	159	159	160	14	12	21	9	14	14	15	*139*	*137*	*146*	*134*	*139*	*139*	*140*
Receptor_204	Offsite Worker	372994	757783	143	160	161	165	155	159	160	161	17	18	23	12	17	17	18	*142*	*143*	*148*	*137*	*142*	*142*	*143*
Receptor_205	Offsite Worker	373087	757783	143	164	164	166	157	164	164	166	21	21	23	14	21	21	23	*146*	*146*	*148*	*139*	*146*	*146*	*148*
Receptor_206	Offsite Worker	373180	757784	142	162	160	168	155	161	162	164	20	18	26	13	19	20	22	*144*	*143*	*151*	*137*	*144*	*144*	*147*
Receptor_207	Offsite Worker	373274	757785	142	161	159	165	154	160	161	163	19	17	23	12	18	19	21	*144*	*141*	*148*	*137*	*143*	*144*	*146*
Receptor_208	Offsite Worker	373367	757786	142	162	158	162	153	161	162	162	20	16	20	11	20	20	20	*145*	*141*	*145*	*136*	*144*	*145*	*145*
Receptor_209	Offsite Worker	373418	757742	143	157	155	165	156	157	157	158	15	12	22	13	14	15	16	*139*	*137*	*147*	*138*	*139*	*139*	*141*
Receptor_21	Recreational	366607	757162	132	138	137	136	136	137	138	141	6	4	4	4	5	6	9	*131*	*129*	*128*	*129*	*130*	*131*	*134*
Receptor_210	Offsite Worker	373418	757653	144	158	155	167	158	158	158	159	14	11	23	14	14	14	15	*139*	*136*	*148*	*139*	*139*	*139*	*139*
Receptor_211	Offsite Worker	373419	757564	147	165	159	170	163	165	165	165	18	12	22	16	17	18	18	*142*	*137*	*147*	*141*	*142*	*142*	*143*
Receptor_212	Offsite Worker	373419	757475	149	166	162	176	169	165	166	166	17	14	28	20	17	17	17	*142*	*138*	*153*	*145*	*142*	*142*	*142*
Receptor_213	Offsite Worker	373420	757386	153	171	170	180	176	171	171	171	18	17	27	23	18	18	18	*143*	*142*	*152*	*148*	*143*	*143*	*143*
Receptor_214	Offsite Worker	373420	757297	159	176	176	186	188	176	176	176	17	17	27	29	17	17	17	*142*	*142*	*152*	*154*	*142*	*142*	*142*
Receptor_215	Offsite Worker	373421	757207	162	186	182	190	200	186	186	187	25	20	28	38	24	25	25	*150*	*145*	*153*	*163*	*149*	*150*	*150*
Receptor_216	Offsite Worker	373421	757118	164	197	193	194	210	197	197	197	33	28	30	46	32	33	33	*157*	*153*	*155*	*171*	*157*	*157*	*158*
Receptor_217	Offsite Worker	373292	757117	168	197	194	204	210	197	197	197	29	26	36	42	29	29	29	*154*	*151*	*161*	*167*	*154*	*154*	*154*
Receptor_218	Offsite Worker	373213	757118	169	198	191	203	206	198	198	198	29	22	34	37	29	29	29	*154*	*147*	*158*	*162*	*153*	*154*	*154*
Receptor_219	Offsite Worker	373158	757066	173	207	198	212	215	206	207	207	34	26	39	42	34	34	34	*159*	*150*	*164*	*167*	*159*	*159*	*159*
Receptor_22	Recreational	366569	757250	129	137	137	134	137	137	137	140	8	7	5	8	8	8	11	*133*	*132*	*130*	*132*	*133*	*133*	*136*
Receptor_220	Offsite Worker	373084	757026	175	211	206	221	219	211	211	211	36	30	46	44	36	36	36	*161*	*155*	*171*	*169*	*160*	*161*	*161*
Receptor_221	Offsite Worker	373009	757011	185	217	215	224	222	217	217	217	32	31	40	38	32	32	33	*157*	*155*	*164*	*162*	*157*	*157*	*157*
Receptor_222	Offsite Worker	372922	757009	189	229	227	230	219	229	229	230	40	37	41	30	40	40	41	*165*	*162*	*166*	*155*	*165*	*165*	*165*
Receptor_223	Offsite Worker	372835	757007	179	232	224	235	226	232	232	233	53	45	56	47	53	53	53	*178*	*169*	*180*	*172*	*178*	*178*	*178*
Receptor_224	Offsite Worker	372747	757006	183	238	226	251	229	238	238	238	55	43	68	46	55	55	55	*180*	*168*	*193*	*171*	*180*	*180*	*180*
Receptor_225	Offsite Worker	372660	757004	175	231	218	235	227	231	231	231	56	43	60	52	56	56	56	*181*	*168*	*185*	*177*	*181*	*181*	*181*
Receptor_226	Offsite Worker	372651	757063	170	221	205	219	218	220	221	221	51	35	49	48	51	51	51	*176*	*160*	*174*	*173*	*175*	*176*	*176*
Receptor_227	Offsite Worker	372629	756931	185	249	230	250	242	249	249	249	63	45	65	57	63	63	63	*188*	*169*	*189*	*182*	*188*	*188*	*188*
Receptor_228	Offsite Worker	372631	756857	201	268	253	280	268	268	268	268	67	51	79	67	66	67	67	*191*	*176*	*204*	*192*	*191*	*191*	*192*
Receptor_229	Offsite Worker	372634	756783	221	301	284	323	293	300	301	301	79	63	101	71	79	79	80	*204*	*188*	*226*	*196*	*204*	*204*	*204*
Receptor_23	Recreational	366530	757338	128	136	136	138	134	136	136	140	8	8	10	6	8	8	12	*133*	*133*	*135*	*131*	*133*	*133*	*137*
Receptor_230	Offsite Worker	372702	756778	217	293	288	308	288	293	293	294	76	70	90	71	76	76	77	*201*	*195*	*215*	*196*	*201*	*201*	*201*
Receptor_231	Offsite Worker	372756	756775	231	298	280	309	284	298	298	299	68	49	78	53	67	68	68	*192*	*174*	*203*	*178*	*192*	*192*	*193*
Receptor_232	Offsite Worker	372729	756712	245	330	310	340	320	330	330	330	85	64	94	74	85	85	85	*210*	*189*	*219*	*199*	*210*	*210*	*210*
Receptor_233	Offsite Worker	372703	756650	269	355	336	360	365	355	355	356	86	68	91	96	86	86	87	*211*	*192*	*215*	*221*	*211*	*211*	*212*
Receptor_234	Offsite Worker	372677	756588	295	403	399	419	436	402	403	403	107	104	124	141	107	107	108	*232*	*229*	*248*	*266*	*232*	*232*	*233*
Receptor_235	Offsite Worker	372619	756588	314	439	398	452	409	438	439	439	124	84	137	95	124	124	125	*249*	*209*	*262*	*220*	*249*	*249*	*250*
Receptor_236	Offsite Worker	372622	756509	355	498	540	521	556	498	498	498	144	186	167	202	143	144	144	*268*	*310*	*291*	*326*	*268*	*268*	*269*
Receptor_237	Offsite Worker	372700	756511	333	521	500	540	537	521	521	522	189	167	207	204	188	189	189	*313*	*292*	*332*	*329*	*313*	*313*	*314*
Receptor_238	Offsite Worker	372789	756510	318	465	480	467	496	464	465	465	147	162	149	178	146	147	147	*272*	*287*	*274*	*303*	*271*	*271*	*272*
Receptor_239	Offsite Worker	372871	756509	316	413	417	408	451	412	413	413	97	101	92	136	96	97	97	*222*	*226*	*216*	*260*	*221*	*222*	*222*
Receptor_24	Recreational	366492	757427	128	137	137	137	134	137	137	140	9	9	9	7	9	9	12	*134*	*134*	*134*	*131*	*134*	*134*	*137*
Receptor_240	Offsite Worker	372871	756437	317	423	428	454	465	422	422	423	106	112	137	148	105	106	106	*231*	*237*	*262*	*273*	*230*	*231*	*231*
Receptor_241	Offsite Worker	372970	756437	280	366	392	410	405	365	366	366	85	111	130	125	85	85	86	*210*	*236*	*255*	*250*	*210*	*210*	*210*
Receptor_242	Offsite Worker	373069	756437	246	328	352	380	370	327	328	328	82	106	134	124	81	82	83	*207*	*231*	*259*	*249*	*206*	*207*	*207*
Receptor_243	Offsite Worker	373168	756437	225	301	308	350	340	300	301	302	76	83	125	115	75	76	77	*201*	*207*	*250*	*240*	*200*	*201*	*202*
Receptor_244	Offsite Worker	373267	756437	213	282	283	324	316	281	282	283	69	70	111	103	68	68	70	*194*	*194*	*236*	*228*	*193*	*193*	*194*
Receptor_245	Offsite Worker	373412	756437	195	257	252	294	287	256	257	257	62	57	100	93	61	62	62	*187*	*182*	*225*	*218*	*186*	*187*	*187*
Receptor_246	Offsite Worker	373409	756339	207	262	275	268	292	262	262	263	55	68	61	86	55	55	56	*180*	*193*	*186*	*210*	*180*	*180*	*181*
Receptor_247	Offsite Worker	373406	756240	207	269	275	274	305	269	269	270	62	68	66	97	61	62	62	*187*	*192*	*191*	*222*	*186*	*187*	*187*
Receptor_248	Offsite Worker	373403	756142	197	250	254	255	290	249	250	251	52	56	58	93	52	52	53	*177*	*181*	*183*	*217*	*176*	*177*	*178*
Receptor_249	Offsite Worker	373400	756042	203	243	249	231	265	243	243	244	41	46	28	62	40	41	42	*166*	*171*	*153*	*187*	*165*	*165*	*166*
Receptor_25	Recreational	366453	757515	128	134	135	136	134	134	134	135	6	7	8	6	5	6	7	*131*	*132*	*133*	*131*	*130*	*131*	*132*

Table 15
LAX SPAS
Operational Concentrations

IFRW Flight Rule
NO2, 1-Hour Averaging Time
98th Percentile

		Meters		Average Concentration (µg/m^3)								Project Concentration (µg/m^3)							Total Concentration (NAAQS) (µg/m^3)						
Receptor ID	Type	X	Y	Baseline	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Alt 6	Alt 7	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Alt 6	Alt 7	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Alt 6	Alt 7
Receptor_250	Offsite Worker	373397	755944	192	227	239	234	251	227	227	228	36	47	43	59	35	35	36	*160*	*172*	*167*	*184*	*160*	*160*	*161*
Receptor_251	Offsite Worker	373393	755846	187	220	220	227	228	219	220	221	33	33	41	41	33	33	34	*158*	*158*	*165*	*166*	*157*	*158*	*159*
Receptor_252	Offsite Worker	373390	755747	183	206	204	211	222	206	206	208	24	21	29	39	23	24	25	*148*	*146*	*154*	*164*	*148*	*148*	*150*
Receptor_253	Offsite Worker	373309	755744	189	206	207	213	224	206	206	208	18	18	24	35	17	17	20	*142*	*143*	*149*	*160*	*142*	*142*	*144*
Receptor_254	Offsite Worker	373229	755743	192	209	225	220	224	208	208	211	17	34	29	32	16	17	19	*142*	*158*	*154*	*157*	*141*	*142*	*144*
Receptor_255	Offsite Worker	373143	755741	192	215	228	225	235	214	215	216	23	36	33	43	23	23	24	*148*	*161*	*158*	*168*	*147*	*148*	*149*
Receptor_256	Offsite Worker	373143	755823	204	223	240	236	243	223	223	224	19	36	32	39	19	19	20	*144*	*160*	*157*	*164*	*144*	*144*	*145*
Receptor_257	Offsite Worker	373143	755906	212	242	239	244	261	241	242	244	30	27	32	48	29	30	32	*155*	*152*	*157*	*173*	*154*	*154*	*157*
Receptor_258	Offsite Worker	373065	755906	220	241	253	251	269	240	241	243	21	33	31	49	20	21	23	*146*	*157*	*156*	*174*	*145*	*146*	*148*
Receptor_259	Offsite Worker	373065	755827	206	231	242	242	254	231	231	232	25	36	36	48	25	25	26	*150*	*161*	*161*	*173*	*150*	*150*	*150*
Receptor_26	Recreational	366415	757603	126	135	134	137	133	134	135	136	8	8	11	6	8	8	10	*133*	*133*	*136*	*131*	*133*	*133*	*135*
Receptor_260	Offsite Worker	373068	755733	190	220	227	224	238	220	220	221	30	37	34	48	30	30	31	*155*	*162*	*159*	*172*	*155*	*155*	*156*
Receptor_261	Offsite Worker	373007	755733	189	219	228	229	236	218	218	217	30	39	40	47	29	29	28	*154*	*164*	*165*	*172*	*154*	*154*	*153*
Receptor_262	Offsite Worker	372941	755733	189	216	224	231	240	216	216	218	27	35	42	50	27	27	29	*152*	*159*	*167*	*175*	*151*	*152*	*154*
Receptor_263	Offsite Worker	372941	755636	183	201	215	215	225	200	201	202	18	32	32	41	17	18	19	*143*	*157*	*156*	*166*	*142*	*142*	*143*
Receptor_264	Offsite Worker	372941	755539	172	193	211	202	204	192	192	192	20	38	30	32	20	20	20	*145*	*163*	*155*	*157*	*144*	*145*	*145*
Receptor_265	Offsite Worker	372941	755442	170	181	194	202	197	181	181	181	11	25	32	27	11	11	11	*136*	*150*	*157*	*152*	*136*	*136*	*136*
Receptor_266	Offsite Worker	372913	755342	168	173	186	189	185	173	173	173	5	18	21	17	4	5	5	*130*	*142*	*146*	*142*	*129*	*130*	*129*
Receptor_267	Offsite Worker	372817	755346	171	174	182	186	199	174	174	174	3	11	15	28	3	3	3	*128*	*136*	*140*	*153*	*128*	*128*	*128*
Receptor_268	Offsite Worker	372720	755349	171	176	182	195	197	175	176	176	5	12	25	27	5	5	5	*130*	*136*	*149*	*152*	*130*	*130*	*130*
Receptor_269	Offsite Worker	372624	755352	172	181	179	196	197	180	180	181	9	7	24	25	9	9	9	*134*	*132*	*149*	*150*	*133*	*134*	*134*
Receptor_27	Recreational	366376	757692	124	132	136	136	132	132	132	134	8	11	12	8	8	8	9	*133*	*136*	*137*	*133*	*133*	*133*	*134*
Receptor_270	Offsite Worker	372527	755349	171	185	184	198	196	184	185	184	14	13	27	25	13	14	13	*138*	*138*	*152*	*150*	*138*	*138*	*138*
Receptor_271	Offsite Worker	372431	755353	167	187	186	194	195	186	187	186	20	18	27	28	19	19	19	*144*	*143*	*151*	*152*	*144*	*144*	*144*
Receptor_272	Offsite Worker	372334	755356	166	179	189	192	198	179	179	179	13	22	26	31	13	13	13	*137*	*147*	*151*	*156*	*137*	*137*	*138*
Receptor_273	Offsite Worker	372237	755359	167	179	189	188	194	178	179	179	12	22	21	27	12	12	12	*137*	*147*	*146*	*152*	*136*	*137*	*137*
Receptor_274	Offsite Worker	372141	755362	163	178	187	186	187	178	178	178	16	24	23	25	16	16	16	*140*	*149*	*148*	*150*	*140*	*140*	*141*
Receptor_275	Offsite Worker	372044	755366	162	177	176	184	183	177	177	176	15	14	22	21	15	15	13	*140*	*139*	*146*	*146*	*139*	*140*	*138*
Receptor_276	Offsite Worker	371948	755369	167	188	182	201	187	188	188	188	21	15	34	20	21	21	21	*146*	*140*	*159*	*145*	*146*	*146*	*146*
Receptor_277	Offsite Worker	371851	755372	165	199	192	204	196	199	199	199	34	26	39	31	34	34	34	*159*	*151*	*163*	*156*	*158*	*158*	*159*
Receptor_278	Offsite Worker	371755	755375	169	197	199	210	208	197	197	198	28	30	41	39	28	28	29	*153*	*154*	*166*	*164*	*153*	*153*	*153*
Receptor_279	Offsite Worker	371658	755378	170	199	189	202	209	199	199	199	29	19	32	39	29	29	29	*154*	*144*	*157*	*164*	*154*	*154*	*154*
Receptor_28	Residential	366338	757780	122	131	133	135	130	131	131	134	9	11	13	8	9	9	12	*134*	*136*	*138*	*133*	*134*	*134*	*136*
Receptor_280	Offsite Worker	371562	755382	169	199	191	200	204	198	199	199	30	22	31	35	29	30	30	*154*	*147*	*156*	*160*	*154*	*154*	*154*
Receptor_281	Offsite Worker	371465	755385	171	197	198	202	206	196	197	197	25	26	31	34	25	25	25	*150*	*151*	*156*	*159*	*150*	*150*	*150*
Receptor_282	Offsite Worker	371368	755388	173	198	199	205	204	198	198	198	26	27	33	31	26	26	26	*151*	*152*	*158*	*156*	*150*	*151*	*151*
Receptor_283	Offsite Worker	371272	755391	171	193	196	200	196	192	192	193	21	25	29	25	21	21	21	*146*	*149*	*154*	*149*	*146*	*146*	*146*
Receptor_284	Offsite Worker	371175	755395	168	188	195	197	201	188	188	188	20	27	29	34	20	20	21	*145*	*152*	*154*	*159*	*145*	*145*	*145*
Receptor_285	Offsite Worker	371079	755398	160	186	186	192	193	186	186	186	26	26	32	33	26	26	26	*151*	*151*	*156*	*158*	*150*	*151*	*151*
Receptor_286	Offsite Worker	371042	755478	168	195	189	199	201	195	195	195	27	21	31	33	27	27	27	*152*	*146*	*156*	*158*	*152*	*152*	*152*
Receptor_287	Offsite Worker	371009	755538	170	198	196	208	204	198	198	199	29	26	38	34	28	28	29	*153*	*151*	*163*	*159*	*153*	*153*	*153*
Receptor_288	Offsite Worker	370975	755597	173	215	207	213	207	214	215	215	42	34	40	34	41	42	42	*167*	*159*	*165*	*159*	*166*	*167*	*167*
Receptor_289	Offsite Worker	370925	755597	172	214	205	212	203	213	214	214	42	32	39	31	41	42	42	*166*	*157*	*164*	*156*	*166*	*166*	*167*
Receptor_29	Residential	366402	757746	123	132	135	136	132	131	132	134	9	12	13	9	9	9	12	*134*	*137*	*138*	*134*	*133*	*134*	*136*
Receptor_290	Offsite Worker	370860	755547	166	204	198	202	198	203	204	204	38	32	36	33	38	38	38	*163*	*157*	*161*	*157*	*163*	*163*	*163*
Receptor_291	Offsite Worker	370796	755497	162	191	192	195	191	191	191	192	29	30	33	29	29	29	29	*154*	*154*	*158*	*154*	*154*	*154*	*154*
Receptor_292	Offsite Worker	370733	755428	156	183	184	189	187	182	183	183	27	29	33	31	27	27	27	*152*	*154*	*158*	*156*	*152*	*152*	*152*
Receptor_293	Offsite Worker	370634	755428	164	187	186	194	187	186	187	187	22	22	29	23	22	22	22	*147*	*146*	*154*	*148*	*147*	*147*	*147*
Receptor_294	Offsite Worker	370536	755428	169	185	185	193	188	185	185	185	16	16	24	19	16	16	16	*141*	*141*	*149*	*144*	*140*	*141*	*141*
Receptor_295	Offsite Worker	370437	755428	172	184	183	196	187	183	184	185	12	11	24	16	12	12	13	*137*	*136*	*149*	*141*	*136*	*137*	*138*
Receptor_296	Offsite Worker	370338	755427	174	184	180	196	189	184	184	184	10	6	22	15	10	10	11	*135*	*130*	*147*	*140*	*135*	*135*	*135*
Receptor_297	Residential	370239	755427	175	185	182	191	192	184	185	185	10	7	16	17	9	10	10	*135*	*132*	*140*	*142*	*134*	*134*	*135*
Receptor_298	Residential	370138	755427	159	180	182	189	185	179	180	180	20	23	29	25	20	20	21	*145*	*148*	*154*	*150*	*145*	*145*	*145*
Receptor_299	Residential	370040	755427	158	183	182	191	187	182	182	183	24	24	33	28	24	24	24	*149*	*148*	*158*	*153*	*149*	*149*	*149*
Receptor_3	Recreational	367301	755573	127	145	144	146	159	145	145	146	18	17	19	32	18	18	18	*143*	*142*	*144*	*157*	*143*	*143*	*143*
Receptor_30	Residential	366467	757713	124	132	138	137	133	132	132	135	9	14	13	9	8	8	12	*133*	*139*	*138*	*134*	*133*	*133*	*136*

Table 15
LAX SPAS
Operational Concentrations

IFRW Flight Rule
NO2, 1-Hour Averaging Time
98th Percentile

		Meters		Average Concentration (µg/m^3)								Project Concentration (µg/m^3)							Total Concentration (NAAQS) (µg/m^3)						
Receptor ID	Type	X	Y	Baseline	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Alt 6	Alt 7	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Alt 6	Alt 7	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Alt 6	Alt 7
Receptor_300	Residential	369941	755426	161	183	180	192	187	183	183	183	23	20	31	27	22	23	23	*148*	*145*	*156*	*152*	*147*	*148*	*148*
Receptor_301	Residential	369842	755426	162	180	182	188	183	180	180	180	19	20	26	22	18	19	19	*143*	*145*	*151*	*146*	*143*	*143*	*143*
Receptor_302	School	369741	755435	163	176	179	186	181	176	176	177	13	17	24	18	13	13	14	*138*	*141*	*148*	*143*	*138*	*138*	*139*
Receptor_303	School	369643	755434	155	177	177	184	183	177	177	178	22	21	29	27	22	22	22	*147*	*146*	*154*	*152*	*146*	*147*	*147*
Receptor_304	Residential	369544	755434	155	175	178	183	180	174	175	175	20	23	28	25	19	19	20	*144*	*147*	*153*	*150*	*144*	*144*	*145*
Receptor_305	Residential	369445	755434	153	176	178	182	180	175	176	176	23	25	29	27	22	23	23	*148*	*150*	*154*	*152*	*147*	*148*	*148*
Receptor_306	Residential	369346	755434	152	174	172	180	179	173	173	174	22	20	28	28	21	22	22	*147*	*145*	*153*	*153*	*146*	*147*	*147*
Receptor_307	Offsite Worker	369249	755442	149	172	173	177	180	171	172	172	23	25	28	31	23	23	23	*148*	*149*	*153*	*156*	*148*	*148*	*148*
Receptor_308	Offsite Worker	369151	755442	146	167	174	175	179	166	167	167	20	27	29	32	20	20	20	*145*	*152*	*153*	*157*	*145*	*145*	*145*
Receptor_309	Offsite Worker	369052	755442	144	166	174	173	178	166	166	166	22	30	29	34	22	22	22	*147*	*155*	*154*	*159*	*146*	*147*	*147*
Receptor_31	Residential	366531	757679	126	134	139	138	134	134	134	136	8	12	12	8	8	8	10	*133*	*137*	*137*	*133*	*132*	*133*	*135*
Receptor_310	Residential	368953	755441	145	165	175	171	177	165	165	165	21	30	26	32	20	21	21	*146*	*155*	*151*	*157*	*145*	*145*	*146*
Receptor_311	Residential	368854	755441	143	165	175	169	175	164	164	165	22	32	26	32	21	22	22	*147*	*157*	*151*	*157*	*146*	*147*	*147*
Receptor_312	Residential	368755	755441	142	163	174	167	173	163	163	164	22	32	25	31	21	22	22	*147*	*157*	*150*	*156*	*146*	*146*	*147*
Receptor_313	Residential	368657	755441	141	162	172	168	170	162	162	162	22	31	27	29	21	21	22	*146*	*156*	*152*	*154*	*146*	*146*	*146*
Receptor_314	Residential	368558	755440	142	161	169	166	168	160	161	161	19	27	24	26	18	19	19	*144*	*152*	*148*	*151*	*143*	*143*	*144*
Receptor_315	Residential	368459	755440	141	161	166	166	167	160	161	161	20	25	25	26	20	20	21	*145*	*150*	*150*	*151*	*145*	*145*	*145*
Receptor_316	Residential	368360	755440	139	157	164	167	168	156	157	157	18	25	28	30	17	18	18	*143*	*150*	*153*	*154*	*142*	*143*	*143*
Receptor_317	Residential	368262	755439	138	153	162	163	169	153	153	153	15	24	26	31	15	15	16	*140*	*149*	*150*	*156*	*140*	*140*	*140*
Receptor_318	Residential	368186	755427	136	152	159	161	167	151	152	152	16	23	25	31	16	16	16	*141*	*148*	*150*	*156*	*140*	*141*	*141*
Receptor_319	Residential	368111	755414	134	150	157	158	164	150	150	151	16	23	24	30	16	16	17	*141*	*148*	*149*	*155*	*141*	*141*	*141*
Receptor_32	Residential	366567	757773	123	135	137	138	134	134	134	137	11	13	14	11	11	11	14	*136*	*138*	*139*	*136*	*136*	*136*	*138*
Receptor_320	Offsite Worker	368035	755402	133	149	155	156	161	149	149	149	17	23	23	28	16	16	17	*141*	*147*	*148*	*153*	*141*	*141*	*141*
Receptor_321	Offsite Worker	367960	755389	132	148	153	154	158	148	148	148	16	22	23	26	16	16	17	*141*	*146*	*147*	*151*	*141*	*141*	*141*
Receptor_322	Offsite Worker	367863	755390	131	148	151	150	157	148	148	148	17	20	20	26	17	17	17	*142*	*145*	*144*	*151*	*142*	*142*	*142*
Receptor_323	Offsite Worker	367766	755392	130	148	149	148	157	147	148	148	18	19	18	27	17	18	18	*143*	*143*	*143*	*152*	*142*	*143*	*143*
Receptor_324	Offsite Worker	367669	755393	129	146	146	146	158	146	146	146	17	17	17	29	17	17	17	*142*	*142*	*142*	*154*	*142*	*142*	*142*
Receptor_325	Offsite Worker	367572	755394	128	147	144	145	155	146	146	147	19	16	17	27	18	19	19	*144*	*141*	*142*	*152*	*143*	*143*	*144*
Receptor_326	Offsite Worker	367475	755395	127	145	143	144	154	144	144	145	18	16	17	27	17	18	18	*142*	*141*	*142*	*152*	*142*	*142*	*143*
Receptor_327	On-Site Occupational	370400	756850	212	196	182	182	186	195	196	197	-17	-30	-30	-26	-17	-17	-15	*108*	*94*	*95*	*99*	*108*	*108*	*110*
Receptor_33	Residential	366625	757758	124	135	138	139	135	135	135	138	11	14	15	11	11	11	14	*136*	*139*	*140*	*136*	*136*	*136*	*139*
Receptor_34	Residential	366682	757744	125	136	139	140	136	136	136	139	12	14	15	11	11	11	14	*136*	*139*	*140*	*136*	*136*	*136*	*139*
Receptor_35	Residential	366768	757788	125	138	137	139	136	137	137	139	13	13	15	12	13	13	15	*138*	*138*	*140*	*136*	*137*	*138*	*140*
Receptor_36	Residential	366854	757833	126	137	138	141	137	136	137	139	11	12	15	11	10	10	12	*135*	*137*	*139*	*135*	*135*	*135*	*137*
Receptor_37	Residential	366941	757877	127	136	139	142	138	136	136	138	10	12	15	11	9	10	11	*135*	*137*	*140*	*136*	*134*	*134*	*136*
Receptor_38	Residential	367027	757922	127	138	138	141	138	137	137	139	11	11	15	11	10	11	12	*136*	*136*	*139*	*136*	*135*	*136*	*137*
Receptor_39	Residential	367113	757966	130	138	136	141	140	137	138	139	8	6	11	10	8	8	9	*133*	*131*	*136*	*135*	*133*	*133*	*134*
Receptor_4	Recreational	367263	755661	125	141	143	146	158	141	141	141	16	17	21	33	16	16	16	*141*	*142*	*146*	*158*	*140*	*141*	*141*
Receptor_40	Residential	367192	757916	130	140	138	143	141	140	140	140	10	8	13	11	10	10	10	*135*	*133*	*138*	*136*	*134*	*134*	*135*
Receptor_41	Residential	367264	757916	132	141	139	144	143	140	141	143	9	7	12	11	8	8	11	*133*	*132*	*137*	*136*	*133*	*133*	*136*
Receptor_42	Residential	367335	757916	134	143	140	145	144	143	143	146	9	6	11	10	9	9	12	*134*	*131*	*135*	*135*	*134*	*134*	*136*
Receptor_43	Residential	367343	757966	133	143	138	143	142	142	142	144	9	4	10	9	9	9	11	*134*	*129*	*135*	*133*	*134*	*134*	*135*
Receptor_44	Residential	367404	757995	133	143	136	143	143	143	143	144	10	3	10	10	10	10	11	*135*	*128*	*135*	*135*	*135*	*135*	*136*
Receptor_45	Residential	367465	758024	135	143	135	142	145	143	143	144	8	0	7	10	8	8	10	*133*	*125*	*132*	*135*	*133*	*133*	*134*
Receptor_46	School	367504	757948	137	146	139	147	146	145	145	146	9	2	10	9	8	9	10	*134*	*127*	*135*	*134*	*133*	*134*	*134*
Receptor_47	School	367544	757873	138	148	143	148	147	148	148	149	10	4	10	8	9	10	11	*134*	*129*	*135*	*133*	*134*	*134*	*135*
Receptor_48	School	367587	757909	139	148	142	149	148	147	147	148	9	3	10	9	8	9	10	*134*	*128*	*135*	*134*	*133*	*133*	*134*
Receptor_49	School	367623	757866	139	148	144	150	149	148	148	151	9	5	11	10	9	9	12	*134*	*130*	*136*	*135*	*134*	*134*	*137*
Receptor_5	Recreational	367224	755749	123	140	138	142	156	140	140	140	17	15	18	33	16	16	17	*141*	*139*	*143*	*158*	*141*	*141*	*141*
Receptor_50	School	367694	757866	141	151	145	151	151	150	150	151	10	5	10	11	9	9	10	*135*	*129*	*135*	*135*	*134*	*134*	*135*
Receptor_51	School	367716	757927	141	149	141	148	151	148	149	150	8	0	7	10	7	7	8	*132*	*125*	*131*	*134*	*132*	*132*	*133*
Receptor_52	School	367737	757988	136	149	138	144	151	148	148	149	13	2	8	15	12	12	12	*137*	*126*	*133*	*140*	*137*	*137*	*137*
Receptor_53	School	367727	758067	136	147	136	144	144	147	147	146	11	0	8	8	10	11	10	*136*	*125*	*133*	*133*	*135*	*135*	*135*
Receptor_54	School	367716	758146	139	146	133	142	140	145	145	144	7	-5	3	1	7	7	6	*132*	*119*	*128*	*126*	*131*	*132*	*131*
Receptor_55	Residential	367673	758189	138	144	132	140	138	144	144	143	6	-6	2	0	6	6	5	*131*	*119*	*127*	*125*	*131*	*131*	*130*
Receptor_56	School	367723	758254	137	143	132	138	137	143	143	142	6	-6	1	0	6	6	5	*131*	*119*	*125*	*125*	*130*	*131*	*129*

Table 15
LAX SPAS
Operational Concentrations

IFRW Flight Rule
NO2, 1-Hour Averaging Time
98th Percentile

		Meters		Average Concentration (µg/m^3)								Project Concentration (µg/m^3)							Total Concentration (NAAQS) (µg/m^3)						
Receptor ID	Type	X	Y	Baseline	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Alt 6	Alt 7	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Alt 6	Alt 7	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Alt 6	Alt 7
Receptor_57	School	367784	758221	139	145	132	139	138	144	144	143	6	-6	0	0	6	6	4	*131*	*119*	*125*	*124*	*130*	*130*	*129*
Receptor_58	School	367845	758189	140	146	133	139	139	145	145	144	6	-7	0	0	5	6	4	*131*	*118*	*124*	*124*	*130*	*130*	*129*
Receptor_59	Residential	367816	758096	141	148	135	143	142	148	148	146	7	-6	3	1	7	7	6	*132*	*119*	*127*	*126*	*132*	*132*	*130*
Receptor_6	Recreational	367186	755838	122	137	134	138	154	137	137	137	15	12	16	32	15	15	15	*140*	*137*	*141*	*157*	*139*	*139*	*140*
Receptor_60	Residential	367898	758066	143	150	137	144	144	149	149	148	7	-6	1	1	6	6	5	*132*	*118*	*126*	*126*	*131*	*131*	*130*
Receptor_61	Residential	367980	758035	145	152	138	145	146	152	151	150	7	-7	0	1	6	6	5	*131*	*117*	*124*	*126*	*131*	*131*	*129*
Receptor_62	Residential	368062	758005	148	154	140	146	149	154	154	152	7	-8	-2	1	6	6	4	*131*	*117*	*123*	*126*	*131*	*131*	*129*
Receptor_63	Residential	368144	757975	150	157	142	147	151	157	157	154	7	-8	-4	1	6	7	3	*131*	*116*	*121*	*126*	*131*	*131*	*128*
Receptor_64	Residential	368226	757945	153	161	144	148	154	160	161	157	8	-8	-5	2	8	8	4	*133*	*116*	*120*	*126*	*132*	*133*	*129*
Receptor_65	Residential	368301	757943	156	161	145	153	154	161	161	157	6	-10	-3	-2	5	6	1	*130*	*114*	*122*	*123*	*130*	*130*	*126*
Receptor_66	Residential	368376	757941	156	162	146	155	155	162	162	158	6	-9	0	-1	6	6	2	*131*	*115*	*124*	*123*	*131*	*131*	*127*
Receptor_67	Residential	368452	757940	156	163	148	156	157	162	162	159	7	-7	0	1	7	6	3	*132*	*118*	*125*	*126*	*131*	*131*	*128*
Receptor_68	Residential	368527	757938	156	163	149	158	161	163	162	160	7	-7	2	6	7	7	4	*132*	*118*	*127*	*130*	*132*	*132*	*129*
Receptor_69	Residential	368563	757880	160	167	153	160	164	167	168	163	7	-7	-1	3	7	8	3	*132*	*117*	*124*	*128*	*131*	*132*	*128*
Receptor_7	Recreational	367147	755926	122	136	136	139	151	136	136	137	14	14	17	29	14	14	15	*139*	*139*	*141*	*153*	*139*	*139*	*140*
Receptor_70	Residential	368636	757926	158	166	151	159	167	166	166	162	8	-8	1	9	7	8	4	*133*	*117*	*125*	*133*	*132*	*132*	*129*
Receptor_71	Residential	368709	757971	155	161	152	156	164	161	163	160	6	-3	2	10	6	9	5	*131*	*122*	*127*	*134*	*131*	*133*	*130*
Receptor_72	Residential	368782	758017	155	157	149	157	162	156	160	157	2	-6	2	7	1	4	2	*127*	*119*	*126*	*132*	*126*	*129*	*126*
Receptor_73	Residential	368855	758062	152	157	149	155	165	156	157	156	5	-3	3	13	4	5	4	*129*	*121*	*128*	*137*	*129*	*130*	*128*
Receptor_74	Residential	368928	758108	151	156	147	154	165	156	156	155	6	-3	4	15	5	6	5	*131*	*122*	*129*	*139*	*130*	*131*	*129*
Receptor_75	Residential	369001	758153	150	156	148	155	165	156	156	155	6	-2	5	15	6	6	5	*131*	*123*	*130*	*140*	*131*	*131*	*130*
Receptor_76	Residential	369058	758074	153	159	152	160	169	157	159	157	6	-1	7	16	4	6	4	*131*	*123*	*132*	*141*	*129*	*130*	*129*
Receptor_77	Residential	369102	758103	152	160	151	161	166	158	160	157	8	-2	9	13	6	7	4	*132*	*123*	*134*	*138*	*131*	*132*	*129*
Receptor_78	Residential	369145	758132	151	158	149	157	167	158	158	156	6	-2	6	15	6	6	5	*131*	*123*	*131*	*140*	*131*	*131*	*130*
Receptor_79	Residential	369200	758065	155	164	152	165	169	163	164	161	9	-3	10	14	7	8	6	*133*	*122*	*135*	*139*	*132*	*133*	*131*
Receptor_8	Recreational	367109	756014	122	141	137	142	151	140	140	141	19	16	20	29	19	19	19	*144*	*140*	*145*	*154*	*143*	*144*	*144*
Receptor_80	Residential	369255	757998	159	169	156	168	172	168	168	167	9	-3	9	13	9	9	8	*134*	*121*	*134*	*138*	*134*	*134*	*133*
Receptor_81	Residential	369310	757931	164	175	159	170	176	174	175	173	10	-6	6	12	10	10	9	*135*	*119*	*131*	*137*	*135*	*135*	*134*
Receptor_82	Residential	369356	757981	162	171	157	166	177	171	170	169	8	-5	3	15	8	8	6	*133*	*119*	*128*	*140*	*133*	*133*	*131*
Receptor_83	Residential	369403	758031	160	167	157	165	171	167	166	165	7	-3	5	11	7	6	5	*131*	*121*	*130*	*136*	*131*	*131*	*130*
Receptor_84	Recreational	369336	758100	156	161	153	160	167	161	160	158	5	-3	4	11	5	4	2	*129*	*121*	*129*	*135*	*129*	*129*	*127*
Receptor_85	Recreational	369269	758170	152	157	150	156	163	157	157	155	5	-3	4	11	5	5	3	*130*	*122*	*129*	*135*	*129*	*130*	*128*
Receptor_86	Recreational	369202	758239	149	156	147	152	160	154	155	153	7	-2	4	11	5	6	4	*131*	*123*	*128*	*135*	*130*	*131*	*129*
Receptor_87	Recreational	369264	758285	151	153	148	152	159	152	153	151	2	-3	1	9	1	2	0	*127*	*122*	*126*	*133*	*126*	*127*	*125*
Receptor_88	Recreational	369326	758330	148	151	146	150	160	150	151	149	2	-2	1	11	1	2	1	*127*	*123*	*126*	*136*	*126*	*127*	*126*
Receptor_89	Recreational	369389	758376	149	152	147	148	161	152	152	152	3	-3	-1	11	2	2	2	*127*	*122*	*124*	*136*	*127*	*127*	*127*
Receptor_9	Recreational	367070	756103	122	140	137	143	148	139	140	142	18	15	21	26	17	18	20	*143*	*140*	*146*	*151*	*142*	*142*	*145*
Receptor_90	Recreational	369389	758462	146	150	144	147	159	150	150	148	4	-2	1	12	4	4	2	*129*	*123*	*125*	*137*	*129*	*129*	*127*
Receptor_91	Recreational	369389	758548	142	148	142	145	153	148	148	145	6	0	2	11	6	6	3	*131*	*125*	*127*	*136*	*130*	*130*	*128*
Receptor_92	Residential	369389	758634	141	144	140	141	151	143	144	144	3	-1	1	10	2	3	3	*128*	*124*	*125*	*135*	*127*	*128*	*128*
Receptor_93	Residential	369469	758630	142	145	140	142	150	144	144	144	2	-2	-1	8	2	2	2	*127*	*123*	*124*	*133*	*126*	*127*	*127*
Receptor_94	Residential	369549	758625	142	145	140	142	149	145	145	145	4	-1	0	8	4	4	3	*128*	*124*	*125*	*133*	*128*	*128*	*128*
Receptor_95	Residential	369630	758621	142	145	141	143	151	145	145	144	3	-1	1	9	3	3	2	*128*	*123*	*126*	*134*	*128*	*128*	*127*
Receptor_96	Residential	369710	758617	145	145	144	145	152	145	144	144	-1	-2	-1	7	-1	-1	-1	*124*	*123*	*124*	*131*	*124*	*124*	*124*
Receptor_97	Residential	369791	758613	146	147	146	145	154	147	147	145	1	0	-1	7	1	1	-2	*126*	*124*	*123*	*132*	*126*	*126*	*123*
Receptor_98	Residential	369791	758514	151	151	148	150	157	151	151	151	1	-3	0	6	1	1	0	*126*	*122*	*124*	*131*	*126*	*126*	*125*
Receptor_99	Residential	369791	758416	155	156	150	152	162	156	156	154	1	-5	-3	7	1	1	-1	*126*	*120*	*121*	*132*	*126*	*125*	*123*

Table 16
LAX SPAS
Operational Concentrations

IFRW Flight Rule
NO2, 1-Hour Averaging Time
98th Percentile

Peak Values

Type	1-Hour NO2 ($\mu g/m^3$)	Location X (m)	Y (m)
Baseline			
Residential	175	370239	755427
School	184	370250	758189
Offsite Worker	355	372622	756509
Recreational	156	369336	758100
On-Site Occupational	212	370400	756850
Alternative 1			
Residential	229	371248	758024
School	180	370361	758236
Offsite Worker	521	372700	756511
Recreational	161	369336	758100
On-Site Occupational	196	370400	756850
Alternative 2			
Residential	212	371248	758024
School	179	369741	755435
Offsite Worker	540	372622	756509
Recreational	153	369336	758100
On-Site Occupational	182	370400	756850
Alternative 3			
Residential	213	371183	758027
School	186	369741	755435
Offsite Worker	540	372700	756511
Recreational	160	369336	758100
On-Site Occupational	182	370400	756850
Alternative 4			
Residential	218	371248	758024
School	186	370308	758196
Offsite Worker	556	372622	756509
Recreational	167	369336	758100
On-Site Occupational	186	370400	756850
Alternative 5			
Residential	229	371248	758024
School	180	370361	758236
Offsite Worker	521	372700	756511
Recreational	161	369336	758100
On-Site Occupational	195	370400	756850
Alternative 6			
Residential	230	371248	758024
School	180	370361	758236
Offsite Worker	521	372700	756511
Recreational	160	369336	758100
On-Site Occupational	196	370400	756850
Alternative 7			
Residential	221	371183	758027
School	178	369643	755434
Offsite Worker	522	372700	756511
Recreational	158	369336	758100
On-Site Occupational	197	370400	756850

Peak Incremental Values

Type	1-Hour NO2 ($\mu g/m^3$)	Location X (m)	Y (m)
Alternative 1			
Residential	66	371248	758024
School	22	369643	755434
Offsite Worker	189	372700	756511
Recreational	19	367109	756014
On-Site Occupational	-17	370400	756850
Alternative 2			
Residential	48	371248	758024
School	21	369643	755434
Offsite Worker	186	372622	756509
Recreational	21	366877	756544
On-Site Occupational	-30	370400	756850
Alternative 3			
Residential	49	371183	758027
School	29	369643	755434
Offsite Worker	218	371005	757357
Recreational	21	367070	756103
On-Site Occupational	-30	370400	756850
Alternative 4			
Residential	54	371248	758024
School	27	369643	755434
Offsite Worker	204	372700	756511
Recreational	33	367263	755661
On-Site Occupational	-26	370400	756850
Alternative 5			
Residential	65	371248	758024
School	22	369643	755434
Offsite Worker	188	372700	756511
Recreational	19	367109	756014
On-Site Occupational	-17	370400	756850
Alternative 6			
Residential	66	371248	758024
School	22	369643	755434
Offsite Worker	189	372700	756511
Recreational	19	367109	756014
On-Site Occupational	-17	370400	756850
Alternative 7			
Residential	57	371183	758027
School	22	369643	755434
Offsite Worker	189	372700	756511
Recreational	20	367070	756103
On-Site Occupational	-15	370400	756850

Total Concentration (NAAQS)

Type	1-Hour NO2 ($\mu g/m^3$)	Location X (m)	Y (m)
Alternative 1			
Residential	*191*	371248	758024
School	*147*	369643	755434
Offsite Worker	*313*	372700	756511
Recreational	*144*	367109	756014
On-Site Occupational	*108*	370400	756850
Alternative 2			
Residential	*173*	371248	758024
School	*146*	369643	755434
Offsite Worker	*310*	372622	756509
Recreational	*146*	366877	756544
On-Site Occupational	*94*	370400	756850
Alternative 3			
Residential	*174*	371183	758027
School	*154*	369643	755434
Offsite Worker	*343*	371005	757357
Recreational	*146*	367070	756103
On-Site Occupational	*95*	370400	756850
Alternative 4			
Residential	*179*	371248	758024
School	*152*	369643	755434
Offsite Worker	*329*	372700	756511
Recreational	*158*	367263	755661
On-Site Occupational	*99*	370400	756850
Alternative 5			
Residential	*190*	371248	758024
School	*146*	369643	755434
Offsite Worker	*313*	372700	756511
Recreational	*143*	367109	756014
On-Site Occupational	*108*	370400	756850
Alternative 6			
Residential	*191*	371248	758024
School	*147*	369643	755434
Offsite Worker	*313*	372700	756511
Recreational	*144*	367109	756014
On-Site Occupational	*108*	370400	756850
Alternative 7			
Residential	*182*	371183	758027
School	*147*	369643	755434
Offsite Worker	*314*	372700	756511
Recreational	*145*	367070	756103
On-Site Occupational	*110*	370400	756850

Notes:
Average concentration is modeled output from AERMOD, version 12060.
Project concentration is difference between given alternative and baseline (project increment).
Total concentration is project concentration plus monitored background concentration.
98th percentile (high 8th high in AERMOD) only applicable to NAAQS.

Table 30

Alternative 1 (VisW)

Note: 3,000,000 m should be added to Y (m) location values to get full UTM Northing (m) coordinate in 1984 WGS.

Peak Concentrations

Pollutant	Averaging Time	Concentration (ug/m3)	Location	
			X (m)	Y (m)
CO	1-hr	3,156	368563	757880
	8-hr	1,305	370400	756850
NO2	1-hr	877	372700	756511
	1-hr NAAQS	532	372622	756509
	Annual	70	372622	756509
SO2	1-hr	383	372700	756511
	1-hr NAAQS	247	372622	756509
	3-hr	209	372622	756509
	24-hr	46	372622	756509
	Annual	18	372622	756509
PM10	24-hr	46	370400	756850
	Annual	25	370400	756850
PM2.5	24-hr	18	370400	756850
	Annual	10	370400	756850

Incremental Concentrations

Pollutant	Averaging Time	Concentration (ug/m3)	Location	
			X (m)	Y (m)
CO	1-hr	1,225	368376	757941
	8-hr	303	370239	755427
NO2	1-hr	356	372700	756511
	1-hr NAAQS	155	372622	756509
	Annual	17	371026	757794
SO2	1-hr	158	372622	756509
	1-hr NAAQS	82	370975	757794
	3-hr	81	372622	756509
	24-hr	14	371026	757794
	Annual	6	371026	757794
PM10	24-hr	3	370998	757194
	Annual	1	370998	757194
PM2.5	24-hr	1	372700	756511
	Annual	1	372622	756509

Total Concentrations

Pollutant	Averaging Time	CAAQS (ug/m3)	NAAQS (ug/m3)
CO	1-hr	5,806	5,806
	8-hr	3,201	2,765
NO2	1-hr	533	279
	Annual	43	43
SO2	1-hr	224	119
	3-hr	N/A	91
	24-hr	30	30
	Annual	N/A	9

CAAQS Significance

Pollutant	Averaging Time	Concentration (ug/m3)	Threshold (ug/m3)	Significant?
CO	1-hr	5,806	23,000	No
	8-hr	3,201	10,000	No
NO2	1-hr	533	339	**Yes**
	Annual	43	57	No
SO2	1-hr	224	655	No
	24-hr	30	105	No

NAAQS Significance

Pollutant	Averaging Time	Concentration (ug/m3)	Threshold (ug/m3)	Significant?
CO	1-hr	5,806	40,000	No
	8-hr	2,765	10,000	No
NO2	1-hr	*279*	188	**Yes**
	Annual	43	100	No
SO2	1-hr	119	196	No
	3-hr	91	1,300	No
	24-hr	30	366	No
	Annual	9	79	No

SCAQMD Significance

Pollutant	Averaging Time	Concentration (ug/m3)	Threshold (ug/m3)	Significant?
PM10	24-hr	2.6	2.5	**Yes**
PM2.5	24-hr	1.2	2.5	No

Note:

The 1971 SO2 national standards (24-hour and annual) were revoked on June 22, 2010; however, they will remain in effect until one year after an area is designated for the 2010 standard.

Since the USEPA has not yet designated areas for the 2010 standard, the revoked SO2 standards are still included in this analysis.

Table 31

Alternative 2 (VisW)

Note: 3,000,000 m should be added to Y (m) location values to get full UTM Northing (m) coordinate in 1984 WGS.

Peak Concentrations

Pollutant	Averaging Time	Concentration (ug/m3)	Location X (m)	Location Y (m)
CO	1-hr	3,187	372622	756509
	8-hr	1,299	370998	757293
NO2	1-hr	698	372622	756509
	1-hr NAAQS	502	372622	756509
	Annual	70	372622	756509
SO2	1-hr	315	372700	756511
	1-hr NAAQS	265	372871	756437
	3-hr	169	372622	756509
	24-hr	48	372622	756509
	Annual	17	372622	756509
PM10	24-hr	46	370400	756850
	Annual	25	370400	756850
PM2.5	24-hr	18	370400	756850
	Annual	10	370400	756850

Incremental Concentrations

Pollutant	Averaging Time	Concentration (ug/m3)	Location X (m)	Location Y (m)
CO	1-hr	1,068	372700	756511
	8-hr	275	372622	756509
NO2	1-hr	250	370975	757794
	1-hr NAAQS	148	372871	756437
	Annual	17	371026	757794
SO2	1-hr	105	370975	757794
	1-hr NAAQS	98	372871	756437
	3-hr	72	372871	756437
	24-hr	14	372700	756511
	Annual	6	371026	757794
PM10	24-hr	3	370998	757194
	Annual	1	370998	757194
PM2.5	24-hr	1	372631	756857
	Annual	1	372622	756509

Total Concentrations

Pollutant	Averaging Time	CAAQS (ug/m3)	NAAQS (ug/m3)
CO	1-hr	5,649	5,649
	8-hr	3,172	2,737
NO2	1-hr	427	273
	Annual	43	43
SO2	1-hr	170	134
	3-hr	N/A	82
	24-hr	30	30
	Annual	N/A	9

CAAQS Significance

Pollutant	Averaging Time	Concentration (ug/m3)	Threshold (ug/m3)	Significant?
CO	1-hr	5,649	23,000	No
	8-hr	3,172	10,000	No
NO2	1-hr	427	339	**Yes**
	Annual	43	57	No
SO2	1-hr	170	655	No
	24-hr	30	105	No

NAAQS Significance

Pollutant	Averaging Time	Concentration (ug/m3)	Threshold (ug/m3)	Significant?
CO	1-hr	5,649	40,000	No
	8-hr	2,737	10,000	No
NO2	1-hr	*273*	188	**Yes**
	Annual	43	100	No
SO2	1-hr	134	196	No
	3-hr	82	1,300	No
	24-hr	30	366	No
	Annual	9	79	No

SCAQMD Significance

Pollutant	Averaging Time	Concentration (ug/m3)	Threshold (ug/m3)	Significant?
PM10	24-hr	2.7	2.5	**Yes**
PM2.5	24-hr	1.3	2.5	No

Note:

The 1971 SO2 national standards (24-hour and annual) were revoked on June 22, 2010; however, they will remain in effect until one year after an area is designated for the 2010 standard.

Since the USEPA has not yet designated areas for the 2010 standard, the revoked SO2 standards are still included in this analysis.

Table 32

Alternative 3 (VisW)

Note: 3,000,000 m should be added to Y (m) location values to get full UTM Northing (m) coordinate in 1984 WGS.

Peak Concentrations

Pollutant	Averaging Time	Concentration (ug/m3)	Location X (m)	Location Y (m)
CO	1-hr	4,080	372622	756509
	8-hr	1,405	372622	756509
NO2	1-hr	857	372622	756509
	1-hr NAAQS	471	372700	756511
	Annual	74	372622	756509
SO2	1-hr	347	372871	756437
	1-hr NAAQS	249	372622	756509
	3-hr	186	372871	756437
	24-hr	48	372622	756509
	Annual	18	372622	756509
PM10	24-hr	74	372913	755342
	Annual	39	372660	757004
PM2.5	24-hr	16	372651	757063
	Annual	9	372660	757004

Incremental Concentrations

Pollutant	Averaging Time	Concentration (ug/m3)	Location X (m)	Location Y (m)
CO	1-hr	2,000	372700	756511
	8-hr	555	372700	756511
NO2	1-hr	313	372622	756509
	1-hr NAAQS	197	371005	757357
	Annual	12	372622	756509
SO2	1-hr	158	371005	757357
	1-hr NAAQS	145	371005	757357
	3-hr	97	372871	756437
	24-hr	19	371005	757357
	Annual	7	371005	757357
PM10	24-hr	70	372913	755342
	Annual	37	372660	757004
PM2.5	24-hr	13	372651	757063
	Annual	7	372660	757004

Total Concentrations

Pollutant	Averaging Time	CAAQS (ug/m3)	NAAQS (ug/m3)
CO	1-hr	6,581	6,581
	8-hr	3,452	3,017
NO2	1-hr	489	321
	Annual	38	38
SO2	1-hr	223	181
	3-hr	N/A	107
	24-hr	35	35
	Annual	N/A	9

CAAQS Significance

Pollutant	Averaging Time	Concentration (ug/m3)	Threshold (ug/m3)	Significant?
CO	1-hr	6,581	23,000	No
	8-hr	3,452	10,000	No
NO2	1-hr	489	339	**Yes**
	Annual	38	57	No
SO2	1-hr	223	655	No
	24-hr	35	105	No

NAAQS Significance

Pollutant	Averaging Time	Concentration (ug/m3)	Threshold (ug/m3)	Significant?
CO	1-hr	6,581	40,000	No
	8-hr	3,017	10,000	No
NO2	1-hr	*321*	188	**Yes**
	Annual	38	100	No
SO2	1-hr	181	196	No
	3-hr	107	1,300	No
	24-hr	35	366	No
	Annual	9	79	No

SCAQMD Significance

Pollutant	Averaging Time	Concentration (ug/m3)	Threshold (ug/m3)	Significant?
PM10	24-hr	70.2	2.5	**Yes**
PM2.5	24-hr	12.5	2.5	**Yes**

Note:

The 1971 SO2 national standards (24-hour and annual) were revoked on June 22, 2010; however, they will remain in effect until one year after an area is designated for the 2010 standard.

Since the USEPA has not yet designated areas for the 2010 standard, the revoked SO2 standards are still included in this analysis.

Table 33

Alternative 4 (VisW)

Note: 3,000,000 m should be added to Y (m) location values to get full UTM Northing (m) coordinate in 1984 WGS.

Peak Concentrations

Pollutant	Averaging Time	Concentration (ug/m3)	Location X (m)	Location Y (m)
CO	1-hr	4,469	370040	755427
	8-hr	1,333	370400	756850
NO2	1-hr	896	372622	756509
	1-hr NAAQS	568	372700	756511
	Annual	71	372622	756509
SO2	1-hr	359	372622	756509
	1-hr NAAQS	288	372622	756509
	3-hr	230	372622	756509
	24-hr	53	372622	756509
	Annual	18	372622	756509
PM10	24-hr	49	370400	756850
	Annual	27	370400	756850
PM2.5	24-hr	18	370400	756850
	Annual	10	370400	756850

Incremental Concentrations

Pollutant	Averaging Time	Concentration (ug/m3)	Location X (m)	Location Y (m)
CO	1-hr	2,120	370040	755427
	8-hr	384	372622	756509
NO2	1-hr	351	372622	756509
	1-hr NAAQS	214	372700	756511
	Annual	14	370975	757794
SO2	1-hr	135	372622	756509
	1-hr NAAQS	94	372622	756509
	3-hr	101	372622	756509
	24-hr	18	372622	756509
	Annual	6	372622	756509
PM10	24-hr	4	373065	755906
	Annual	2	373065	755906
PM2.5	24-hr	2	372622	756509
	Annual	1	372622	756509

Total Concentrations

Pollutant	Averaging Time	CAAQS (ug/m3)	NAAQS (ug/m3)
CO	1-hr	6,701	6,701
	8-hr	3,282	2,847
NO2	1-hr	528	339
	Annual	40	40
SO2	1-hr	200	130
	3-hr	N/A	112
	24-hr	33	33
	Annual	N/A	9

CAAQS Significance

Pollutant	Averaging Time	Concentration (ug/m3)	Threshold (ug/m3)	Significant?
CO	1-hr	6,701	23,000	No
	8-hr	3,282	10,000	No
NO2	1-hr	528	339	**Yes**
	Annual	40	57	No
SO2	1-hr	200	655	No
	24-hr	33	105	No

NAAQS Significance

Pollutant	Averaging Time	Concentration (ug/m3)	Threshold (ug/m3)	Significant?
CO	1-hr	6,701	40,000	No
	8-hr	2,847	10,000	No
NO2	1-hr	*339*	188	**Yes**
	Annual	40	100	No
SO2	1-hr	130	196	No
	3-hr	112	1,300	No
	24-hr	33	366	No
	Annual	9	79	No

SCAQMD Significance

Pollutant	Averaging Time	Concentration (ug/m3)	Threshold (ug/m3)	Significant?
PM10	24-hr	4.4	2.5	**Yes**
PM2.5	24-hr	2.0	2.5	No

Note:

The 1971 SO2 national standards (24-hour and annual) were revoked on June 22, 2010; however, they will remain in effect until one year after an area is designated for the 2010 standard.

Since the USEPA has not yet designated areas for the 2010 standard, the revoked SO2 standards are still included in this analysis.

Table 34

Alternative 5 (VisW)

Note: 3,000,000 m should be added to Y (m) location values to get full UTM Northing (m) coordinate in 1984 WGS.

Peak Concentrations

Pollutant	Averaging Time	Concentration (ug/m3)	Location X (m)	Location Y (m)
CO	1-hr	3,257	368563	757880
	8-hr	1,305	370400	756850
NO2	1-hr	876	372700	756511
	1-hr NAAQS	532	372622	756509
	Annual	70	372622	756509
SO2	1-hr	382	372700	756511
	1-hr NAAQS	247	372622	756509
	3-hr	209	372622	756509
	24-hr	46	372622	756509
	Annual	18	372622	756509
PM10	24-hr	46	370400	756850
	Annual	25	370400	756850
PM2.5	24-hr	18	370400	756850
	Annual	10	370400	756850

Incremental Concentrations

Pollutant	Averaging Time	Concentration (ug/m3)	Location X (m)	Location Y (m)
CO	1-hr	1,301	368563	757880
	8-hr	303	370239	755427
NO2	1-hr	355	372700	756511
	1-hr NAAQS	154	372622	756509
	Annual	17	371026	757794
SO2	1-hr	157	372622	756509
	1-hr NAAQS	82	370975	757794
	3-hr	80	372622	756509
	24-hr	14	371026	757794
	Annual	6	371026	757794
PM10	24-hr	3	370998	757194
	Annual	1	370998	757194
PM2.5	24-hr	1	372700	756511
	Annual	1	372622	756509

Total Concentrations

Pollutant	Averaging Time	CAAQS (ug/m3)	NAAQS (ug/m3)
CO	1-hr	5,882	5,882
	8-hr	3,201	2,765
NO2	1-hr	532	279
	Annual	43	43
SO2	1-hr	222	119
	3-hr	N/A	90
	24-hr	30	30
	Annual	N/A	9

CAAQS Significance

Pollutant	Averaging Time	Concentration (ug/m3)	Threshold (ug/m3)	Significant?
CO	1-hr	5,882	23,000	No
	8-hr	3,201	10,000	No
NO2	1-hr	532	339	**Yes**
	Annual	43	57	No
SO2	1-hr	222	655	No
	24-hr	30	105	No

NAAQS Significance

Pollutant	Averaging Time	Concentration (ug/m3)	Threshold (ug/m3)	Significant?
CO	1-hr	5,882	40,000	No
	8-hr	2,765	10,000	No
NO2	1-hr	*279*	188	**Yes**
	Annual	43	100	No
SO2	1-hr	119	196	No
	3-hr	90	1,300	No
	24-hr	30	366	No
	Annual	9	79	No

SCAQMD Significance

Pollutant	Averaging Time	Concentration (ug/m3)	Threshold (ug/m3)	Significant?
PM10	24-hr	2.6	2.5	**Yes**
PM2.5	24-hr	1.1	2.5	No

Note:

The 1971 SO2 national standards (24-hour and annual) were revoked on June 22, 2010; however, they will remain in effect until one year after an area is designated for the 2010 standard.

Since the USEPA has not yet designated areas for the 2010 standard, the revoked SO2 standards are still included in this analysis.

Table 35

Alternative 6 (VisW)

Note: 3,000,000 m should be added to Y (m) location values to get full UTM Northing (m) coordinate in 1984 WGS.

Peak Concentrations

Pollutant	Averaging Time	Concentration (ug/m3)	Location X (m)	Location Y (m)
CO	1-hr	3,079	370998	757293
	8-hr	1,293	370400	756850
NO2	1-hr	876	372700	756511
	1-hr NAAQS	531	372622	756509
	Annual	70	372622	756509
SO2	1-hr	380	372700	756511
	1-hr NAAQS	245	372622	756509
	3-hr	207	372622	756509
	24-hr	45	372622	756509
	Annual	17	372622	756509
PM10	24-hr	46	370400	756850
	Annual	25	370400	756850
PM2.5	24-hr	18	370400	756850
	Annual	10	370400	756850

Incremental Concentrations

Pollutant	Averaging Time	Concentration (ug/m3)	Location X (m)	Location Y (m)
CO	1-hr	1,109	368301	757943
	8-hr	294	370239	755427
NO2	1-hr	354	372700	756511
	1-hr NAAQS	153	372622	756509
	Annual	17	371026	757794
SO2	1-hr	154	372622	756509
	1-hr NAAQS	81	370975	757794
	3-hr	78	372622	756509
	24-hr	14	371026	757794
	Annual	6	371026	757794
PM10	24-hr	3	370998	757194
	Annual	1	370998	757194
PM2.5	24-hr	1	372700	756511
	Annual	1	372622	756509

Total Concentrations

Pollutant	Averaging Time	CAAQS (ug/m3)	NAAQS (ug/m3)
CO	1-hr	5,689	5,689
	8-hr	3,191	2,756
NO2	1-hr	531	278
	Annual	43	43
SO2	1-hr	219	118
	3-hr	N/A	89
	24-hr	30	30
	Annual	N/A	9

CAAQS Significance

Pollutant	Averaging Time	Concentration (ug/m3)	Threshold (ug/m3)	Significant?
CO	1-hr	5,689	23,000	No
	8-hr	3,191	10,000	No
NO2	1-hr	531	339	**Yes**
	Annual	43	57	No
SO2	1-hr	219	655	No
	24-hr	30	105	No

NAAQS Significance

Pollutant	Averaging Time	Concentration (ug/m3)	Threshold (ug/m3)	Significant?
CO	1-hr	5,689	40,000	No
	8-hr	2,756	10,000	No
NO2	1-hr	*278*	188	**Yes**
	Annual	43	100	No
SO2	1-hr	118	196	No
	3-hr	89	1,300	No
	24-hr	30	366	No
	Annual	9	79	No

SCAQMD Significance

Pollutant	Averaging Time	Concentration (ug/m3)	Threshold (ug/m3)	Significant?
PM10	24-hr	2.6	2.5	**Yes**
PM2.5	24-hr	1.1	2.5	No

Note:

The 1971 SO2 national standards (24-hour and annual) were revoked on June 22, 2010; however, they will remain in effect until one year after an area is designated for the 2010 standard.

Since the USEPA has not yet designated areas for the 2010 standard, the revoked SO2 standards are still included in this analysis.

Table 36

Alternative 7 (VisW)

Note: 3,000,000 m should be added to Y (m) location values to get full UTM Northing (m) coordinate in 1984 WGS.

Peak Concentrations

Pollutant	Averaging Time	Concentration (ug/m3)	Location X (m)	Location Y (m)
CO	1-hr	3,264	370998	757194
	8-hr	1,370	370998	757194
NO2	1-hr	876	372700	756511
	1-hr NAAQS	532	372622	756509
	Annual	70	372622	756509
SO2	1-hr	381	372700	756511
	1-hr NAAQS	246	372622	756509
	3-hr	208	372622	756509
	24-hr	46	372622	756509
	Annual	18	372622	756509
PM10	24-hr	47	370400	756850
	Annual	25	370400	756850
PM2.5	24-hr	19	370400	756850
	Annual	10	370400	756850

Incremental Concentrations

Pollutant	Averaging Time	Concentration (ug/m3)	Location X (m)	Location Y (m)
CO	1-hr	1,155	367980	758035
	8-hr	299	370239	755427
NO2	1-hr	355	372700	756511
	1-hr NAAQS	154	372622	756509
	Annual	12	371026	757794
SO2	1-hr	155	372622	756509
	1-hr NAAQS	101	371005	757357
	3-hr	79	372622	756509
	24-hr	14	371005	757357
	Annual	5	372622	756509
PM10	24-hr	3	370998	757194
	Annual	1	370998	757194
PM2.5	24-hr	1	372700	756511
	Annual	1	372622	756509

Total Concentrations

Pollutant	Averaging Time	CAAQS (ug/m3)	NAAQS (ug/m3)
CO	1-hr	5,736	5,736
	8-hr	3,197	2,762
NO2	1-hr	532	279
	Annual	39	39
SO2	1-hr	221	137
	3-hr	N/A	90
	24-hr	29	29
	Annual	N/A	8

CAAQS Significance

Pollutant	Averaging Time	Concentration (ug/m3)	Threshold (ug/m3)	Significant?
CO	1-hr	5,736	23,000	No
	8-hr	3,197	10,000	No
NO2	1-hr	532	339	**Yes**
	Annual	39	57	No
SO2	1-hr	221	655	No
	24-hr	29	105	No

NAAQS Significance

Pollutant	Averaging Time	Concentration (ug/m3)	Threshold (ug/m3)	Significant?
CO	1-hr	5,736	40,000	No
	8-hr	2,762	10,000	No
NO2	1-hr	*279*	188	**Yes**
	Annual	39	100	No
SO2	1-hr	137	196	No
	3-hr	90	1,300	No
	24-hr	29	366	No
	Annual	8	79	No

SCAQMD Significance

Pollutant	Averaging Time	Concentration (ug/m3)	Threshold (ug/m3)	Significant?
PM10	24-hr	3.4	2.5	**Yes**
PM2.5	24-hr	1.1	2.5	No

Note:

The 1971 SO2 national standards (24-hour and annual) were revoked on June 22, 2010; however, they will remain in effect until one year after an area is designated for the 2010 standard.

Since the USEPA has not yet designated areas for the 2010 standard, the revoked SO2 standards are still included in this analysis.

Table 43																									
LAX SPAS																								VisW Flight Rule	
Operational Concentrations																								NO2, 1-Hour Averaging Time	
																								98th Percentile	
		Meters		Average Concentration (µg/m^3)								Project Concentration (µg/m^3)							Total Concentration (NAAQS) (µg/m^3)						
Receptor ID	Type	X	Y	Baseline	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Alt 6	Alt 7	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Alt 6	Alt 7	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Alt 6	Alt 7
Receptor_1	Recreational	367379	755396	126	138	138	146	144	138	138	138	12	12	20	18	12	12	12	*137*	*137*	*145*	*143*	*137*	*137*	*137*
Receptor_10	Recreational	367032	756191	124	135	136	134	135	135	134	134	11	12	11	12	11	11	11	*136*	*137*	*135*	*137*	*136*	*136*	*136*
Receptor_100	Residential	369791	758318	164	155	158	151	160	155	154	152	-9	-6	-13	-4	-9	-10	-12	*116*	*118*	*112*	*121*	*116*	*115*	*113*
Receptor_101	Residential	369881	758318	161	155	158	153	161	155	154	154	-6	-2	-8	0	-6	-6	-7	*119*	*122*	*117*	*125*	*119*	*118*	*118*
Receptor_102	Residential	369972	758318	161	156	160	157	162	156	156	155	-5	-1	-4	0	-5	-5	-6	*120*	*124*	*121*	*125*	*120*	*119*	*119*
Receptor_103	Residential	370062	758318	168	158	159	155	163	158	157	155	-11	-9	-13	-5	-10	-11	-13	*114*	*116*	*112*	*120*	*114*	*114*	*112*
Receptor_104	Residential	370153	758318	169	158	161	157	164	158	157	155	-11	-7	-11	-5	-11	-12	-14	*113*	*117*	*113*	*120*	*114*	*113*	*110*
Receptor_105	Residential	370243	758318	166	158	165	157	167	158	158	156	-8	-1	-9	1	-8	-8	-10	*117*	*124*	*116*	*126*	*117*	*117*	*115*
Receptor_106	School	370247	758254	173	162	170	159	170	162	162	159	-10	-3	-14	-2	-10	-11	-14	*115*	*122*	*111*	*123*	*115*	*114*	*111*
Receptor_107	School	370250	758189	181	164	172	164	177	165	164	163	-17	-9	-18	-5	-17	-18	-18	*108*	*115*	*107*	*120*	*108*	*107*	*106*
Receptor_108	School	370308	758196	177	165	176	165	177	165	164	163	-12	0	-12	0	-12	-13	-14	*113*	*124*	*113*	*125*	*113*	*112*	*111*
Receptor_109	School	370361	758236	174	164	173	161	175	165	164	160	-10	-1	-13	1	-10	-10	-14	*115*	*124*	*112*	*126*	*115*	*115*	*111*
Receptor_11	Recreational	366993	756279	124	133	135	132	132	133	132	133	8	11	8	8	8	8	8	*133*	*135*	*132*	*133*	*133*	*133*	*133*
Receptor_110	School	370415	758275	168	162	173	161	175	163	162	161	-6	4	-7	7	-6	-6	-7	*119*	*129*	*118*	*132*	*119*	*118*	*118*
Receptor_111	Residential	370408	758347	163	159	169	158	169	160	159	157	-3	6	-5	6	-3	-4	-5	*122*	*131*	*120*	*131*	*122*	*121*	*120*
Receptor_112	Residential	370490	758344	165	162	170	162	170	162	162	159	-3	5	-3	5	-3	-3	-6	*122*	*130*	*122*	*130*	*122*	*122*	*119*
Receptor_113	Residential	370572	758341	166	161	177	163	173	161	161	159	-5	11	-3	7	-5	-5	-7	*120*	*136*	*122*	*132*	*120*	*120*	*118*
Receptor_114	Residential	370654	758338	168	164	171	169	175	164	164	161	-4	3	1	7	-4	-4	-7	*121*	*128*	*126*	*132*	*121*	*121*	*118*
Receptor_115	Residential	370735	758335	162	167	170	174	176	167	167	164	5	8	12	14	5	5	2	*130*	*133*	*136*	*138*	*130*	*129*	*127*
Receptor_116	Residential	370817	758333	164	169	172	162	176	169	169	167	5	7	-3	12	5	5	3	*130*	*132*	*122*	*137*	*130*	*129*	*128*
Receptor_117	Offsite Worker	370814	758243	172	177	179	171	185	177	177	174	5	8	-1	13	5	5	2	*130*	*132*	*123*	*138*	*130*	*130*	*127*
Receptor_118	Offsite Worker	370810	758153	174	188	190	180	195	188	188	182	15	16	6	22	15	14	8	*139*	*141*	*131*	*146*	*139*	*139*	*133*
Receptor_119	Offsite Worker	370807	758063	180	200	205	187	209	200	200	194	20	26	7	29	20	20	14	*145*	*150*	*132*	*154*	*145*	*145*	*139*
Receptor_12	Recreational	366954	756367	123	133	133	133	134	133	132	133	9	10	9	10	9	9	9	*134*	*135*	*134*	*135*	*134*	*134*	*134*
Receptor_120	Offsite Worker	370803	757974	185	220	223	199	231	220	220	210	34	37	14	46	34	34	25	*159*	*162*	*139*	*170*	*159*	*159*	*149*
Receptor_121	Offsite Worker	370835	757927	182	233	241	209	249	233	233	220	51	59	27	67	51	51	38	*176*	*183*	*152*	*192*	*176*	*176*	*163*
Receptor_122	Offsite Worker	370868	757880	184	253	251	224	261	253	254	235	69	67	40	77	69	70	51	*194*	*192*	*165*	*202*	*194*	*194*	*176*
Receptor_123	Offsite Worker	370921	757884	186	269	248	223	251	269	269	247	84	63	37	65	83	84	61	*208*	*187*	*162*	*190*	*208*	*209*	*186*
Receptor_124	Offsite Worker	370975	757887	183	262	254	227	247	262	262	249	79	71	43	64	79	79	66	*204*	*196*	*168*	*188*	*204*	*203*	*190*
Receptor_125	Offsite Worker	370975	757794	192	315	294	257	272	315	314	285	123	102	65	80	123	123	94	*248*	*227*	*190*	*205*	*248*	*247*	*218*
Receptor_126	Offsite Worker	371026	757794	187	280	287	261	276	280	280	270	93	100	74	89	93	93	83	*218*	*225*	*199*	*214*	*218*	*217*	*208*
Receptor_127	Offsite Worker	371076	757877	177	244	251	235	233	244	244	238	68	75	58	57	68	67	61	*193*	*199*	*183*	*181*	*193*	*192*	*186*
Receptor_128	Offsite Worker	371126	757959	171	223	219	215	216	223	222	217	52	48	44	45	52	51	46	*176*	*172*	*169*	*170*	*176*	*176*	*171*
Receptor_129	Offsite Worker	371119	758031	168	220	214	201	202	220	219	217	52	46	33	34	52	52	49	*177*	*171*	*158*	*159*	*177*	*176*	*174*
Receptor_13	Recreational	366916	756456	123	133	129	131	135	133	133	133	10	6	8	12	10	10	10	*135*	*131*	*132*	*137*	*135*	*134*	*134*
Receptor_130	Residential	371183	758027	166	209	205	199	205	209	209	206	44	39	33	39	44	43	40	*168*	*164*	*157*	*164*	*168*	*168*	*165*
Receptor_131	Residential	371248	758024	164	204	201	191	197	204	204	195	40	37	27	33	40	40	31	*165*	*162*	*152*	*157*	*165*	*165*	*156*
Receptor_132	Residential	371326	758075	162	192	192	188	190	192	192	187	30	30	26	28	30	30	25	*155*	*155*	*151*	*153*	*155*	*155*	*150*
Receptor_133	Residential	371404	758127	157	185	183	180	182	185	185	181	28	26	23	25	28	28	24	*153*	*151*	*148*	*150*	*153*	*153*	*149*
Receptor_134	Residential	371481	758178	153	182	177	175	179	181	181	177	29	25	22	26	29	29	24	*154*	*149*	*147*	*151*	*153*	*154*	*149*
Receptor_135	Residential	371559	758230	149	175	172	172	174	174	174	172	26	23	23	25	25	26	23	*150*	*148*	*148*	*150*	*150*	*150*	*148*
Receptor_136	Residential	371637	758281	146	170	167	167	168	170	170	168	24	21	22	22	24	24	22	*149*	*146*	*147*	*147*	*149*	*149*	*147*
Receptor_137	Residential	371715	758333	143	165	163	164	163	165	166	164	23	20	22	20	23	23	21	*148*	*145*	*146*	*145*	*147*	*148*	*146*
Receptor_138	Residential	371769	758261	148	165	165	163	166	165	165	166	17	17	15	18	17	17	18	*142*	*142*	*140*	*143*	*142*	*142*	*143*
Receptor_139	Residential	371822	758189	153	166	166	167	169	166	166	166	13	13	14	16	12	13	12	*137*	*138*	*139*	*141*	*137*	*137*	*137*
Receptor_14	Recreational	366877	756544	122	137	133	133	130	137	137	137	15	11	11	8	15	15	15	*140*	*135*	*136*	*133*	*140*	*139*	*140*
Receptor_140	Residential	371894	758160	153	167	169	167	169	167	167	166	14	15	13	15	13	14	13	*138*	*140*	*138*	*140*	*138*	*138*	*138*
Receptor_141	Residential	371894	758081	158	170	176	175	172	170	171	172	13	18	17	14	13	13	15	*138*	*143*	*142*	*139*	*137*	*138*	*139*
Receptor_142	Residential	371959	758074	155	167	168	171	166	166	167	167	11	13	16	11	11	12	12	*136*	*138*	*141*	*135*	*136*	*136*	*137*
Receptor_143	Offsite Worker	371953	757977	163	172	171	173	165	172	172	170	9	8	10	2	9	9	7	*134*	*132*	*135*	*127*	*134*	*134*	*132*
Receptor_144	Offsite Worker	371948	757880	156	175	172	173	175	175	175	170	19	16	18	19	19	19	14	*144*	*141*	*142*	*144*	*143*	*144*	*139*
Receptor_145	Offsite Worker	371943	757783	158	172	176	173	175	172	172	174	15	18	16	18	15	15	16	*140*	*143*	*140*	*142*	*140*	*140*	*141*
Receptor_146	Offsite Worker	372016	757794	154	169	174	170	173	169	169	168	15	19	15	19	14	14	14	*139*	*144*	*140*	*143*	*139*	*139*	*139*
Receptor_147	Offsite Worker	372102	757791	152	165	171	166	171	165	165	168	14	19	14	19	14	13	16	*138*	*144*	*139*	*144*	*138*	*138*	*141*

Table 43
LAX SPAS
Operational Concentrations

VisW Flight Rule
NO2, 1-Hour Averaging Time
98th Percentile

		Meters		Average Concentration (µg/m^3)								Project Concentration (µg/m^3)							Total Concentration (NAAQS) (µg/m^3)						
Receptor ID	**Type**	**X**	**Y**	**Baseline**	**Alt 1**	**Alt 2**	**Alt 3**	**Alt 4**	**Alt 5**	**Alt 6**	**Alt 7**	**Alt 1**	**Alt 2**	**Alt 3**	**Alt 4**	**Alt 5**	**Alt 6**	**Alt 7**	**Alt 1**	**Alt 2**	**Alt 3**	**Alt 4**	**Alt 5**	**Alt 6**	**Alt 7**
Receptor_148	Offsite Worker	372178	757760	150	167	169	163	167	167	167	169	17	19	13	17	17	17	19	*142*	*143*	*138*	*142*	*142*	*142*	*144*
Receptor_149	Offsite Worker	372177	757670	149	166	170	168	170	166	166	164	17	22	19	22	17	17	15	*142*	*146*	*144*	*147*	*142*	*142*	*140*
Receptor_15	Recreational	366839	756632	123	136	133	131	131	136	136	137	13	10	8	8	13	13	14	*138*	*135*	*133*	*133*	*138*	*138*	*139*
Receptor_150	Offsite Worker	372176	757579	149	161	170	172	164	161	161	165	12	21	22	15	12	12	16	*137*	*146*	*147*	*140*	*136*	*137*	*141*
Receptor_151	Offsite Worker	372174	757489	153	161	169	175	165	160	161	162	7	16	22	12	7	8	9	*132*	*141*	*147*	*137*	*132*	*133*	*133*
Receptor_152	Offsite Worker	372173	757398	154	163	176	165	167	163	163	163	9	21	11	13	9	9	8	*134*	*146*	*136*	*138*	*134*	*134*	*133*
Receptor_153	Offsite Worker	372171	757308	155	168	172	171	172	168	168	168	13	17	15	17	13	12	12	*137*	*142*	*140*	*142*	*137*	*137*	*137*
Receptor_154	Offsite Worker	372055	757309	154	172	173	173	173	172	172	172	18	19	19	19	18	18	18	*143*	*144*	*144*	*144*	*143*	*142*	*143*
Receptor_155	Residential	372055	757363	154	168	176	169	169	168	168	168	13	21	15	15	13	13	14	*138*	*146*	*140*	*139*	*138*	*138*	*139*
Receptor_156	Offsite Worker	372055	757416	155	168	174	170	167	168	168	168	13	19	15	13	13	13	13	*138*	*144*	*140*	*138*	*138*	*138*	*138*
Receptor_157	Offsite Worker	371952	757442	155	167	178	172	170	167	167	171	12	23	17	15	12	12	15	*137*	*148*	*142*	*140*	*137*	*137*	*140*
Receptor_158	Offsite Worker	371950	757345	159	168	176	170	174	168	168	173	9	17	11	14	9	9	14	*134*	*142*	*136*	*139*	*134*	*133*	*138*
Receptor_159	Offsite Worker	371864	757344	162	168	177	172	168	168	168	171	6	15	10	6	6	6	9	*131*	*139*	*135*	*131*	*131*	*131*	*134*
Receptor_16	Recreational	366800	756720	124	138	133	129	132	137	138	137	13	8	5	8	13	13	12	*138*	*133*	*130*	*132*	*138*	*138*	*137*
Receptor_160	Offsite Worker	371790	757347	165	172	181	178	170	172	172	184	7	16	13	5	7	7	19	*132*	*141*	*138*	*130*	*132*	*132*	*144*
Receptor_161	Offsite Worker	371708	757356	163	174	189	186	174	174	174	183	11	26	23	11	11	11	20	*136*	*150*	*148*	*136*	*136*	*136*	*144*
Receptor_162	Offsite Worker	371615	757356	162	182	196	197	180	182	182	187	20	34	35	18	20	20	25	*145*	*159*	*160*	*143*	*145*	*145*	*150*
Receptor_163	Offsite Worker	371523	757356	162	190	201	210	182	190	190	195	28	39	48	20	28	28	33	*153*	*164*	*173*	*145*	*153*	*153*	*158*
Receptor_164	Offsite Worker	371430	757356	165	198	205	232	187	198	198	207	33	40	67	22	33	33	42	*158*	*165*	*192*	*147*	*158*	*158*	*167*
Receptor_165	Offsite Worker	371338	757356	168	217	210	259	194	217	217	222	49	42	91	26	49	49	54	*173*	*166*	*216*	*150*	*173*	*173*	*179*
Receptor_166	Offsite Worker	371245	757356	170	234	217	282	200	234	234	250	64	47	113	30	64	65	80	*189*	*172*	*237*	*155*	*189*	*190*	*205*
Receptor_167	Offsite Worker	371153	757356	175	246	227	320	214	246	245	285	71	52	146	39	71	71	110	*196*	*177*	*270*	*164*	*196*	*196*	*235*
Receptor_168	Offsite Worker	371061	757356	179	266	273	350	227	265	267	304	87	94	172	49	87	88	125	*212*	*219*	*297*	*174*	*211*	*213*	*250*
Receptor_169	Offsite Worker	371005	757357	182	255	275	378	235	255	255	312	74	93	197	53	73	73	131	*198*	*218*	*321*	*178*	*198*	*198*	*255*
Receptor_17	Recreational	366762	756809	125	136	130	127	134	136	135	136	10	5	2	9	10	10	11	*135*	*129*	*126*	*134*	*135*	*135*	*136*
Receptor_170	Offsite Worker	370998	757293	186	218	243	307	202	218	218	243	33	57	122	17	33	33	57	*158*	*182*	*246*	*141*	*158*	*157*	*182*
Receptor_171	Offsite Worker	370998	757194	185	207	217	250	174	207	206	231	21	32	65	-11	21	21	45	*146*	*156*	*190*	*114*	*146*	*146*	*170*
Receptor_172	Offsite Worker	370998	757096	185	179	205	213	167	179	179	193	-6	20	28	-18	-6	-6	8	*119*	*145*	*153*	*107*	*119*	*119*	*132*
Receptor_173	Offsite Worker	370998	756998	192	170	183	194	166	170	170	171	-22	-9	2	-25	-22	-22	-21	*103*	*116*	*127*	*99*	*103*	*103*	*104*
Receptor_174	Offsite Worker	371057	756997	181	169	187	187	166	169	168	173	-12	6	6	-15	-12	-12	-8	*113*	*131*	*131*	*109*	*113*	*112*	*117*
Receptor_175	Offsite Worker	371153	756997	176	167	179	187	165	167	167	169	-9	3	11	-11	-9	-9	-7	*116*	*128*	*136*	*114*	*116*	*116*	*118*
Receptor_176	Offsite Worker	371249	756997	178	166	179	181	169	166	166	167	-12	1	3	-9	-12	-12	-12	*113*	*126*	*128*	*116*	*113*	*113*	*113*
Receptor_177	Offsite Worker	371345	756997	172	166	180	177	172	166	165	169	-6	8	5	0	-6	-7	-2	*119*	*133*	*130*	*125*	*119*	*118*	*122*
Receptor_178	Offsite Worker	371440	756997	164	169	173	172	173	169	168	169	5	9	8	9	5	5	5	*130*	*134*	*133*	*134*	*130*	*129*	*130*
Receptor_179	Offsite Worker	371536	756997	159	173	169	174	181	173	173	173	14	10	15	22	14	14	14	*139*	*134*	*140*	*147*	*139*	*138*	*138*
Receptor_18	Recreational	366723	756897	125	137	129	128	133	137	137	140	12	4	4	8	12	12	16	*137*	*129*	*129*	*133*	*137*	*137*	*141*
Receptor_180	Offsite Worker	371632	756997	162	171	166	180	187	171	171	177	10	4	19	25	10	10	15	*135*	*129*	*143*	*150*	*135*	*134*	*140*
Receptor_181	Offsite Worker	371728	756997	162	180	171	183	189	180	180	181	19	9	21	27	19	18	20	*143*	*134*	*146*	*152*	*143*	*143*	*145*
Receptor_182	Offsite Worker	371824	756997	164	190	175	190	192	190	189	190	26	11	26	29	26	26	26	*151*	*136*	*151*	*153*	*151*	*150*	*151*
Receptor_183	Offsite Worker	371920	756997	162	200	187	188	191	200	200	200	38	25	25	28	38	37	38	*163*	*150*	*150*	*153*	*163*	*162*	*162*
Receptor_184	Offsite Worker	372016	756997	164	202	199	192	202	202	201	202	37	35	27	38	37	37	37	*162*	*160*	*152*	*163*	*162*	*162*	*162*
Receptor_185	Offsite Worker	372111	756997	168	207	207	205	211	207	207	207	39	39	36	42	39	38	39	*164*	*163*	*161*	*167*	*163*	*163*	*163*
Receptor_186	Offsite Worker	372207	756997	172	205	210	201	207	205	204	205	33	38	28	35	33	32	32	*157*	*163*	*153*	*160*	*157*	*157*	*157*
Receptor_187	Offsite Worker	372303	756997	179	199	210	202	205	199	199	199	20	31	23	26	20	20	20	*145*	*155*	*148*	*151*	*145*	*144*	*145*
Receptor_188	Offsite Worker	372399	756997	185	209	208	210	209	208	208	208	24	23	25	24	24	24	24	*149*	*148*	*150*	*149*	*149*	*148*	*149*
Receptor_189	Offsite Worker	372495	756997	179	203	212	199	210	203	203	203	24	33	20	32	24	24	24	*149*	*157*	*145*	*156*	*149*	*149*	*149*
Receptor_19	Recreational	366685	756985	126	137	127	130	136	137	137	138	12	1	4	11	12	12	12	*137*	*126*	*129*	*135*	*137*	*136*	*137*
Receptor_190	Offsite Worker	372591	756997	173	211	204	198	203	211	211	211	37	31	24	30	37	37	37	*162*	*156*	*149*	*154*	*162*	*162*	*162*
Receptor_191	Offsite Worker	372610	757063	165	200	194	187	190	200	200	200	34	29	22	25	34	34	34	*159*	*154*	*146*	*150*	*159*	*159*	*159*
Receptor_192	Offsite Worker	372612	757132	160	189	186	181	180	189	189	189	29	26	21	20	29	29	29	*154*	*150*	*146*	*145*	*154*	*154*	*154*
Receptor_193	Offsite Worker	372614	757201	155	179	178	174	173	179	179	179	24	23	19	18	24	24	24	*149*	*148*	*144*	*143*	*149*	*149*	*149*
Receptor_194	Offsite Worker	372616	757270	152	174	173	169	168	174	174	174	22	20	17	16	22	21	22	*146*	*145*	*141*	*140*	*146*	*146*	*146*
Receptor_195	Offsite Worker	372627	757351	148	167	166	167	163	167	167	167	19	18	19	15	19	19	19	*144*	*143*	*144*	*139*	*144*	*144*	*144*
Receptor_196	Offsite Worker	372651	757422	148	165	168	163	159	165	165	166	17	20	15	11	17	17	18	*142*	*145*	*140*	*136*	*142*	*142*	*142*

Table 43

LAX SPAS — **VisW Flight Rule**

Operational Concentrations — **NO2, 1-Hour Averaging Time**

98th Percentile

		Meters		Average Concentration (µg/m^3)								Project Concentration (µg/m^3)							Total Concentration (NAAQS) (µg/m^3)						
Receptor ID	**Type**	**X**	**Y**	**Baseline**	**Alt 1**	**Alt 2**	**Alt 3**	**Alt 4**	**Alt 5**	**Alt 6**	**Alt 7**	**Alt 1**	**Alt 2**	**Alt 3**	**Alt 4**	**Alt 5**	**Alt 6**	**Alt 7**	**Alt 1**	**Alt 2**	**Alt 3**	**Alt 4**	**Alt 5**	**Alt 6**	**Alt 7**
Receptor_197	Offsite Worker	372676	757494	147	163	164	162	157	163	163	163	17	18	15	10	17	16	16	*141*	*142*	*140*	*135*	*141*	*141*	*141*
Receptor_198	Offsite Worker	372704	757569	146	162	159	159	156	162	162	162	16	13	12	9	16	16	16	*140*	*137*	*137*	*134*	*140*	*140*	*141*
Receptor_199	Offsite Worker	372733	757645	147	158	158	160	155	158	158	158	12	12	13	8	12	11	12	*136*	*136*	*138*	*133*	*136*	*136*	*136*
Receptor_2	Recreational	367340	755485	125	140	136	146	146	140	140	140	15	11	21	21	15	15	15	*140*	*136*	*146*	*146*	*140*	*140*	*140*
Receptor_20	Recreational	366646	757074	127	135	126	130	133	135	135	136	8	-1	3	6	8	8	9	*133*	*124*	*127*	*131*	*133*	*133*	*134*
Receptor_200	Offsite Worker	372746	757702	148	154	161	158	155	154	154	154	7	13	10	7	7	6	7	*131*	*138*	*135*	*132*	*131*	*131*	*131*
Receptor_201	Offsite Worker	372746	757768	150	153	161	153	153	153	153	158	3	11	4	4	3	3	8	*128*	*136*	*128*	*128*	*128*	*128*	*133*
Receptor_202	Offsite Worker	372807	757781	149	153	161	151	153	153	153	156	4	12	2	4	4	4	7	*129*	*137*	*127*	*129*	*129*	*129*	*131*
Receptor_203	Offsite Worker	372901	757782	147	157	159	152	151	157	157	157	10	12	4	3	10	10	10	*135*	*136*	*129*	*128*	*135*	*135*	*135*
Receptor_204	Offsite Worker	372994	757783	144	162	157	153	152	162	162	161	18	13	10	8	18	18	17	*143*	*138*	*134*	*133*	*143*	*143*	*142*
Receptor_205	Offsite Worker	373087	757783	143	161	155	154	151	161	161	160	18	11	10	7	18	17	17	*142*	*136*	*135*	*132*	*142*	*142*	*141*
Receptor_206	Offsite Worker	373180	757784	143	162	154	155	150	162	162	160	19	11	12	7	19	19	17	*144*	*136*	*137*	*132*	*144*	*143*	*141*
Receptor_207	Offsite Worker	373274	757785	142	159	153	155	151	159	159	156	17	11	13	8	17	17	14	*142*	*135*	*137*	*133*	*142*	*142*	*139*
Receptor_208	Offsite Worker	373367	757786	143	154	152	153	153	154	154	154	12	10	11	10	12	12	12	*136*	*135*	*135*	*135*	*136*	*136*	*136*
Receptor_209	Offsite Worker	373418	757742	142	153	156	153	156	153	153	153	12	15	12	14	12	12	12	*137*	*139*	*136*	*139*	*137*	*136*	*137*
Receptor_21	Recreational	366607	757162	129	134	125	130	133	134	134	137	5	-4	1	4	5	5	8	*130*	*121*	*125*	*129*	*130*	*130*	*133*
Receptor_210	Offsite Worker	373418	757653	143	158	158	159	160	158	158	158	15	15	16	17	15	14	15	*139*	*140*	*141*	*142*	*139*	*139*	*139*
Receptor_211	Offsite Worker	373419	757564	145	162	161	165	167	162	162	162	17	16	21	23	17	17	17	*142*	*141*	*146*	*147*	*142*	*142*	*142*
Receptor_212	Offsite Worker	373419	757475	148	168	165	168	169	168	168	168	19	16	19	21	19	19	20	*144*	*141*	*144*	*146*	*144*	*144*	*144*
Receptor_213	Offsite Worker	373420	757386	152	170	170	165	176	170	170	170	18	18	14	24	18	18	18	*143*	*143*	*138*	*149*	*143*	*143*	*143*
Receptor_214	Offsite Worker	373420	757297	153	175	177	172	185	175	175	175	22	24	19	32	22	22	22	*147*	*149*	*144*	*157*	*147*	*147*	*147*
Receptor_215	Offsite Worker	373421	757207	157	185	183	178	195	185	185	185	28	26	21	37	28	28	28	*153*	*150*	*146*	*162*	*153*	*153*	*153*
Receptor_216	Offsite Worker	373421	757118	162	195	189	182	204	195	195	195	33	27	20	42	33	33	33	*158*	*152*	*145*	*167*	*158*	*158*	*158*
Receptor_217	Offsite Worker	373292	757117	163	196	196	186	210	196	196	196	34	33	23	47	34	33	34	*158*	*158*	*148*	*172*	*158*	*158*	*158*
Receptor_218	Offsite Worker	373213	757118	165	197	194	188	204	196	196	196	32	29	23	39	32	32	32	*157*	*154*	*148*	*164*	*156*	*156*	*156*
Receptor_219	Offsite Worker	373158	757066	169	204	200	194	211	204	204	204	35	31	25	42	35	35	35	*160*	*156*	*150*	*166*	*160*	*160*	*160*
Receptor_22	Recreational	366569	757250	132	135	127	131	134	135	135	137	3	-5	-2	2	3	2	5	*127*	*120*	*123*	*127*	*127*	*127*	*130*
Receptor_220	Offsite Worker	373084	757026	177	211	207	200	217	211	211	211	34	30	23	40	34	33	33	*158*	*154*	*148*	*165*	*158*	*158*	*158*
Receptor_221	Offsite Worker	373009	757011	184	218	210	205	215	218	218	218	35	26	22	31	35	34	35	*160*	*151*	*146*	*156*	*159*	*159*	*159*
Receptor_222	Offsite Worker	372922	757009	184	219	215	208	214	218	218	218	34	31	24	30	34	34	34	*159*	*156*	*149*	*155*	*159*	*159*	*159*
Receptor_223	Offsite Worker	372835	757007	178	216	211	206	219	216	215	216	37	33	28	41	37	37	37	*162*	*157*	*153*	*165*	*162*	*162*	*162*
Receptor_224	Offsite Worker	372747	757006	177	230	201	209	215	230	230	230	54	24	32	39	54	54	54	*179*	*149*	*157*	*163*	*179*	*178*	*179*
Receptor_225	Offsite Worker	372660	757004	177	218	208	208	210	218	218	218	41	32	31	33	41	41	41	*166*	*156*	*156*	*158*	*166*	*166*	*166*
Receptor_226	Offsite Worker	372651	757063	169	199	191	194	196	199	199	199	31	23	25	27	31	31	31	*156*	*148*	*150*	*152*	*156*	*155*	*155*
Receptor_227	Offsite Worker	372629	756931	183	232	222	217	223	232	232	232	49	39	34	40	49	49	49	*174*	*163*	*159*	*165*	*174*	*174*	*174*
Receptor_228	Offsite Worker	372631	756857	200	255	247	242	247	255	255	255	55	48	42	47	55	55	55	*180*	*172*	*167*	*172*	*180*	*180*	*180*
Receptor_229	Offsite Worker	372634	756783	221	287	260	272	277	287	287	287	67	40	51	57	67	66	67	*192*	*165*	*176*	*181*	*191*	*191*	*191*
Receptor_23	Recreational	366530	757338	131	134	130	132	135	134	133	136	3	-1	1	4	3	2	5	*127*	*123*	*125*	*129*	*127*	*127*	*130*
Receptor_230	Offsite Worker	372702	756778	222	274	269	265	274	274	273	274	52	47	42	52	51	51	51	*176*	*172*	*167*	*177*	*176*	*176*	*176*
Receptor_231	Offsite Worker	372756	756775	220	286	277	270	278	286	286	286	66	57	50	58	66	66	66	*191*	*182*	*175*	*182*	*191*	*191*	*191*
Receptor_232	Offsite Worker	372729	756712	243	302	305	292	312	302	302	302	59	63	50	70	59	59	59	*184*	*188*	*174*	*195*	*184*	*184*	*184*
Receptor_233	Offsite Worker	372703	756650	262	346	336	323	353	346	346	346	85	74	62	92	85	84	85	*210*	*199*	*187*	*216*	*210*	*209*	*209*
Receptor_234	Offsite Worker	372677	756588	291	397	393	375	415	396	396	396	105	102	84	123	105	105	105	*230*	*227*	*208*	*248*	*230*	*229*	*229*
Receptor_235	Offsite Worker	372619	756588	293	414	396	371	398	414	413	414	121	104	79	106	121	121	121	*246*	*229*	*203*	*231*	*246*	*246*	*246*
Receptor_236	Offsite Worker	372622	756509	378	532	502	458	556	532	531	532	155	124	81	178	154	153	154	*279*	*249*	*205*	*303*	*279*	*278*	*279*
Receptor_237	Offsite Worker	372700	756511	354	488	493	471	568	488	488	488	134	139	117	214	134	134	134	*259*	*264*	*242*	*339*	*259*	*259*	*259*
Receptor_238	Offsite Worker	372789	756510	316	423	447	429	459	423	422	423	107	131	113	143	107	106	107	*232*	*256*	*238*	*268*	*232*	*231*	*232*
Receptor_239	Offsite Worker	372871	756509	302	395	398	390	400	395	395	395	93	96	88	98	92	92	92	*217*	*220*	*212*	*223*	*217*	*217*	*217*
Receptor_24	Recreational	366492	757427	130	131	130	131	135	131	131	135	2	0	1	5	2	1	5	*126*	*125*	*126*	*130*	*126*	*126*	*130*
Receptor_240	Offsite Worker	372871	756437	322	436	470	409	410	436	435	436	114	148	87	88	114	113	114	*239*	*273*	*212*	*213*	*239*	*238*	*238*
Receptor_241	Offsite Worker	372970	756437	295	386	407	360	359	386	385	386	91	112	65	65	91	91	91	*216*	*237*	*190*	*190*	*216*	*215*	*216*
Receptor_242	Offsite Worker	373069	756437	261	340	373	329	319	340	340	340	79	112	68	58	79	79	79	*204*	*237*	*193*	*183*	*204*	*204*	*204*
Receptor_243	Offsite Worker	373168	756437	243	310	335	291	299	309	309	309	66	91	47	55	66	66	66	*191*	*216*	*172*	*180*	*191*	*190*	*191*
Receptor_244	Offsite Worker	373267	756437	232	289	306	274	284	289	288	289	57	74	42	52	57	56	56	*181*	*198*	*167*	*177*	*181*	*181*	*181*

Table 43

LAX SPAS — **VisW Flight Rule**

Operational Concentrations — **NO2, 1-Hour Averaging Time**

98th Percentile

		Meters		Average Concentration (µg/m^3)								Project Concentration (µg/m^3)							Total Concentration (NAAQS) (µg/m^3)						
Receptor ID	**Type**	**X**	**Y**	**Baseline**	**Alt 1**	**Alt 2**	**Alt 3**	**Alt 4**	**Alt 5**	**Alt 6**	**Alt 7**	**Alt 1**	**Alt 2**	**Alt 3**	**Alt 4**	**Alt 5**	**Alt 6**	**Alt 7**	**Alt 1**	**Alt 2**	**Alt 3**	**Alt 4**	**Alt 5**	**Alt 6**	**Alt 7**
Receptor_245	Offsite Worker	373412	756437	212	260	279	255	262	260	259	260	48	67	43	50	48	48	48	*173*	*192*	*168*	*175*	*173*	*173*	*173*
Receptor_246	Offsite Worker	373409	756339	221	265	280	268	258	265	265	265	44	59	47	37	44	44	44	*169*	*184*	*172*	*162*	*169*	*169*	*169*
Receptor_247	Offsite Worker	373406	756240	213	264	271	251	255	264	264	265	52	58	38	42	51	51	52	*176*	*183*	*163*	*167*	*176*	*176*	*177*
Receptor_248	Offsite Worker	373403	756142	206	244	248	235	250	244	243	244	38	42	29	44	37	37	38	*162*	*167*	*154*	*169*	*162*	*162*	*163*
Receptor_249	Offsite Worker	373400	756042	195	229	225	229	255	229	228	230	34	30	34	60	34	33	35	*159*	*155*	*158*	*185*	*159*	*158*	*160*
Receptor_25	Recreational	366453	757515	126	130	129	127	134	130	130	132	4	3	1	7	4	4	6	*129*	*128*	*125*	*132*	*129*	*129*	*131*
Receptor_250	Offsite Worker	373397	755944	202	227	217	208	241	227	227	228	25	15	7	40	25	25	27	*150*	*140*	*131*	*164*	*150*	*150*	*151*
Receptor_251	Offsite Worker	373393	755846	193	208	204	209	223	208	207	209	14	10	16	29	14	14	15	*139*	*135*	*140*	*154*	*139*	*138*	*140*
Receptor_252	Offsite Worker	373390	755747	181	194	198	200	203	194	194	195	13	17	19	22	13	13	14	*138*	*142*	*143*	*146*	*138*	*138*	*138*
Receptor_253	Offsite Worker	373309	755744	182	199	206	202	204	199	199	199	16	24	20	22	16	16	16	*141*	*149*	*145*	*147*	*141*	*141*	*141*
Receptor_254	Offsite Worker	373229	755743	183	202	214	201	205	202	201	202	18	31	18	22	18	18	19	*143*	*155*	*142*	*147*	*143*	*143*	*144*
Receptor_255	Offsite Worker	373143	755741	184	206	220	209	206	206	206	206	22	36	25	22	22	21	22	*146*	*160*	*150*	*147*	*146*	*146*	*146*
Receptor_256	Offsite Worker	373143	755823	195	214	221	215	220	214	214	215	19	27	20	25	19	19	20	*144*	*151*	*145*	*149*	*144*	*144*	*145*
Receptor_257	Offsite Worker	373143	755906	208	233	230	237	240	233	232	234	25	22	29	32	25	24	26	*150*	*147*	*154*	*157*	*150*	*149*	*151*
Receptor_258	Offsite Worker	373065	755906	212	235	233	237	240	235	235	235	24	21	25	29	23	23	23	*148*	*146*	*150*	*153*	*148*	*148*	*148*
Receptor_259	Offsite Worker	373065	755827	198	223	232	224	223	223	223	223	25	34	26	25	25	25	25	*150*	*159*	*151*	*150*	*150*	*150*	*150*
Receptor_26	Recreational	366415	757603	124	129	127	125	131	129	129	131	5	3	1	7	5	4	7	*130*	*128*	*126*	*131*	*130*	*129*	*132*
Receptor_260	Offsite Worker	373068	755733	184	213	225	211	207	213	212	212	28	40	27	22	28	28	28	*153*	*165*	*152*	*147*	*153*	*153*	*153*
Receptor_261	Offsite Worker	373007	755733	188	214	226	208	208	214	214	214	27	38	21	20	27	26	26	*151*	*163*	*146*	*145*	*151*	*151*	*151*
Receptor_262	Offsite Worker	372941	755733	192	218	226	214	212	218	218	218	26	34	22	20	26	25	26	*151*	*159*	*147*	*145*	*151*	*150*	*150*
Receptor_263	Offsite Worker	372941	755636	182	198	213	204	200	198	198	199	16	31	22	18	16	16	17	*141*	*156*	*147*	*143*	*141*	*141*	*142*
Receptor_264	Offsite Worker	372941	755539	175	185	197	197	192	185	185	185	11	22	22	17	11	10	10	*135*	*147*	*147*	*142*	*135*	*135*	*135*
Receptor_265	Offsite Worker	372941	755442	168	172	186	189	180	172	171	172	4	18	21	12	4	3	4	*128*	*143*	*146*	*137*	*128*	*128*	*129*
Receptor_266	Offsite Worker	372913	755342	162	168	180	181	170	168	167	168	6	17	18	7	6	5	6	*130*	*142*	*143*	*132*	*130*	*130*	*131*
Receptor_267	Offsite Worker	372817	755346	163	168	172	183	171	168	168	168	5	9	19	8	5	5	5	*130*	*134*	*144*	*133*	*130*	*129*	*129*
Receptor_268	Offsite Worker	372720	755349	164	169	174	174	173	169	169	169	5	10	11	9	5	5	5	*130*	*135*	*135*	*134*	*130*	*130*	*130*
Receptor_269	Offsite Worker	372624	755352	162	171	176	179	171	171	171	171	9	14	17	9	9	9	9	*134*	*139*	*142*	*134*	*134*	*134*	*134*
Receptor_27	Recreational	366376	757692	123	128	124	124	130	128	128	131	5	1	1	7	5	5	8	*129*	*126*	*126*	*132*	*129*	*129*	*133*
Receptor_270	Offsite Worker	372527	755349	163	179	181	176	176	179	179	179	17	18	13	13	17	16	17	*141*	*143*	*138*	*138*	*141*	*141*	*141*
Receptor_271	Offsite Worker	372431	755353	168	177	181	175	173	177	177	177	9	13	7	5	9	9	9	*134*	*138*	*132*	*130*	*134*	*134*	*134*
Receptor_272	Offsite Worker	372334	755356	174	175	183	192	173	175	175	176	1	10	18	-1	1	1	2	*126*	*135*	*143*	*124*	*126*	*126*	*127*
Receptor_273	Offsite Worker	372237	755359	168	175	185	192	173	175	175	175	7	18	25	6	7	7	7	*132*	*142*	*149*	*130*	*132*	*132*	*132*
Receptor_274	Offsite Worker	372141	755362	164	177	176	182	175	177	177	177	13	12	17	11	13	13	13	*138*	*136*	*142*	*136*	*138*	*137*	*137*
Receptor_275	Offsite Worker	372044	755366	160	171	179	174	166	171	171	171	11	19	14	7	11	11	11	*136*	*144*	*139*	*131*	*136*	*136*	*136*
Receptor_276	Offsite Worker	371948	755369	164	190	180	185	169	190	190	190	26	16	22	5	26	26	26	*151*	*141*	*146*	*130*	*151*	*151*	*151*
Receptor_277	Offsite Worker	371851	755372	170	191	180	193	181	191	191	191	21	10	24	11	21	21	21	*146*	*135*	*148*	*136*	*146*	*146*	*146*
Receptor_278	Offsite Worker	371755	755375	173	195	190	192	185	195	195	195	22	17	19	12	22	22	22	*147*	*141*	*143*	*137*	*147*	*147*	*147*
Receptor_279	Offsite Worker	371658	755378	173	187	194	191	185	187	187	187	15	21	18	12	14	14	14	*139*	*146*	*143*	*137*	*139*	*139*	*139*
Receptor_28	Residential	366338	757780	122	128	126	123	128	127	128	131	6	4	1	7	6	6	9	*131*	*129*	*126*	*132*	*131*	*131*	*134*
Receptor_280	Offsite Worker	371562	755382	169	188	196	189	184	188	187	188	18	26	20	15	18	18	18	*143*	*151*	*145*	*140*	*143*	*143*	*143*
Receptor_281	Offsite Worker	371465	755385	163	186	192	187	188	186	185	186	22	28	24	25	22	22	22	*147*	*153*	*148*	*150*	*147*	*147*	*147*
Receptor_282	Offsite Worker	371368	755388	167	181	191	192	189	181	181	181	14	23	24	21	14	14	14	*139*	*148*	*149*	*146*	*139*	*139*	*139*
Receptor_283	Offsite Worker	371272	755391	168	178	197	187	191	178	178	178	11	29	19	23	11	11	11	*136*	*154*	*144*	*148*	*135*	*135*	*135*
Receptor_284	Offsite Worker	371175	755395	167	176	193	186	187	176	176	177	10	27	20	20	10	9	10	*134*	*151*	*144*	*145*	*134*	*134*	*135*
Receptor_285	Offsite Worker	371079	755398	164	179	184	186	185	179	179	179	16	21	22	21	15	15	15	*140*	*145*	*147*	*146*	*140*	*140*	*140*
Receptor_286	Offsite Worker	371042	755478	168	191	190	192	193	191	191	191	23	22	24	25	23	23	23	*148*	*146*	*149*	*150*	*148*	*147*	*147*
Receptor_287	Offsite Worker	371009	755538	173	198	199	194	205	198	198	198	25	26	21	33	25	25	25	*150*	*151*	*146*	*157*	*150*	*150*	*150*
Receptor_288	Offsite Worker	370975	755597	176	205	203	203	212	205	205	205	29	27	27	35	29	29	29	*154*	*152*	*152*	*160*	*154*	*154*	*154*
Receptor_289	Offsite Worker	370925	755597	177	203	202	204	208	203	202	203	26	26	27	32	26	26	26	*151*	*151*	*152*	*156*	*151*	*151*	*151*
Receptor_29	Residential	366402	757746	123	128	126	124	130	128	128	133	5	3	0	6	5	5	10	*130*	*128*	*125*	*131*	*130*	*130*	*134*
Receptor_290	Offsite Worker	370860	755547	169	196	194	193	201	196	196	196	27	26	25	33	27	27	27	*152*	*150*	*149*	*157*	*152*	*152*	*152*
Receptor_291	Offsite Worker	370796	755497	163	189	189	186	195	189	189	189	26	26	23	33	26	26	26	*151*	*151*	*148*	*158*	*151*	*151*	*151*
Receptor_292	Offsite Worker	370733	755428	157	181	183	178	189	181	181	181	24	26	21	32	24	24	24	*149*	*150*	*145*	*156*	*149*	*148*	*149*
Receptor_293	Offsite Worker	370634	755428	164	179	178	177	189	179	179	179	15	13	13	25	15	15	15	*140*	*138*	*138*	*150*	*140*	*139*	*140*

Table 43

LAX SPAS — **VisW Flight Rule**

Operational Concentrations — **NO2, 1-Hour Averaging Time**

98th Percentile

		Meters		Average Concentration (µg/m^3)								Project Concentration (µg/m^3)							Total Concentration (NAAQS) (µg/m^3)						
Receptor ID	**Type**	**X**	**Y**	**Baseline**	**Alt 1**	**Alt 2**	**Alt 3**	**Alt 4**	**Alt 5**	**Alt 6**	**Alt 7**	**Alt 1**	**Alt 2**	**Alt 3**	**Alt 4**	**Alt 5**	**Alt 6**	**Alt 7**	**Alt 1**	**Alt 2**	**Alt 3**	**Alt 4**	**Alt 5**	**Alt 6**	**Alt 7**
Receptor_294	Offsite Worker	370536	755428	174	177	176	179	185	177	177	177	3	1	5	11	3	3	3	*128*	*126*	*130*	*136*	*128*	*127*	*128*
Receptor_295	Offsite Worker	370437	755428	176	177	175	184	181	177	177	177	1	0	8	6	1	1	1	*126*	*124*	*133*	*130*	*126*	*126*	*126*
Receptor_296	Offsite Worker	370338	755427	176	174	176	186	181	174	174	174	-2	0	10	5	-2	-2	-2	*123*	*124*	*134*	*130*	*123*	*123*	*123*
Receptor_297	Residential	370239	755427	171	172	175	182	182	172	172	172	1	4	11	11	1	1	1	*126*	*129*	*135*	*136*	*126*	*125*	*126*
Receptor_298	Residential	370138	755427	168	172	179	183	181	172	171	172	4	11	16	13	4	4	5	*129*	*136*	*141*	*138*	*129*	*129*	*129*
Receptor_299	Residential	370040	755427	166	170	177	182	182	170	169	170	3	11	15	16	3	3	3	*128*	*136*	*140*	*141*	*128*	*128*	*128*
Receptor_3	Recreational	367301	755573	126	138	136	148	149	138	138	138	13	10	23	24	12	12	12	*137*	*135*	*147*	*148*	*137*	*137*	*137*
Receptor_30	Residential	366467	757713	124	129	126	125	131	129	129	134	6	3	1	7	6	5	10	*130*	*127*	*126*	*132*	*130*	*130*	*135*
Receptor_300	Residential	369941	755426	166	172	176	181	182	172	172	172	7	10	15	16	7	6	7	*131*	*135*	*140*	*141*	*131*	*131*	*131*
Receptor_301	Residential	369842	755426	161	172	175	178	178	172	172	172	11	14	16	17	11	10	11	*135*	*139*	*141*	*142*	*135*	*135*	*135*
Receptor_302	School	369741	755435	155	170	175	175	177	170	170	170	15	19	19	22	15	15	15	*140*	*144*	*144*	*147*	*140*	*139*	*140*
Receptor_303	School	369643	755434	156	166	172	175	175	166	165	166	10	16	19	19	10	9	10	*135*	*141*	*144*	*144*	*135*	*134*	*135*
Receptor_304	Residential	369544	755434	156	166	170	172	175	166	166	166	10	13	16	19	10	10	10	*135*	*138*	*140*	*144*	*135*	*135*	*135*
Receptor_305	Residential	369445	755434	155	168	168	170	173	168	168	168	13	13	15	18	13	13	13	*138*	*138*	*139*	*143*	*138*	*138*	*138*
Receptor_306	Residential	369346	755434	153	168	167	168	172	168	168	168	16	15	15	20	16	16	16	*141*	*140*	*140*	*145*	*141*	*140*	*141*
Receptor_307	Offsite Worker	369249	755442	149	168	166	167	173	168	167	168	19	17	18	24	19	19	19	*144*	*142*	*143*	*149*	*144*	*144*	*144*
Receptor_308	Offsite Worker	369151	755442	148	160	165	164	174	160	160	161	12	17	16	26	12	12	13	*137*	*142*	*141*	*151*	*137*	*137*	*137*
Receptor_309	Offsite Worker	369052	755442	145	159	162	162	176	159	159	159	14	17	17	31	14	14	14	*139*	*142*	*142*	*156*	*139*	*139*	*139*
Receptor_31	Residential	366531	757679	124	130	127	125	132	130	130	134	6	2	1	7	6	5	10	*130*	*127*	*126*	*132*	*130*	*130*	*135*
Receptor_310	Residential	368953	755441	145	159	160	163	174	159	158	159	13	15	17	29	13	13	13	*138*	*139*	*142*	*154*	*138*	*138*	*138*
Receptor_311	Residential	368854	755441	146	159	161	162	173	159	159	159	13	15	16	27	13	13	13	*138*	*140*	*141*	*152*	*138*	*138*	*138*
Receptor_312	Residential	368755	755441	143	159	159	161	173	159	159	159	16	16	18	29	16	15	16	*140*	*141*	*143*	*154*	*140*	*140*	*140*
Receptor_313	Residential	368657	755441	141	158	158	162	172	158	157	157	17	17	21	32	17	17	17	*142*	*142*	*146*	*157*	*142*	*141*	*142*
Receptor_314	Residential	368558	755440	139	156	158	161	170	156	155	155	16	18	22	30	16	16	16	*141*	*143*	*146*	*155*	*141*	*141*	*141*
Receptor_315	Residential	368459	755440	139	156	158	163	170	156	156	156	17	20	24	31	17	17	17	*142*	*145*	*149*	*156*	*142*	*142*	*142*
Receptor_316	Residential	368360	755440	138	155	156	162	169	155	155	155	17	19	25	31	17	17	17	*142*	*144*	*150*	*156*	*142*	*142*	*142*
Receptor_317	Residential	368262	755439	136	151	155	162	166	151	151	152	15	19	26	30	15	15	16	*140*	*144*	*151*	*155*	*140*	*140*	*140*
Receptor_318	Residential	368186	755427	135	149	154	160	164	149	149	149	14	19	26	29	14	14	14	*139*	*144*	*150*	*154*	*139*	*139*	*139*
Receptor_319	Residential	368111	755414	134	148	152	159	162	148	147	148	14	18	25	28	14	14	14	*139*	*143*	*150*	*153*	*139*	*139*	*139*
Receptor_32	Residential	366567	757773	124	131	127	125	130	131	130	133	6	3	1	5	6	6	8	*131*	*128*	*125*	*130*	*131*	*131*	*133*
Receptor_320	Offsite Worker	368035	755402	132	146	150	158	159	146	146	146	14	18	25	27	14	14	14	*139*	*143*	*150*	*152*	*139*	*139*	*139*
Receptor_321	Offsite Worker	367960	755389	131	145	149	156	157	145	144	145	14	18	25	26	14	14	14	*139*	*143*	*150*	*151*	*139*	*139*	*139*
Receptor_322	Offsite Worker	367863	755390	129	144	147	153	154	144	144	144	15	19	25	26	15	15	15	*140*	*143*	*150*	*150*	*140*	*140*	*140*
Receptor_323	Offsite Worker	367766	755392	128	142	146	154	152	142	142	142	14	18	25	24	14	14	14	*139*	*143*	*150*	*149*	*139*	*139*	*139*
Receptor_324	Offsite Worker	367669	755393	127	140	145	152	151	140	140	140	13	18	25	24	13	13	13	*138*	*143*	*150*	*148*	*138*	*138*	*138*
Receptor_325	Offsite Worker	367572	755394	127	138	142	150	148	138	137	138	11	15	24	21	11	10	11	*136*	*140*	*148*	*146*	*136*	*135*	*136*
Receptor_326	Offsite Worker	367475	755395	126	138	140	150	146	138	138	138	12	14	24	21	12	12	12	*137*	*139*	*149*	*145*	*137*	*137*	*137*
Receptor_327	On-Site Occupational	370400	756850	211	172	179	183	175	172	172	182	-39	-32	-28	-36	-39	-39	-29	*86*	*93*	*97*	*89*	*86*	*86*	*96*
Receptor_33	Residential	366625	757758	125	131	128	126	130	131	131	134	7	3	1	5	7	6	9	*131*	*128*	*125*	*130*	*131*	*131*	*134*
Receptor_34	Residential	366682	757744	126	132	129	126	131	132	132	135	7	3	1	5	7	7	9	*132*	*128*	*125*	*130*	*132*	*131*	*134*
Receptor_35	Residential	366768	757788	126	134	128	125	130	134	133	135	8	2	0	4	8	8	10	*133*	*127*	*125*	*129*	*133*	*133*	*135*
Receptor_36	Residential	366854	757833	126	133	128	127	129	133	133	136	6	1	0	3	6	7	9	*131*	*126*	*125*	*128*	*131*	*131*	*134*
Receptor_37	Residential	366941	757877	127	133	129	128	132	133	133	134	6	2	1	5	6	6	7	*131*	*127*	*126*	*130*	*131*	*131*	*132*
Receptor_38	Residential	367027	757922	125	132	130	129	132	132	132	133	7	5	3	7	7	7	8	*132*	*129*	*128*	*132*	*132*	*132*	*133*
Receptor_39	Residential	367113	757966	128	132	132	131	135	132	132	135	5	5	3	7	5	4	7	*130*	*129*	*128*	*132*	*130*	*129*	*132*
Receptor_4	Recreational	367263	755661	124	137	136	144	147	137	137	140	13	12	20	23	13	13	16	*138*	*137*	*145*	*148*	*138*	*138*	*140*
Receptor_40	Residential	367192	757916	128	136	133	132	136	136	136	136	8	5	4	8	8	7	8	*133*	*130*	*129*	*132*	*133*	*132*	*133*
Receptor_41	Residential	367264	757916	130	136	135	134	138	136	136	137	6	5	4	8	6	6	7	*131*	*130*	*129*	*133*	*131*	*130*	*132*
Receptor_42	Residential	367335	757916	132	136	137	135	139	137	136	138	4	5	3	7	5	4	6	*129*	*130*	*128*	*132*	*129*	*129*	*131*
Receptor_43	Residential	367343	757966	132	136	137	134	138	136	135	134	4	5	2	6	4	3	2	*128*	*130*	*127*	*131*	*128*	*128*	*127*
Receptor_44	Residential	367404	757995	130	134	138	133	136	134	133	133	3	8	3	6	3	3	3	*128*	*132*	*128*	*131*	*128*	*128*	*128*
Receptor_45	Residential	367465	758024	133	134	136	133	135	134	134	133	1	3	1	2	1	1	1	*126*	*128*	*125*	*127*	*126*	*126*	*125*
Receptor_46	School	367504	757948	133	137	140	135	140	137	136	135	3	7	2	7	3	3	2	*128*	*131*	*127*	*132*	*128*	*128*	*127*
Receptor_47	School	367544	757873	136	141	141	137	143	141	140	141	5	5	2	8	5	4	5	*130*	*130*	*127*	*133*	*130*	*129*	*130*

Table 43

LAX SPAS — **VisW Flight Rule**

Operational Concentrations — **NO2, 1-Hour Averaging Time**

98th Percentile

		Meters		Average Concentration (µg/m^3)								Project Concentration (µg/m^3)							Total Concentration (NAAQS) (µg/m^3)						
Receptor ID	**Type**	**X**	**Y**	**Baseline**	**Alt 1**	**Alt 2**	**Alt 3**	**Alt 4**	**Alt 5**	**Alt 6**	**Alt 7**	**Alt 1**	**Alt 2**	**Alt 3**	**Alt 4**	**Alt 5**	**Alt 6**	**Alt 7**	**Alt 1**	**Alt 2**	**Alt 3**	**Alt 4**	**Alt 5**	**Alt 6**	**Alt 7**
Receptor_48	School	367587	757909	135	139	142	137	143	139	139	138	4	6	2	7	4	4	3	*129*	*131*	*127*	*132*	*129*	*129*	*128*
Receptor_49	School	367623	757866	137	142	143	138	145	142	142	141	6	6	1	9	6	5	5	*131*	*131*	*126*	*134*	*131*	*130*	*129*
Receptor_5	Recreational	367224	755749	124	135	134	143	144	135	135	135	11	10	19	20	11	11	11	*136*	*135*	*144*	*145*	*136*	*136*	*136*
Receptor_50	School	367694	757866	137	143	144	139	146	143	142	141	5	6	2	9	5	5	4	*130*	*131*	*127*	*134*	*130*	*130*	*129*
Receptor_51	School	367716	757927	139	139	142	139	144	139	139	141	0	3	-1	5	0	0	2	*125*	*128*	*124*	*130*	*125*	*125*	*127*
Receptor_52	School	367737	757988	135	139	139	135	139	139	139	139	4	4	0	4	4	4	4	*129*	*128*	*125*	*128*	*129*	*128*	*129*
Receptor_53	School	367727	758067	136	137	137	134	139	137	137	137	1	1	-2	3	1	1	1	*126*	*126*	*123*	*128*	*126*	*126*	*126*
Receptor_54	School	367716	758146	138	134	135	129	137	134	134	134	-4	-2	-9	0	-4	-4	-4	*121*	*123*	*116*	*124*	*121*	*121*	*121*
Receptor_55	Residential	367673	758189	136	133	133	128	136	133	133	133	-3	-3	-8	0	-3	-3	-3	*122*	*122*	*116*	*125*	*122*	*121*	*122*
Receptor_56	School	367723	758254	137	135	133	128	135	135	134	134	-2	-4	-8	-2	-2	-2	-2	*123*	*121*	*117*	*123*	*123*	*123*	*123*
Receptor_57	School	367784	758221	138	136	134	130	136	136	136	136	-2	-4	-8	-2	-2	-2	-2	*123*	*121*	*117*	*123*	*123*	*123*	*123*
Receptor_58	School	367845	758189	139	137	135	131	137	137	137	137	-2	-4	-8	-2	-2	-2	-2	*123*	*121*	*117*	*123*	*123*	*123*	*123*
Receptor_59	Residential	367816	758096	140	137	137	132	139	137	136	137	-3	-2	-8	0	-3	-3	-3	*122*	*122*	*117*	*124*	*122*	*122*	*122*
Receptor_6	Recreational	367186	755838	123	134	136	140	138	134	134	134	11	13	17	15	11	11	11	*136*	*138*	*142*	*139*	*136*	*136*	*136*
Receptor_60	Residential	367898	758066	141	139	139	134	141	139	139	139	-2	-2	-7	0	-2	-2	-2	*123*	*122*	*117*	*125*	*123*	*123*	*123*
Receptor_61	Residential	367980	758035	143	142	141	136	143	142	142	141	-1	-2	-6	0	-1	-1	-1	*124*	*123*	*118*	*125*	*124*	*123*	*123*
Receptor_62	Residential	368062	758005	145	144	143	139	145	144	143	143	-1	-2	-6	1	-1	-1	-1	*124*	*123*	*119*	*126*	*124*	*124*	*123*
Receptor_63	Residential	368144	757975	146	146	144	141	148	146	145	145	-1	-2	-5	1	-1	-1	-1	*124*	*123*	*120*	*126*	*124*	*124*	*123*
Receptor_64	Residential	368226	757945	149	148	146	143	150	148	147	147	-1	-3	-6	2	-1	-1	-2	*124*	*122*	*119*	*127*	*124*	*123*	*123*
Receptor_65	Residential	368301	757943	151	149	147	144	152	149	148	148	-2	-4	-7	1	-2	-3	-3	*122*	*121*	*118*	*126*	*123*	*122*	*122*
Receptor_66	Residential	368376	757941	153	150	148	144	154	150	149	149	-4	-5	-9	0	-3	-4	-4	*121*	*120*	*116*	*125*	*121*	*121*	*120*
Receptor_67	Residential	368452	757940	155	150	150	145	154	150	150	150	-5	-5	-10	-1	-5	-5	-5	*120*	*120*	*115*	*124*	*120*	*120*	*119*
Receptor_68	Residential	368527	757938	156	151	152	145	154	151	151	151	-5	-4	-11	-2	-5	-5	-6	*120*	*121*	*114*	*123*	*120*	*119*	*119*
Receptor_69	Residential	368563	757880	160	159	154	148	158	158	158	153	-1	-6	-12	-2	-1	-1	-6	*123*	*119*	*113*	*123*	*123*	*123*	*118*
Receptor_7	Recreational	367147	755926	124	132	131	137	134	132	132	132	8	8	13	11	8	8	8	*133*	*133*	*138*	*136*	*133*	*133*	*133*
Receptor_70	Residential	368636	757926	159	153	155	147	156	153	153	152	-6	-4	-12	-3	-6	-6	-7	*119*	*121*	*113*	*122*	*118*	*118*	*118*
Receptor_71	Residential	368709	757971	157	152	153	146	156	153	152	151	-6	-5	-11	-1	-5	-6	-6	*119*	*120*	*114*	*124*	*120*	*119*	*118*
Receptor_72	Residential	368782	758017	156	152	152	146	156	152	151	151	-4	-4	-10	0	-4	-4	-5	*121*	*120*	*115*	*124*	*121*	*120*	*120*
Receptor_73	Residential	368855	758062	156	153	152	145	153	153	153	151	-3	-4	-12	-3	-3	-4	-5	*121*	*121*	*113*	*122*	*121*	*121*	*119*
Receptor_74	Residential	368928	758108	157	154	154	144	153	154	153	153	-3	-2	-13	-4	-3	-3	-4	*122*	*122*	*112*	*121*	*122*	*122*	*121*
Receptor_75	Residential	369001	758153	155	153	154	145	153	153	152	149	-3	-2	-11	-3	-3	-3	-6	*122*	*123*	*114*	*122*	*122*	*122*	*119*
Receptor_76	Residential	369058	758074	160	157	158	147	157	157	157	156	-3	-3	-13	-3	-3	-3	-4	*122*	*122*	*112*	*121*	*121*	*121*	*121*
Receptor_77	Residential	369102	758103	158	157	157	148	156	157	157	154	-1	-1	-10	-2	-1	-2	-4	*123*	*124*	*114*	*123*	*123*	*123*	*121*
Receptor_78	Residential	369145	758132	157	154	157	149	156	154	154	150	-3	1	-8	-1	-2	-3	-7	*122*	*126*	*117*	*124*	*122*	*122*	*118*
Receptor_79	Residential	369200	758065	161	160	161	153	160	160	160	158	-1	-1	-8	-1	-1	-1	-3	*124*	*124*	*116*	*123*	*124*	*124*	*122*
Receptor_8	Recreational	367109	756014	124	136	132	137	134	136	136	136	12	8	13	10	12	12	12	*136*	*133*	*137*	*135*	*136*	*136*	*136*
Receptor_80	Residential	369255	757998	167	164	164	155	163	164	164	163	-3	-3	-12	-4	-3	-3	-4	*122*	*122*	*113*	*121*	*122*	*122*	*121*
Receptor_81	Residential	369310	757931	173	168	168	158	168	168	168	166	-5	-5	-15	-5	-5	-5	-7	*120*	*120*	*110*	*120*	*120*	*120*	*118*
Receptor_82	Residential	369356	757981	170	165	167	159	167	165	164	162	-5	-3	-11	-3	-5	-6	-9	*120*	*122*	*114*	*122*	*119*	*119*	*116*
Receptor_83	Residential	369403	758031	167	163	165	158	166	163	163	160	-4	-2	-10	-1	-4	-5	-8	*121*	*123*	*115*	*124*	*121*	*120*	*117*
Receptor_84	Recreational	369336	758100	163	156	162	154	161	156	155	155	-7	-2	-9	-2	-7	-8	-9	*117*	*123*	*116*	*123*	*118*	*117*	*116*
Receptor_85	Recreational	369269	758170	159	152	158	151	158	152	151	151	-8	-1	-8	-1	-8	-8	-8	*117*	*124*	*117*	*123*	*117*	*117*	*116*
Receptor_86	Recreational	369202	758239	156	149	155	146	155	149	149	145	-7	0	-10	-1	-7	-7	-11	*118*	*124*	*115*	*124*	*118*	*118*	*114*
Receptor_87	Recreational	369264	758285	153	145	155	147	157	145	144	143	-9	1	-7	4	-9	-9	-10	*116*	*126*	*118*	*128*	*116*	*116*	*115*
Receptor_88	Recreational	369326	758330	154	145	153	144	152	145	145	144	-9	-1	-10	-1	-9	-9	-10	*116*	*124*	*115*	*123*	*116*	*116*	*115*
Receptor_89	Recreational	369389	758376	151	145	149	140	150	145	145	145	-6	-2	-10	-1	-6	-6	-6	*119*	*123*	*114*	*124*	*119*	*119*	*119*
Receptor_9	Recreational	367070	756103	123	136	132	136	136	136	136	136	13	9	13	13	13	12	13	*137*	*134*	*138*	*137*	*137*	*137*	*138*
Receptor_90	Recreational	369389	758462	150	145	146	138	149	145	144	144	-6	-5	-12	-1	-6	-6	-6	*119*	*120*	*113*	*124*	*119*	*119*	*119*
Receptor_91	Recreational	369389	758548	148	143	143	135	146	143	142	141	-6	-6	-13	-3	-6	-6	-7	*119*	*119*	*112*	*122*	*119*	*119*	*118*
Receptor_92	Residential	369389	758634	145	142	142	135	143	142	141	140	-3	-3	-10	-3	-3	-4	-5	*122*	*121*	*115*	*122*	*122*	*121*	*120*
Receptor_93	Residential	369469	758630	144	142	141	138	145	142	142	140	-2	-4	-7	0	-2	-3	-4	*122*	*121*	*118*	*125*	*122*	*122*	*121*
Receptor_94	Residential	369549	758625	142	140	141	136	145	141	140	139	-1	0	-5	3	-1	-2	-2	*123*	*124*	*119*	*128*	*124*	*123*	*123*
Receptor_95	Residential	369630	758621	145	141	144	138	146	141	141	140	-4	-1	-7	1	-3	-4	-4	*121*	*124*	*118*	*126*	*121*	*121*	*121*
Receptor_96	Residential	369710	758617	145	142	143	139	148	143	142	141	-2	-2	-6	3	-2	-3	-4	*122*	*123*	*119*	*128*	*123*	*122*	*121*

Table 43																								
LAX SPAS																								VisW Flight Rule
Operational Concentrations																								NO2, 1-Hour Averaging Time
																								98th Percentile
		Meters		Average Concentration (µg/m^3)								Project Concentration (µg/m^3)							Total Concentration (NAAQS) (µg/m^3)						
Receptor ID	Type	X	Y	Baseline	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Alt 6	Alt 7	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Alt 6	Alt 7	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Alt 6	Alt 7
Receptor_97	Residential	369791	758613	144	143	142	140	149	143	143	141	-1	-2	-4	5	0	-1	-3	*124*	*123*	*121*	*130*	*124*	*124*	*122*
Receptor_98	Residential	369791	758514	147	147	147	145	153	147	147	145	0	-1	-2	5	0	0	-2	*125*	*124*	*123*	*130*	*125*	*125*	*122*
Receptor_99	Residential	369791	758416	157	151	150	148	155	151	151	148	-6	-7	-9	-2	-6	-7	-9	*119*	*118*	*116*	*122*	*119*	*118*	*116*

Table 44
LAX SPAS
Operational Concentrations

Peak Values

Type	1-Hour NO2 ($\mu g/m^3$)	Location X (m)	Location Y (m)
Baseline			
Residential	173	369310	757931
School	181	370250	758189
Offsite Worker	378	372622	756509
Recreational	163	369336	758100
On-Site Occupational	211	370400	756850
Alternative 1			
Residential	209	371183	758027
School	170	369741	755435
Offsite Worker	532	372622	756509
Recreational	156	369336	758100
On-Site Occupational	172	370400	756850
Alternative 2			
Residential	205	371183	758027
School	176	370308	758196
Offsite Worker	502	372622	756509
Recreational	162	369336	758100
On-Site Occupational	179	370400	756850
Alternative 3			
Residential	199	371183	758027
School	175	369643	755434
Offsite Worker	471	372700	756511
Recreational	154	369336	758100
On-Site Occupational	183	370400	756850
Alternative 4			
Residential	205	371183	758027
School	177	369741	755435
Offsite Worker	568	372700	756511
Recreational	161	369336	758100
On-Site Occupational	175	370400	756850
Alternative 5			
Residential	209	371183	758027
School	170	369741	755435
Offsite Worker	532	372622	756509
Recreational	156	369336	758100
On-Site Occupational	172	370400	756850
Alternative 6			
Residential	209	371183	758027
School	170	369741	755435
Offsite Worker	531	372622	756509
Recreational	155	369336	758100
On-Site Occupational	172	370400	756850
Alternative 7			
Residential	206	371183	758027
School	170	369741	755435
Offsite Worker	532	372622	756509
Recreational	155	369336	758100
On-Site Occupational	182	370400	756850

Peak Incremental Values

Type	1-Hour NO2 ($\mu g/m^3$)	Location X (m)	Location Y (m)
Alternative 1			
Residential	44	371183	758027
School	15	369741	755435
Offsite Worker	155	372622	756509
Recreational	15	367340	755485
On-Site Occupational	-39	370400	756850
Alternative 2			
Residential	39	371183	758027
School	19	369741	755435
Offsite Worker	148	372871	756437
Recreational	13	367186	755838
On-Site Occupational	-32	370400	756850
Alternative 3			
Residential	33	371183	758027
School	19	369643	755434
Offsite Worker	197	371005	757357
Recreational	23	367301	755573
On-Site Occupational	-28	370400	756850
Alternative 4			
Residential	39	371183	758027
School	22	369741	755435
Offsite Worker	214	372700	756511
Recreational	24	367301	755573
On-Site Occupational	-36	370400	756850
Alternative 5			
Residential	44	371183	758027
School	15	369741	755435
Offsite Worker	154	372622	756509
Recreational	15	367340	755485
On-Site Occupational	-39	370400	756850
Alternative 6			
Residential	43	371183	758027
School	15	369741	755435
Offsite Worker	153	372622	756509
Recreational	15	367340	755485
On-Site Occupational	-39	370400	756850
Alternative 7			
Residential	40	371183	758027
School	15	369741	755435
Offsite Worker	154	372622	756509
Recreational	16	366723	756897
On-Site Occupational	-29	370400	756850

Total Concentration (NAAQS)

VisW Flight Rule
NO2, 1-Hour Averaging Time
98th Percentile

Type	1-Hour NO2 ($\mu g/m^3$)	Location X (m)	Location Y (m)
Alternative 1			
Residential	*168*	371183	758027
School	*140*	369741	755435
Offsite Worker	*279*	372622	756509
Recreational	*140*	367340	755485
On-Site Occupational	*86*	370400	756850
Alternative 2			
Residential	*164*	371183	758027
School	*144*	369741	755435
Offsite Worker	*273*	372871	756437
Recreational	*138*	367186	755838
On-Site Occupational	*93*	370400	756850
Alternative 3			
Residential	*157*	371183	758027
School	*144*	369643	755434
Offsite Worker	*321*	371005	757357
Recreational	*147*	367301	755573
On-Site Occupational	*97*	370400	756850
Alternative 4			
Residential	*164*	371183	758027
School	*147*	369741	755435
Offsite Worker	*339*	372700	756511
Recreational	*148*	367301	755573
On-Site Occupational	*89*	370400	756850
Alternative 5			
Residential	*168*	371183	758027
School	*140*	369741	755435
Offsite Worker	*279*	372622	756509
Recreational	*140*	367340	755485
On-Site Occupational	*86*	370400	756850
Alternative 6			
Residential	*168*	371183	758027
School	*139*	369741	755435
Offsite Worker	*278*	372622	756509
Recreational	*140*	367340	755485
On-Site Occupational	*86*	370400	756850
Alternative 7			
Residential	*165*	371183	758027
School	*140*	369741	755435
Offsite Worker	*279*	372622	756509
Recreational	*141*	366723	756897
On-Site Occupational	*96*	370400	756850

Notes:
Average concentration is modeled output from AERMOD, version 12060.
Project concentration is difference between given alternative and baseline (project increment).
Total concentration is project concentration plus monitored background concentration.
98th percentile (high 8th high in AERMOD) only applicable to NAAQS.

Table 65

Air Monitoring Data vs California State Standrads

Year	Station	O3 1st High (ppm)		NO2 1st High (ppm)		CO 1st High (ppm)		PM10 1st High (ug/m3)		PM2.5 1st High (ug/m3)		SO2 1st High (ppm)	
		1-hr	8-hr	1-hr	Ann_Ave	1-hr	8-hr	24-hr	Ann_Ave	24-hr	Ann_Ave	1-hr	24-hr
2010	LA Westchester	0.089	0.07	0.076	0.012	3	2.19	37	na	na	na	0.025	0.004
2009	LA Westchester	0.077	0.07	0.077	na	2.0	1.99	52	25.5	63.0	13.0	0.022	0.006
2008	LA Westchester	0.086	0.076	0.094	0.014	4.0	2.53	50	25.5	60.9	14.2	0.021	0.004
CAAQS		0.09	0.07	0.180	0.030	20.0	9.00	50	20.0		12.0	0.250	0.040
Design Value				**0.094**	**0.014**	**4.0**	**2.53**	**52**	**25.5**	**N/A**	**14.2**	**0.025**	**0.006**

Air Monitoring Data vs Federal Standrads

Year	Station	1-hr O3 Revoked	O3 4th High (ppm)	NO2 8th High (ppm)	NO2 Annual (ppm)	CO 2nd High (ppm)		PM10 2nd High (ug/m3)	PM10 Annual (ug/m3)	PM2.5 8th High (ug/m3)	PM2.5 Annual (ug/m3)	SO2 4th High (ppm)	SO2 2nd High (ppm)	SO2 2nd High (ppm)	SO2 Annual (ppm)
		1-hr	8-hr	1-hr	Ann_Ave	1-hr	8-hr	24-hr	Ann_Ave	24-hr	Ann_Ave	1-hr	3-hr	24-hr	Ann_Ave
2010	LA Westchester	na	0.059	0.06	0.012	3.0	2.15	36.0	20.6	na	na	0.015	*	0.002	0
2009	LA Westchester	na	0.061	0.065	na	2.0	1.89	46.0	25.6	34.2	13	0.012	*	0.006	*
2008	LA Westchester	na	0.065	0.074	0.014	4.0	1.99	49.0	25.6	38.9	14.2	0.015	0.004	0.004	0.001
Average			**0.062**	**0.066**				**43.7**		**36.6**	**13.6**	0.014			
NAAQS			**0.075**	**0.100**	**0.053**	35	9.00	**150.0**	na	**35.0**	**15.0**	0.075	0.500	0.140	0.030
Design Value				**0.066**	**0.014**	**4**	**2**	**44**	**N/A**	**36.6**	**13.6**	**0.014**	**0.004**	**0.006**	**0.001**

Notes:

Data summarized in table is based on the Design Value for each pollutant.

Ozone NAAQS is attained when the fourth highest eight hour concentration in a year, averaged over three years, is equal to or less than the NAAQS; therefore, 4th high summarized and averaged over 3 years.

CO NAAQS is not to be exceeded more than once a year; therefore, 2nd high from monitoring data used for background concentration (based on design value).

For PM10 NAAQS, the 24-hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration over 150 ug/m3 is equal to or less than one; therefore, 2nd high used for background concentration.

Resources:

Except for CO 1-hr, all data obtained from ARB website, http://www.arb.ca.gov/adam/index.html.

CO 1-hr data are available on SCAQMD website, http://www.aqmd.gov/smog/historicaldata.htm.

PM2.5 is not monitored at LA Westchester, so the monitoring data from the South Coast LA County 1 & 2 were used.

SO2 3-hour data obtained from EPA Air Data for North Main Street (http://www.epa.gov/air/data)

Design Values to Add to Modeled Concentrations

$C_{ppm} = C_{\mu g/m3} \times 0.02445/MW$

Pollutant	Molecular Weight (g/mol)	Averaging Period	CAAQS ug/m3	NAAQS ug/m3
CO	28	1-Hour	4,581	4,581
CO	28	8-Hour	2,897	2,462
NO2	46	1-Hour	177	*125*
NO2	46	Annual	26	26
SO2	64	1-Hour	65	37
SO2	64	3-Hour	N/A	10
SO2	64	24-Hour	16	16
SO2	64	Annual	N/A	3

Table 10
LAX SPAS **12/4/2012**
Baseline **Mixing Height = 1806 ft**

	Total Emissions, metric tons per year			
Scenario	**CO2**	**CH4**	**N2O**	**CO2e**
Aircraft	625,910	100	21	634,424
Ground Support Equipment	59,778	9	2	60,551
Auxiliary Power Units	43,922	1	1	44,380
Parking Facilities	104,740	61	9	108,784
On-Airport Roadways	47,049	27	4	48,865
On-Airport Stationary	66	0	0	66
On-Airport Subtotal	**881,465**	**199**	**37**	**897,070**
Building Electricity	7,738	0	0	7,763
Solid Waste Dispoal	154	9	0	345
Indoor/Outdoor Water Usage	597	2	0	646
Off-Airport Roadways	1,315,179	885	229	1,404,778
Off-Airport Subtotal	**1,323,668**	**896**	**229**	**1,413,532**
Grand Total	2,205,133	1,094	266	2,310,602
GWP	1	21	310	

1 short ton = 0.9072 metric tons

Note:
CH4 and N2O emissions from aircraft, parking facilities, and roadways estimated from results of LAWA GHG Emissions Inventory (CDM 2008).

Table 11
LAX SPAS **12/4/2012**
Alternative 1 **Mixing Height = 1806 ft**

	Total Emissions, metric tons per year				Increment
Scenario	**CO2**	**CH4**	**N2O**	**CO2e**	**MTCO2e/yr**
Aircraft	943,602	151	31	956,437	322,013
Ground Support Equipment	78,131	5	2	78,838	18,287
Auxiliary Power Units	59,915	2	2	60,540	16,160
Parking Facilities	104,145	61	9	108,166	-618
On-Airport Roadways	43,393	25	4	45,068	-3,797
On-Airport Stationary	128	0	0	129	63
On-Airport Subtotal	**1,229,314**	**243**	**48**	**1,249,177**	**352,107**
Building Electricity	15,103	0	0	15,152	7,389
Solid Waste Dispoal	301	18	0	674	329
Indoor/Outdoor Water Usage	1,166	3	0	1,261	615
Off-Airport Roadways	1,435,650	966	250	1,533,455	128,677
Off-Airport Subtotal	**1,452,219**	**987**	**250**	**1,550,542**	**137,010**
Grand Total	2,681,533	1,230	298	2,799,719	489,118
GWP	1	21	310		

1 short ton = 0.9072 metric tons

Note:
CH4 and N2O emissions from aircraft, parking facilities, and roadways estimated from results of LAWA GHG Emissions Inventory (CDM 2008).

Table 12
LAX SPAS **12/4/2012**
Alternative 2 **Mixing Height = 1806 ft**

	Total Emissions, metric tons per year				Increment
Scenario	**CO2**	**CH4**	**N2O**	**CO2e**	**MTCO2e/yr**
Aircraft	931,449	149	31	944,119	309,695
Ground Support Equipment	78,131	5	2	78,838	18,287
Auxiliary Power Units	59,915	2	2	60,540	16,160
Parking Facilities	104,145	61	9	108,166	-618
On-Airport Roadways	43,393	25	4	45,068	-3,797
On-Airport Stationary	128	0	0	129	63
On-Airport Subtotal	**1,217,161**	**241**	**47**	**1,236,860**	**339,790**
Building Electricity	15,103	0	0	15,152	7,389
Solid Waste Dispoal	301	18	0	674	329
Indoor/Outdoor Water Usage	1,166	3	0	1,261	615
Off-Airport Roadways	1,435,650	966	250	1,533,455	128,677
Off-Airport Subtotal	**1,452,219**	**987**	**250**	**1,550,542**	**137,010**
Grand Total	2,669,380	1,228	298	2,787,402	476,800
GWP	1	21	310		

1 short ton = 0.9072 metric tons

Note:
CH4 and N2O emissions from aircraft, parking facilities, and roadways estimated from results of LAWA GHG Emissions Inventory (CDM 2008).

Table 13
LAX SPAS **12/4/2012**
Alternative 3 **Mixing Height = 1806 ft**

	Total Emissions, metric tons per year				Increment
Scenario	**CO2**	**CH4**	**N2O**	**CO2e**	**MTCO2e/yr**
Aircraft	983,468	157	33	996,846	362,422
Ground Support Equipment	78,131	5	2	78,838	18,287
Auxiliary Power Units	59,915	2	2	60,540	16,160
Parking Facilities	97,493	57	8	101,256	-7,528
On-Airport Roadways	46,236	27	4	48,021	-845
On-Airport Stationary	465	0	0	468	402
On-Airport Subtotal	**1,265,708**	**247**	**49**	**1,285,968**	**388,898**
Building Electricity	54,848	1	0	55,026	47,263
Solid Waste Dispoal	1,092	65	0	2,448	2,103
Indoor/Outdoor Water Usage	4,233	12	0	4,580	3,933
Off-Airport Roadways	1,348,743	907	235	1,440,628	35,851
Off-Airport Subtotal	**1,408,917**	**985**	**236**	**1,502,682**	**89,150**
Grand Total	2,674,624	1,232	284	2,788,650	478,048
GWP	1	21	310		

1 short ton = 0.9072 metric tons

Note:
CH4 and N2O emissions from aircraft, parking facilities, and roadways estimated from results of LAWA GHG Emissions Inventory (CDM 2008).

Table 14
LAX SPAS **12/4/2012**
Alternative 4 **Mixing Height = 1806 ft**

	Total Emissions, metric tons per year				Increment
Scenario	**CO2**	**CH4**	**N2O**	**CO2e**	**MTCO2e/yr**
Aircraft	954,094	152	32	967,072	332,648
Ground Support Equipment	78,131	5	2	78,838	18,287
Auxiliary Power Units	59,915	2	2	60,540	16,160
Parking Facilities	101,594	59	9	105,516	-3,268
On-Airport Roadways	42,858	25	4	44,512	-4,353
On-Airport Stationary	74	0	0	74	8
On-Airport Subtotal	**1,236,665**	**243**	**48**	**1,256,552**	**359,482**
Building Electricity	8,690	0	0	8,718	956
Solid Waste Dispoal	173	10	0	388	43
Indoor/Outdoor Water Usage	671	2	0	726	80
Off-Airport Roadways	1,409,223	948	245	1,505,228	100,450
Off-Airport Subtotal	**1,418,757**	**960**	**246**	**1,515,060**	**101,528**
Grand Total	2,655,422	1,203	293	2,771,611	461,010
GWP	1	21	310		

1 short ton = 0.9072 metric tons

Note:
CH4 and N2O emissions from aircraft, parking facilities, and roadways estimated from results of LAWA GHG Emissions Inventory (CDM 2008).

Table 15
LAX SPAS **12/4/2012**
Alternative 5 **Mixing Height = 1806 ft**

	Total Emissions, metric tons per year				Increment
Scenario	**CO2**	**CH4**	**N2O**	**CO2e**	**MTCO2e/yr**
Aircraft	944,152	151	31	956,994	322,570
Ground Support Equipment	78,131	5	2	78,838	18,287
Auxiliary Power Units	59,915	2	2	60,540	16,160
Parking Facilities	N/A	N/A	N/A	N/A	N/A
On-Airport Roadways	N/A	N/A	N/A	N/A	N/A
On-Airport Stationary	114	0	0	114	48
On-Airport Subtotal	**1,082,311**	**157**	**35**	**1,096,486**	**357,066**
Building Electricity	13,389	0	0	13,433	5,670
Solid Waste Dispoal	267	16	0	598	252
Indoor/Outdoor Water Usage	1,033	3	0	1,118	472
Off-Airport Roadways	N/A	N/A	N/A	N/A	N/A
Off-Airport Subtotal	**14,689**	**19**	**0**	**15,148**	**6,394**
Grand Total	1,097,000	176	35	1,111,634	363,460
GWP	1	21	310		

1 short ton = 0.9072 metric tons

Note:
CH4 and N2O emissions from aircraft, parking facilities, and roadways estimated from results of LAWA GHG Emissions Inventory (CDM 2008).

Table 16
LAX SPAS **12/4/2012**
Alternative 6 **Mixing Height = 1806 ft**

	Total Emissions, metric tons per year				Increment
Scenario	**CO2**	**CH4**	**N2O**	**CO2e**	**MTCO2e/yr**
Aircraft	933,469	149	31	946,166	311,742
Ground Support Equipment	78,131	5	2	78,838	18,287
Auxiliary Power Units	59,915	2	2	60,540	16,160
Parking Facilities	N/A	N/A	N/A	N/A	N/A
On-Airport Roadways	N/A	N/A	N/A	N/A	N/A
On-Airport Stationary	121	0	0	122	56
On-Airport Subtotal	**1,071,636**	**155**	**35**	**1,085,666**	**346,245**
Building Electricity	14,300	0	0	14,346	6,584
Solid Waste Dispoal	285	17	0	638	293
Indoor/Outdoor Water Usage	1,104	3	0	1,194	548
Off-Airport Roadways	N/A	N/A	N/A	N/A	N/A
Off-Airport Subtotal	**15,689**	**20**	**0**	**16,179**	**7,425**
Grand Total	1,087,324	175	35	1,101,844	353,670
GWP	1	21	310		

1 short ton = 0.9072 metric tons

Note:
CH4 and N2O emissions from aircraft, parking facilities, and roadways estimated from results of LAWA GHG Emissions Inventory (CDM 2008).

Table 17
LAX SPAS **12/4/2012**
Alternative 7 **Mixing Height = 1806 ft**

	Total Emissions, metric tons per year				Increment
Scenario	**CO2**	**CH4**	**N2O**	**CO2e**	**MTCO2e/yr**
Aircraft	944,906	151	31	957,759	323,335
Ground Support Equipment	78,131	5	2	78,838	18,287
Auxiliary Power Units	59,915	2	2	60,540	16,160
Parking Facilities	N/A	N/A	N/A	N/A	N/A
On-Airport Roadways	N/A	N/A	N/A	N/A	N/A
On-Airport Stationary	103	0	0	104	38
On-Airport Subtotal	**1,083,055**	**157**	**35**	**1,097,240**	**357,820**
Building Electricity	12,180	0	0	12,219	4,457
Solid Waste Dispoal	243	14	0	544	198
Indoor/Outdoor Water Usage	940	3	0	1,017	371
Off-Airport Roadways	N/A	N/A	N/A	N/A	N/A
Off-Airport Subtotal	**13,363**	**17**	**0**	**13,780**	**5,026**
Grand Total	1,096,418	174	35	1,111,020	362,846
GWP	1	21	310		

1 short ton = 0.9072 metric tons

Note:
CH4 and N2O emissions from aircraft, parking facilities, and roadways estimated from results of LAWA GHG Emissions Inventory (CDM 2008).

Table 18
LAX SPAS **6/8/2012**
Alternative 8 **Mixing Height = 1806 ft**

Scenario	Total Emissions, metric tons per year CO2	CH4	N2O	CO2e	Increment MTCO2e/yr
Aircraft	N/A	N/A	N/A	N/A	N/A
Ground Support Equipment	N/A	N/A	N/A	N/A	N/A
Auxiliary Power Units	N/A	N/A	N/A	N/A	N/A
Parking Facilities	95,126	56	8	98,799	-9,985
On-Airport Roadways	43,075	25	4	44,737	-4,128
On-Airport Stationary	15	0	0	15	-51
On-Airport Subtotal	**138,215**	**81**	**12**	**143,551**	**-14,165**
Building Electricity	1,712	0	0	1,718	-6,045
Solid Waste Dispoal	34	2	0	76	-269
Indoor/Outdoor Water Usage	132	0	0	143	-503
Off-Airport Roadways	1,388,729	934	242	1,483,338	78,560
Off-Airport Subtotal	**1,390,607**	**937**	**242**	**1,485,275**	**71,743**
Grand Total	1,528,823	1,017	254	1,628,826	57,579
GWP	1	21	310		

1 short ton = 0.9072 metric tons

Note:
CH4 and N2O emissions from aircraft, parking facilities, and roadways estimated from results of LAWA GHG Emissions Inventory (CDM 2008).

Table 19
LAX SPAS **6/8/2012**
Alternative 9 **Mixing Height = 1806 ft**

Scenario	Total Emissions, metric tons per year CO2	CH4	N2O	CO2e	Increment MTCO2e/yr
Aircraft	N/A	N/A	N/A	N/A	N/A
Ground Support Equipment	N/A	N/A	N/A	N/A	N/A
Auxiliary Power Units	N/A	N/A	N/A	N/A	N/A
Parking Facilities	95,126	56	8	98,799	-9,985
On-Airport Roadways	41,674	24	4	43,283	-5,582
On-Airport Stationary	15	0	0	15	-51
On-Airport Subtotal	**136,815**	**80**	**12**	**142,096**	**-15,619**
Building Electricity	1,712	0	0	1,718	-6,045
Solid Waste Dispoal	34	2	0	76	-269
Indoor/Outdoor Water Usage	132	0	0	143	-503
Off-Airport Roadways	1,388,729	934	242	1,483,338	78,560
Off-Airport Subtotal	**1,390,607**	**937**	**242**	**1,485,275**	**71,743**
Grand Total	1,527,422	1,016	254	1,627,371	56,124
GWP	1	21	310		

1 short ton = 0.9072 metric tons

Note:
CH4 and N2O emissions from aircraft, parking facilities, and roadways estimated from results of LAWA GHG Emissions Inventory (CDM 2008).

Table 74
LAX SPAS
Auxiliary Power Units - Greenhouse Gas Emissions

Preliminary Baseline Operational Emissions Estimates

Aircraft ID	User ID	APU Description	Annual Operations	APU Operation (hours/year)	APU Fuel Flow (lb/hr)	Fuel Consumption		Annual Emissions (MT/year)			Annual CO2e Emissions (MTCO2e/year)			
						(lb/yr)	(gal/yr)	CO2	CH4	N2O	CO2	CH4	N2O	Total
1	25L-ARR-CARGO_2-A300F4-6	GTCP331-200ER	670	145	267.92	38,893	5,770	56	0	0	56	0	1	**57**
2	25L-ARR-CARGO_3-A300F4-6	GTCP331-200ER	335	73	267.92	19,447	2,885	28	0	0	28	0	0	**28**
3	25L-DEP-CARGO_2-A300F4-6	GTCP331-200ER	670	145	267.92	38,893	5,770	56	0	0	56	0	1	**57**
4	25L-DEP-CARGO_3-A300F4-6	GTCP331-200ER	335	73	267.92	19,447	2,885	28	0	0	28	0	0	**28**
5	25L-ARR-CARGO_2-A310-2	GTCP331-200ER	335	73	267.92	19,447	2,885	28	0	0	28	0	0	**28**
6	25L-DEP-CARGO_2-A310-2	GTCP331-200ER	335	73	267.92	19,447	2,885	28	0	0	28	0	0	**28**
7	24L-DEP-T1-A319-1	GTCP36-300	2,009	435	282.20	122,837	18,225	178	0	0	178	0	2	**180**
8	24L-DEP-T2-A319-1	GTCP36-300	2,344	508	282.20	143,320	21,264	207	0	0	207	0	2	**209**
9	24L-DEP-T3-A319-1	GTCP36-300	1,004	218	282.20	61,388	9,108	89	0	0	89	0	1	**90**
10	24L-DEP-T6-A319-1	GTCP36-300	1,004	218	282.20	61,388	9,108	89	0	0	89	0	1	**90**
11	24L-DEP-T7-A319-1	GTCP36-300	1,004	218	282.20	61,388	9,108	89	0	0	89	0	1	**90**
12	24L-DEP-TBIT-N-A319-1	GTCP36-300	2,009	435	282.20	122,837	18,225	178	0	0	178	0	2	**180**
13	24L-DEP-TBIT-S-A319-1	GTCP36-300	335	73	282.20	20,483	3,039	30	0	0	30	0	0	**30**
14	24R-ARR-T1-A319-1	GTCP36-300	2,009	435	282.20	122,837	18,225	178	0	0	178	0	2	**180**
15	24R-ARR-T2-A319-1	GTCP36-300	2,344	508	282.20	143,320	21,264	207	0	0	207	0	2	**209**
16	24R-ARR-T3-A319-1	GTCP36-300	1,004	218	282.20	61,388	9,108	89	0	0	89	0	1	**90**
17	24R-ARR-T6-A319-1	GTCP36-300	335	73	282.20	20,483	3,039	30	0	0	30	0	0	**30**
18	24R-ARR-T7-A319-1	GTCP36-300	335	73	282.20	20,483	3,039	30	0	0	30	0	0	**30**
19	24R-ARR-TBIT-N-A319-1	GTCP36-300	2,009	435	282.20	122,837	18,225	178	0	0	178	0	2	**180**
20	24R-ARR-TBIT-S-A319-1	GTCP36-300	335	73	282.20	20,483	3,039	30	0	0	30	0	0	**30**
21	25L-ARR-T6-A319-1	GTCP36-300	2,344	508	282.20	143,320	21,264	207	0	0	207	0	2	**209**
22	25L-ARR-T7-A319-1	GTCP36-300	3,348	725	282.20	204,708	30,372	296	0	0	296	0	3	**299**
23	25L-ARR-TBIT-S-A319-1	GTCP36-300	335	73	282.20	20,483	3,039	30	0	0	30	0	0	**30**
24	25R-ARR-T7-A319-1	GTCP36-300	335	73	282.20	20,483	3,039	30	0	0	30	0	0	**30**
25	25R-DEP-T6-A319-1	GTCP36-300	2,009	435	282.20	122,837	18,225	178	0	0	178	0	2	**180**
26	25R-DEP-T7-A319-1	GTCP36-300	2,344	508	282.20	143,320	21,264	207	0	0	207	0	2	**209**
27	25R-DEP-TBIT-S-A319-1	GTCP36-300	1,004	218	282.20	61,388	9,108	89	0	0	89	0	1	**90**
28	24L-DEP-T1-A320-2	GTCP36-300	5,022	1,088	282.20	307,062	45,558	444	0	0	444	0	4	**449**
29	24L-DEP-T2-A320-2	GTCP36-300	2,343	508	282.20	143,259	21,255	207	0	0	207	0	2	**209**
30	24L-DEP-T3-A320-2	GTCP36-300	5,692	1,233	282.20	348,028	51,636	503	0	0	503	0	5	**509**
31	24L-DEP-T5-A320-2	GTCP36-300	670	145	282.20	40,966	6,078	59	0	0	59	0	1	**60**
32	24L-DEP-T6-A320-2	GTCP36-300	335	73	282.20	20,483	3,039	30	0	0	30	0	0	**30**
33	24L-DEP-T7-A320-2	GTCP36-300	1,674	363	282.20	102,354	15,186	148	0	0	148	0	1	**150**
34	24L-DEP-TBIT-N-A320-2	GTCP36-300	1,004	218	282.20	61,388	9,108	89	0	0	89	0	1	**90**
35	24R-ARR-T1-A320-2	GTCP36-300	5,021	1,088	282.20	307,001	45,549	444	0	0	444	0	4	**449**
36	24R-ARR-T2-A320-2	GTCP36-300	2,009	435	282.20	122,837	18,225	178	0	0	178	0	2	**180**
37	24R-ARR-T3-A320-2	GTCP36-300	5,692	1,233	282.20	348,028	51,636	503	0	0	503	0	5	**509**
38	24R-ARR-T7-A320-2	GTCP36-300	670	145	282.20	40,966	6,078	59	0	0	59	0	1	**60**
39	24R-ARR-TBIT-N-A320-2	GTCP36-300	1,004	218	282.20	61,388	9,108	89	0	0	89	0	1	**90**
40	25L-ARR-T5-A320-2	GTCP36-300	4,018	871	282.20	245,674	36,450	355	0	0	355	0	4	**359**
41	25L-ARR-T6-A320-2	GTCP36-300	2,678	580	282.20	163,742	24,294	237	0	0	237	0	2	**239**
42	25L-ARR-T7-A320-2	GTCP36-300	5,021	1,088	282.20	307,001	45,549	444	0	0	444	0	4	**449**
43	25L-ARR-TBIT-S-A320-2	GTCP36-300	670	145	282.20	40,966	6,078	59	0	0	59	0	1	**60**

LAX SPAS

Auxiliary Power Units - Greenhouse Gas Emissions

Preliminary Baseline Operational Emissions Estimates

Aircraft ID	User ID	APU Description	Annual Operations	APU Operation (hours/year)	APU Fuel Flow (lb/hr)	Fuel Consumption (lb/yr)	Fuel Consumption (gal/yr)	Annual Emissions (MT/year) CO2	CH4	N2O	Annual CO2e Emissions (MTCO2e/year) CO2	CH4	N2O	Total
44	25R-ARR-T5-A320-2	GTCP36-300	335	73	282.20	20,483	3,039	30	0	0	30	0	0	**30**
45	25R-ARR-T7-A320-2	GTCP36-300	670	145	282.20	40,966	6,078	59	0	0	59	0	1	**60**
46	25R-DEP-T5-A320-2	GTCP36-300	3,683	798	282.20	225,191	33,411	326	0	0	326	0	3	**329**
47	25R-DEP-T6-A320-2	GTCP36-300	2,009	435	282.20	122,837	18,225	178	0	0	178	0	2	**180**
48	25R-DEP-T7-A320-2	GTCP36-300	5,357	1,161	282.20	327,545	48,597	474	0	0	474	0	5	**479**
49	25R-DEP-TBIT-S-A320-2	GTCP36-300	1,339	290	282.20	81,871	12,147	118	0	0	118	0	1	**120**
50	24L-DEP-T2-A340-6	GTCP331-500	670	145	536.00	77,809	11,544	113	0	0	113	0	1	**114**
51	24L-DEP-TBIT-N-A340-6	GTCP331-500	335	73	536.00	38,905	5,772	56	0	0	56	0	1	**57**
52	24L-DEP-WEST-A340-6	GTCP331-500	335	73	536.00	38,905	5,772	56	0	0	56	0	1	**57**
53	24R-ARR-T2-A340-6	GTCP331-500	670	145	536.00	77,809	11,544	113	0	0	113	0	1	**114**
54	24R-ARR-TBIT-N-A340-6	GTCP331-500	335	73	536.00	38,905	5,772	56	0	0	56	0	1	**57**
55	24R-ARR-WEST-A340-6	GTCP331-500	1,339	290	536.00	155,503	23,072	225	0	0	225	0	2	**227**
56	25L-ARR-TBIT-S-A340-6	GTCP331-500	1,339	290	536.00	155,503	23,072	225	0	0	225	0	2	**227**
57	25R-DEP-TBIT-S-A340-6	GTCP331-500	1,339	290	536.00	155,503	23,072	225	0	0	225	0	2	**227**
58	25R-DEP-WEST-A340-6	GTCP331-500	1,004	218	536.00	116,598	17,299	169	0	0	169	0	2	**170**
59	25L-ARR-TBIT-S-A380-8	GTCP331-500	335	73	536.00	38,905	5,772	56	0	0	56	0	1	**57**
60	25L-DEP-TBIT-N-A380-8	GTCP331-500	335	73	536.00	38,905	5,772	56	0	0	56	0	1	**57**
61	24L-DEP-T1-B737-3	GTCP85-129	12,720	2,756	235.28	648,432	96,206	938	0	0	938	1	9	**948**
62	24L-DEP-T3-B737-3	GTCP85-129	2,344	508	235.28	119,491	17,729	173	0	0	173	0	2	**175**
63	24R-ARR-T1-B737-3	GTCP85-129	13,392	2,902	235.28	682,688	101,289	988	0	0	988	1	10	**998**
64	24R-ARR-T3-B737-3	GTCP85-129	2,009	435	235.28	102,413	15,195	148	0	0	148	0	1	**150**
65	25L-ARR-T6-B737-3	GTCP85-129	670	145	235.28	34,155	5,067	49	0	0	49	0	0	**50**
66	25R-DEP-T6-B737-3	GTCP85-129	670	145	235.28	34,155	5,067	49	0	0	49	0	0	**50**
67	24L-ARR-T1-B737-7	GTCP85	335	73	235.28	17,077	2,534	25	0	0	25	0	0	**25**
68	24L-DEP-T1-B737-7	GTCP85	23,437	5,078	235.28	1,194,756	177,263	1,728	0	0	1,728	1	17	**1,746**
69	24L-DEP-T2-B737-7	GTCP85	2,009	435	235.28	102,413	15,195	148	0	0	148	0	1	**150**
70	24L-DEP-T3-B737-7	GTCP85	1,004	218	235.28	51,181	7,594	74	0	0	74	0	1	**75**
71	24R-ARR-T1-B737-7	GTCP85	22,768	4,933	235.28	1,160,652	172,204	1,679	0	0	1,679	1	17	**1,697**
72	24R-ARR-T2-B737-7	GTCP85	2,009	435	235.28	102,413	15,195	148	0	0	148	0	1	**150**
73	24R-ARR-T3-B737-7	GTCP85	1,004	218	235.28	51,181	7,594	74	0	0	74	0	1	**75**
74	24R-DEP-T1-B737-7	GTCP85	335	73	235.28	17,077	2,534	25	0	0	25	0	0	**25**
75	25L-ARR-T6-B737-7	GTCP85	2,678	580	235.28	136,517	20,255	197	0	0	197	0	2	**200**
76	25L-DEP-GA-B737-7	GTCP85	335	73	235.28	17,077	2,534	25	0	0	25	0	0	**25**
77	25R-DEP-T6-B737-7	GTCP85	2,678	580	235.28	136,517	20,255	197	0	0	197	0	2	**200**
78	24L-DEP-T2-B737-8	GTCP85	1,004	218	235.28	51,181	7,594	74	0	0	74	0	1	**75**
79	24L-DEP-T3-B737-8	GTCP85	6,026	1,306	235.28	307,189	45,577	444	0	0	444	0	4	**449**
80	24L-DEP-T4-B737-8	GTCP85	335	73	235.28	17,077	2,534	25	0	0	25	0	0	**25**
81	24L-DEP-T5-B737-8	GTCP85	335	73	235.28	17,077	2,534	25	0	0	25	0	0	**25**
82	24L-DEP-WEST-B737-8	GTCP85	335	73	235.28	17,077	2,534	25	0	0	25	0	0	**25**
83	24R-ARR-T2-B737-8	GTCP85	1,004	218	235.28	51,181	7,594	74	0	0	74	0	1	**75**
84	24R-ARR-T3-B737-8	GTCP85	4,352	943	235.28	221,853	32,916	321	0	0	321	0	3	**324**
85	24R-ARR-T4-B737-8	GTCP85	335	73	235.28	17,077	2,534	25	0	0	25	0	0	**25**
86	24R-ARR-WEST-B737-8	GTCP85	335	73	235.28	17,077	2,534	25	0	0	25	0	0	**25**
87	25L-ARR-T3-B737-8	GTCP85	335	73	235.28	17,077	2,534	25	0	0	25	0	0	**25**
88	25L-ARR-T4-B737-8	GTCP85	4,352	943	235.28	221,853	32,916	321	0	0	321	0	3	**324**

LAX SPAS

Auxiliary Power Units - Greenhouse Gas Emissions

Preliminary Baseline Operational Emissions Estimates

Aircraft ID	User ID	APU Description	Annual Operations	APU Operation (hours/year)	APU Fuel Flow (lb/hr)	Fuel Consumption		Annual Emissions (MT/year)			Annual CO2e Emissions (MTCO2e/year)			
						(lb/yr)	(gal/yr)	CO2	CH4	N2O	CO2	CH4	N2O	Total
89	25L-ARR-T5-B737-8	GTCP85	4,017	870	235.28	204,776	30,382	296	0	0	296	0	3	**299**
90	25L-ARR-T6-B737-8	GTCP85	3,013	653	235.28	153,595	22,789	222	0	0	222	0	2	**225**
91	25L-ARR-TBIT-S-B737-8	GTCP85	670	145	235.28	34,155	5,067	49	0	0	49	0	0	**50**
92	25R-ARR-T4-B737-8	GTCP85	1,004	218	235.28	51,181	7,594	74	0	0	74	0	1	**75**
93	25R-ARR-T6-B737-8	GTCP85	335	73	235.28	17,077	2,534	25	0	0	25	0	0	**25**
94	25R-ARR-TBIT-S-B737-8	GTCP85	335	73	235.28	17,077	2,534	25	0	0	25	0	0	**25**
95	25R-DEP-T4-B737-8	GTCP85	5,356	1,160	235.28	273,035	40,510	395	0	0	395	0	4	**399**
96	25R-DEP-T5-B737-8	GTCP85	3,348	725	235.28	170,672	25,322	247	0	0	247	0	2	**249**
97	25R-DEP-T6-B737-8	GTCP85	3,013	653	235.28	153,595	22,789	222	0	0	222	0	2	**225**
98	24L-DEP-T2-B747-4F	PWC 901A	335	73	510.00	37,018	5,492	54	0	0	54	0	1	**54**
99	24R-ARR-T2-B747-4F	PWC 901A	335	73	510.00	37,018	5,492	54	0	0	54	0	1	**54**
100	24R-ARR-WEST-B747-4F	PWC 901A	335	73	510.00	37,018	5,492	54	0	0	54	0	1	**54**
101	25R-DEP-WEST-B747-4F	PWC 901A	335	73	510.00	37,018	5,492	54	0	0	54	0	1	**54**
102	24L-DEP-T2-B747-4	PWC 901A	670	145	510.00	74,035	10,984	107	0	0	107	0	1	**108**
103	24L-DEP-TBIT-N-B747-4	PWC 901A	1,339	290	510.00	147,960	21,952	214	0	0	214	0	2	**216**
104	24L-DEP-TBIT-S-B747-4	PWC 901A	335	73	510.00	37,018	5,492	54	0	0	54	0	1	**54**
105	24L-DEP-WEST-B747-4	PWC 901A	1,339	290	510.00	147,960	21,952	214	0	0	214	0	2	**216**
106	24R-ARR-T2-B747-4	PWC 901A	1,004	218	510.00	110,942	16,460	160	0	0	160	0	2	**162**
107	24R-ARR-TBIT-N-B747-4	PWC 901A	1,674	363	510.00	184,977	27,445	268	0	0	268	0	3	**270**
108	24R-ARR-TBIT-S-B747-4	PWC 901A	335	73	510.00	37,018	5,492	54	0	0	54	0	1	**54**
109	24R-ARR-WEST-B747-4	PWC 901A	1,339	290	510.00	147,960	21,952	214	0	0	214	0	2	**216**
110	25L-ARR-CARGO_1-B747-4	PWC 901A	670	145	510.00	74,035	10,984	107	0	0	107	0	1	**108**
111	25L-ARR-CARGO_2-B747-4	PWC 901A	670	145	510.00	74,035	10,984	107	0	0	107	0	1	**108**
112	25L-ARR-CARGO_3-B747-4	PWC 901A	2,008	435	510.00	221,884	32,920	321	0	0	321	0	3	**324**
113	25L-ARR-T4-B747-4	PWC 901A	670	145	510.00	74,035	10,984	107	0	0	107	0	1	**108**
114	25L-ARR-T6-B747-4	PWC 901A	670	145	510.00	74,035	10,984	107	0	0	107	0	1	**108**
115	25L-ARR-T7-B747-4	PWC 901A	335	73	510.00	37,018	5,492	54	0	0	54	0	1	**54**
116	25L-ARR-TBIT-S-B747-4	PWC 901A	1,674	363	510.00	184,977	27,445	268	0	0	268	0	3	**270**
117	25L-DEP-CARGO_1-B747-4	PWC 901A	1,674	363	510.00	184,977	27,445	268	0	0	268	0	3	**270**
118	25L-DEP-CARGO_2-B747-4	PWC 901A	670	145	510.00	74,035	10,984	107	0	0	107	0	1	**108**
119	25L-DEP-CARGO_3-B747-4	PWC 901A	1,004	218	510.00	110,942	16,460	160	0	0	160	0	2	**162**
120	25R-ARR-TBIT-S-B747-4	PWC 901A	335	73	510.00	37,018	5,492	54	0	0	54	0	1	**54**
121	25R-DEP-T2-B747-4	PWC 901A	335	73	510.00	37,018	5,492	54	0	0	54	0	1	**54**
122	25R-DEP-T4-B747-4	PWC 901A	335	73	510.00	37,018	5,492	54	0	0	54	0	1	**54**
123	25R-DEP-T6-B747-4	PWC 901A	335	73	510.00	37,018	5,492	54	0	0	54	0	1	**54**
124	25R-DEP-T7-B747-4	PWC 901A	670	145	510.00	74,035	10,984	107	0	0	107	0	1	**108**
125	25R-DEP-TBIT-N-B747-4	PWC 901A	1,004	218	510.00	110,942	16,460	160	0	0	160	0	2	**162**
126	25R-DEP-TBIT-S-B747-4	PWC 901A	1,674	363	510.00	184,977	27,445	268	0	0	268	0	3	**270**
127	25R-DEP-WEST-B747-4	PWC 901A	670	145	510.00	74,035	10,984	107	0	0	107	0	1	**108**
128	24R-ARR-T5-B757-2	GTCP331-200ER	670	145	267.92	38,893	5,770	56	0	0	56	0	1	**57**
129	25L-ARR-T4-B757-2	GTCP331-200ER	8,370	1,814	267.92	485,873	72,088	703	0	0	703	0	7	**710**
130	25L-ARR-T5-B757-2	GTCP331-200ER	6,695	1,451	267.92	388,640	57,662	562	0	0	562	0	6	**568**
131	25L-ARR-T6-B757-2	GTCP331-200ER	7,366	1,596	267.92	427,591	63,441	619	0	0	619	0	6	**625**
132	25L-ARR-T7-B757-2	GTCP331-200ER	9,709	2,104	267.92	563,601	83,620	815	0	0	815	0	8	**824**
133	25R-ARR-T4-B757-2	GTCP331-200ER	335	73	267.92	19,447	2,885	28	0	0	28	0	0	**28**

LAX SPAS

Auxiliary Power Units - Greenhouse Gas Emissions

Preliminary Baseline Operational Emissions Estimates

Aircraft ID	User ID	APU Description	Annual Operations	APU Operation (hours/year)	APU Fuel Flow (lb/hr)	Fuel Consumption (lb/yr)	Fuel Consumption (gal/yr)	Annual Emissions (MT/year) CO2	CH4	N2O	Annual CO2e Emissions (MTCO2e/year) CO2	CH4	N2O	Total
134	25R-ARR-T6-B757-2	GTCP331-200ER	335	73	267.92	19,447	2,885	28	0	0	28	0	0	**28**
135	25R-ARR-T7-B757-2	GTCP331-200ER	1,339	290	267.92	77,728	11,532	112	0	0	112	0	1	**114**
136	25R-DEP-T4-B757-2	GTCP331-200ER	8,705	1,886	267.92	505,319	74,973	731	0	0	731	0	7	**739**
137	25R-DEP-T5-B757-2	GTCP331-200ER	6,695	1,451	267.92	388,640	57,662	562	0	0	562	0	6	**568**
138	25R-DEP-T6-B757-2	GTCP331-200ER	7,031	1,523	267.92	408,145	60,556	590	0	0	590	0	6	**597**
139	25R-DEP-T7-B757-2	GTCP331-200ER	11,718	2,539	267.92	680,222	100,923	984	0	0	984	1	10	**994**
140	24L-DEP-T2-B767-3	GTCP331-200ER	1,339	290	267.92	77,728	11,532	112	0	0	112	0	1	**114**
141	24L-DEP-TBIT-N-B767-3	GTCP331-200ER	670	145	267.92	38,893	5,770	56	0	0	56	0	1	**57**
142	24R-ARR-CARGO_1-B767-3	GTCP331-200ER	335	73	267.92	19,447	2,885	28	0	0	28	0	0	**28**
143	24R-ARR-T2-B767-3	GTCP331-200ER	1,339	290	267.92	77,728	11,532	112	0	0	112	0	1	**114**
144	24R-ARR-TBIT-N-B767-3	GTCP331-200ER	670	145	267.92	38,893	5,770	56	0	0	56	0	1	**57**
145	25L-ARR-CARGO_1-B767-3	GTCP331-200ER	335	73	267.92	19,447	2,885	28	0	0	28	0	0	**28**
146	25L-ARR-CARGO_3-B767-3	GTCP331-200ER	335	73	267.92	19,447	2,885	28	0	0	28	0	0	**28**
147	25L-ARR-CARGO_4-B767-3	GTCP331-200ER	335	73	267.92	19,447	2,885	28	0	0	28	0	0	**28**
148	25L-ARR-T4-B767-3	GTCP331-200ER	5,021	1,088	267.92	291,466	43,244	422	0	0	422	0	4	**426**
149	25L-ARR-T5-B767-3	GTCP331-200ER	670	145	267.92	38,893	5,770	56	0	0	56	0	1	**57**
150	25L-ARR-T6-B767-3	GTCP331-200ER	670	145	267.92	38,893	5,770	56	0	0	56	0	1	**57**
151	25L-ARR-T7-B767-3	GTCP331-200ER	2,344	508	267.92	136,068	20,188	197	0	0	197	0	2	**199**
152	25L-DEP-CARGO_1-B767-3	GTCP331-200ER	1,004	218	267.92	58,282	8,647	84	0	0	84	0	1	**85**
153	25L-DEP-CARGO_3-B767-3	GTCP331-200ER	335	73	267.92	19,447	2,885	28	0	0	28	0	0	**28**
154	25R-ARR-T7-B767-3	GTCP331-200ER	335	73	267.92	19,447	2,885	28	0	0	28	0	0	**28**
155	25R-DEP-CARGO_4-B767-3	GTCP331-200ER	335	73	267.92	19,447	2,885	28	0	0	28	0	0	**28**
156	25R-DEP-T4-B767-3	GTCP331-200ER	5,022	1,088	267.92	291,524	43,253	422	0	0	422	0	4	**426**
157	25R-DEP-T5-B767-3	GTCP331-200ER	1,339	290	267.92	77,728	11,532	112	0	0	112	0	1	**114**
158	25R-DEP-T6-B767-3	GTCP331-200ER	670	145	267.92	38,893	5,770	56	0	0	56	0	1	**57**
159	25R-DEP-T7-B767-3	GTCP331-200ER	2,678	580	267.92	155,456	23,065	225	0	0	225	0	2	**227**
160	24L-DEP-T2-B777-2	GTCP331-500	670	145	536.00	77,809	11,544	113	0	0	113	0	1	**114**
161	24L-DEP-T3-B777-2	GTCP331-500	335	73	536.00	38,905	5,772	56	0	0	56	0	1	**57**
162	24L-DEP-T7-B777-2	GTCP331-500	335	73	536.00	38,905	5,772	56	0	0	56	0	1	**57**
163	24L-DEP-TBIT-N-B777-2	GTCP331-500	1,004	218	536.00	116,598	17,299	169	0	0	169	0	2	**170**
164	24L-DEP-TBIT-S-B777-2	GTCP331-500	335	73	536.00	38,905	5,772	56	0	0	56	0	1	**57**
165	24R-ARR-T2-B777-2	GTCP331-500	1,004	218	536.00	116,598	17,299	169	0	0	169	0	2	**170**
166	24R-ARR-T3-B777-2	GTCP331-500	335	73	536.00	38,905	5,772	56	0	0	56	0	1	**57**
167	24R-ARR-TBIT-N-B777-2	GTCP331-500	1,004	218	536.00	116,598	17,299	169	0	0	169	0	2	**170**
168	24R-ARR-TBIT-S-B777-2	GTCP331-500	670	145	536.00	77,809	11,544	113	0	0	113	0	1	**114**
169	25L-ARR-T4-B777-2	GTCP331-500	1,004	218	536.00	116,598	17,299	169	0	0	169	0	2	**170**
170	25L-ARR-T6-B777-2	GTCP331-500	670	145	536.00	77,809	11,544	113	0	0	113	0	1	**114**
171	25L-ARR-T7-B777-2	GTCP331-500	1,004	218	536.00	116,598	17,299	169	0	0	169	0	2	**170**
172	25L-ARR-TBIT-N-B777-2	GTCP331-500	335	73	536.00	38,905	5,772	56	0	0	56	0	1	**57**
173	25L-ARR-TBIT-S-B777-2	GTCP331-500	2,009	435	536.00	233,312	34,616	338	0	0	338	0	3	**341**
174	25R-ARR-T7-B777-2	GTCP331-500	335	73	536.00	38,905	5,772	56	0	0	56	0	1	**57**
175	25R-DEP-T2-B777-2	GTCP331-500	335	73	536.00	38,905	5,772	56	0	0	56	0	1	**57**
176	25R-DEP-T3-B777-2	GTCP331-500	670	145	536.00	77,809	11,544	113	0	0	113	0	1	**114**
177	25R-DEP-T4-B777-2	GTCP331-500	1,004	218	536.00	116,598	17,299	169	0	0	169	0	2	**170**
178	25R-DEP-T6-B777-2	GTCP331-500	670	145	536.00	77,809	11,544	113	0	0	113	0	1	**114**

LAX SPAS

Auxiliary Power Units - Greenhouse Gas Emissions

Preliminary Baseline Operational Emissions Estimates

Aircraft ID	User ID	APU Description	Annual Operations	APU Operation (hours/year)	APU Fuel Flow (lb/hr)	Fuel Consumption (lb/yr)	Fuel Consumption (gal/yr)	Annual Emissions (MT/year) CO2	CH4	N2O	Annual CO2e Emissions (MTCO2e/year) CO2	CH4	N2O	Total
179	25R-DEP-T7-B777-2	GTCP331-500	1,004	218	536.00	116,598	17,299	169	0	0	169	0	2	**170**
180	25R-DEP-TBIT-N-B777-2	GTCP331-500	335	73	536.00	38,905	5,772	56	0	0	56	0	1	**57**
181	25R-DEP-TBIT-S-B777-2	GTCP331-500	2,009	435	536.00	233,312	34,616	338	0	0	338	0	3	**341**
182	25L-ARR-CARGO_2-DC10-1	TSCP 700-4B	1,674	363	323.68	117,399	17,418	170	0	0	170	0	2	**172**
183	25L-DEP-CARGO_2-DC10-1	TSCP 700-4B	2,009	435	323.68	140,893	20,904	204	0	0	204	0	2	**206**
184	25L-ARR-CARGO_3-DC8-7	GTCP85-98ck	335	73	235.28	17,077	2,534	25	0	0	25	0	0	**25**
185	25L-DEP-CARGO_3-DC8-7	GTCP85-98ck	335	73	235.28	17,077	2,534	25	0	0	25	0	0	**25**
186	25L-ARR-CARGO_2-MD11	TSCP 700-4B	1,004	218	323.68	70,411	10,447	102	0	0	102	0	1	**103**
187	25L-ARR-CARGO_3-MD11	TSCP 700-4B	335	73	323.68	23,494	3,486	34	0	0	34	0	0	**34**
188	25L-DEP-CARGO_1-MD11	TSCP 700-4B	335	73	323.68	23,494	3,486	34	0	0	34	0	0	**34**
189	25L-DEP-CARGO_2-MD11	TSCP 700-4B	670	145	323.68	46,988	6,971	68	0	0	68	0	1	**69**
190	24L-DEP-T4-MD83	GTCP85-98ck	1,674	363	235.28	85,336	12,661	123	0	0	123	0	1	**125**
191	24L-DEP-T6-MD83	GTCP85-98ck	335	73	235.28	17,077	2,534	25	0	0	25	0	0	**25**
192	24R-ARR-T4-MD83	GTCP85-98ck	335	73	235.28	17,077	2,534	25	0	0	25	0	0	**25**
193	25L-ARR-T4-MD83	GTCP85-98ck	6,696	1,451	235.28	341,344	50,645	494	0	0	494	0	5	**499**
194	25L-ARR-T6-MD83	GTCP85-98ck	2,009	435	235.28	102,413	15,195	148	0	0	148	0	1	**150**
195	25R-ARR-T4-MD83	GTCP85-98ck	335	73	235.28	17,077	2,534	25	0	0	25	0	0	**25**
196	25R-DEP-T4-MD83	GTCP85-98ck	5,691	1,233	235.28	290,112	43,043	420	0	0	420	0	4	**424**
197	25R-DEP-T6-MD83	GTCP85-98ck	1,674	363	235.28	85,336	12,661	123	0	0	123	0	1	**125**
198	24L-DEP-T1-CRJ7	GTCP85	670	145	235.28	34,155	5,067	49	0	0	49	0	0	**50**
199	24L-DEP-T2-CRJ7	GTCP85	335	73	235.28	17,077	2,534	25	0	0	25	0	0	**25**
200	24L-DEP-T3-CRJ7	GTCP85	670	145	235.28	34,155	5,067	49	0	0	49	0	0	**50**
201	24L-DEP-T8-CRJ7	GTCP85	3,348	725	235.28	170,672	25,322	247	0	0	247	0	2	**249**
202	24L-DEP-TBIT-N-CRJ7	GTCP85	335	73	235.28	17,077	2,534	25	0	0	25	0	0	**25**
203	24R-ARR-T1-CRJ7	GTCP85	670	145	235.28	34,155	5,067	49	0	0	49	0	0	**50**
204	24R-ARR-T2-CRJ7	GTCP85	335	73	235.28	17,077	2,534	25	0	0	25	0	0	**25**
205	24R-ARR-T3-CRJ7	GTCP85	670	145	235.28	34,155	5,067	49	0	0	49	0	0	**50**
206	24R-ARR-T7-CRJ7	GTCP85	335	73	235.28	17,077	2,534	25	0	0	25	0	0	**25**
207	24R-ARR-T8-CRJ7	GTCP85	5,357	1,161	235.28	273,086	40,517	395	0	0	395	0	4	**399**
208	24R-ARR-TBIT-N-CRJ7	GTCP85	335	73	235.28	17,077	2,534	25	0	0	25	0	0	**25**
209	25L-ARR-T5-CRJ7	GTCP85	1,339	290	235.28	68,259	10,127	99	0	0	99	0	1	**100**
210	25L-ARR-T7-CRJ7	GTCP85	1,339	290	235.28	68,259	10,127	99	0	0	99	0	1	**100**
211	25L-ARR-T8-CRJ7	GTCP85	6,696	1,451	235.28	341,344	50,645	494	0	0	494	0	5	**499**
212	25R-ARR-T8-CRJ7	GTCP85	670	145	235.28	34,155	5,067	49	0	0	49	0	0	**50**
213	25R-DEP-T5-CRJ7	GTCP85	1,004	218	235.28	51,181	7,594	74	0	0	74	0	1	**75**
214	25R-DEP-T7-CRJ7	GTCP85	1,674	363	235.28	85,336	12,661	123	0	0	123	0	1	**125**
215	25R-DEP-T8-CRJ7	GTCP85	9,709	2,104	235.28	494,939	73,433	716	0	0	716	0	7	**723**
216	25L-ARR-GA-CL600	GTCP36-300	1,004	218	282.20	61,388	9,108	89	0	0	89	0	1	**90**
217	25L-DEP-GA-CL600	GTCP36-300	1,004	218	282.20	61,388	9,108	89	0	0	89	0	1	**90**
218	24R-ARR-GA-CNA750	0	335	n/a	n/a	0	0	0	0	0	0	0	0	**0**
219	25L-ARR-GA-CNA750	0	7,031	n/a	n/a	0	0	0	0	0	0	0	0	**0**
220	25L-DEP-GA-CNA750	0	7,030	n/a	n/a	0	0	0	0	0	0	0	0	**0**
221	24L-DEP-T8-EMB120	GTCP36-300	10,044	2,176	282.20	614,124	91,116	888	0	0	888	1	9	**898**
222	24R-ARR-T8-EMB120	GTCP36-300	10,044	2,176	282.20	614,124	91,116	888	0	0	888	1	9	**898**
223	25L-ARR-T8-EMB120	GTCP36-300	8,704	1,886	282.20	532,192	78,960	770	0	0	770	0	8	**778**

LAX SPAS

Auxiliary Power Units - Greenhouse Gas Emissions

Preliminary Baseline Operational Emissions Estimates

Aircraft ID	User ID	APU Description	Annual Operations	APU Operation (hours/year)	APU Fuel Flow (lb/hr)	Fuel Consumption		Annual Emissions (MT/year)			Annual CO2e Emissions (MTCO2e/year)			
						(lb/yr)	(gal/yr)	CO2	CH4	N2O	CO2	CH4	N2O	Total
224	25L-DEP-T8-EMB120	GTCP36-300	670	145	282.20	40,966	6,078	59	0	0	59	0	1	**60**
225	25R-ARR-T8-EMB120	GTCP36-300	670	145	282.20	40,966	6,078	59	0	0	59	0	1	**60**
226	25R-DEP-T8-EMB120	GTCP36-300	8,704	1,886	282.20	532,192	78,960	770	0	0	770	0	8	**778**
227	24L-DEP-AE-ERJ140	GTCP36-300	4,352	943	282.20	266,096	39,480	385	0	0	385	0	4	**389**
228	24L-DEP-WEST-ERJ140	GTCP36-300	670	145	282.20	40,966	6,078	59	0	0	59	0	1	**60**
229	24R-ARR-AE-ERJ140	GTCP36-300	6,360	1,378	282.20	388,872	57,696	563	0	0	563	0	6	**568**
230	24R-ARR-WEST-ERJ140	GTCP36-300	670	145	282.20	40,966	6,078	59	0	0	59	0	1	**60**
231	25L-ARR-AE-ERJ140	GTCP36-300	3,348	725	282.20	204,708	30,372	296	0	0	296	0	3	**299**
232	25R-ARR-AE-ERJ140	GTCP36-300	1,004	218	282.20	61,388	9,108	89	0	0	89	0	1	**90**
233	25R-DEP-AE-ERJ140	GTCP36-300	6,360	1,378	282.20	388,872	57,696	563	0	0	563	0	6	**568**
234	24L-DEP-T2-ERJ190-LR	0	2,678	n/a	n/a	0	0	0	0	0	0	0	0	**0**
235	24L-DEP-T3-ERJ190-LR	0	4,017	n/a	n/a	0	0	0	0	0	0	0	0	**0**
236	24R-ARR-T2-ERJ190-LR	0	2,678	n/a	n/a	0	0	0	0	0	0	0	0	**0**
237	24R-ARR-T3-ERJ190-LR	0	4,018	n/a	n/a	0	0	0	0	0	0	0	0	**0**
238	25L-ARR-T6-ERJ190-LR	0	335	n/a	n/a	0	0	0	0	0	0	0	0	**0**
239	25R-DEP-T6-ERJ190-LR	0	335	n/a	n/a	0	0	0	0	0	0	0	0	**0**
240	25L-ARR-GA-MIL-C130	0	335	n/a	n/a	0	0	0	0	0	0	0	0	**0**
241	25L-DEP-GA-MIL-C130	0	335	n/a	n/a	0	0	0	0	0	0	0	0	**0**
242	25L-ARR-GA-BEECH18	0	1,339	n/a	n/a	0	0	0	0	0	0	0	0	**0**
243	25L-DEP-GA-BEECH18	0	1,004	n/a	n/a	0	0	0	0	0	0	0	0	**0**
244	25L-ARR-CARGO_1-BEECH1900-D	0	335	n/a	n/a	0	0	0	0	0	0	0	0	**0**
245	25L-ARR-GA-BEECH1900-D	0	1,339	n/a	n/a	0	0	0	0	0	0	0	0	**0**
246	25L-DEP-GA-BEECH1900-D	0	1,339	n/a	n/a	0	0	0	0	0	0	0	0	**0**
		Total	**523,298**	**105,910**	**76,772**	**30,362,174**	**4,504,774**	**43,922**	**1**	**1**	**43,922**	**26**	**433**	**44,380**

Source: EDMS 5.1.3, Baseline-VisW (Adjusted Taxiway Speed), AC_MAIN.dbf.

Note:

Annual aircraft operations are calculated higher than EDMS because of rounding differences.

Key:

APU = auxiliary power unit
CH4 = methane
CO2 = carbon dioxide
CO2e = carbon dioxide equivalent
gal/yr = gallons per year
lb/hr = pounds per hour
lb/yr = pounds per year
MT/year = metric tons per year
MTCO2e/year = metric tons carbon dioxide equivalent per year
N2O = nitrous oxide

Table 75
LAX SPAS
Auxiliary Power Units - Greenhouse Gas Emissions

Preliminary Alternative 1-9 Operational Emissions Estimates

Aircraft ID	User ID	APU Description	Annual Operations	APU Operation (hours/year)	APU Fuel Flow (lb/hr)	Fuel Consumption (lb/yr)	Fuel Consumption (gal/yr)	Annual Emissions (MT/year) CO2	CH4	N2O	Annual CO2e Emissions (MTCO2e/year) CO2	CH4	N2O	Total
1	24L-DEP-MSC-N-B787-800	GTCP331-500	670	145	536.00	77,809	11,544	113	0	0	113	0	1	**114**
2	24R-ARR-MSC-N-B787-800	GTCP331-500	670	145	536.00	77,809	11,544	113	0	0	113	0	1	**114**
3	25L-ARR-T4-B787-800	GTCP331-500	335	73	536.00	38,905	5,772	56	0	0	56	0	1	**57**
4	25L-ARR-T5-B787-800	GTCP331-500	335	73	536.00	38,905	5,772	56	0	0	56	0	1	**57**
5	25L-ARR-T6-B787-800	GTCP331-500	335	73	536.00	38,905	5,772	56	0	0	56	0	1	**57**
6	25L-ARR-TBIT-S-B787-800	GTCP331-500	335	73	536.00	38,905	5,772	56	0	0	56	0	1	**57**
7	25R-DEP-T4-B787-800	GTCP331-500	335	73	536.00	38,905	5,772	56	0	0	56	0	1	**57**
8	25R-DEP-T5-B787-800	GTCP331-500	670	145	536.00	77,809	11,544	113	0	0	113	0	1	**114**
9	25R-DEP-T6-B787-800	GTCP331-500	335	73	536.00	38,905	5,772	56	0	0	56	0	1	**57**
10	25R-DEP-TBIT-S-B787-800	GTCP331-500	335	73	536.00	38,905	5,772	56	0	0	56	0	1	**57**
11	24L-DEP-MSC-N-B787-900	GTCP331-500	670	145	536.00	77,809	11,544	113	0	0	113	0	1	**114**
12	24L-DEP-T3-B787-900	GTCP331-500	335	73	536.00	38,905	5,772	56	0	0	56	0	1	**57**
13	24L-DEP-TBIT-N-B787-900	GTCP331-500	335	73	536.00	38,905	5,772	56	0	0	56	0	1	**57**
14	24R-ARR-MSC-N-B787-900	GTCP331-500	670	145	536.00	77,809	11,544	113	0	0	113	0	1	**114**
15	24R-ARR-MSC-S-B787-900	GTCP331-500	335	73	536.00	38,905	5,772	56	0	0	56	0	1	**57**
16	24R-ARR-T3-B787-900	GTCP331-500	335	73	536.00	38,905	5,772	56	0	0	56	0	1	**57**
17	24R-ARR-TBIT-N-B787-900	GTCP331-500	335	73	536.00	38,905	5,772	56	0	0	56	0	1	**57**
18	25L-ARR-MSC-S-B787-900	GTCP331-500	335	73	536.00	38,905	5,772	56	0	0	56	0	1	**57**
19	25L-ARR-T4-B787-900	GTCP331-500	335	73	536.00	38,905	5,772	56	0	0	56	0	1	**57**
20	25L-ARR-T5-B787-900	GTCP331-500	335	73	536.00	38,905	5,772	56	0	0	56	0	1	**57**
21	25L-ARR-TBIT-S-B787-900	GTCP331-500	335	73	536.00	38,905	5,772	56	0	0	56	0	1	**57**
22	25R-ARR-MSC-N-B787-900	GTCP331-500	335	73	536.00	38,905	5,772	56	0	0	56	0	1	**57**
23	25R-DEP-MSC-N-B787-900	GTCP331-500	335	73	536.00	38,905	5,772	56	0	0	56	0	1	**57**
24	25R-DEP-MSC-S-B787-900	GTCP331-500	670	145	536.00	77,809	11,544	113	0	0	113	0	1	**114**
25	25R-DEP-T4-B787-900	GTCP331-500	335	73	536.00	38,905	5,772	56	0	0	56	0	1	**57**
26	25R-DEP-T5-B787-900	GTCP331-500	335	73	536.00	38,905	5,772	56	0	0	56	0	1	**57**
27	25R-DEP-TBIT-S-B787-900	GTCP331-500	335	73	536.00	38,905	5,772	56	0	0	56	0	1	**57**
28	25L-ARR-CARGO_1-A300F4-6	GTCP331-200ER	335	73	267.92	19,447	2,885	28	0	0	28	0	0	**28**
29	25L-ARR-CARGO_2-A300F4-6	GTCP331-200ER	670	145	267.92	38,893	5,770	56	0	0	56	0	1	**57**
30	25L-DEP-CARGO_2-A300F4-6	GTCP331-200ER	670	145	267.92	38,893	5,770	56	0	0	56	0	1	**57**
31	25R-DEP-CARGO_4-A300F4-6	GTCP331-200ER	335	73	267.92	19,447	2,885	28	0	0	28	0	0	**28**
32	25L-ARR-CARGO_1-A310-2	GTCP331-200ER	335	73	267.92	19,447	2,885	28	0	0	28	0	0	**28**
33	25L-DEP-CARGO_1-A310-2	GTCP331-200ER	335	73	267.92	19,447	2,885	28	0	0	28	0	0	**28**
34	24L-DEP-MSC-N-A319-1	GTCP36-300	335	73	282.20	20,483	3,039	30	0	0	30	0	0	**30**
35	24L-DEP-MSC-S-A319-1	GTCP36-300	335	73	282.20	20,483	3,039	30	0	0	30	0	0	**30**
36	24L-DEP-T0-A319-1	GTCP36-300	335	73	282.20	20,483	3,039	30	0	0	30	0	0	**30**
37	24L-DEP-T1-A319-1	GTCP36-300	670	145	282.20	40,966	6,078	59	0	0	59	0	1	**60**
38	24L-DEP-T2-A319-1	GTCP36-300	335	73	282.20	20,483	3,039	30	0	0	30	0	0	**30**
39	24L-DEP-T3-A319-1	GTCP36-300	335	73	282.20	20,483	3,039	30	0	0	30	0	0	**30**
40	24L-DEP-T6-A319-1	GTCP36-300	335	73	282.20	20,483	3,039	30	0	0	30	0	0	**30**
41	24L-DEP-T8-A319-1	GTCP36-300	335	73	282.20	20,483	3,039	30	0	0	30	0	0	**30**
42	24L-DEP-TBIT-N-A319-1	GTCP36-300	670	145	282.20	40,966	6,078	59	0	0	59	0	1	**60**
43	24L-DEP-TBIT-S-A319-1	GTCP36-300	670	145	282.20	40,966	6,078	59	0	0	59	0	1	**60**

LAX SPAS

Auxiliary Power Units - Greenhouse Gas Emissions

Preliminary Alternative 1-9 Operational Emissions Estimates

Aircraft ID	User ID	APU Description	Annual Operations	APU Operation (hours/year)	APU Fuel Flow (lb/hr)	Fuel Consumption		Annual Emissions (MT/year)			Annual CO2e Emissions (MTCO2e/year)			
						(lb/yr)	(gal/yr)	CO2	CH4	N2O	CO2	CH4	N2O	Total
44	24R-ARR-MSC-N-A319-1	GTCP36-300	670	145	282.20	40,966	6,078	59	0	0	59	0	1	**60**
45	24R-ARR-MSC-S-A319-1	GTCP36-300	335	73	282.20	20,483	3,039	30	0	0	30	0	0	**30**
46	24R-ARR-T0-A319-1	GTCP36-300	335	73	282.20	20,483	3,039	30	0	0	30	0	0	**30**
47	24R-ARR-T1-A319-1	GTCP36-300	670	145	282.20	40,966	6,078	59	0	0	59	0	1	**60**
48	24R-ARR-T2-A319-1	GTCP36-300	335	73	282.20	20,483	3,039	30	0	0	30	0	0	**30**
49	24R-ARR-T3-A319-1	GTCP36-300	335	73	282.20	20,483	3,039	30	0	0	30	0	0	**30**
50	24R-ARR-TBIT-N-A319-1	GTCP36-300	670	145	282.20	40,966	6,078	59	0	0	59	0	1	**60**
51	24R-ARR-TBIT-S-A319-1	GTCP36-300	335	73	282.20	20,483	3,039	30	0	0	30	0	0	**30**
52	25L-ARR-MSC-S-A319-1	GTCP36-300	670	145	282.20	40,966	6,078	59	0	0	59	0	1	**60**
53	25L-ARR-T4-A319-1	GTCP36-300	670	145	282.20	40,966	6,078	59	0	0	59	0	1	**60**
54	25L-ARR-T5-A319-1	GTCP36-300	335	73	282.20	20,483	3,039	30	0	0	30	0	0	**30**
55	25L-ARR-T6-A319-1	GTCP36-300	1,004	218	282.20	61,388	9,108	89	0	0	89	0	1	**90**
56	25L-ARR-T7-A319-1	GTCP36-300	670	145	282.20	40,966	6,078	59	0	0	59	0	1	**60**
57	25L-ARR-T8-A319-1	GTCP36-300	1,004	218	282.20	61,388	9,108	89	0	0	89	0	1	**90**
58	25L-ARR-TBIT-S-A319-1	GTCP36-300	335	73	282.20	20,483	3,039	30	0	0	30	0	0	**30**
59	25R-ARR-T4-A319-1	GTCP36-300	335	73	282.20	20,483	3,039	30	0	0	30	0	0	**30**
60	25R-ARR-T7-A319-1	GTCP36-300	335	73	282.20	20,483	3,039	30	0	0	30	0	0	**30**
61	25R-DEP-MSC-N-A319-1	GTCP36-300	335	73	282.20	20,483	3,039	30	0	0	30	0	0	**30**
62	25R-DEP-MSC-S-A319-1	GTCP36-300	670	145	282.20	40,966	6,078	59	0	0	59	0	1	**60**
63	25R-DEP-T4-A319-1	GTCP36-300	1,004	218	282.20	61,388	9,108	89	0	0	89	0	1	**90**
64	25R-DEP-T5-A319-1	GTCP36-300	335	73	282.20	20,483	3,039	30	0	0	30	0	0	**30**
65	25R-DEP-T6-A319-1	GTCP36-300	670	145	282.20	40,966	6,078	59	0	0	59	0	1	**60**
66	25R-DEP-T7-A319-1	GTCP36-300	1,004	218	282.20	61,388	9,108	89	0	0	89	0	1	**90**
67	25R-DEP-T8-A319-1	GTCP36-300	670	145	282.20	40,966	6,078	59	0	0	59	0	1	**60**
68	24L-ARR-MSC-N-A320-2	GTCP36-300	335	73	282.20	20,483	3,039	30	0	0	30	0	0	**30**
69	24L-ARR-T1-A320-2	GTCP36-300	335	73	282.20	20,483	3,039	30	0	0	30	0	0	**30**
70	24L-DEP-MSC-N-A320-2	GTCP36-300	3,683	798	282.20	225,191	33,411	326	0	0	326	0	3	**329**
71	24L-DEP-MSC-S-A320-2	GTCP36-300	1,339	290	282.20	81,871	12,147	118	0	0	118	0	1	**120**
72	24L-DEP-T0-A320-2	GTCP36-300	3,013	653	282.20	184,225	27,333	266	0	0	266	0	3	**269**
73	24L-DEP-T1-A320-2	GTCP36-300	3,348	725	282.20	204,708	30,372	296	0	0	296	0	3	**299**
74	24L-DEP-T2-A320-2	GTCP36-300	2,344	508	282.20	143,320	21,264	207	0	0	207	0	2	**209**
75	24L-DEP-T3-A320-2	GTCP36-300	1,674	363	282.20	102,354	15,186	148	0	0	148	0	1	**150**
76	24L-DEP-T4-A320-2	GTCP36-300	670	145	282.20	40,966	6,078	59	0	0	59	0	1	**60**
77	24L-DEP-T7-A320-2	GTCP36-300	670	145	282.20	40,966	6,078	59	0	0	59	0	1	**60**
78	24L-DEP-TBIT-N-A320-2	GTCP36-300	2,344	508	282.20	143,320	21,264	207	0	0	207	0	2	**209**
79	24L-DEP-TBIT-S-A320-2	GTCP36-300	670	145	282.20	40,966	6,078	59	0	0	59	0	1	**60**
80	24R-ARR-MSC-N-A320-2	GTCP36-300	2,678	580	282.20	163,742	24,294	237	0	0	237	0	2	**239**
81	24R-ARR-MSC-S-A320-2	GTCP36-300	1,004	218	282.20	61,388	9,108	89	0	0	89	0	1	**90**
82	24R-ARR-T0-A320-2	GTCP36-300	3,013	653	282.20	184,225	27,333	266	0	0	266	0	3	**269**
83	24R-ARR-T1-A320-2	GTCP36-300	3,348	725	282.20	204,708	30,372	296	0	0	296	0	3	**299**
84	24R-ARR-T2-A320-2	GTCP36-300	1,674	363	282.20	102,354	15,186	148	0	0	148	0	1	**150**
85	24R-ARR-T3-A320-2	GTCP36-300	1,004	218	282.20	61,388	9,108	89	0	0	89	0	1	**90**
86	24R-ARR-T6-A320-2	GTCP36-300	335	73	282.20	20,483	3,039	30	0	0	30	0	0	**30**
87	24R-ARR-T7-A320-2	GTCP36-300	335	73	282.20	20,483	3,039	30	0	0	30	0	0	**30**
88	24R-ARR-T8-A320-2	GTCP36-300	670	145	282.20	40,966	6,078	59	0	0	59	0	1	**60**

LAX SPAS

Auxiliary Power Units - Greenhouse Gas Emissions

Preliminary Alternative 1-9 Operational Emissions Estimates

Aircraft ID	User ID	APU Description	Annual Operations	APU Operation (hours/year)	APU Fuel Flow (lb/hr)	Fuel Consumption		Annual Emissions (MT/year)			Annual CO2e Emissions (MTCO2e/year)			
						(lb/yr)	(gal/yr)	CO2	CH4	N2O	CO2	CH4	N2O	Total
89	24R-ARR-TBIT-N-A320-2	GTCP36-300	670	145	282.20	40,966	6,078	59	0	0	59	0	1	**60**
90	24R-ARR-TBIT-S-A320-2	GTCP36-300	335	73	282.20	20,483	3,039	30	0	0	30	0	0	**30**
91	25L-ARR-MSC-N-A320-2	GTCP36-300	2,009	435	282.20	122,837	18,225	178	0	0	178	0	2	**180**
92	25L-ARR-MSC-S-A320-2	GTCP36-300	2,344	508	282.20	143,320	21,264	207	0	0	207	0	2	**209**
93	25L-ARR-T2-A320-2	GTCP36-300	335	73	282.20	20,483	3,039	30	0	0	30	0	0	**30**
94	25L-ARR-T4-A320-2	GTCP36-300	3,013	653	282.20	184,225	27,333	266	0	0	266	0	3	**269**
95	25L-ARR-T5-A320-2	GTCP36-300	2,009	435	282.20	122,837	18,225	178	0	0	178	0	2	**180**
96	25L-ARR-T6-A320-2	GTCP36-300	670	145	282.20	40,966	6,078	59	0	0	59	0	1	**60**
97	25L-ARR-T7-A320-2	GTCP36-300	2,344	508	282.20	143,320	21,264	207	0	0	207	0	2	**209**
98	25L-ARR-T8-A320-2	GTCP36-300	670	145	282.20	40,966	6,078	59	0	0	59	0	1	**60**
99	25L-ARR-TBIT-N-A320-2	GTCP36-300	1,674	363	282.20	102,354	15,186	148	0	0	148	0	1	**150**
100	25L-ARR-TBIT-S-A320-2	GTCP36-300	1,674	363	282.20	102,354	15,186	148	0	0	148	0	1	**150**
101	25R-ARR-MSC-S-A320-2	GTCP36-300	670	145	282.20	40,966	6,078	59	0	0	59	0	1	**60**
102	25R-ARR-T3-A320-2	GTCP36-300	335	73	282.20	20,483	3,039	30	0	0	30	0	0	**30**
103	25R-ARR-T4-A320-2	GTCP36-300	335	73	282.20	20,483	3,039	30	0	0	30	0	0	**30**
104	25R-ARR-T5-A320-2	GTCP36-300	670	145	282.20	40,966	6,078	59	0	0	59	0	1	**60**
105	25R-ARR-T7-A320-2	GTCP36-300	335	73	282.20	20,483	3,039	30	0	0	30	0	0	**30**
106	25R-ARR-TBIT-N-A320-2	GTCP36-300	335	73	282.20	20,483	3,039	30	0	0	30	0	0	**30**
107	25R-ARR-TBIT-S-A320-2	GTCP36-300	670	145	282.20	40,966	6,078	59	0	0	59	0	1	**60**
108	25R-DEP-MSC-N-A320-2	GTCP36-300	1,674	363	282.20	102,354	15,186	148	0	0	148	0	1	**150**
109	25R-DEP-MSC-S-A320-2	GTCP36-300	3,348	725	282.20	204,708	30,372	296	0	0	296	0	3	**299**
110	25R-DEP-T4-A320-2	GTCP36-300	2,343	508	282.20	143,259	21,255	207	0	0	207	0	2	**209**
111	25R-DEP-T5-A320-2	GTCP36-300	2,678	580	282.20	163,742	24,294	237	0	0	237	0	2	**239**
112	25R-DEP-T6-A320-2	GTCP36-300	1,004	218	282.20	61,388	9,108	89	0	0	89	0	1	**90**
113	25R-DEP-T7-A320-2	GTCP36-300	2,678	580	282.20	163,742	24,294	237	0	0	237	0	2	**239**
114	25R-DEP-T8-A320-2	GTCP36-300	2,009	435	282.20	122,837	18,225	178	0	0	178	0	2	**180**
115	25R-DEP-TBIT-S-A320-2	GTCP36-300	2,009	435	282.20	122,837	18,225	178	0	0	178	0	2	**180**
116	25L-ARR-TBIT-S-A330-3	GTCP331-500	670	145	536.00	77,809	11,544	113	0	0	113	0	1	**114**
117	25R-ARR-TBIT-S-A330-3	GTCP331-500	335	73	536.00	38,905	5,772	56	0	0	56	0	1	**57**
118	25R-DEP-TBIT-S-A330-3	GTCP331-500	1,004	218	536.00	116,598	17,299	169	0	0	169	0	2	**170**
119	24L-DEP-MSC-N-A340-3	GTCP331-500	335	73	536.00	38,905	5,772	56	0	0	56	0	1	**57**
120	24L-DEP-MSC-S-A340-3	GTCP331-500	335	73	536.00	38,905	5,772	56	0	0	56	0	1	**57**
121	24L-DEP-T4-A340-3	GTCP331-500	335	73	536.00	38,905	5,772	56	0	0	56	0	1	**57**
122	24L-DEP-TBIT-N-A340-3	GTCP331-500	335	73	536.00	38,905	5,772	56	0	0	56	0	1	**57**
123	24L-DEP-TBIT-S-A340-3	GTCP331-500	335	73	536.00	38,905	5,772	56	0	0	56	0	1	**57**
124	24R-ARR-MSC-N-A340-3	GTCP331-500	335	73	536.00	38,905	5,772	56	0	0	56	0	1	**57**
125	24R-ARR-MSC-S-A340-3	GTCP331-500	335	73	536.00	38,905	5,772	56	0	0	56	0	1	**57**
126	24R-ARR-TBIT-N-A340-3	GTCP331-500	670	145	536.00	77,809	11,544	113	0	0	113	0	1	**114**
127	24R-ARR-TBIT-S-A340-3	GTCP331-500	335	73	536.00	38,905	5,772	56	0	0	56	0	1	**57**
128	25L-ARR-MSC-N-A340-3	GTCP331-500	335	73	536.00	38,905	5,772	56	0	0	56	0	1	**57**
129	25L-ARR-MSC-S-A340-3	GTCP331-500	335	73	536.00	38,905	5,772	56	0	0	56	0	1	**57**
130	25L-ARR-T4-A340-3	GTCP331-500	670	145	536.00	77,809	11,544	113	0	0	113	0	1	**114**
131	25L-ARR-TBIT-S-A340-3	GTCP331-500	670	145	536.00	77,809	11,544	113	0	0	113	0	1	**114**
132	25R-DEP-MSC-N-A340-3	GTCP331-500	335	73	536.00	38,905	5,772	56	0	0	56	0	1	**57**
133	25R-DEP-MSC-S-A340-3	GTCP331-500	335	73	536.00	38,905	5,772	56	0	0	56	0	1	**57**

LAX SPAS

Auxiliary Power Units - Greenhouse Gas Emissions

Preliminary Alternative 1-9 Operational Emissions Estimates

Aircraft ID	User ID	APU Description	Annual Operations	APU Operation (hours/year)	APU Fuel Flow (lb/hr)	Fuel Consumption		Annual Emissions (MT/year)			Annual CO2e Emissions (MTCO2e/year)			
						(lb/yr)	(gal/yr)	CO2	CH4	N2O	CO2	CH4	N2O	Total
134	25R-DEP-T4-A340-3	GTCP331-500	335	73	536.00	38,905	5,772	56	0	0	56	0	1	**57**
135	25R-DEP-TBIT-N-A340-3	GTCP331-500	335	73	536.00	38,905	5,772	56	0	0	56	0	1	**57**
136	25R-DEP-TBIT-S-A340-3	GTCP331-500	670	145	536.00	77,809	11,544	113	0	0	113	0	1	**114**
137	24L-DEP-MSC-S-A380-8	GTCP331-500	335	73	536.00	38,905	5,772	56	0	0	56	0	1	**57**
138	24L-DEP-TBIT-S-A380-8	GTCP331-500	335	73	536.00	38,905	5,772	56	0	0	56	0	1	**57**
139	24R-ARR-MSC-S-A380-8	GTCP331-500	670	145	536.00	77,809	11,544	113	0	0	113	0	1	**114**
140	24R-ARR-TBIT-N-A380-8	GTCP331-500	670	145	536.00	77,809	11,544	113	0	0	113	0	1	**114**
141	24R-ARR-TBIT-S-A380-8	GTCP331-500	1,674	363	536.00	194,407	28,844	281	0	0	281	0	3	**284**
142	25L-ARR-TBIT-S-A380-8	GTCP331-500	1,339	290	536.00	155,503	23,072	225	0	0	225	0	2	**227**
143	25L-DEP-MSC-S-A380-8	GTCP331-500	670	145	536.00	77,809	11,544	113	0	0	113	0	1	**114**
144	25L-DEP-TBIT-N-A380-8	GTCP331-500	670	145	536.00	77,809	11,544	113	0	0	113	0	1	**114**
145	25L-DEP-TBIT-S-A380-8	GTCP331-500	2,678	580	536.00	311,005	46,143	450	0	0	450	0	4	**455**
146	24L-DEP-MSC-N-B737-3	GTCP85-129	335	73	235.28	17,077	2,534	25	0	0	25	0	0	**25**
147	24L-DEP-MSC-S-B737-3	GTCP85-129	670	145	235.28	34,155	5,067	49	0	0	49	0	0	**50**
148	24L-DEP-T0-B737-3	GTCP85-129	1,004	218	235.28	51,181	7,594	74	0	0	74	0	1	**75**
149	24L-DEP-T1-B737-3	GTCP85-129	2,344	508	235.28	119,491	17,729	173	0	0	173	0	2	**175**
150	24L-DEP-T3-B737-3	GTCP85-129	335	73	235.28	17,077	2,534	25	0	0	25	0	0	**25**
151	24L-DEP-T6-B737-3	GTCP85-129	1,004	218	235.28	51,181	7,594	74	0	0	74	0	1	**75**
152	24L-DEP-T7-B737-3	GTCP85-129	335	73	235.28	17,077	2,534	25	0	0	25	0	0	**25**
153	24R-ARR-MSC-N-B737-3	GTCP85-129	335	73	235.28	17,077	2,534	25	0	0	25	0	0	**25**
154	24R-ARR-T0-B737-3	GTCP85-129	1,004	218	235.28	51,181	7,594	74	0	0	74	0	1	**75**
155	24R-ARR-T1-B737-3	GTCP85-129	2,344	508	235.28	119,491	17,729	173	0	0	173	0	2	**175**
156	24R-ARR-T3-B737-3	GTCP85-129	335	73	235.28	17,077	2,534	25	0	0	25	0	0	**25**
157	24R-ARR-T4-B737-3	GTCP85-129	335	73	235.28	17,077	2,534	25	0	0	25	0	0	**25**
158	25L-ARR-MSC-N-B737-3	GTCP85-129	335	73	235.28	17,077	2,534	25	0	0	25	0	0	**25**
159	25L-ARR-MSC-S-B737-3	GTCP85-129	2,009	435	235.28	102,413	15,195	148	0	0	148	0	1	**150**
160	25L-ARR-T4-B737-3	GTCP85-129	1,339	290	235.28	68,259	10,127	99	0	0	99	0	1	**100**
161	25L-ARR-T5-B737-3	GTCP85-129	1,004	218	235.28	51,181	7,594	74	0	0	74	0	1	**75**
162	25L-ARR-T6-B737-3	GTCP85-129	1,674	363	235.28	85,336	12,661	123	0	0	123	0	1	**125**
163	25L-ARR-T7-B737-3	GTCP85-129	335	73	235.28	17,077	2,534	25	0	0	25	0	0	**25**
164	25L-ARR-T8-B737-3	GTCP85-129	335	73	235.28	17,077	2,534	25	0	0	25	0	0	**25**
165	25R-ARR-T6-B737-3	GTCP85-129	335	73	235.28	17,077	2,534	25	0	0	25	0	0	**25**
166	25R-ARR-T8-B737-3	GTCP85-129	335	73	235.28	17,077	2,534	25	0	0	25	0	0	**25**
167	25R-DEP-MSC-N-B737-3	GTCP85-129	335	73	235.28	17,077	2,534	25	0	0	25	0	0	**25**
168	25R-DEP-MSC-S-B737-3	GTCP85-129	1,339	290	235.28	68,259	10,127	99	0	0	99	0	1	**100**
169	25R-DEP-T4-B737-3	GTCP85-129	1,674	363	235.28	85,336	12,661	123	0	0	123	0	1	**125**
170	25R-DEP-T5-B737-3	GTCP85-129	1,004	218	235.28	51,181	7,594	74	0	0	74	0	1	**75**
171	25R-DEP-T6-B737-3	GTCP85-129	1,004	218	235.28	51,181	7,594	74	0	0	74	0	1	**75**
172	25R-DEP-T8-B737-3	GTCP85-129	670	145	235.28	34,155	5,067	49	0	0	49	0	0	**50**
173	24L-DEP-MSC-N-B737-7	GTCP85	3,013	653	235.28	153,595	22,789	222	0	0	222	0	2	**225**
174	24L-DEP-MSC-S-B737-7	GTCP85	1,004	218	235.28	51,181	7,594	74	0	0	74	0	1	**75**
175	24L-DEP-T0-B737-7	GTCP85	5,022	1,088	235.28	256,008	37,983	370	0	0	370	0	4	**374**
176	24L-DEP-T1-B737-7	GTCP85	6,361	1,378	235.28	324,267	48,111	469	0	0	469	0	5	**474**
177	24L-DEP-T2-B737-7	GTCP85	2,009	435	235.28	102,413	15,195	148	0	0	148	0	1	**150**
178	24L-DEP-T3-B737-7	GTCP85	4,352	943	235.28	221,853	32,916	321	0	0	321	0	3	**324**

LAX SPAS

Auxiliary Power Units - Greenhouse Gas Emissions

Preliminary Alternative 1-9 Operational Emissions Estimates

Aircraft ID	User ID	APU Description	Annual Operations	APU Operation (hours/year)	APU Fuel Flow (lb/hr)	Fuel Consumption		Annual Emissions (MT/year)			Annual CO2e Emissions (MTCO2e/year)			
						(lb/yr)	(gal/yr)	CO2	CH4	N2O	CO2	CH4	N2O	Total
179	24L-DEP-T5-B737-7	GTCP85	1,674	363	235.28	85,336	12,661	123	0	0	123	0	1	**125**
180	24L-DEP-T6-B737-7	GTCP85	1,339	290	235.28	68,259	10,127	99	0	0	99	0	1	**100**
181	24L-DEP-T7-B737-7	GTCP85	335	73	235.28	17,077	2,534	25	0	0	25	0	0	**25**
182	24L-DEP-TBIT-N-B737-7	GTCP85	335	73	235.28	17,077	2,534	25	0	0	25	0	0	**25**
183	24R-ARR-MSC-N-B737-7	GTCP85	3,013	653	235.28	153,595	22,789	222	0	0	222	0	2	**225**
184	24R-ARR-MSC-S-B737-7	GTCP85	1,004	218	235.28	51,181	7,594	74	0	0	74	0	1	**75**
185	24R-ARR-T0-B737-7	GTCP85	5,021	1,088	235.28	255,957	37,976	370	0	0	370	0	4	**374**
186	24R-ARR-T1-B737-7	GTCP85	6,696	1,451	235.28	341,344	50,645	494	0	0	494	0	5	**499**
187	24R-ARR-T2-B737-7	GTCP85	1,674	363	235.28	85,336	12,661	123	0	0	123	0	1	**125**
188	24R-ARR-T3-B737-7	GTCP85	4,017	870	235.28	204,776	30,382	296	0	0	296	0	3	**299**
189	24R-ARR-T5-B737-7	GTCP85	335	73	235.28	17,077	2,534	25	0	0	25	0	0	**25**
190	24R-ARR-T6-B737-7	GTCP85	335	73	235.28	17,077	2,534	25	0	0	25	0	0	**25**
191	24R-ARR-T7-B737-7	GTCP85	670	145	235.28	34,155	5,067	49	0	0	49	0	0	**50**
192	25L-ARR-MSC-N-B737-7	GTCP85	335	73	235.28	17,077	2,534	25	0	0	25	0	0	**25**
193	25L-ARR-MSC-S-B737-7	GTCP85	1,004	218	235.28	51,181	7,594	74	0	0	74	0	1	**75**
194	25L-ARR-T2-B737-7	GTCP85	335	73	235.28	17,077	2,534	25	0	0	25	0	0	**25**
195	25L-ARR-T3-B737-7	GTCP85	335	73	235.28	17,077	2,534	25	0	0	25	0	0	**25**
196	25L-ARR-T4-B737-7	GTCP85	2,344	508	235.28	119,491	17,729	173	0	0	173	0	2	**175**
197	25L-ARR-T5-B737-7	GTCP85	3,348	725	235.28	170,672	25,322	247	0	0	247	0	2	**249**
198	25L-ARR-T6-B737-7	GTCP85	2,009	435	235.28	102,413	15,195	148	0	0	148	0	1	**150**
199	25L-ARR-T7-B737-7	GTCP85	670	145	235.28	34,155	5,067	49	0	0	49	0	0	**50**
200	25L-ARR-TBIT-N-B737-7	GTCP85	335	73	235.28	17,077	2,534	25	0	0	25	0	0	**25**
201	25L-ARR-TBIT-S-B737-7	GTCP85	335	73	235.28	17,077	2,534	25	0	0	25	0	0	**25**
202	25L-DEP-N-B737-7	GTCP85	335	73	235.28	17,077	2,534	25	0	0	25	0	0	**25**
203	25R-ARR-T4-B737-7	GTCP85	335	73	235.28	17,077	2,534	25	0	0	25	0	0	**25**
204	25R-ARR-T5-B737-7	GTCP85	335	73	235.28	17,077	2,534	25	0	0	25	0	0	**25**
205	25R-ARR-T7-B737-7	GTCP85	1,004	218	235.28	51,181	7,594	74	0	0	74	0	1	**75**
206	25R-DEP-MSC-N-B737-7	GTCP85	335	73	235.28	17,077	2,534	25	0	0	25	0	0	**25**
207	25R-DEP-MSC-S-B737-7	GTCP85	1,004	218	235.28	51,181	7,594	74	0	0	74	0	1	**75**
208	25R-DEP-T4-B737-7	GTCP85	3,013	653	235.28	153,595	22,789	222	0	0	222	0	2	**225**
209	25R-DEP-T5-B737-7	GTCP85	2,344	508	235.28	119,491	17,729	173	0	0	173	0	2	**175**
210	25R-DEP-T6-B737-7	GTCP85	1,004	218	235.28	51,181	7,594	74	0	0	74	0	1	**75**
211	25R-DEP-T7-B737-7	GTCP85	2,009	435	235.28	102,413	15,195	148	0	0	148	0	1	**150**
212	25R-DEP-TBIT-S-B737-7	GTCP85	335	73	235.28	17,077	2,534	25	0	0	25	0	0	**25**
213	24L-ARR-T1-B737-8	GTCP85	670	145	235.28	34,155	5,067	49	0	0	49	0	0	**50**
214	24L-ARR-T2-B737-8	GTCP85	335	73	235.28	17,077	2,534	25	0	0	25	0	0	**25**
215	24L-DEP-MSC-N-B737-8	GTCP85	4,017	870	235.28	204,776	30,382	296	0	0	296	0	3	**299**
216	24L-DEP-MSC-S-B737-8	GTCP85	2,009	435	235.28	102,413	15,195	148	0	0	148	0	1	**150**
217	24L-DEP-T0-B737-8	GTCP85	3,683	798	235.28	187,750	27,856	272	0	0	272	0	3	**274**
218	24L-DEP-T1-B737-8	GTCP85	7,030	1,523	235.28	358,371	53,171	518	0	0	518	0	5	**524**
219	24L-DEP-T2-B737-8	GTCP85	4,687	1,016	235.28	238,931	35,450	346	0	0	346	0	3	**349**
220	24L-DEP-T3-B737-8	GTCP85	2,344	508	235.28	119,491	17,729	173	0	0	173	0	2	**175**
221	24L-DEP-T4-B737-8	GTCP85	1,674	363	235.28	85,336	12,661	123	0	0	123	0	1	**125**
222	24L-DEP-T5-B737-8	GTCP85	335	73	235.28	17,077	2,534	25	0	0	25	0	0	**25**
223	24L-DEP-T6-B737-8	GTCP85	1,339	290	235.28	68,259	10,127	99	0	0	99	0	1	**100**

LAX SPAS

Auxiliary Power Units - Greenhouse Gas Emissions

Preliminary Alternative 1-9 Operational Emissions Estimates

Aircraft ID	User ID	APU Description	Annual Operations	APU Operation (hours/year)	APU Fuel Flow (lb/hr)	Fuel Consumption		Annual Emissions (MT/year)			Annual CO2e Emissions (MTCO2e/year)			
						(lb/yr)	(gal/yr)	CO2	CH4	N2O	CO2	CH4	N2O	Total
224	24L-DEP-T7-B737-8	GTCP85	670	145	235.28	34,155	5,067	49	0	0	49	0	0	**50**
225	24L-DEP-TBIT-N-B737-8	GTCP85	670	145	235.28	34,155	5,067	49	0	0	49	0	0	**50**
226	24L-DEP-TBIT-S-B737-8	GTCP85	335	73	235.28	17,077	2,534	25	0	0	25	0	0	**25**
227	24R-ARR-MSC-N-B737-8	GTCP85	3,683	798	235.28	187,750	27,856	272	0	0	272	0	3	**274**
228	24R-ARR-MSC-S-B737-8	GTCP85	1,339	290	235.28	68,259	10,127	99	0	0	99	0	1	**100**
229	24R-ARR-T0-B737-8	GTCP85	3,348	725	235.28	170,672	25,322	247	0	0	247	0	2	**249**
230	24R-ARR-T1-B737-8	GTCP85	7,030	1,523	235.28	358,371	53,171	518	0	0	518	0	5	**524**
231	24R-ARR-T2-B737-8	GTCP85	4,352	943	235.28	221,853	32,916	321	0	0	321	0	3	**324**
232	24R-ARR-T3-B737-8	GTCP85	2,344	508	235.28	119,491	17,729	173	0	0	173	0	2	**175**
233	24R-ARR-T6-B737-8	GTCP85	335	73	235.28	17,077	2,534	25	0	0	25	0	0	**25**
234	24R-ARR-TBIT-N-B737-8	GTCP85	1,004	218	235.28	51,181	7,594	74	0	0	74	0	1	**75**
235	24R-DEP-T1-B737-8	GTCP85	670	145	235.28	34,155	5,067	49	0	0	49	0	0	**50**
236	25L-ARR-MSC-N-B737-8	GTCP85	2,009	435	235.28	102,413	15,195	148	0	0	148	0	1	**150**
237	25L-ARR-MSC-S-B737-8	GTCP85	8,035	1,741	235.28	409,603	60,772	593	0	0	593	0	6	**599**
238	25L-ARR-T4-B737-8	GTCP85	3,013	653	235.28	153,595	22,789	222	0	0	222	0	2	**225**
239	25L-ARR-T5-B737-8	GTCP85	2,009	435	235.28	102,413	15,195	148	0	0	148	0	1	**150**
240	25L-ARR-T6-B737-8	GTCP85	4,687	1,016	235.28	238,931	35,450	346	0	0	346	0	3	**349**
241	25L-ARR-T7-B737-8	GTCP85	1,674	363	235.28	85,336	12,661	123	0	0	123	0	1	**125**
242	25L-ARR-TBIT-S-B737-8	GTCP85	670	145	235.28	34,155	5,067	49	0	0	49	0	0	**50**
243	25R-ARR-MSC-N-B737-8	GTCP85	335	73	235.28	17,077	2,534	25	0	0	25	0	0	**25**
244	25R-ARR-MSC-S-B737-8	GTCP85	670	145	235.28	34,155	5,067	49	0	0	49	0	0	**50**
245	25R-ARR-T4-B737-8	GTCP85	335	73	235.28	17,077	2,534	25	0	0	25	0	0	**25**
246	25R-ARR-T5-B737-8	GTCP85	670	145	235.28	34,155	5,067	49	0	0	49	0	0	**50**
247	25R-ARR-T6-B737-8	GTCP85	335	73	235.28	17,077	2,534	25	0	0	25	0	0	**25**
248	25R-ARR-T7-B737-8	GTCP85	335	73	235.28	17,077	2,534	25	0	0	25	0	0	**25**
249	25R-DEP-MSC-N-B737-8	GTCP85	2,009	435	235.28	102,413	15,195	148	0	0	148	0	1	**150**
250	25R-DEP-MSC-S-B737-8	GTCP85	8,370	1,814	235.28	426,680	63,306	617	0	0	617	0	6	**624**
251	25R-DEP-T4-B737-8	GTCP85	2,009	435	235.28	102,413	15,195	148	0	0	148	0	1	**150**
252	25R-DEP-T5-B737-8	GTCP85	2,344	508	235.28	119,491	17,729	173	0	0	173	0	2	**175**
253	25R-DEP-T6-B737-8	GTCP85	4,352	943	235.28	221,853	32,916	321	0	0	321	0	3	**324**
254	25R-DEP-T7-B737-8	GTCP85	1,339	290	235.28	68,259	10,127	99	0	0	99	0	1	**100**
255	25R-DEP-TBIT-S-B737-8	GTCP85	335	73	235.28	17,077	2,534	25	0	0	25	0	0	**25**
256	24L-DEP-MSC-N-B747-4	PWC 901A	670	145	510.00	74,035	10,984	107	0	0	107	0	1	**108**
257	24L-DEP-TBIT-N-B747-4	PWC 901A	2,678	580	510.00	295,919	43,905	428	0	0	428	0	4	**433**
258	24L-DEP-TBIT-S-B747-4	PWC 901A	335	73	510.00	37,018	5,492	54	0	0	54	0	1	**54**
259	24R-ARR-MSC-N-B747-4	PWC 901A	670	145	510.00	74,035	10,984	107	0	0	107	0	1	**108**
260	24R-ARR-T2-B747-4	PWC 901A	335	73	510.00	37,018	5,492	54	0	0	54	0	1	**54**
261	24R-ARR-TBIT-N-B747-4	PWC 901A	670	145	510.00	74,035	10,984	107	0	0	107	0	1	**108**
262	24R-ARR-TBIT-S-B747-4	PWC 901A	1,004	218	510.00	110,942	16,460	160	0	0	160	0	2	**162**
263	25L-ARR-CARGO_1-B747-4	PWC 901A	1,674	363	510.00	184,977	27,445	268	0	0	268	0	3	**270**
264	25L-ARR-CARGO_2-B747-4	PWC 901A	670	145	510.00	74,035	10,984	107	0	0	107	0	1	**108**
265	25L-ARR-CARGO_3-B747-4	PWC 901A	1,004	218	510.00	110,942	16,460	160	0	0	160	0	2	**162**
266	25L-ARR-CARGO_4-B747-4	PWC 901A	670	145	510.00	74,035	10,984	107	0	0	107	0	1	**108**
267	25L-ARR-MSC-N-B747-4	PWC 901A	670	145	510.00	74,035	10,984	107	0	0	107	0	1	**108**
268	25L-ARR-T4-B747-4	PWC 901A	335	73	510.00	37,018	5,492	54	0	0	54	0	1	**54**

LAX SPAS

Auxiliary Power Units - Greenhouse Gas Emissions

Preliminary Alternative 1-9 Operational Emissions Estimates

Aircraft ID	User ID	APU Description	Annual Operations	APU Operation (hours/year)	APU Fuel Flow (lb/hr)	Fuel Consumption		Annual Emissions (MT/year)			Annual CO2e Emissions (MTCO2e/year)			
						(lb/yr)	(gal/yr)	CO2	CH4	N2O	CO2	CH4	N2O	Total
269	25L-ARR-T7-B747-4	PWC 901A	335	73	510.00	37,018	5,492	54	0	0	54	0	1	**54**
270	25L-ARR-TBIT-N-B747-4	PWC 901A	2,344	508	510.00	259,012	38,429	375	0	0	375	0	4	**379**
271	25L-ARR-TBIT-S-B747-4	PWC 901A	335	73	510.00	37,018	5,492	54	0	0	54	0	1	**54**
272	25L-DEP-CARGO_1-B747-4	PWC 901A	2,009	435	510.00	221,995	32,937	321	0	0	321	0	3	**324**
273	25L-DEP-CARGO_2-B747-4	PWC 901A	670	145	510.00	74,035	10,984	107	0	0	107	0	1	**108**
274	25L-DEP-CARGO_3-B747-4	PWC 901A	670	145	510.00	74,035	10,984	107	0	0	107	0	1	**108**
275	25L-DEP-TBIT-S-B747-4	PWC 901A	335	73	510.00	37,018	5,492	54	0	0	54	0	1	**54**
276	25R-ARR-CARGO_1-B747-4	PWC 901A	335	73	510.00	37,018	5,492	54	0	0	54	0	1	**54**
277	25R-ARR-T4-B747-4	PWC 901A	335	73	510.00	37,018	5,492	54	0	0	54	0	1	**54**
278	25R-ARR-T7-B747-4	PWC 901A	670	145	510.00	74,035	10,984	107	0	0	107	0	1	**108**
279	25R-ARR-TBIT-S-B747-4	PWC 901A	335	73	510.00	37,018	5,492	54	0	0	54	0	1	**54**
280	25R-DEP-CARGO_4-B747-4	PWC 901A	1,339	290	510.00	147,960	21,952	214	0	0	214	0	2	**216**
281	25R-DEP-MSC-N-B747-4	PWC 901A	670	145	510.00	74,035	10,984	107	0	0	107	0	1	**108**
282	25R-DEP-T2-B747-4	PWC 901A	335	73	510.00	37,018	5,492	54	0	0	54	0	1	**54**
283	25R-DEP-T4-B747-4	PWC 901A	335	73	510.00	37,018	5,492	54	0	0	54	0	1	**54**
284	25R-DEP-T5-B747-4	PWC 901A	670	145	510.00	74,035	10,984	107	0	0	107	0	1	**108**
285	25R-DEP-T7-B747-4	PWC 901A	1,004	218	510.00	110,942	16,460	160	0	0	160	0	2	**162**
286	25R-DEP-TBIT-N-B747-4	PWC 901A	335	73	510.00	37,018	5,492	54	0	0	54	0	1	**54**
287	25R-DEP-TBIT-S-B747-4	PWC 901A	1,339	290	510.00	147,960	21,952	214	0	0	214	0	2	**216**
288	24L-ARR-T3-B757-2	GTCP331-200ER	335	73	267.92	19,447	2,885	28	0	0	28	0	0	**28**
289	24L-DEP-MSC-N-B757-2	GTCP331-200ER	3,348	725	267.92	194,349	28,835	281	0	0	281	0	3	**284**
290	24L-DEP-MSC-S-B757-2	GTCP331-200ER	1,004	218	267.92	58,282	8,647	84	0	0	84	0	1	**85**
291	24L-DEP-T0-B757-2	GTCP331-200ER	1,004	218	267.92	58,282	8,647	84	0	0	84	0	1	**85**
292	24L-DEP-T1-B757-2	GTCP331-200ER	2,344	508	267.92	136,068	20,188	197	0	0	197	0	2	**199**
293	24L-DEP-T2-B757-2	GTCP331-200ER	2,344	508	267.92	136,068	20,188	197	0	0	197	0	2	**199**
294	24L-DEP-T3-B757-2	GTCP331-200ER	2,678	580	267.92	155,456	23,065	225	0	0	225	0	2	**227**
295	24R-ARR-MSC-N-B757-2	GTCP331-200ER	3,348	725	267.92	194,349	28,835	281	0	0	281	0	3	**284**
296	24R-ARR-MSC-S-B757-2	GTCP331-200ER	1,004	218	267.92	58,282	8,647	84	0	0	84	0	1	**85**
297	24R-ARR-T0-B757-2	GTCP331-200ER	1,004	218	267.92	58,282	8,647	84	0	0	84	0	1	**85**
298	24R-ARR-T1-B757-2	GTCP331-200ER	3,013	653	267.92	174,903	25,950	253	0	0	253	0	2	**256**
299	24R-ARR-T2-B757-2	GTCP331-200ER	2,678	580	267.92	155,456	23,065	225	0	0	225	0	2	**227**
300	24R-ARR-T3-B757-2	GTCP331-200ER	2,344	508	267.92	136,068	20,188	197	0	0	197	0	2	**199**
301	24R-ARR-T5-B757-2	GTCP331-200ER	670	145	267.92	38,893	5,770	56	0	0	56	0	1	**57**
302	24R-ARR-T6-B757-2	GTCP331-200ER	1,004	218	267.92	58,282	8,647	84	0	0	84	0	1	**85**
303	24R-ARR-T7-B757-2	GTCP331-200ER	670	145	267.92	38,893	5,770	56	0	0	56	0	1	**57**
304	25L-ARR-MSC-S-B757-2	GTCP331-200ER	335	73	267.92	19,447	2,885	28	0	0	28	0	0	**28**
305	25L-ARR-T4-B757-2	GTCP331-200ER	4,018	871	267.92	233,242	34,606	337	0	0	337	0	3	**341**
306	25L-ARR-T5-B757-2	GTCP331-200ER	4,352	943	267.92	252,631	37,482	365	0	0	365	0	4	**369**
307	25L-ARR-T6-B757-2	GTCP331-200ER	3,348	725	267.92	194,349	28,835	281	0	0	281	0	3	**284**
308	25L-ARR-T7-B757-2	GTCP331-200ER	1,004	218	267.92	58,282	8,647	84	0	0	84	0	1	**85**
309	25R-ARR-T4-B757-2	GTCP331-200ER	335	73	267.92	19,447	2,885	28	0	0	28	0	0	**28**
310	25R-ARR-T5-B757-2	GTCP331-200ER	335	73	267.92	19,447	2,885	28	0	0	28	0	0	**28**
311	25R-ARR-T6-B757-2	GTCP331-200ER	335	73	267.92	19,447	2,885	28	0	0	28	0	0	**28**
312	25R-ARR-T7-B757-2	GTCP331-200ER	670	145	267.92	38,893	5,770	56	0	0	56	0	1	**57**
313	25R-DEP-MSC-S-B757-2	GTCP331-200ER	335	73	267.92	19,447	2,885	28	0	0	28	0	0	**28**

LAX SPAS

Auxiliary Power Units - Greenhouse Gas Emissions

Preliminary Alternative 1-9 Operational Emissions Estimates

Aircraft ID	User ID	APU Description	Annual Operations	APU Operation (hours/year)	APU Fuel Flow (lb/hr)	Fuel Consumption		Annual Emissions (MT/year)			Annual CO2e Emissions (MTCO2e/year)			
						(lb/yr)	(gal/yr)	CO2	CH4	N2O	CO2	CH4	N2O	Total
314	25R-DEP-T0-B757-2	GTCP331-200ER	335	73	267.92	19,447	2,885	28	0	0	28	0	0	**28**
315	25R-DEP-T1-B757-2	GTCP331-200ER	670	145	267.92	38,893	5,770	56	0	0	56	0	1	**57**
316	25R-DEP-T4-B757-2	GTCP331-200ER	4,352	943	267.92	252,631	37,482	365	0	0	365	0	4	**369**
317	25R-DEP-T5-B757-2	GTCP331-200ER	5,357	1,161	267.92	310,970	46,138	450	0	0	450	0	4	**455**
318	25R-DEP-T6-B757-2	GTCP331-200ER	4,687	1,016	267.92	272,077	40,368	394	0	0	394	0	4	**398**
319	25R-DEP-T7-B757-2	GTCP331-200ER	2,344	508	267.92	136,068	20,188	197	0	0	197	0	2	**199**
320	24L-ARR-MSC-S-B767-3	GTCP331-200ER	335	73	267.92	19,447	2,885	28	0	0	28	0	0	**28**
321	24L-ARR-T2-B767-3	GTCP331-200ER	670	145	267.92	38,893	5,770	56	0	0	56	0	1	**57**
322	24L-DEP-MSC-N-B767-3	GTCP331-200ER	2,009	435	267.92	116,621	17,303	169	0	0	169	0	2	**170**
323	24L-DEP-MSC-S-B767-3	GTCP331-200ER	335	73	267.92	19,447	2,885	28	0	0	28	0	0	**28**
324	24L-DEP-T2-B767-3	GTCP331-200ER	2,344	508	267.92	136,068	20,188	197	0	0	197	0	2	**199**
325	24L-DEP-T3-B767-3	GTCP331-200ER	2,678	580	267.92	155,456	23,065	225	0	0	225	0	2	**227**
326	24L-DEP-T7-B767-3	GTCP331-200ER	670	145	267.92	38,893	5,770	56	0	0	56	0	1	**57**
327	24L-DEP-TBIT-N-B767-3	GTCP331-200ER	335	73	267.92	19,447	2,885	28	0	0	28	0	0	**28**
328	24R-ARR-MSC-N-B767-3	GTCP331-200ER	1,339	290	267.92	77,728	11,532	112	0	0	112	0	1	**114**
329	24R-ARR-MSC-S-B767-3	GTCP331-200ER	335	73	267.92	19,447	2,885	28	0	0	28	0	0	**28**
330	24R-ARR-T2-B767-3	GTCP331-200ER	2,344	508	267.92	136,068	20,188	197	0	0	197	0	2	**199**
331	24R-ARR-T3-B767-3	GTCP331-200ER	2,009	435	267.92	116,621	17,303	169	0	0	169	0	2	**170**
332	24R-ARR-T4-B767-3	GTCP331-200ER	1,674	363	267.92	97,175	14,418	141	0	0	141	0	1	**142**
333	24R-ARR-T6-B767-3	GTCP331-200ER	335	73	267.92	19,447	2,885	28	0	0	28	0	0	**28**
334	24R-ARR-T7-B767-3	GTCP331-200ER	670	145	267.92	38,893	5,770	56	0	0	56	0	1	**57**
335	24R-ARR-TBIT-N-B767-3	GTCP331-200ER	335	73	267.92	19,447	2,885	28	0	0	28	0	0	**28**
336	25L-ARR-CARGO_1-B767-3	GTCP331-200ER	670	145	267.92	38,893	5,770	56	0	0	56	0	1	**57**
337	25L-ARR-CARGO_2-B767-3	GTCP331-200ER	670	145	267.92	38,893	5,770	56	0	0	56	0	1	**57**
338	25L-ARR-CARGO_3-B767-3	GTCP331-200ER	335	73	267.92	19,447	2,885	28	0	0	28	0	0	**28**
339	25L-ARR-MSC-N-B767-3	GTCP331-200ER	335	73	267.92	19,447	2,885	28	0	0	28	0	0	**28**
340	25L-ARR-MSC-S-B767-3	GTCP331-200ER	3,013	653	267.92	174,903	25,950	253	0	0	253	0	2	**256**
341	25L-ARR-T4-B767-3	GTCP331-200ER	3,347	725	267.92	194,291	28,827	281	0	0	281	0	3	**284**
342	25L-ARR-T5-B767-3	GTCP331-200ER	4,352	943	267.92	252,631	37,482	365	0	0	365	0	4	**369**
343	25L-ARR-T6-B767-3	GTCP331-200ER	3,013	653	267.92	174,903	25,950	253	0	0	253	0	2	**256**
344	25L-ARR-T7-B767-3	GTCP331-200ER	4,018	871	267.92	233,242	34,606	337	0	0	337	0	3	**341**
345	25L-ARR-TBIT-S-B767-3	GTCP331-200ER	335	73	267.92	19,447	2,885	28	0	0	28	0	0	**28**
346	25L-DEP-CARGO_1-B767-3	GTCP331-200ER	1,004	218	267.92	58,282	8,647	84	0	0	84	0	1	**85**
347	25L-DEP-CARGO_2-B767-3	GTCP331-200ER	335	73	267.92	19,447	2,885	28	0	0	28	0	0	**28**
348	25R-ARR-MSC-S-B767-3	GTCP331-200ER	335	73	267.92	19,447	2,885	28	0	0	28	0	0	**28**
349	25R-ARR-T4-B767-3	GTCP331-200ER	335	73	267.92	19,447	2,885	28	0	0	28	0	0	**28**
350	25R-ARR-T5-B767-3	GTCP331-200ER	335	73	267.92	19,447	2,885	28	0	0	28	0	0	**28**
351	25R-ARR-T7-B767-3	GTCP331-200ER	670	145	267.92	38,893	5,770	56	0	0	56	0	1	**57**
352	25R-DEP-CARGO_4-B767-3	GTCP331-200ER	335	73	267.92	19,447	2,885	28	0	0	28	0	0	**28**
353	25R-DEP-MSC-N-B767-3	GTCP331-200ER	670	145	267.92	38,893	5,770	56	0	0	56	0	1	**57**
354	25R-DEP-MSC-S-B767-3	GTCP331-200ER	3,013	653	267.92	174,903	25,950	253	0	0	253	0	2	**256**
355	25R-DEP-T4-B767-3	GTCP331-200ER	5,022	1,088	267.92	291,524	43,253	422	0	0	422	0	4	**426**
356	25R-DEP-T5-B767-3	GTCP331-200ER	4,352	943	267.92	252,631	37,482	365	0	0	365	0	4	**369**
357	25R-DEP-T6-B767-3	GTCP331-200ER	3,347	725	267.92	194,291	28,827	281	0	0	281	0	3	**284**
358	25R-DEP-T7-B767-3	GTCP331-200ER	4,686	1,015	267.92	272,019	40,359	393	0	0	393	0	4	**398**

LAX SPAS

Auxiliary Power Units - Greenhouse Gas Emissions

Preliminary Alternative 1-9 Operational Emissions Estimates

Aircraft ID	User ID	APU Description	Annual Operations	APU Operation (hours/year)	APU Fuel Flow (lb/hr)	Fuel Consumption		Annual Emissions (MT/year)			Annual CO2e Emissions (MTCO2e/year)			
						(lb/yr)	(gal/yr)	CO2	CH4	N2O	CO2	CH4	N2O	Total
359	25R-DEP-TBIT-N-B767-3	GTCP331-200ER	335	73	267.92	19,447	2,885	28	0	0	28	0	0	**28**
360	25R-DEP-TBIT-S-B767-3	GTCP331-200ER	335	73	267.92	19,447	2,885	28	0	0	28	0	0	**28**
361	24L-ARR-T2-B777-2	GTCP331-500	335	73	536.00	38,905	5,772	56	0	0	56	0	1	**57**
362	24L-DEP-MSC-N-B777-2	GTCP331-500	1,004	218	536.00	116,598	17,299	169	0	0	169	0	2	**170**
363	24L-DEP-MSC-S-B777-2	GTCP331-500	335	73	536.00	38,905	5,772	56	0	0	56	0	1	**57**
364	24L-DEP-T2-B777-2	GTCP331-500	670	145	536.00	77,809	11,544	113	0	0	113	0	1	**114**
365	24L-DEP-T3-B777-2	GTCP331-500	2,009	435	536.00	233,312	34,616	338	0	0	338	0	3	**341**
366	24L-DEP-T7-B777-2	GTCP331-500	335	73	536.00	38,905	5,772	56	0	0	56	0	1	**57**
367	24L-DEP-TBIT-N-B777-2	GTCP331-500	1,674	363	536.00	194,407	28,844	281	0	0	281	0	3	**284**
368	24R-ARR-MSC-N-B777-2	GTCP331-500	1,674	363	536.00	194,407	28,844	281	0	0	281	0	3	**284**
369	24R-ARR-T2-B777-2	GTCP331-500	670	145	536.00	77,809	11,544	113	0	0	113	0	1	**114**
370	24R-ARR-T3-B777-2	GTCP331-500	2,678	580	536.00	311,005	46,143	450	0	0	450	0	4	**455**
371	24R-ARR-TBIT-N-B777-2	GTCP331-500	1,674	363	536.00	194,407	28,844	281	0	0	281	0	3	**284**
372	25L-ARR-CARGO_3-B777-2	GTCP331-500	335	73	536.00	38,905	5,772	56	0	0	56	0	1	**57**
373	25L-ARR-CARGO_4-B777-2	GTCP331-500	335	73	536.00	38,905	5,772	56	0	0	56	0	1	**57**
374	25L-ARR-MSC-N-B777-2	GTCP331-500	335	73	536.00	38,905	5,772	56	0	0	56	0	1	**57**
375	25L-ARR-MSC-S-B777-2	GTCP331-500	670	145	536.00	77,809	11,544	113	0	0	113	0	1	**114**
376	25L-ARR-T4-B777-2	GTCP331-500	670	145	536.00	77,809	11,544	113	0	0	113	0	1	**114**
377	25L-ARR-T5-B777-2	GTCP331-500	335	73	536.00	38,905	5,772	56	0	0	56	0	1	**57**
378	25L-ARR-T6-B777-2	GTCP331-500	670	145	536.00	77,809	11,544	113	0	0	113	0	1	**114**
379	25L-ARR-T7-B777-2	GTCP331-500	1,339	290	536.00	155,503	23,072	225	0	0	225	0	2	**227**
380	25L-ARR-TBIT-N-B777-2	GTCP331-500	670	145	536.00	77,809	11,544	113	0	0	113	0	1	**114**
381	25L-ARR-TBIT-S-B777-2	GTCP331-500	670	145	536.00	77,809	11,544	113	0	0	113	0	1	**114**
382	25L-DEP-CARGO_2-B777-2	GTCP331-500	335	73	536.00	38,905	5,772	56	0	0	56	0	1	**57**
383	25L-DEP-CARGO_3-B777-2	GTCP331-500	670	145	536.00	77,809	11,544	113	0	0	113	0	1	**114**
384	25R-ARR-CARGO_4-B777-2	GTCP331-500	335	73	536.00	38,905	5,772	56	0	0	56	0	1	**57**
385	25R-ARR-MSC-N-B777-2	GTCP331-500	335	73	536.00	38,905	5,772	56	0	0	56	0	1	**57**
386	25R-ARR-T6-B777-2	GTCP331-500	335	73	536.00	38,905	5,772	56	0	0	56	0	1	**57**
387	25R-ARR-T7-B777-2	GTCP331-500	335	73	536.00	38,905	5,772	56	0	0	56	0	1	**57**
388	25R-ARR-TBIT-N-B777-2	GTCP331-500	670	145	536.00	77,809	11,544	113	0	0	113	0	1	**114**
389	25R-ARR-TBIT-S-B777-2	GTCP331-500	335	73	536.00	38,905	5,772	56	0	0	56	0	1	**57**
390	25R-DEP-MSC-N-B777-2	GTCP331-500	670	145	536.00	77,809	11,544	113	0	0	113	0	1	**114**
391	25R-DEP-MSC-S-B777-2	GTCP331-500	1,004	218	536.00	116,598	17,299	169	0	0	169	0	2	**170**
392	25R-DEP-T3-B777-2	GTCP331-500	670	145	536.00	77,809	11,544	113	0	0	113	0	1	**114**
393	25R-DEP-T4-B777-2	GTCP331-500	670	145	536.00	77,809	11,544	113	0	0	113	0	1	**114**
394	25R-DEP-T5-B777-2	GTCP331-500	335	73	536.00	38,905	5,772	56	0	0	56	0	1	**57**
395	25R-DEP-T6-B777-2	GTCP331-500	670	145	536.00	77,809	11,544	113	0	0	113	0	1	**114**
396	25R-DEP-T7-B777-2	GTCP331-500	1,339	290	536.00	155,503	23,072	225	0	0	225	0	2	**227**
397	25R-DEP-TBIT-N-B777-2	GTCP331-500	670	145	536.00	77,809	11,544	113	0	0	113	0	1	**114**
398	25R-DEP-TBIT-S-B777-2	GTCP331-500	1,339	290	536.00	155,503	23,072	225	0	0	225	0	2	**227**
399	25L-ARR-CARGO_3-DC10-1	TSCP 700-4B	335	73	323.68	23,494	3,486	34	0	0	34	0	0	**34**
400	25L-ARR-CARGO_4-DC10-1	TSCP 700-4B	335	73	323.68	23,494	3,486	34	0	0	34	0	0	**34**
401	25L-DEP-CARGO_3-DC10-1	TSCP 700-4B	670	145	323.68	46,988	6,971	68	0	0	68	0	1	**69**
402	25R-DEP-CARGO_4-DC10-1	TSCP 700-4B	335	73	323.68	23,494	3,486	34	0	0	34	0	0	**34**
403	25L-ARR-CARGO_1-DC8-7	GTCP85-98ck	335	73	235.28	17,077	2,534	25	0	0	25	0	0	**25**

LAX SPAS

Auxiliary Power Units - Greenhouse Gas Emissions

Preliminary Alternative 1-9 Operational Emissions Estimates

Aircraft ID	User ID	APU Description	Annual Operations	APU Operation (hours/year)	APU Fuel Flow (lb/hr)	Fuel Consumption		Annual Emissions (MT/year)			Annual CO2e Emissions (MTCO2e/year)			
						(lb/yr)	(gal/yr)	CO2	CH4	N2O	CO2	CH4	N2O	Total
404	25L-DEP-CARGO_1-DC8-7	GTCP85-98ck	335	73	235.28	17,077	2,534	25	0	0	25	0	0	**25**
405	25L-ARR-CARGO_1-MD11	TSCP 700-4B	335	73	323.68	23,494	3,486	34	0	0	34	0	0	**34**
406	25L-ARR-CARGO_2-MD11	TSCP 700-4B	335	73	323.68	23,494	3,486	34	0	0	34	0	0	**34**
407	25L-ARR-CARGO_3-MD11	TSCP 700-4B	670	145	323.68	46,988	6,971	68	0	0	68	0	1	**69**
408	25L-ARR-CARGO_4-MD11	TSCP 700-4B	335	73	323.68	23,494	3,486	34	0	0	34	0	0	**34**
409	25L-DEP-CARGO_1-MD11	TSCP 700-4B	335	73	323.68	23,494	3,486	34	0	0	34	0	0	**34**
410	25L-DEP-CARGO_2-MD11	TSCP 700-4B	335	73	323.68	23,494	3,486	34	0	0	34	0	0	**34**
411	25L-DEP-CARGO_3-MD11	TSCP 700-4B	335	73	323.68	23,494	3,486	34	0	0	34	0	0	**34**
412	25R-DEP-CARGO_4-MD11	TSCP 700-4B	670	145	323.68	46,988	6,971	68	0	0	68	0	1	**69**
413	24L-ARR-T3-MD83	GTCP85-98ck	335	73	235.28	17,077	2,534	25	0	0	25	0	0	**25**
414	24L-DEP-MSC-N-MD83	GTCP85-98ck	670	145	235.28	34,155	5,067	49	0	0	49	0	0	**50**
415	24L-DEP-T0-MD83	GTCP85-98ck	335	73	235.28	17,077	2,534	25	0	0	25	0	0	**25**
416	24L-DEP-T1-MD83	GTCP85-98ck	670	145	235.28	34,155	5,067	49	0	0	49	0	0	**50**
417	24L-DEP-T3-MD83	GTCP85-98ck	335	73	235.28	17,077	2,534	25	0	0	25	0	0	**25**
418	24R-ARR-MSC-N-MD83	GTCP85-98ck	670	145	235.28	34,155	5,067	49	0	0	49	0	0	**50**
419	24R-ARR-T0-MD83	GTCP85-98ck	670	145	235.28	34,155	5,067	49	0	0	49	0	0	**50**
420	24R-ARR-T1-MD83	GTCP85-98ck	335	73	235.28	17,077	2,534	25	0	0	25	0	0	**25**
421	25L-ARR-MSC-S-MD83	GTCP85-98ck	335	73	235.28	17,077	2,534	25	0	0	25	0	0	**25**
422	25L-ARR-T4-MD83	GTCP85-98ck	335	73	235.28	17,077	2,534	25	0	0	25	0	0	**25**
423	25R-DEP-MSC-S-MD83	GTCP85-98ck	335	73	235.28	17,077	2,534	25	0	0	25	0	0	**25**
424	25R-DEP-T4-MD83	GTCP85-98ck	335	73	235.28	17,077	2,534	25	0	0	25	0	0	**25**
425	24L-ARR-T1-CRJ7	GTCP85	1,339	290	235.28	68,259	10,127	99	0	0	99	0	1	**100**
426	24L-ARR-T2-CRJ7	GTCP85	335	73	235.28	17,077	2,534	25	0	0	25	0	0	**25**
427	24L-ARR-T6-CRJ7	GTCP85	335	73	235.28	17,077	2,534	25	0	0	25	0	0	**25**
428	24L-ARR-T8-CRJ7	GTCP85	670	145	235.28	34,155	5,067	49	0	0	49	0	0	**50**
429	24L-DEP-MSC-N-CRJ7	GTCP85	2,678	580	235.28	136,517	20,255	197	0	0	197	0	2	**200**
430	24L-DEP-MSC-S-CRJ7	GTCP85	335	73	235.28	17,077	2,534	25	0	0	25	0	0	**25**
431	24L-DEP-T0-CRJ7	GTCP85	1,004	218	235.28	51,181	7,594	74	0	0	74	0	1	**75**
432	24L-DEP-T1-CRJ7	GTCP85	3,683	798	235.28	187,750	27,856	272	0	0	272	0	3	**274**
433	24L-DEP-T2-CRJ7	GTCP85	2,344	508	235.28	119,491	17,729	173	0	0	173	0	2	**175**
434	24L-DEP-T3-CRJ7	GTCP85	1,004	218	235.28	51,181	7,594	74	0	0	74	0	1	**75**
435	24L-DEP-T5-CRJ7	GTCP85	1,339	290	235.28	68,259	10,127	99	0	0	99	0	1	**100**
436	24L-DEP-T6-CRJ7	GTCP85	1,339	290	235.28	68,259	10,127	99	0	0	99	0	1	**100**
437	24L-DEP-T7-CRJ7	GTCP85	1,339	290	235.28	68,259	10,127	99	0	0	99	0	1	**100**
438	24L-DEP-T8-CRJ7	GTCP85	2,678	580	235.28	136,517	20,255	197	0	0	197	0	2	**200**
439	24L-DEP-TBIT-N-CRJ7	GTCP85	335	73	235.28	17,077	2,534	25	0	0	25	0	0	**25**
440	24R-ARR-MSC-N-CRJ7	GTCP85	2,678	580	235.28	136,517	20,255	197	0	0	197	0	2	**200**
441	24R-ARR-MSC-S-CRJ7	GTCP85	1,004	218	235.28	51,181	7,594	74	0	0	74	0	1	**75**
442	24R-ARR-T0-CRJ7	GTCP85	1,339	290	235.28	68,259	10,127	99	0	0	99	0	1	**100**
443	24R-ARR-T1-CRJ7	GTCP85	2,344	508	235.28	119,491	17,729	173	0	0	173	0	2	**175**
444	24R-ARR-T2-CRJ7	GTCP85	2,009	435	235.28	102,413	15,195	148	0	0	148	0	1	**150**
445	24R-ARR-T3-CRJ7	GTCP85	1,004	218	235.28	51,181	7,594	74	0	0	74	0	1	**75**
446	24R-ARR-T4-CRJ7	GTCP85	670	145	235.28	34,155	5,067	49	0	0	49	0	0	**50**
447	24R-ARR-T5-CRJ7	GTCP85	1,674	363	235.28	85,336	12,661	123	0	0	123	0	1	**125**
448	24R-ARR-T6-CRJ7	GTCP85	1,004	218	235.28	51,181	7,594	74	0	0	74	0	1	**75**

LAX SPAS

Auxiliary Power Units - Greenhouse Gas Emissions

Preliminary Alternative 1-9 Operational Emissions Estimates

		APU	Annual	APU Operation	APU Fuel Flow	Fuel Consumption		Annual Emissions (MT/year)			Annual CO2e Emissions (MTCO2e/year)			
Aircraft ID	User ID	Description	Operations	(hours/year)	(lb/hr)	(lb/yr)	(gal/yr)	CO2	CH4	N2O	CO2	CH4	N2O	Total
449	24R-ARR-T7-CRJ7	GTCP85	670	145	235.28	34,155	5,067	49	0	0	49	0	0	**50**
450	24R-ARR-T8-CRJ7	GTCP85	5,022	1,088	235.28	256,008	37,983	370	0	0	370	0	4	**374**
451	24R-ARR-TBIT-N-CRJ7	GTCP85	670	145	235.28	34,155	5,067	49	0	0	49	0	0	**50**
452	24R-DEP-T0-CRJ7	GTCP85	335	73	235.28	17,077	2,534	25	0	0	25	0	0	**25**
453	25L-ARR-MSC-N-CRJ7	GTCP85	335	73	235.28	17,077	2,534	25	0	0	25	0	0	**25**
454	25L-ARR-MSC-S-CRJ7	GTCP85	1,674	363	235.28	85,336	12,661	123	0	0	123	0	1	**125**
455	25L-ARR-T5-CRJ7	GTCP85	2,009	435	235.28	102,413	15,195	148	0	0	148	0	1	**150**
456	25L-ARR-T6-CRJ7	GTCP85	670	145	235.28	34,155	5,067	49	0	0	49	0	0	**50**
457	25L-ARR-T7-CRJ7	GTCP85	1,674	363	235.28	85,336	12,661	123	0	0	123	0	1	**125**
458	25L-ARR-T8-CRJ7	GTCP85	3,682	798	235.28	187,699	27,848	272	0	0	272	0	3	**274**
459	25L-ARR-TBIT-S-CRJ7	GTCP85	335	73	235.28	17,077	2,534	25	0	0	25	0	0	**25**
460	25R-ARR-MSC-N-CRJ7	GTCP85	335	73	235.28	17,077	2,534	25	0	0	25	0	0	**25**
461	25R-ARR-T6-CRJ7	GTCP85	335	73	235.28	17,077	2,534	25	0	0	25	0	0	**25**
462	25R-ARR-T8-CRJ7	GTCP85	670	145	235.28	34,155	5,067	49	0	0	49	0	0	**50**
463	25R-ARR-TBIT-S-CRJ7	GTCP85	335	73	235.28	17,077	2,534	25	0	0	25	0	0	**25**
464	25R-DEP-MSC-N-CRJ7	GTCP85	670	145	235.28	34,155	5,067	49	0	0	49	0	0	**50**
465	25R-DEP-MSC-S-CRJ7	GTCP85	2,343	508	235.28	119,440	17,721	173	0	0	173	0	2	**175**
466	25R-DEP-T4-CRJ7	GTCP85	670	145	235.28	34,155	5,067	49	0	0	49	0	0	**50**
467	25R-DEP-T5-CRJ7	GTCP85	2,343	508	235.28	119,440	17,721	173	0	0	173	0	2	**175**
468	25R-DEP-T6-CRJ7	GTCP85	1,004	218	235.28	51,181	7,594	74	0	0	74	0	1	**75**
469	25R-DEP-T7-CRJ7	GTCP85	1,004	218	235.28	51,181	7,594	74	0	0	74	0	1	**75**
470	25R-DEP-T8-CRJ7	GTCP85	7,366	1,596	235.28	375,499	55,712	543	0	0	543	0	5	**549**
471	25R-DEP-TBIT-N-CRJ7	GTCP85	335	73	235.28	17,077	2,534	25	0	0	25	0	0	**25**
472	25R-DEP-TBIT-S-CRJ7	GTCP85	335	73	235.28	17,077	2,534	25	0	0	25	0	0	**25**
473	25L-ARR-N-CNA441	0	335	n/a	n/a	0	0	0	0	0	0	0	0	**0**
474	25L-DEP-N-CNA441	0	335	n/a	n/a	0	0	0	0	0	0	0	0	**0**
475	24R-ARR-N-CNA750	0	335	n/a	n/a	0	0	0	0	0	0	0	0	**0**
476	25L-ARR-MI-CNA750	0	1,004	n/a	n/a	0	0	0	0	0	0	0	0	**0**
477	25L-ARR-N-CNA750	0	6,696	n/a	n/a	0	0	0	0	0	0	0	0	**0**
478	25L-DEP-MI-CNA750	0	1,004	n/a	n/a	0	0	0	0	0	0	0	0	**0**
479	25L-DEP-N-CNA750	0	7,365	n/a	n/a	0	0	0	0	0	0	0	0	**0**
480	25R-ARR-N-CNA750	0	670	n/a	n/a	0	0	0	0	0	0	0	0	**0**
481	24L-ARR-ERD-EMB120	GTCP36-300	335	73	282.20	20,483	3,039	30	0	0	30	0	0	**30**
482	24L-ARR-T8-EMB120	GTCP36-300	335	73	282.20	20,483	3,039	30	0	0	30	0	0	**30**
483	24L-DEP-ERD-EMB120	GTCP36-300	6,026	1,306	282.20	368,450	54,666	533	0	0	533	0	5	**539**
484	24L-DEP-T8-EMB120	GTCP36-300	3,347	725	282.20	204,647	30,363	296	0	0	296	0	3	**299**
485	24R-ARR-ERD-EMB120	GTCP36-300	6,026	1,306	282.20	368,450	54,666	533	0	0	533	0	5	**539**
486	24R-ARR-T8-EMB120	GTCP36-300	5,356	1,160	282.20	327,484	48,588	474	0	0	474	0	5	**479**
487	24R-DEP-ERD-EMB120	GTCP36-300	670	145	282.20	40,966	6,078	59	0	0	59	0	1	**60**
488	24R-DEP-T8-EMB120	GTCP36-300	670	145	282.20	40,966	6,078	59	0	0	59	0	1	**60**
489	25L-ARR-ERD-EMB120	GTCP36-300	6,026	1,306	282.20	368,450	54,666	533	0	0	533	0	5	**539**
490	25L-ARR-T8-EMB120	GTCP36-300	3,013	653	282.20	184,225	27,333	266	0	0	266	0	3	**269**
491	25L-DEP-ERD-EMB120	GTCP36-300	670	145	282.20	40,966	6,078	59	0	0	59	0	1	**60**
492	25L-DEP-T8-EMB120	GTCP36-300	335	73	282.20	20,483	3,039	30	0	0	30	0	0	**30**
493	25R-ARR-ERD-EMB120	GTCP36-300	670	145	282.20	40,966	6,078	59	0	0	59	0	1	**60**

LAX SPAS

Auxiliary Power Units - Greenhouse Gas Emissions

Preliminary Alternative 1-9 Operational Emissions Estimates

Aircraft ID	User ID	APU Description	Annual Operations	APU Operation (hours/year)	APU Fuel Flow (lb/hr)	Fuel Consumption (lb/yr)	Fuel Consumption (gal/yr)	Annual Emissions (MT/year) CO2	Annual Emissions (MT/year) CH4	Annual Emissions (MT/year) N2O	Annual CO2e Emissions (MTCO2e/year) CO2	Annual CO2e Emissions (MTCO2e/year) CH4	Annual CO2e Emissions (MTCO2e/year) N2O	Annual CO2e Emissions (MTCO2e/year) Total
494	25R-ARR-T8-EMB120	GTCP36-300	1,004	218	282.20	61,388	9,108	89	0	0	89	0	1	**90**
495	25R-DEP-ERD-EMB120	GTCP36-300	5,692	1,233	282.20	348,028	51,636	503	0	0	503	0	5	**509**
496	25R-DEP-T8-EMB120	GTCP36-300	5,357	1,161	282.20	327,545	48,597	474	0	0	474	0	5	**479**
497	24L-ARR-ERD-ERJ140	GTCP36-300	670	145	282.20	40,966	6,078	59	0	0	59	0	1	**60**
498	24L-ARR-T1-ERJ140	GTCP36-300	335	73	282.20	20,483	3,039	30	0	0	30	0	0	**30**
499	24L-ARR-T7-ERJ140	GTCP36-300	670	145	282.20	40,966	6,078	59	0	0	59	0	1	**60**
500	24L-DEP-ERD-ERJ140	GTCP36-300	670	145	282.20	40,966	6,078	59	0	0	59	0	1	**60**
501	24L-DEP-MSC-N-ERJ140	GTCP36-300	670	145	282.20	40,966	6,078	59	0	0	59	0	1	**60**
502	24L-DEP-MSC-S-ERJ140	GTCP36-300	670	145	282.20	40,966	6,078	59	0	0	59	0	1	**60**
503	24L-DEP-T0-ERJ140	GTCP36-300	670	145	282.20	40,966	6,078	59	0	0	59	0	1	**60**
504	24L-DEP-T1-ERJ140	GTCP36-300	1,004	218	282.20	61,388	9,108	89	0	0	89	0	1	**90**
505	24L-DEP-T2-ERJ140	GTCP36-300	335	73	282.20	20,483	3,039	30	0	0	30	0	0	**30**
506	24L-DEP-T3-ERJ140	GTCP36-300	335	73	282.20	20,483	3,039	30	0	0	30	0	0	**30**
507	24L-DEP-T5-ERJ140	GTCP36-300	335	73	282.20	20,483	3,039	30	0	0	30	0	0	**30**
508	24L-DEP-T6-ERJ140	GTCP36-300	335	73	282.20	20,483	3,039	30	0	0	30	0	0	**30**
509	24L-DEP-T7-ERJ140	GTCP36-300	1,004	218	282.20	61,388	9,108	89	0	0	89	0	1	**90**
510	24R-ARR-ERD-ERJ140	GTCP36-300	670	145	282.20	40,966	6,078	59	0	0	59	0	1	**60**
511	24R-ARR-MSC-N-ERJ140	GTCP36-300	1,004	218	282.20	61,388	9,108	89	0	0	89	0	1	**90**
512	24R-ARR-MSC-S-ERJ140	GTCP36-300	1,004	218	282.20	61,388	9,108	89	0	0	89	0	1	**90**
513	24R-ARR-T0-ERJ140	GTCP36-300	335	73	282.20	20,483	3,039	30	0	0	30	0	0	**30**
514	24R-ARR-T1-ERJ140	GTCP36-300	1,004	218	282.20	61,388	9,108	89	0	0	89	0	1	**90**
515	24R-ARR-T2-ERJ140	GTCP36-300	335	73	282.20	20,483	3,039	30	0	0	30	0	0	**30**
516	24R-ARR-T5-ERJ140	GTCP36-300	670	145	282.20	40,966	6,078	59	0	0	59	0	1	**60**
517	24R-ARR-T6-ERJ140	GTCP36-300	335	73	282.20	20,483	3,039	30	0	0	30	0	0	**30**
518	24R-ARR-T7-ERJ140	GTCP36-300	1,339	290	282.20	81,871	12,147	118	0	0	118	0	1	**120**
519	24R-DEP-MSC-S-ERJ140	GTCP36-300	335	73	282.20	20,483	3,039	30	0	0	30	0	0	**30**
520	24R-DEP-T1-ERJ140	GTCP36-300	335	73	282.20	20,483	3,039	30	0	0	30	0	0	**30**
521	24R-DEP-T4-ERJ140	GTCP36-300	335	73	282.20	20,483	3,039	30	0	0	30	0	0	**30**
522	25L-ARR-ERD-ERJ140	GTCP36-300	335	73	282.20	20,483	3,039	30	0	0	30	0	0	**30**
523	25L-ARR-MSC-S-ERJ140	GTCP36-300	335	73	282.20	20,483	3,039	30	0	0	30	0	0	**30**
524	25L-ARR-T0-ERJ140	GTCP36-300	335	73	282.20	20,483	3,039	30	0	0	30	0	0	**30**
525	25L-ARR-T1-ERJ140	GTCP36-300	335	73	282.20	20,483	3,039	30	0	0	30	0	0	**30**
526	25L-ARR-T2-ERJ140	GTCP36-300	335	73	282.20	20,483	3,039	30	0	0	30	0	0	**30**
527	25L-ARR-T3-ERJ140	GTCP36-300	335	73	282.20	20,483	3,039	30	0	0	30	0	0	**30**
528	25L-ARR-T4-ERJ140	GTCP36-300	1,339	290	282.20	81,871	12,147	118	0	0	118	0	1	**120**
529	25L-ARR-T5-ERJ140	GTCP36-300	335	73	282.20	20,483	3,039	30	0	0	30	0	0	**30**
530	25L-ARR-T6-ERJ140	GTCP36-300	1,004	218	282.20	61,388	9,108	89	0	0	89	0	1	**90**
531	25L-ARR-T7-ERJ140	GTCP36-300	335	73	282.20	20,483	3,039	30	0	0	30	0	0	**30**
532	25R-ARR-MSC-N-ERJ140	GTCP36-300	670	145	282.20	40,966	6,078	59	0	0	59	0	1	**60**
533	25R-ARR-T0-ERJ140	GTCP36-300	335	73	282.20	20,483	3,039	30	0	0	30	0	0	**30**
534	25R-DEP-ERD-ERJ140	GTCP36-300	1,004	218	282.20	61,388	9,108	89	0	0	89	0	1	**90**
535	25R-DEP-MSC-N-ERJ140	GTCP36-300	1,004	218	282.20	61,388	9,108	89	0	0	89	0	1	**90**
536	25R-DEP-MSC-S-ERJ140	GTCP36-300	335	73	282.20	20,483	3,039	30	0	0	30	0	0	**30**
537	25R-DEP-T0-ERJ140	GTCP36-300	335	73	282.20	20,483	3,039	30	0	0	30	0	0	**30**
538	25R-DEP-T1-ERJ140	GTCP36-300	335	73	282.20	20,483	3,039	30	0	0	30	0	0	**30**

LAX SPAS

Auxiliary Power Units - Greenhouse Gas Emissions

Preliminary Alternative 1-9 Operational Emissions Estimates

Aircraft ID	User ID	APU Description	Annual Operations	APU Operation (hours/year)	APU Fuel Flow (lb/hr)	Fuel Consumption		Annual Emissions (MT/year)			Annual CO2e Emissions (MTCO2e/year)			
						(lb/yr)	(gal/yr)	CO2	CH4	N2O	CO2	CH4	N2O	Total
539	25R-DEP-T2-ERJ140	GTCP36-300	335	73	282.20	20,483	3,039	30	0	0	30	0	0	**30**
540	25R-DEP-T4-ERJ140	GTCP36-300	1,004	218	282.20	61,388	9,108	89	0	0	89	0	1	**90**
541	25R-DEP-T5-ERJ140	GTCP36-300	670	145	282.20	40,966	6,078	59	0	0	59	0	1	**60**
542	25R-DEP-T6-ERJ140	GTCP36-300	1,004	218	282.20	61,388	9,108	89	0	0	89	0	1	**90**
543	25R-DEP-T7-ERJ140	GTCP36-300	1,339	290	282.20	81,871	12,147	118	0	0	118	0	1	**120**
544	24L-ARR-TBIT-N-ERJ190-LR	0	335	n/a	n/a	0	0	0	0	0	0	0	0	**0**
545	24L-DEP-T1-ERJ190-LR	0	335	n/a	n/a	0	0	0	0	0	0	0	0	**0**
546	24L-DEP-T2-ERJ190-LR	0	335	n/a	n/a	0	0	0	0	0	0	0	0	**0**
547	24L-DEP-T3-ERJ190-LR	0	670	n/a	n/a	0	0	0	0	0	0	0	0	**0**
548	24L-DEP-TBIT-N-ERJ190-LR	0	670	n/a	n/a	0	0	0	0	0	0	0	0	**0**
549	24R-ARR-T1-ERJ190-LR	0	335	n/a	n/a	0	0	0	0	0	0	0	0	**0**
550	24R-ARR-T2-ERJ190-LR	0	335	n/a	n/a	0	0	0	0	0	0	0	0	**0**
551	24R-ARR-T3-ERJ190-LR	0	670	n/a	n/a	0	0	0	0	0	0	0	0	**0**
552	24R-ARR-T6-ERJ190-LR	0	670	n/a	n/a	0	0	0	0	0	0	0	0	**0**
553	24R-ARR-TBIT-N-ERJ190-LR	0	335	n/a	n/a	0	0	0	0	0	0	0	0	**0**
554	25L-ARR-T8-ERJ190-LR	0	335	n/a	n/a	0	0	0	0	0	0	0	0	**0**
555	25R-ARR-T5-ERJ190-LR	0	335	n/a	n/a	0	0	0	0	0	0	0	0	**0**
556	25R-DEP-T5-ERJ190-LR	0	335	n/a	n/a	0	0	0	0	0	0	0	0	**0**
557	25R-DEP-T6-ERJ190-LR	0	670	n/a	n/a	0	0	0	0	0	0	0	0	**0**
558	25R-DEP-T8-ERJ190-LR	0	335	n/a	n/a	0	0	0	0	0	0	0	0	**0**
559	25L-ARR-MI-MIL-C130	0	335	n/a	n/a	0	0	0	0	0	0	0	0	**0**
560	25L-DEP-MI-MIL-C130	0	335	n/a	n/a	0	0	0	0	0	0	0	0	**0**
561	25L-ARR-N-BEECH18	0	1,339	n/a	n/a	0	0	0	0	0	0	0	0	**0**
562	25L-DEP-N-BEECH18	0	1,004	n/a	n/a	0	0	0	0	0	0	0	0	**0**
563	24R-ARR-N-BEECH1900-D	0	335	n/a	n/a	0	0	0	0	0	0	0	0	**0**
564	25L-ARR-CARGO_4-BEECH1900-D	0	335	n/a	n/a	0	0	0	0	0	0	0	0	**0**
565	25L-ARR-N-BEECH1900-D	0	1,339	n/a	n/a	0	0	0	0	0	0	0	0	**0**
566	25L-DEP-CARGO_2-BEECH1900-D	0	335	n/a	n/a	0	0	0	0	0	0	0	0	**0**
567	25L-DEP-N-BEECH1900-D	0	1,674	n/a	n/a	0	0	0	0	0	0	0	0	**0**
		Total	**685,394**	**141,682**	**173,677**	**41,417,884**	**6,145,087**	**59,915**	**2**	**2**	**59,915**	**35**	**591**	**60,540**

Source: EDMS 5.1.3, Alt 1-VisW (Adjusted Taxiway Speed), AC_MAIN.dbf.

Note:

Annual aircraft operations are calculated higher than EDMS because of rounding differences.

Key:

APU = auxiliary power unit
CH4 = methane
CO2 = carbon dioxide
CO2e = carbon dioxide equivalent
gal/yr = gallons per year
lb/hr = pounds per hour
lb/yr = pounds per year
MT/year = metric tons per year
MTCO2e/year = metric tons carbon dioxide equivalent per year
N2O = nitrous oxide

7. Table 46 on page 94 in Appendix I-2 of the Draft EIR is hereby revised to add the following footnote:

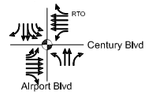
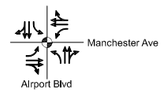
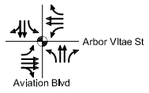
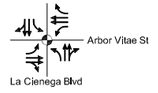
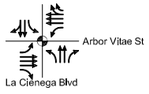
   [3] *Impacts on parks are considered significant if newly exposed to noise levels of 75 CNEL or higher, as described on pages 4-762, 4-765, and 4-766 in Section 4.9.6 of the SPAS Draft EIR. A listing of these parks is provided in Table 43 of Appendix I-2.*

Appendix K2-3 Intersection Lane Configurations

1. The existing lane configurations for Intersections #1, #3, #4, #15, and #114, shown on pages 1, 2, and 9 of Appendix K2-3 of the Draft EIR, have been revised. The existing and/or future lane configurations for Intersections #1, #3, #4, #10, #15, #60, and #114, shown on pages, 17, 18, 21, and 25 of Appendix K2-3 of the Draft EIR, have been revised. Please see the following revised figures.

Appendix K2-6 Intersection Level of Service Worksheets

1. The level of service worksheets for Intersection #1 have been modified. These worksheets replace what is shown in Attachments 4 and 5 of Appendix K2-6 of the Draft EIR. Please see replacement worksheets provided in Attachment 4 of Part II of this Final EIR (provided in electronic format only).
2. The level of service worksheets for Intersection #3 have been modified. These worksheets replace what is shown in Attachments 4 and 5 of Appendix K2-6 of the Draft EIR. Please see replacement worksheets provided in Attachment 4 of Part II of this Final EIR (provided in electronic format only).
3. The level of service worksheets for Intersection #4 have been modified. These worksheets replace what is shown in Attachments 4 and 5 of Appendix K2-6 of the Draft EIR. Please see replacement worksheets provided in Attachment 4 of Part II of this Final EIR (provided in electronic format only).
4. The level of service worksheets for Intersection #10 have been modified. These worksheets replace what is shown in Attachment 6 of Appendix K2-6 of the Draft EIR. Please see replacement worksheets provided in Attachment 4 of Part II of this Final EIR (provided in electronic format only).
5. The level of service worksheets for Intersection #15 have been modified. These worksheets replace what is shown in Attachments 1, 2, and 4 through 6 of Appendix K2-6 of the Draft EIR. Please see replacement worksheets provided in Attachment 4 of Part II of this Final EIR (provided in electronic format only).
6. The level of service worksheets for Intersection #60 have been modified. These worksheets replace what is shown in Attachment 6 of Appendix K2-6 of the Draft EIR. Please see replacement worksheets provided in Attachment 4 of Part II of this Final EIR (provided in electronic format only).
7. The level of service worksheets for Intersection #114 have been modified. These worksheets replace what is shown in Attachments 1, 2, 4, and 5 of Appendix K2-6 of the Draft EIR. Please see replacement worksheets provided in Attachment 4 of Part II of this Final EIR (provided in electronic format only).

	EXISTING (2010) (NO PROJECT)	EXISTING (2010) WITH PROJECT ALTERNATIVES 1/2	EXISTING (2010) WITH PROJECT ALTERNATIVES 3	EXISTING (2010) WITH PROJECT ALTERNATIVE 4	EXISTING (2010) WITH PROJECT ALTERNATIVES 8/9	EXISTING (2010) WITH PROJECT MITIGATIONS ALTERNATIVES 1/2	EXISTING (2010) WITH PROJECT MITIGATIONS ALTERNATIVE 3	EXISTING (2010) WITH PROJECT MITIGATIONS ALTERNATIVE 4	EXISTING (2010) WITH PROJECT MITIGATIONS ALTERNATIVES 8/9
1. Admiralty Way & Bali Way		Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions
2. Admiralty Way & Fiji Way		Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions
3. Admiralty Way & Mindanao Way		Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions
4. Admiralty Way & Palawan Way		Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions
5. Admiralty Way & Via Marina		Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions
6. Airport Blvd & Westchester Pkwy/ Arbor Vitae St		Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions
7. Airport Blvd & Century Blvd		Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions		Same As Existing Conditions
8. Airport Blvd & La Tijera Blvd		Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions
9. Airport Blvd & Manchester Ave		Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions
10. Aviation Blvd & Arbor Vitae St		Same As Existing Conditions		Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing With Alternative 3 Conditions	Same As Existing Conditions	Same As Existing Conditions
11. Inglewood Ave & Arbor Vitae St		Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions
12. La Brea Ave & Arbor Vitae St		Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions
13. La Cienega Blvd & Arbor Vitae St		Same As Existing Conditions		Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions

north

not to scale

Legend

- Signalized
- FF Free Flow
- ★ Functional Turn Lane
- RTO Right Turn Overlap

LAX Specific Plan Amendment Study Draft EIR

Intersection Lane Configurations

Appendix **K2-3** Page 1

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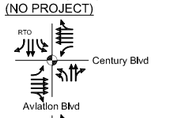
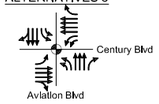
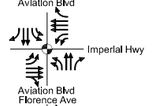
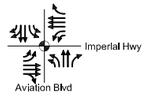
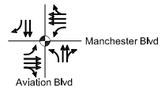
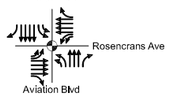
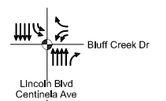
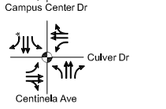
	EXISTING (2010) (NO PROJECT)	EXISTING (2010) WITH PROJECT ALTERNATIVES 1/2	EXISTING (2010) WITH PROJECT ALTERNATIVES 3	EXISTING (2010) WITH PROJECT ALTERNATIVE 4	EXISTING (2010) WITH PROJECT ALTERNATIVES 8/9	EXISTING (2010) WITH PROJECT MITIGATIONS ALTERNATIVES 1/2	EXISTING (2010) WITH PROJECT MITIGATIONS ALTERNATIVE 3	EXISTING (2010) WITH PROJECT MITIGATIONS ALTERNATIVE 4	EXISTING (2010) WITH PROJECT MITIGATIONS ALTERNATIVES 8/9
14. Aviation Blvd & Century Blvd		Same As Existing Conditions		Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing With Alternative 3 Conditions	Same As Existing Conditions	Same As Existing Conditions
15. Aviation Blvd & El Seguno Blvd		Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions
16. Aviation Blvd & Imperial Hwy		Same As Existing Conditions		Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing With Alternative 3 Conditions	Same As Existing Conditions	Same As Existing Conditions
17. Aviation Blvd/ Florence Ave & Manchester Blvd		Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions		Same As Existing Conditions	Same As Existing Conditions
18. Aviation Blvd & Rosencrans Ave		Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions
19. Aviation Blvd & 111th St		Same As Existing Conditions		Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing With Alternative 3 Conditions	Same As Existing Conditions	Same As Existing Conditions
20. Aviation Blvd & 120th St		Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions
21. Lincoln Blvd & Bali Way		Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions
22. Lincoln Blvd & Bluff Creek Dr		Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions
23. Centinela Ave/ Campus Center Dr & Jefferson Blvd		Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions
24. Centinela Ave & Culver Dr		Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions
25. La Brea Ave & Centinela Ave		Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions
26. La Clenega Blvd & Centinela Ave		Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions		Same As Existing Conditions	Same As Existing Conditions

north

not to scale

Legend

- Signalized
- FF Free Flow
- Functional Turn Lane
- RTO Right Turn Overlap

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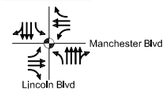
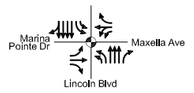
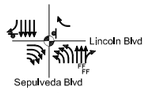
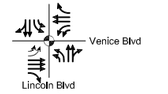
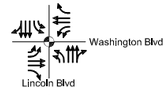
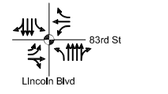
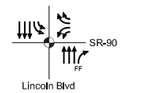
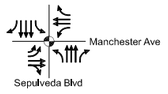
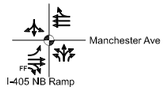
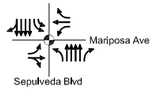
	EXISTING (2010) (NO PROJECT)	EXISTING (2010) WITH PROJECT ALTERNATIVES 1/2	EXISTING (2010) WITH PROJECT ALTERNATIVE 3	EXISTING (2010) WITH PROJECT ALTERNATIVE 4	EXISTING (2010) WITH PROJECT ALTERNATIVES 8/9	EXISTING (2010) WITH PROJECT MITIGATIONS ALTERNATIVES 1/2	EXISTING (2010) WITH PROJECT MITIGATIONS ALTERNATIVE 3	EXISTING (2010) WITH PROJECT MITIGATIONS ALTERNATIVE 4	EXISTING (2010) WITH PROJECT MITIGATIONS ALTERNATIVES 8/9
105. Lincoln Blvd & Manchester Blvd		Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions
106. Lincoln Blvd & Marina Pointe Dr/ Maxella Ave		Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions
107. Lincoln Blvd & Mindanao Way		Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions
108. Sepulveda Blvd & Lincoln Blvd		Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions
109. Lincoln Blvd & Venice Blvd		Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions
110. Lincoln Blvd & Washington Blvd		Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions
111. Lincoln Blvd & 83rd St		Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions
112. Lincoln Blvd & SR-90		Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions
113. Pershing Dr & Manchester Ave		Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions
114. Sepulveda Blvd & Manchester Ave		Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions
115. I-405 NB Ramp & Manchester Ave		Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions
116. Nash St & Mariposa Ave		Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions
117. Sepulveda Blvd & Mariposa Ave		Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions

north

not to scale

Legend

- Signalized
- FF Free Flow
- ★ Functional Turn Lane
- RTO Right Turn Overlap

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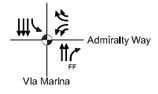
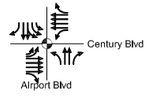
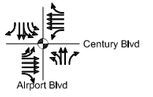
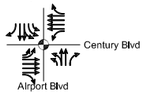
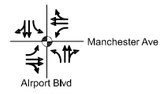
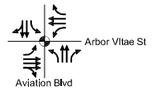
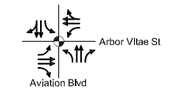
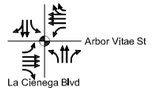
	EXISTING (2010) (NO PROJECT)	FUTURE (2025) ADJUSTED BASE (NO PROJECT)	FUTURE (2025) WITH PROJECT ALTERNATIVES 1/2	FUTURE (2025) WITH PROJECT ALTERNATIVE 3	FUTURE (2025) WITH PROJECT ALTERNATIVE 4	FUTURE (2025) WITH PROJECT ALTERNATIVES 8/9	FUTURE (2025) WITH PROJECT MITIGATIONS ALTERNATIVES 1/2	FUTURE (2025) WITH PROJECT MITIGATIONS ALTERNATIVE 3	FUTURE (2025) WITH PROJECT MITIGATIONS ALTERNATIVE 4	FUTURE (2025) WITH PROJECT MITIGATIONS ALTERNATIVES 8/9
1. Admiralty Way & Bali Way			Same As Future Conditions	Same As Future Conditions	Same As Future Conditions	Same As Future Conditions	Same As Future Conditions	Same As Future Conditions	Same As Future Conditions	Same As Future Conditions
2. Admiralty Way & Fiji Way		Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions
3. Admiralty Way & Mindanao Way			Same As Future Conditions	Same As Future Conditions	Same As Future Conditions	Same As Future Conditions	Same As Future Conditions	Same As Future Conditions	Same As Future Conditions	Same As Future Conditions
4. Admiralty Way & Palawan Way			Same As Future Conditions	Same As Future Conditions	Same As Future Conditions	Same As Future Conditions	Same As Future Conditions	Same As Future Conditions	Same As Future Conditions	Same As Future Conditions
5. Admiralty Way & Via Marina		Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions
6. Airport Blvd & Westchester Pkwy/ Arbor Vitae St		Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions				
7. Airport Blvd & Century Blvd		Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions		Same As Existing Conditions		
8. Airport Blvd & La Tijera Blvd		Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions
9. Airport Blvd & Manchester Ave		Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions
10. Aviation Blvd & Arbor Vitae St		Same As Existing Conditions	Same As Existing Conditions		Same As Existing Conditions	Same As Existing Conditions		Same As Future with Alternative 3 Conditions		
11. Inglewood Ave & Arbor Vitae St		Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions		Same As Existing Conditions		
12. La Brea Ave & Arbor Vitae St		Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions
13. La Cienega Blvd & Arbor Vitae St		Same As Existing Conditions	Same As Existing Conditions		Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions

Legend

- Signalized
- FF Free Flow
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- RTO Right Turn Overlap

north

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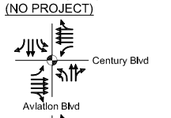
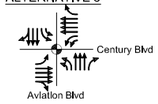
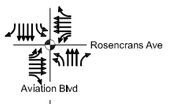
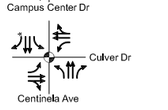
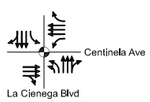
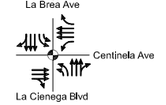
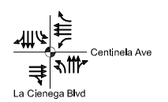
	EXISTING (2010) (NO PROJECT)	FUTURE (2025) ADJUSTED BASE (NO PROJECT)	FUTURE (2025) WITH PROJECT ALTERNATIVES 1/2	FUTURE (2025) WITH PROJECT ALTERNATIVE 3	FUTURE (2025) WITH PROJECT ALTERNATIVE 4	FUTURE (2025) WITH PROJECT ALTERNATIVES 8/9	FUTURE (2025) WITH PROJECT MITIGATIONS ALTERNATIVES 1/2	FUTURE (2025) WITH PROJECT MITIGATIONS ALTERNATIVE 3	FUTURE (2025) WITH PROJECT MITIGATIONS ALTERNATIVE 4	FUTURE (2025) WITH PROJECT MITIGATIONS ALTERNATIVES 8/9
14. Aviation Blvd & Century Blvd		Same As Existing Conditions	Same As Existing Conditions		Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Future With Alternative 3 Conditions	Same As Existing Conditions	Same As Existing Conditions
15. Aviation Blvd & El Seguno Blvd		Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions		Same As Existing Conditions	Same As Existing Conditions
16. Aviation Blvd & Imperial Hwy		Same As Existing Conditions	Same As Existing Conditions		Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions			Same As Existing Conditions
17. Aviation Blvd/ Florence Ave & Manchester Blvd		Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions				
18. Aviation Blvd & Rosencrans Ave		Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions
19. Aviation Blvd & 111th St		Same As Existing Conditions	Same As Existing Conditions		Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Future With Alternative 3 Conditions	Same As Existing Conditions	Same As Existing Conditions
20. Aviation Blvd & 120th St		Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions
21. Lincoln Blvd & Bali Way		Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions
22. Lincoln Blvd & Bluff Creek Dr		Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions
23. Centinela Ave/ Campus Center Dr & Jefferson Blvd		Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions
24. Centinela Ave & Culver Dr			Same As Future With Base Conidititions	Same As Future With Base Conidititions	Same As Future With Base Conidititions	Same As Future With Base Conidititions	Same As Future With Base Conidititions	Same As Future With Base Conidititions	Same As Future With Base Conidititions	Same As Future With Base Conidititions
25. La Brea Ave & Centinela Ave		Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions			Same As Existing Conditions	
26. La Clenega Blvd & Centinela Ave			Same As Future With Base Conidititions	Same As Future With Base Conidititions	Same As Future With Base Conidititions	Same As Future With Base Conidititions				

Legend

- Signalized
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- RTO Right Turn Overlap

north

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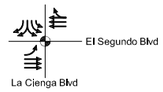
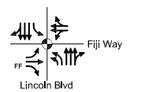
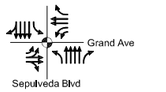
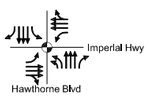
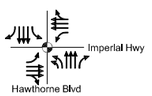
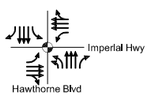
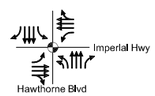
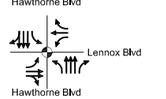
	EXISTING (2010) (NO PROJECT)	FUTURE (2025) ADJUSTED BASE (NO PROJECT)	FUTURE (2025) WITH PROJECT ALTERNATIVES 1/2	FUTURE (2025) WITH PROJECT ALTERNATIVE 3	FUTURE (2025) WITH PROJECT ALTERNATIVE 4	FUTURE (2025) WITH PROEJCT ALTERNATIVES 8/9	FUTURE (2025) WITH PROJECT MITIGATIONS ALTERNATIVES 1/2	FUTURE (2025) WITH PROJECT MITIGATIONS ALTERNATIVE 3	FUTURE (2025) WITH PROJECT MITIGATIONS ALTERNATIVE 4	FUTURE (2025) WITH PROJECT MITIGATIONS ALTERNATIVES 8/9
53. La Clenga Blvd & El Segundo Blvd		Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions		Same As Existing Conditions	Same As Existing Conditions
54. Nash St & El Segundo Blvd		Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions
55. Sepulveda Blvd & El Segundo Blvd		Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions
56. Lincoln Blvd & Fiji Way		Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions
57. La Brea Ave & Florence Ave		Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions				
58. La Clenega Blvd & Florence Blvd		Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions				
59. Nash St & Grand Ave		Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions
60. Sepulveda Blvd & Grand Ave		Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions		Same As Existing Conditions	Same As Existing Conditions	
61. Vista Del Mar & Grand Ave		Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions
62. Hawthorne Blvd & Imperial Hwy		Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions				
63. Hawthorne Blvd & Lennox Blvd		Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions
64. Vista Del Mar/ Highland Ave & Rosecrans Ave		Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions
65. Sepulveda Blvd & Howard Hughes Pkwy		Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions

north

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Legend

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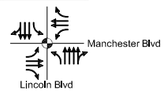
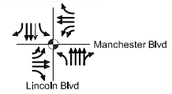
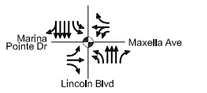
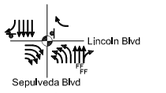
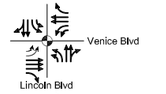
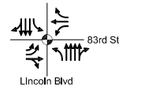
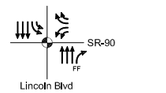
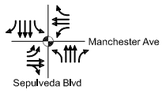
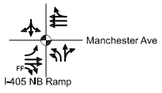
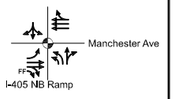
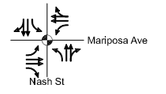
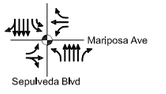
	EXISTING (2010) (NO PROJECT)	FUTURE (2025) ADJUSTED BASE (NO PROJECT)	FUTURE (2025) WITH PROJECT ALTERNATIVES 1/2	FUTURE (2025) WITH PROJECT ALTERNATIVE 3	FUTURE (2025) WITH PROJECT ALTERNATIVE 4	FUTURE (2025) WITH PROJECT ALTERNATIVES 8/9	FUTURE (2025) WITH PROJECT MITIGATIONS ALTERNATIVES 1/2	FUTURE (2025) WITH PROJECT MITIGATIONS ALTERNATIVE 3	FUTURE (2025) WITH PROJECT MITIGATIONS ALTERNATIVE 4	FUTURE (2025) WITH PROJECT MITIGATIONS ALTERNATIVES 8/9
105. Lincoln Blvd & Manchester Blvd		Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions		Same As Existing Conditions	Same As Existing Conditions
106. Lincoln Blvd & Marina Pointe Dr/ Maxella Ave		Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions
107. Lincoln Blvd & Mindanao Way		Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions
108. Sepulveda Blvd & Lincoln Blvd		Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions
109. Lincoln Blvd & Venice Blvd		Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions
110. Lincoln Blvd & Washington Blvd		Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions
111. Lincoln Blvd & 83rd St		Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions
112. Lincoln Blvd & SR-90		Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions
113. Pershing Dr & Manchester Ave		Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions
114. Sepulveda Blvd & Manchester Ave		Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions
115. I-405 NB Ramp & Manchester Ave		Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions		Same As Existing Conditions	Same As Existing Conditions	
116. Nash St & Mariposa Ave		Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions
117. Sepulveda Blvd & Mariposa Ave		Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions	Same As Existing Conditions

north

not to scale

Legend

- Signalized
- FF Free Flow
- Functional Turn Lane
- RTO Right Turn Overlap

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5.4 Corrections and Additions to the Preliminary LAX SPAS Report Text

Chapter 6, SPAS Alternative Projects

1. Table 6-4 on pages 6-23 through 6-32 of the Preliminary LAX SPAS Report has been revised. Please see the following revised table.

Table 6-4

LAX Master Plan Commitments, LAX Master Plan Mitigation Measures, and SPAS-Specific Mitigation Measures as Related to the SPAS Alternatives

	Alt. 1	Alt. 2	Alt. 3	Alt. 4	Alt. 5	Alt. 6	Alt. 7	Alt. 8	Alt. 9
Aesthetics									
LAX Master Plan Commitments									
DA-1. Provide and Maintain Airport Buffer Areas	X	X	X	X	X	X	X	X	X
DA-2. Update and Integrate Design Plans and Guidelines	X	X	X	X	X	X	X	X	X
LU-2. Establishment of a Landscape Maintenance Program for Parcels Acquired Due to Airport Expansion	X	X	X	X				X	X
LU-4. Neighborhood Compatibility Program	X	X	X	X	X	X	X	X	X
LI-2. Use of Non-Glare Generating Building Materials	X	X	X	X	X	X	X	X	X
LI-3. Lighting Controls	X	X	X	X	X	X	X	X	X
LAX Master Plan Mitigation Measures									
MM-DA-1. Construction Fencing	X	X	X	X	X	X	X	X	X
SPAS Mitigation Measures									
MM-HA (SPAS)-1. Preservation of Historic Resources: Theme Building and Setting			X						
MM-HA (SPAS)-2. Preservation of Historic Resources: Theme Building and Setting									X
Air Quality									
LAX Master Plan Commitments									
None									
LAX Master Plan Mitigation Measures[1]									
MM-AQ-1. LAX Master Plan Mitigation Plan for Air Quality, Framework	X	X	X	X	X	X	X	X	X
MM-AQ-2. LAX Master Plan Mitigation Plan for Air Quality, Construction-Related Mitigation Measures	X	X	X	X	X	X	X	X	X
MM-AQ-3. LAX Master Plan Mitigation Plan for Air Quality, Transportation-Related Mitigation Measures	X	X	X	X	X[2]	X[2]	X[2]	X	X
MM-AQ-4. LAX Master Plan Mitigation Plan for Air Quality, Operations-Related Mitigation Measures	X	X	X	X	X	X	X	X	X
Community Benefits Agreement, Section X.A., Electrification of Passenger Gates[1]	X	X	X	X	X	X	X	X[3]	X[3]
Community Benefits Agreement, Section X.F., Construction Equipment[1]	X	X	X	X	X	X	X	X	X
Community Benefits Agreement, Section X.K., PM2.5[1]	X	X	X	X	X	X	X	X	X
Community Benefits Agreement, Section X.L., Rock-Crushing Operations and Construction Materials Stockpiles[1]	X	X	X	X	X	X	X	X	X
Community Benefits Agreement, Section X.M., Limits on Diesel Idling[1]	X	X	X	X	X	X	X	X	X
Community Benefits Agreement, Section X.N., Provision of Alternative Fuel[1]	X	X	X	X	X	X	X	X	X
SPAS Mitigation Measures									
~~None~~									
MM-AQ (SPAS)-1. Additional Measures to Supplement the LAX Master Plan for Air Quality - Construction-Related Mitigation Measures	*X*	*X*	*X*	*X*	*X*	*X*	*X*	*X*	*X*
MM-AQ (SPAS)-2. Additional Measures to Supplement the LAX Master Plan for Air Quality - Transportation-Related Mitigation Measures	*X*	*X*	*X*	*X*	*X*[2]	*X*[2]	*X*[2]	*X*	*X*
MM-AQ (SPAS)-3. Additional Measures to Supplement the LAX Master Plan for Air Quality - Operations-Related Mitigation Measures	*X*	*X*	*X*	*X*	*X*	*X*	*X*	*X*	*X*

Table 6-4

LAX Master Plan Commitments, LAX Master Plan Mitigation Measures, and SPAS-Specific Mitigation Measures as Related to the SPAS Alternatives

	Alt. 1	Alt. 2	Alt. 3	Alt. 4	Alt. 5	Alt. 6	Alt. 7	Alt. 8	Alt. 9
Biological Resources									
LAX Master Plan Commitments									
None									
LAX Master Plan Mitigation Measures									
MM-BC-1. Conservation of State-Designated Sensitive Habitat Within and Adjacent to the El Segundo Blue Butterfly Habitat Restoration Area	X	X	X	X	X	X	X		
MM-BC-3. Conservation of Floral Resources: Mature Tree Replacement	X	X	X	X	X	X	X	X	X
MM-ET-3. El Segundo Blue Butterfly Conservation: Dust Control	X	X	X	X	X	X	X		
MM-ET-4. El Segundo Blue Butterfly Conservation: Habitat Restoration	X	X	X	X	X	X	X		
SPAS Mitigation Measures									
MM-BIO (SPAS)-1. Replacement of State-Designated Sensitive Habitats	X	X	X	X	X	X	X		
MM-BIO (SPAS)-2. Conservation of Floral Resources: South Coast Branching Phacelia	X	X	X	X	X	X	X		
MM-BIO (SPAS)-3. Conservation of Floral Resources: Lewis' Evening Primrose	X	X	X	X	X	X	X		
MM-BIO (SPAS)-4. Conservation of Floral Resources: California Spineflower	X	X	X	X	X	X	X		
MM-BIO (SPAS)-5. Conservation of Floral Resources: Mesa Horkelia	X	X	X	X	X	X	X		
MM-BIO (SPAS)-6. Conservation of Floral Resources: Orcutt's Pincushion	X	X	X	X	X	X	X		
MM-BIO (SPAS)-7. Conservation of Floral Resources: Southern Tarplant	X	X	X	X	X	X	X	X	X
MM-BIO (SPAS)-8. Conservation of Faunal Resources: Sensitive Reptiles, Arthropods, and Gastropods	X	X	X	X	X	X	X		
MM-BIO (SPAS)-9. Conservation of Faunal Resources: Loggerhead Shrike	X	X	X	X	X	X	X		
MM-BIO (SPAS)-10. Conservation of Faunal Resources: Burrowing Owl	X	X	X	X	X	X	X	X	X
MM-BIO (SPAS)-11. Conservation of Floral Resources: Mature Tree Replacement - Nesting Raptors	X	X	X	X	X	X	X	X	X
MM-BIO (SPAS)-12. Conservation of Faunal Resources: Nesting Birds/Raptors	X	X	X	X	X	X	X	X	X
MM-BIO (SPAS)-13. Replacement of Jurisdictional Aquatic Features	X				X	X			
MM-BIO (SPAS)-14. Replacement of Habitat Units	X	X	X	X	X	X	X	X	X
Coastal Resources									
LAX Master Plan Commitments									
None									
LAX Master Plan Mitigation Measures									
MM-BC-1. Conservation of State-Designated Sensitive Habitat Within and Adjacent to the El Segundo Blue Butterfly Habitat Restoration Area	X	X	X	X	X	X	X		
MM-ET-3. El Segundo Blue Butterfly Conservation: Dust Control	X	X	X	X	X	X	X		
MM-ET-4. El Segundo Blue Butterfly Conservation: Habitat Restoration	X	X	X	X	X	X	X		
SPAS Mitigation Measures									
MM-BIO (SPAS)-1. Replacement of State-Designated Sensitive Habitats	X	X	X	X	X	X	X		
MM-BIO (SPAS)-2. Conservation of Floral Resources: South Coast Branching Phacelia	X	X	X	X	X	X	X		

Table 6-4

LAX Master Plan Commitments, LAX Master Plan Mitigation Measures, and SPAS-Specific Mitigation Measures as Related to the SPAS Alternatives

	Alt. 1	Alt. 2	Alt. 3	Alt. 4	Alt. 5	Alt. 6	Alt. 7	Alt. 8	Alt. 9
MM-BIO (SPAS)-3. Conservation of Floral Resources: Lewis' Evening Primrose	X	X	X	X	X	X	X		
MM-BIO (SPAS)-4. Conservation of Floral Resources: California Spineflower	X	X	X	X	X	X	X		
MM-BIO (SPAS)-5. Conservation of Floral Resources: Mesa Horkelia	X	X	X	X	X	X	X		
MM-BIO (SPAS)-6. Conservation of Floral Resources: Orcutt's Pincushion	X	X	X	X	X	X	X		
MM-BIO (SPAS)-8. Conservation of Faunal Resources: Sensitive Reptiles and Arthropods	X	X	X	X	X	X	X		
MM-BIO (SPAS)-9. Conservation of Faunal Resources: Loggerhead Shrike	X	X	X	X	X	X	X		
MM-BIO (SPAS)-10. Conservation of Faunal Resources: Burrowing Owl	X	X	X	X	X	X	X		
Cultural Resources									
LAX Master Plan Commitments									
HR-1. Preservation of Historic Resources	X	X	X		X	X	X	X	X
LAX Master Plan Mitigation Measures									
None									
SPAS Mitigation Measures									
MM-HA (SPAS)-1. Preservation of Historic Resources: Theme Building and Setting			X						
MM-HA (SPAS)-2. Preservation of Historic Resources: Theme Building and Setting									X
MM-HA (SPAS)-3. Preservation of Historic Resources: Union Savings and Loan Building			X						
MM-HA (SPAS)-4. Conformance with LAX Master Plan Archaeological Treatment Plan	X	X	X	X	X	X	X	X	X
Greenhouse Gases									
LAX Master Plan Commitments									
None									
LAX Master Plan Mitigation Measures									
MM-AQ-1. LAX Master Plan Mitigation Plan for Air Quality, Framework	X	X	X	X	X	X	X	X	X
MM-AQ-2. LAX Master Plan Mitigation Plan for Air Quality, Construction-Related Mitigation Measures	X	X	X	X	X	X	X	X	X
MM-AQ-3. LAX Master Plan Mitigation Plan for Air Quality, Transportation-Related Mitigation Measures	X	X	X	X	X[2]	X[2]	X[2]	X	X
MM-AQ-4. LAX Master Plan Mitigation Plan for Air Quality, Operations-Related Mitigation Measures	X	X	X	X	X	X	X	X	X
Community Benefits Agreement, Section X.A., Electrification of Passenger Gates[1]	X	X	X	X	X	X	X	X[3]	X[3]
Community Benefits Agreement, Section X.N., Provision of Alternative Fuel[1]	X	X	X	X	X	X	X	X	X
SPAS Mitigation Measures									
~~None~~									
MM-AQ (SPAS)-1. Additional Measures to Supplement the LAX Master Plan for Air Quality - Construction-Related Mitigation Measures	*X*	*X*	*X*	*X*	*X*	*X*	*X*	*X*	*X*
MM-AQ (SPAS)-2. Additional Measures to Supplement the LAX Master Plan for Air Quality - Transportation-Related Mitigation Measures	*X*	*X*	*X*	*X*	*X*[2]	*X*[2]	*X*[2]	*X*	*X*
MM-AQ (SPAS)-3. Additional Measures to Supplement the LAX Master Plan for Air Quality - Operations-Related Mitigation Measures	*X*	*X*	*X*	*X*	*X*	*X*	*X*	*X*	*X*

Table 6-4

LAX Master Plan Commitments, LAX Master Plan Mitigation Measures, and SPAS-Specific Mitigation Measures as Related to the SPAS Alternatives

	Alt. 1	Alt. 2	Alt. 3	Alt. 4	Alt. 5	Alt. 6	Alt. 7	Alt. 8	Alt. 9
Human Health Risk Assessment									
LAX Master Plan Commitments									
None									
LAX Master Plan Mitigation Measures									
MM-AQ-1. LAX Master Plan Mitigation Plan for Air Quality, Framework	X	X	X	X	X	X	X	X	X
MM-AQ-2. LAX Master Plan Mitigation Plan for Air Quality, Construction-Related Mitigation Measures	X	X	X	X	X	X	X	X	X
MM-AQ-3. LAX Master Plan Mitigation Plan for Air Quality, Transportation-Related Mitigation Measures	X	X	X	X	X[2]	X[2]	X[2]	X	X
MM-AQ-4. LAX Master Plan Mitigation Plan for Air Quality, Operations-Related Mitigation Measures	X	X	X	X	X	X	X	X	X
Community Benefits Agreement, Section X.A., Electrification of Passenger Gates[1]	X	X	X	X	X	X	X	X[3]	X[3]
Community Benefits Agreement, Section X.F., Construction Equipment[1]	X	X	X	X	X	X	X	X	X
Community Benefits Agreement, Section X.K., PM2.5[1]	X	X	X	X	X	X	X	X	X
Community Benefits Agreement, Section X.L., Rock-Crushing Operations and Construction Materials Stockpiles[1]	X	X	X	X	X	X	X	X	X
Community Benefits Agreement, Section X.M., Limits on Diesel Idling[1]	X	X	X	X	X	X	X	X	X
Community Benefits Agreement, Section X.N., Provision of Alternative Fuel[1]	X	X	X	X	X	X	X	X	X
SPAS Mitigation Measures									
~~None~~									
MM-AQ (SPAS)-1. Additional Measures to Supplement the LAX Master Plan for Air Quality - Construction-Related Mitigation Measures	*X*	*X*	*X*	*X*	*X*	*X*	*X*	*X*	*X*
MM-AQ (SPAS)-2. Additional Measures to Supplement the LAX Master Plan for Air Quality - Transportation-Related Mitigation Measures	*X*	*X*	*X*	*X*	*X*[2]	*X*[2]	*X*[2]	*X*	*X*
MM-AQ (SPAS)-3. Additional Measures to Supplement the LAX Master Plan for Air Quality - Operations-Related Mitigation Measures	*X*	*X*	*X*	*X*	*X*	*X*	*X*	*X*	*X*
Safety									
LAX Master Plan Commitments									
None									
LAX Master Plan Mitigation Measures									
None									
SPAS Mitigation Measures									
MM-SAF (SPAS)-1. Runway Protection Zone Reviews[4]	X				X	X			
Hazardous Materials									
LAX Master Plan Commitments									
HM-1. Ensure Continued Implementation of Existing Remediation Efforts	X	X	X	X	X	X	X	X	X
HM-2. Handling of Contaminated Materials Encountered During Construction	X	X	X	X	X	X	X	X	X
C-1. Establishment of a Ground Transportation/Construction Coordination Office	X	X	X	X				X	X

Table 6-4

LAX Master Plan Commitments, LAX Master Plan Mitigation Measures, and SPAS-Specific Mitigation Measures as Related to the SPAS Alternatives

	Alt. 1	Alt. 2	Alt. 3	Alt. 4	Alt. 5	Alt. 6	Alt. 7	Alt. 8	Alt. 9
ST-9. Construction Deliveries	X	X	X	X				X	X
ST-12. Designated Truck Delivery Hours	X	X	X	X				X	X
ST-14. Construction Employee Shift Hours	X	X	X	X				X	X
ST-17. Maintenance of Haul Routes	X	X	X	X				X	X
ST-18. Construction Traffic Management Plan	X	X	X	X				X	X
ST-19. Closure Restrictions of Existing Roadways	X	X	X	X				X	X
ST-21. Construction Employee Parking Locations	X	X	X	X				X	X
ST-22. Designated Truck Routes	X	X	X	X				X	X
LAX Master Plan Mitigation Measures									
None									
SPAS Mitigation Measures									
None									
Hydrology/Water Quality									
LAX Master Plan Commitments									
HWQ-1. Conceptual Drainage Plan			X						
LAX Master Plan Mitigation Measures									
None									
SPAS Mitigation Measures									
MM-HWQ (SPAS)-1. Conceptual Drainage Plan Revision and Update	X	X		X	X	X	X	X	X
Land Use and Planning									
LAX Master Plan Commitments									
LU-2. Establishment of a Landscape Maintenance Program for Parcels Acquired Due to Airport Expansion	X	X	X	X				X	X
LU-4. Neighborhood Compatibility Program	X	X	X	X	X	X	X	X	X
LU-5. Comply with City of Los Angeles Transportation Element Bicycle Plan	X	X	X	X	X	X	X	X	X
RBR-1. Residential and Business Relocation Program	X	X	X	X				X	X
LAX Master Plan Mitigation Measures									
MM-LU-1. Implement Revised Aircraft Noise Mitigation Program	X	X	X	X	X	X	X		
MM-LU-3. Conduct Study of the Relationship Between Aircraft Noise Levels and the Ability of Children to Learn	*X*	*X*	*X*	*X*	*X*	*X*	*X*		
MM-LU-4. Provide Additional Sound Insulation for Schools Shown by MM-LU-3 to be Significantly Impacted by Aircraft Noise	*X*	*X*	*X*	*X*	*X*	*X*	*X*		
MM-RBR-1. Phasing for Business Relocations	X	X	X	X				X	X
MM-RBR-2. Relocation Opportunities through Aircraft Noise Mitigation Program	X	X	X	X				X	X
SPAS Mitigation Measures									
None									

Table 6-4

LAX Master Plan Commitments, LAX Master Plan Mitigation Measures, and SPAS-Specific Mitigation Measures as Related to the SPAS Alternatives

	Alt. 1	Alt. 2	Alt. 3	Alt. 4	Alt. 5	Alt. 6	Alt. 7	Alt. 8	Alt. 9
Aircraft Noise ~~(in addition to noise-related measures listed above in Land Use)~~									
LAX Master Plan Commitments									
N-1. Maintenance of Applicable Elements of Existing Aircraft Noise Abatement Program	X	X	X	X	X	X	X		
LAX Master Plan Mitigation Measures									
MM-LU-1. Implement Revised Aircraft Noise Mitigation Program	*X*	*X*	*X*	*X*	*X*	*X*	*X*		
MM-LU-3. Conduct Study of the Relationship Between Aircraft Noise Levels and the Ability of Children to Learn	*X*	*X*	*X*	*X*	*X*	*X*	*X*		
MM-LU-4. Provide Additional Sound Insulation for Schools Shown by MM-LU-3 to be Significantly Impacted by Aircraft Noise	*X*	*X*	*X*	*X*	*X*	*X*	*X*		
MM-N-4. Update the Aircraft Noise Abatement Program Elements as Applicable to Adapt to the Future Airfield Configuration	X	X	X	X	X	X	X		
MM-N-5. Conduct Part 161 Study to Make Over-Ocean Procedures Mandatory	X	X	X	X	X	X	X		
SPAS Mitigation Measures									
None									
Road Traffic Noise									
LAX Master Plan Commitments									
None									
LAX Master Plan Mitigation Measures									
None									
SPAS Mitigation Measures									
None									
Construction Traffic and Equipment Noise									
LAX Master Plan Commitments									
ST-16. Designated Haul Routes	X	X	X	X	X	X	X	X	X
ST-18. Construction Traffic Management Plan	X	X	X	X	X	X	X	X	X
ST-22. Designated Truck Routes	X	X	X	X	X	X	X	X	X
LAX Master Plan Mitigation Measures									
MM-N-7. Construction Noise Control Plan	X	X	X	X	X	X	X	X	X
MM-N-8. Construction Staging	X	X	X	X	X	X	X	X	X
MM-N-9. Equipment Replacement	X	X	X	X	X	X	X	X	X
MM-N-10. Construction Scheduling	X	X	X	X	X	X	X	X	X
SPAS Mitigation Measures									
None									

Table 6-4

LAX Master Plan Commitments, LAX Master Plan Mitigation Measures, and SPAS-Specific Mitigation Measures as Related to the SPAS Alternatives

	Alt. 1	Alt. 2	Alt. 3	Alt. 4	Alt. 5	Alt. 6	Alt. 7	Alt. 8	Alt. 9
Transit Noise									
LAX Master Plan Commitments									
None									
LAX Master Plan Mitigation Measures									
MM-N-11. Automated People Mover (APM) Noise Assessment and Control Plan			X						
SPAS Mitigation Measures									
MM-N (SPAS)-1. Elevated/Dedicated Busway Noise Assessment and Control Plan	X	X						X	
Fire Protection									
LAX Master Plan Commitments									
FP-1. LAFD Design Recommendations	X	X	X	X	X	X	X	X	X
PS-1. Fire and Police Facility Relocation Plan	X	X	X	X	X	X	X	X	X
PS-2. Fire and Police Facility Space and Siting Requirements	X	X	X	X	X	X	X	X	X
C-1. Establishment of a Ground Transportation/Construction Coordination Office	X	X	X	X	X	X	X	X	X
ST-9. Construction Deliveries	X	X	X	X	X	X	X	X	X
ST-12. Designated Truck Delivery Hours	X	X	X	X	X	X	X	X	X
ST-14. Construction Employee Shift Hours	X	X	X	X	X	X	X	X	X
ST-17. Maintenance of Haul Routes	X	X	X	X	X	X	X	X	X
ST-18. Construction Traffic Management Plan	X	X	X	X	X	X	X	X	X
ST-19. Closure Restrictions of Existing Roadways	X	X	X	X	X	X	X	X	X
ST-21. Construction Employee Parking Locations	X	X	X	X	X	X	X	X	X
ST-22. Designated Truck Routes	X	X	X	X	X	X	X	X	X
LAX Master Plan Mitigation Measures									
None									
SPAS Mitigation Measures									
None									
Law Enforcement									
LAX Master Plan Commitments									
LE-1. Routine Evaluation of Manpower and Equipment Needs	X	X	X	X	X	X	X	X	X
LE-2. Plan Review	X	X	X	X	X	X	X	X	X
PS-1. Fire and Police Facility Relocation Plan	X	X	X		X	X	X	X	X
PS-2. Fire and Police Facility Space and Siting Requirements	X	X	X		X	X	X	X	X
C-1. Establishment of a Ground Transportation/Construction Coordination Office	X	X	X	X	X	X	X	X	X
ST-9. Construction Deliveries	X	X	X	X	X	X	X	X	X
ST-12. Designated Truck Delivery Hours	X	X	X	X	X	X	X	X	X
ST-14. Construction Employee Shift Hours	X	X	X	X	X	X	X	X	X

Table 6-4

LAX Master Plan Commitments, LAX Master Plan Mitigation Measures, and SPAS-Specific Mitigation Measures as Related to the SPAS Alternatives

	Alt. 1	Alt. 2	Alt. 3	Alt. 4	Alt. 5	Alt. 6	Alt. 7	Alt. 8	Alt. 9
ST-17. Maintenance of Haul Routes	X	X	X	X	X	X	X	X	X
ST-18. Construction Traffic Management Plan	X	X	X	X	X	X	X	X	X
ST-19. Closure Restrictions of Existing Roadways	X	X	X	X	X	X	X	X	X
ST-21. Construction Employee Parking Locations	X	X	X	X	X	X	X	X	X
ST-22. Designated Truck Routes	X	X	X	X	X	X	X	X	X
LAX Master Plan Mitigation Measures	~~X~~	~~X~~	~~X~~	~~X~~	~~X~~	~~X~~	~~X~~	~~X~~	~~X~~
None									
SPAS Mitigation Measures									
MM-LE (SPAS)-1. LAWAPD Replacement Facilities	X	X	X		X	X	X	X	X
On-Airport Transportation									
LAX Master Plan Commitments									
ST-2. Non-Peak CTA Deliveries	X	X		X				X	X
ST-8. Limited Short-Term Lane Closures	X	X		X				X	X
ST-9. Construction Deliveries	X	X		X				X	X
ST-18. Construction Traffic Management Plan	X	X		X				X	X
ST-19. Closure Restrictions of Existing Roadways	X	X		X				X	X
LAX Master Plan Mitigation Measures									
MM-ST-1. Require CTA Construction Vehicles to Use Designated Lanes	X	X		X				X	X
MM-ST-2. Modify CTA Signage	X	X		X				X	X
MM-ST-3. Develop Designated Shuttle Stops for Labor Buses and ITC-CTA Buses	X	X		X				X	X
Bradley West Project Mitigation Measures									
MM-ST (BWP)-2. Improve the Intersection of Center Way and World Way South	X	X		X				X	X
MM-ST (BWP)-3. Widen World Way Across from TBIT	X	X		X				X	X
SPAS Mitigation Measures									
MM-ST*(OA)* (SPAS)-1. Relocate Existing Taxi Loading Zone at TBIT	X	X		X				X	X
MM-ST*(OA)* (SPAS)-2. Change Departures and Arrivals Level Commercial Vehicle Curbside Operations	X	X		X				X	X
Off-Airport Transportation									
LAX Master Plan Commitments									
ST-9. Construction Deliveries	X	X	X	X				X	X
ST-12. Designated Truck Delivery Hours	X	X	X	X				X	X
ST-14. Construction Employee Shift Hours	X	X	X	X				X	X
ST-17. Maintenance of Haul Routes	X	X	X	X				X	X
ST-18. Construction Traffic Management Plan	X	X	X	X				X	X
ST-19. Closure Restrictions of Existing Roadways	X	X	X	X				X	X
ST-20. Stockpile Locations	X	X	X	X				X	X
ST-21. Construction Employee Parking Locations	X	X	X	X				X	X

Table 6-4

LAX Master Plan Commitments, LAX Master Plan Mitigation Measures, and SPAS-Specific Mitigation Measures as Related to the SPAS Alternatives

	Alt. 1	Alt. 2	Alt. 3	Alt. 4	Alt. 5	Alt. 6	Alt. 7	Alt. 8	Alt. 9
ST-22. Designated Truck Routes	X	X	X	X				X	X
ST-24. Fair Share Contribution to CMP Improvements	X	X	X	X				X	X
LAX Master Plan Mitigation Measures									
MM-ST-14. Ground Transportation/Construction Coordination Office Outreach Program	X	X	X	X				X	X
SPAS Mitigation Measures									
MM-ST (SPAS)-1. Transportation Demand Management Program	X	X	X	X				X	X
MM-ST (SPAS)-2. Modify the Intersection of Airport Boulevard and Arbor Vitae Street/Westchester Parkway (Intersection 6)	X	X	X	X				X	X
MM-ST (SPAS)-3. Modify the Intersection of Airport Boulevard and Century Boulevard (Intersection 7)	X	X		X				X	X
MM-ST (SPAS)-4. Modify the Intersection of Arbor Vitae Street and Inglewood Avenue (Intersection 11)	X	X		X				X	X
MM-ST (SPAS)-5. La Brea Avenue and Arbor Vitae Street (Intersection 12)	X	X						X	X
MM-ST (SPAS)-6. Modify the Intersection of Aviation Boulevard and El Segundo Boulevard (Intersection 15)			X						
MM-ST (SPAS)-7. Modify the Intersection of Aviation Boulevard and Imperial Highway (Intersection 16)			X	X					
MM-ST (SPAS)-8. Modify the Intersection of Aviation Boulevard/Florence Avenue and Manchester Avenue (Intersection 17)	X	X	X	X				X	X
MM-ST (SPAS)-9. Modify the Intersection of La Brea Avenue and Centinela Avenue (Intersection 25)	X	X	X					X	X
MM-ST (SPAS)-10. Modify the Intersection of La Cienega Boulevard and Centinela Avenue (Intersection 26)	X	X	X	X				X	X
MM-ST (SPAS)-11. Modify the Intersection of Sepulveda Boulevard and Centinela Avenue (Intersection 28)			X						
MM-ST (SPAS)-12. La Brea Avenue/Hawthorne Boulevard and Century Boulevard (Intersection 34)	X	X		X				X	X
MM-ST (SPAS)-13. Inglewood Avenue and Century Boulevard (Intersection 35)	X	X	X	X				X	X
MM-ST (SPAS)-14. Prairie Avenue and Century Boulevard (Intersection 37)	X	X		X				X	X
MM-ST (SPAS)-15. Modify the Intersection of Sepulveda Boulevard and Century Boulevard (Intersection 38)	X	X	X	X				X	X
MM-ST (SPAS)-16. Modify the Intersection of La Cienega Boulevard and El Segundo Boulevard (Intersection 53)			X						
MM-ST (SPAS)-17. Modify the Intersection of La Brea Avenue and Florence Avenue (Intersection 57)	X	X	X	X				X	X
MM-ST (SPAS)-18. Modify the Intersection of La Cienega Boulevard and Florence Avenue (Intersection 58)	X	X	X	X				X	X
MM-ST (SPAS)-19. Modify the Intersection of Sepulveda Boulevard and Grand Avenue (Intersection 60)	X	X						X	X
MM-ST (SPAS)-20. Modify the Intersection of Hawthorne Boulevard and Imperial Avenue (Intersection 62)	X	X	X	X				X	X
MM-ST (SPAS)-21. Modify the Intersection of Inglewood Avenue and Imperial Highway (Intersection 66)	X	X	X	X				X	X
MM-ST (SPAS)-22. Prairie Avenue and Imperial Highway (Intersection 70)			X						
MM-ST (SPAS)-23. Modify the Intersection of Sepulveda Boulevard and Imperial Highway (Intersection 71)	X	X	X	X				X	X
MM-ST (SPAS)-24. Modify the Intersection of I-105 Ramps (east of Aviation Boulevard) and Imperial Highway (Intersection 74)			X						
MM-ST (SPAS)-25. Modify the Intersection of La Brea Avenue and Manchester Boulevard (Intersection 85)			X					X	X
MM-ST (SPAS)-26. Modify the Intersection of La Brea Avenue and Slauson Avenue (Intersection 87)	X	X	X	X				X	X
MM-ST (SPAS)-27. Modify the Intersection of La Cienega Boulevard and Manchester Boulevard (Intersection 90)			X					X	X

Table 6-4

LAX Master Plan Commitments, LAX Master Plan Mitigation Measures, and SPAS-Specific Mitigation Measures as Related to the SPAS Alternatives

	Alt. 1	Alt. 2	Alt. 3	Alt. 4	Alt. 5	Alt. 6	Alt. 7	Alt. 8	Alt. 9
MM-ST (SPAS)-28. Modify the intersection of La Cienega Boulevard and Southbound I-405 Ramps (north of Century Boulevard) (Intersection 96)	X	X						X	X
MM-ST (SPAS)-29. Modify the Intersection of Sepulveda Boulevard and La Tijera Boulevard (Intersection 101)			X	X					
MM-ST (SPAS)-30. Modify the Intersection of Lincoln Boulevard and Manchester Boulevard (Intersection 105)			X						
MM-ST (SPAS)-31. Modify the Intersection of Ash Avenue and Manchester Avenue (Intersection 115)	X	X						X	X
MM-ST (SPAS)-32. Vicksburg Avenue and 96th Street (Intersection 143)	X	X						X	X
MM-ST (SPAS)-33. Modify the Intersection of Sepulveda Eastway and Westchester Parkway (Intersection 146)			X	X					
MM-ST (SPAS)-34. Modify the Intersection of Hindry Avenue and Manchester Boulevard (Intersection 159)	X	X	X	X				X	X
MM-ST (SPAS)-35. Modify the Intersection of Prairie Avenue and Manchester Boulevard (Intersection 169)	X	X	X	X				X	X
MM-ST (SPAS)-36. Modify the Intersection of Prairie Avenue and Lennox Boulevard (Intersection 197)	X	X	X	X				X	X
MM-ST (SPAS)-37. Modify the Intersection of Arbor Vitae Street and Aviation Boulevard (Intersection 10)	*X*	*X*		*X*				*X*	*X*
MM-ST (SPAS)-38. Modify the Intersection of La Tijera Boulevard and Centinela Avenue (Intersection 27)	*X*	*X*		*X*				*X*	*X*
MM-ST (SPAS)-39. Fair Share Contribution to a Traffic Signal at the Intersection of Overland Avenue and Kelmore Street/Ranch Road (Intersection 153)			*X*						
MM-ST (SPAS)-40. Fair Share Contribution to a Traffic Signal at the Intersection of Overland Avenue and Sawtelle Boulevard (Intersection 154)	*X*	*X*	*X*	*X*				*X*	*X*
MM-ST (SPAS)-41. Fair Share Contribution to a Traffic Signal at the Intersection of Walgrove Avenue and Washington Boulevard (Intersection 156)	*X*	*X*	*X*	*X*				*X*	*X*
MM-ST (SPAS)-42. Contribute to ITS Improvements at 11 Study Intersections Within the Jurisdiction of Los Angeles County (Intersections 27, 36, 52, 63, 76, 86, 87, 93, 95, 119, and 173)	*X*	*X*	*X*	*X*				*X*	*X*
Energy									
LAX Master Plan Commitments									
E-1. Energy Conservation and Efficiency Program	X	X	X	X	X	X	X	X	X
LAX Master Plan Mitigation Measures									
None									
SPAS Mitigation Measures									
None									
Solid Waste									
LAX Master Plan Commitments									
SW-1. Implement an Enhanced Recycling Program	X	X	X	X	X	X	X	X	X
LAX Master Plan Mitigation Measures									
MM SW-1. Provide Landfill Capacity[5]	X	X	X	X	X	X	X	X	X
SPAS Mitigation Measures									
None									

Table 6-4

LAX Master Plan Commitments, LAX Master Plan Mitigation Measures, and SPAS-Specific Mitigation Measures as Related to the SPAS Alternatives

	Alt. 1	Alt. 2	Alt. 3	Alt. 4	Alt. 5	Alt. 6	Alt. 7	Alt. 8	Alt. 9
Wastewater Generation									
LAX Master Plan Commitments									
W-2. Enhance Existing Water Conservation Program	X	X	X	X	X	X	X	X	X
LAX Master Plan Mitigation Measures									
None									
SPAS Mitigation Measures									
None									
Water Supply									
LAX Master Plan Commitments									
W-1. Maximize Use of Reclaimed Water	X	X	X	X	X	X	X	X	X
W-2. Enhance Existing Water Conservation Program	X	X	X	X	X	X	X	X	X
LAX Master Plan Mitigation Measures									
None									
SPAS Mitigation Measures									
None									

[1] LAWA and the LAX Coalition for Economic, Environmental and Educational Justice (LAX Coalition) have developed and entered into an agreement, the Community Benefits Agreement (CBA), to ensure that communities adversely affected by the LAX Master Plan Program also receive benefits as a result of implementation of the Program. The benefits and mitigations included in the CBA were negotiated independently from, and are not a part of, the LAX Master Plan Mitigation Monitoring and Reporting Program. The CBA contains a number of air quality mitigation measures, of which Sections X.A., X.F., X.K., X.L., X.M., and X.N. are applicable to SPAS.

[2] Alternatives 5, 6, and 7 focus on airfield improvements, and would not have any impacts related to ground transportation; however, assuming the airfield improvements under those alternatives would be paired with ground access improvements proposed under Alternative 1, 2, 8, or 9, there would be impacts to ground transportation that would subject to this mitigation measure.

[3] Alternatives 8 and 9 focus on ground access improvements, and would not have any impacts associated with aircraft gates; however, assuming the ground access improvements under those alternatives would be paired with airfield improvements proposed under Alternative 1, 2, 5, 6, or 7, there would be impacts to gates that would be subject to this mitigation measure.

[4] This measure would reduce the cumulatively considerable contribution to impacts to aviation safety from building/structural penetrations of FAR Part 77 imaginary surfaces.

[5] This measure would address cumulatively significant impacts associated with solid waste generation and disposal.

Source: CDM Smith, 2012.

5.5 Corrections and Additions to Appendices to the Preliminary LAX SPAS Report

Appendix E2-1, LAX Ground Transportation Study Report

1. The second sentence of the first paragraph in the right column on Page 64 of Appendix E2-1 of the Preliminary LAX SPAS Report is hereby revised as follows:

   The gated passenger schedule*,* representing the aircraft gating scenario illustrated in ~~the~~ Figure A-7 *and* used as the future condition for this study*,* ~~was created from the passenger schedule for the~~ *is commensurate with a* 78.9 MAP activity level. *This schedule was developed by LAWA and was also used by the Academic Panel for the North Airfield Safety Study*~~, developed with the assistance of the National Aeronautics and Space Administration (NASA) to support various north~~ airfield simulation efforts.

2. The second sentence on page 72 of Appendix E2-1 of the Preliminary LAX SPAS Report is hereby revised as follows:

   Future 78.9 MAP conditions (modeled using the ~~NASA~~ *gated passenger* schedule *developed by LAWA commensurate with a 78.9 MAP activity level* without the midfield processor) showed that at TBIT the LOS significantly worsens.

Appendix F-2, North Runway Alternatives Simulation Analysis

1. The following text on page 3 of Appendix F-2 of the Preliminary LAX SPAS Report is hereby revised as follows:

   - Calibrate the simulation model to ensure that the model adequately approximates actual operations at LAX. The LAX calibration compared simulated hourly operations and airfield travel times with actual performance data for March 29, 2005, collected from the airlines serving LAX. *The simulation model was subsequently verified and revalidated in 2007 and 2009 based upon updated operational performance data.*

2. Table 14 on page 91 of Appendix F-2 of the Preliminary LAX SPAS Report has been revised. Please see the following revised table.

3. Table 16 on page 107 of Appendix F-2 of the Preliminary LAX SPAS Report has been revised. Please see the following revised table.

Table 14

Peak Hour Throughput - 2025 SPAS Alternative 3

2,053 Daily Operations							
		Throughput					
		Peak Arrivals		Peak Departures		Peak Operations	
Configuration	Annual Use	Daily Total	Peak Throughput Hour	Daily Total	Peak Throughput Hour	Daily Total	Peak Throughput Hour
VFR with Visual Approaches - West Flow	69.2%	1,022	72	1,031	75	2,053	~~134~~*135*
VFR with ILS Approaches - West Flow	24.6%	1,022	72	1,031	74	2,053	~~133~~*136*
VFR with ILS Approaches - East Flow	2.1%	1,022	68	1,031	73	2,053	~~137~~*133*
IMC with Instrument Approaches - West Flow	4.1%	1,022	62	1,031	67	2,053	~~122~~*125*
Average All-Weather Throughput	100.0%	1,022	72	1,031	75	2,053	~~133~~*135*

Notes:

ILS = Instrument Landing System
IMC = Instrument Meteorological Conditions
VFR = Visual Flight Rules

Source: Ricondo & Associates, Inc., October 2011, based on SIMMOD simulation results (daily and hourly throughput operations).

Table 16

Peak Hour Throughput - 2025 SPAS Alternative 4

2,053 Daily Operations							
		Throughput					
		Peak Arrivals		Peak Departures		Peak Operations	
Configuration	Annual Use	Daily Total	Peak Throughput Hour	Daily Total	Peak Throughput Hour	Daily Total	Peak Throughput Hour
VFR Visual West Flow	69.2%	1,022	72	1,031	74	~~2,285~~*2,053*	~~148~~*134*
VFR ILS West Flow	24.6%	1,022	72	1,031	73	~~2,285~~*2,053*	~~144~~*133*
VFR ILS East Flow	2.1%	1,022	69	1,031	78	~~2,285~~*2,053*	~~134~~*137*
IFR West Flow	4.1%	1,022	61	1,031	66	~~2,285~~*2,053*	~~123~~*122*
Average All-Weather Throughput	100.0%	1,022	72	1,031	73	2,053	133

Notes:

ILS = Instrument Landing System
IMC = Instrument Meteorological Conditions
VFR = Visual Flight Rules

Source: Ricondo & Associates, Inc., October 2011, based on SIMMOD simulation results (daily and hourly throughput operations).